Guildford borough Submission
Local Plan: strategy and sites

Regulation 19 consultation representations (ordered by respondent ID number)

December 2017

Document 1 of 10
Respondent ID numbers 8553761 to 8819969
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<th>PSLPA16/410</th>
<th>Respondent:</th>
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<th>Document:</th>
<th>Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule</th>
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<td>I object to the fact that infrastructure requirements have not been properly considered and are inadequate to deal with proposed housing levels. Roads, doctors and schools will be unable to cope.</td>
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<td>I object to the exaggerated “housing need” figure of 13,860 which is far too high and results in the completely unnecessary development of the Green Belt. The way students, economic need and affordability are calculated inflates the housing need. A better alternative would be to blocks of build bed sitsin Guildford for single occupancy to house the thousands of immigrants seeking work in the UK.</td>
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Guildford Draft Local Development Plan

I object to all erosion of the green belt and in particular the removal of Send from the Green Belt because the village and its countryside provides a necessary buffer between Woking and Guildford. A vital lung for our congested and polluted town centres.

I object to the building on the Green Belt at Send at site cA34, Garlick’s Arch, Clockbarn Nurseries and Send Hill because it is not justified by any special circumstances and the fact that Green Belt is meant to be permanent and not continually eroded.

I object to all proposals to build on the Green Belt at Send and elsewhere in the borough because all the development that is really needed can be accommodated in Guildford’s urban brownfield areas much closer to existing transport hubs.

I object to all the proposed sites in Send because they were not included in the previous consultation in 2014. Unlike the rest of the borough Send has not been properly consulted and all its sites have been changed substantially. I object to the proposal for travelers sites in Send. They should be subject to the same requirements as for other council housing, in work, ability to pay rent, a named person to pay rates, utility bills, council tax, need. With their high social need these sites need to be located next to main conurbations in Guildford and not in Send where local services are overloaded, schools, Doctors Surgeries, banks, shops, groceries, and Public transport.

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

Attached documents:

Comment ID: PSLPS16/542  Respondent: 8553761 / A Howlett  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

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

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the large proposed development of 2,000 houses at Wisley Airfield, 2,000 houses at Gosden Hill and 1,850 houses at Blackwell Farm because it will destroy large areas of Green Belt and agricultural land and produce congestion on the A3 and surrounding roads including Send.

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

Attached documents:

Comment ID: PSLPS16/540  Respondent: 8553761 / A Howlett  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A42

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

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to building 45 houses at Clockbarn because of inadequate access and traffic volume. Tannery Lane is far too narrow and bendy to take any more traffic. The junction with Send Road is already very hazardous for vehicles emerging into the main road. Planning permission has already been given for 64 houses at the Tannery and the marina will generate heavy traffic too. The road cannot take any more. Where is your transport provision study.

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

Attached documents:

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Comment ID: PSLPS16/539  Respondent: 8553761 / A Howlett  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

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

Answer (if comment is on questions 1-7 of the questionnaire): ()

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I object to the development at Garlick’s Arch for 400 houses because it was sprung on the village at the last moment with only 2 weeks’ notice and without any prior consultation and is not required in terms of housing need either for the village or the borough. Insufficient thought has been given to how the local infrastructure could cope with the additional traffic.

I object to the proposed industrial development of 7,000 sq m at Garlick’s Arch because it is simply not required since the latest Employment Land Needs Assessment 2015 (ELNA) shows a reduction of 80% in required employment floor space from the previous draft plan. If there is a need for 7,000 sq m of industrial space it should be at Slyfield where there is a 40ha site available. The office block on the Portsmouth road at Burnt common has remained unoccupied for 10 years.

I object to the development at Garlick’s Arch because the site has a particular conservation sensitivity since it is covered in ancient woodland. Trees which existed in the 16th century would be endangered. The site is also subject to flooding, with regular flooding on Portsmouth road where the river had to be diverted and culverted at the intersection with Send Marsh Road.

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

Attached documents:

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Comment ID: PSLPS16/538  Respondent: 8553761 / A Howlett  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

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

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to the proposed new interchange onto the A3 at Burnt Common because it would be disastrous for Send and the (A247) would be gridlocked all day, instead of just rush hours.

I object to the proposed new interchange onto the A3 at Burnt Common because the Transport Evidence is incomplete and unreliable and shows there will be congestion because Send would be used as a cut through to the A3/M25. The traffic light intersection is already a major hazard for pedestrians as the walkway is only wide enough for one person, and unsuitable for parents walking their children to the local schools.

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

Attached documents:

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

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the development of 40 houses at Send Hill due to its high quality Green Belt amenity within an area of beautiful countryside which would be spoilt. The subsoil of the existing site contains documented unsafe land fill waste which is currently vented. The proposal to include 2 Travellers Pitches is completely inappropriate due to the narrow width single track country road providing insufficient access to the site.

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

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

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the fact that 70% of the proposed 13,860 houses are targeted at the Green Belt strung along the A3 which will destroy the open amenity of the borough and produce gridlock on the A3 and surrounding roads including the A247 which are all already at 100% capacity.

I object to the complete failure of GBC to identify sufficient brownfield sites within the urban area which should be targeted first for development before the open countryside and the Green Belt and the failure to include the Town Centre Masterplan 2015 within the plan.
Please register my objection to the Local Plan, we need to consider our children future. We cannot go on building forever over our green belt. Who will stand up and say enough is enough. Surrey Hills is a unique area, lets keep it that way.

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

Attached documents:

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

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

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

Answer (if comment is on questions 1-7 of the questionnaire): ()

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

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

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

Attached documents:

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Comment ID: pslp173/776  Respondent: 8554113 / Anthony Baker  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Appendix C: Infrastructure Schedule

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

Answer (if comment is on questions 1-7 of the questionnaire): ()

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3. Inadequate Infrastructure
The substantial number of houses proposed between the M25 and Burpham will result in merging and inevitable urbanisation of the villages. There is too much traffic in our villages already and this plan will cause more congestion in West Horsley, East Horsley, Ockham, Ripley, Send and Clandon, with no plans to remedy this. The rural roads in this area are narrow, in poor condition and have no footpaths. 5000 more houses in such a small area means dangerous and unsustainable traffic as well as a significant decline in air quality.

The A3 would need substantial improvements, including widening as well as rebuilding and improvement of multiple junctions before any development is allowed. Any planned development must not be allowed until such road improvements are completed. However it seems clear that Highways England has no plans to even start considering improving the A3 before 2020. Under the current economic climate post Brexit, it is unlikely any additional funding will be made available.
for new capital projects. Clearly no real improvements are possible in the timeframe of this Plan so the developments at Wisley Airfield (A35), Garlick's Arch (A43) and Gosden Hill (A25), should not take place.

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

Attached documents:

Comment ID: pslp172/2922  Respondent: 8554113 / Anthony Baker  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A40

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

Answer (if comment is on questions 1-7 of the questionnaire): ()

The proposals for West Horsley would result in a massive increase in village size with consequent loss of character. Simply put, there are too many homes for a village without the necessary infrastructure and the proposals constitute a major assault on Green Belt land. The current settlement area does not need to be extended. Current housing is varied in size and style and is low density as befits a village of this character. It is ill-considered and inappropriate to build clusters of 100 or so houses at much higher density.

Over the years the number of households in East and West Horsley have increased slowly due to a few houses being built each year but spread throughout the two villages. To build the 500 houses proposed would overwhelm the villages and their facilities.

The Raleigh school is oversubscribed- even children living in the Horsleys cannot all obtain a place. This school and the two independent schools create high volumes of traffic at peak times with considerable congestion at the various pinch points throughout the village.

The proposed development of over 500 additional homes in East and West Horsley will result in hundreds of additional school-aged children in need of a school place. This is ill-considered and not supportable.

Both of the major roads running through the village (B2039 and East lane/The Street) are crossed by low, railway bridges and each have pinch-points where the roads very narrow. On East Lane, very close to proposed major developments, there is a very narrow section which does not permit twoway traffic flow. East Lane is therefore particularly unsuited to significant increase in traffic flow. The Street frequently floods and is impassable after heavy rain. Residents would have to commute to work via A3 or A246 or drive through East and/or West Horsley to get to the station or school.

Fields and gardens alongside Ockham Road North flood regularly and the water table is high for the majority of the year. The proposed development of site A40 would exacerbate flooding risk to neighbouring houses and roads. Flood mapping in the consultation document recognizes this problem but the site remains as one for potential development.

The proposed development site A40 also surrounds a successful and highly regarded campsite with some 130 pitches. Currently this is a quiet rural area with bountiful wildlife- deer, foxes, rabbits and a large variety of birdlife. The proposed development of site A40 would destroy this environment and most likely this successful local business.

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

Attached documents:

Comment ID: pslp171/1184  Respondent: 8554113 / Anthony Baker  Agent:
1. Green Belt
I strongly object to no changes being proposed since the 2016 consultation with regards to insetting of East and West Horsley from the Green Belt.

This is completely unacceptable and is against stated Government policy. No credible attempt has been made to demonstrate the exceptional circumstances which are required to allow the plan massive scale of development on Green Belt land around the Horsleys.

It makes better sense for large scale development to be allowed on brownfield sites in urban areas where there is established and sustainable transport. It is of note that planning permission for a 438-home mixed-use scheme at Guildford train station was recently refused, saying it would appear as a 'monolithic' and 'alien' feature in Guildford town centre. Why does Guildford Borough Council (GBC) consider the station plan unacceptable but would prefer the destruction of large swathes of greenbelt land?

At least 70% of the proposed housing is planned for land currently in the Green Belt. Housing need is not a reason in law for protected green belt land being used. It is perverse for so much housing to be planned for the green belt. Clearly, the green belt has not been used as a constraint as clearly set out in Government advice, planning policy guidance, the NPPF, case law, election manifestos and Ministerial letters to MPs.

Green Belt is precious and was established to confine development to designated areas and this concept is increasingly important in the south east of England. It is what protects London from urban sprawl; it preserves air quality and this is especially important for the villages of East and West Horsley which are also very close to the A3 and M25.

The Green Belt serves five legal purposes:
• To check the unrestricted sprawl of large built-up areas
• To prevent neighbouring towns merging into one another
• To assist in safeguarding the countryside from encroachment
• To preserve the setting and special character of historic towns
• To assist in urban regeneration by encouraging the recycling of derelict and other urban land.

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

Attached documents:
2. Housing Number
The proposed housing target of 12,426 is based on assumptions which have not been made public and doubtless would not withstand public scrutiny. A much lower figure of 400 per annum has been proposed as adequate to meet Guildford's overall needs by an acknowledged professional analyst, Neil McDonald of NMSS.

The proposed policy is flawed and should be amended. In the last consultation 97% of responses were against the proposed policy.

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

Attached documents:

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Comment ID: PSLPA16/829  Respondent: 8555041 / Adrian Platt  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North

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

Answer (if comment is on questions 1-7 of the questionnaire): ()

- I object to the specific plan relating to my village, West Horsley. It seems utterly incredible that GBC could propose such a plan for a village which is probably the most rural village after East Clandon. Not only is the proposed increase of 385 houses over four sites unbelievable but it is also an increase of 35% which is more than any other location. Whilst I understand that any Neighbourhood Plan has to fit into the Borough Local Plan, a recent survey of the whole village showed that residents felt that only 40 houses were needed [or could be coped with sustainably- no shop, no Post Office, difficult parking in East Horsley, railway station parking at capacity and limited Bus Service] in the same period. Even allowing for the GBC needs, this shows just how distorted the numbers are in Local Plan.

- I object to the unacceptable density of the proposed housing for West Horsley. This is far higher than the current density and it is likely to lead to houses totally out of character with the existing village and no sustainability in terms of schooling, drainage, roads capacity, shops and public transport.

- I object to the early exhibition of a SANG in Longreach, West Horsley by a Company, Greenreach Ltd, which is totally owned by developers. How dare the GBC support the concept of this exhibition when we have many wonderful areas of country for recreation? To put this artificial plan forward before the Local Plan has completed its consultation is disgraceful, especially since it has been created by Developers who clearly expect the GBC to favour them.

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

Attached documents:

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Comment ID: PSLPS16/1363  Respondent: 8555041 / Adrian Platt  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I object to the proposed development of the Wisley site and am astonished that GBC has even considered including the site in the Local Plan, especially since planning has already been refused. Whilst I agree that the Wisley developers have included much needed extra infrastructure, the whole plan completely fails on the traffic issue. Our local roads are already very congested and the roads around the M25 and A3 junctions are mostly chaotic. It would be absolute madness for GBC to consider this plan unless it was for a very small number of houses which did not create the risk of further traffic chaos. Under no circumstances can this site be considered without careful and close discussion with local Wisley and Ockham residents, in particular.

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

Attached documents:

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I object to the total lack of any substantial information on providing adequate infrastructure for the developments proposed. It is simply not good enough to make bland statements about infrastructure, since, before any development of the frightening level proposed is considered, fully costed and detailed infrastructure plans for items such as new schools, Medical Centres etc. must be clear.

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

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

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

**Attached documents:**

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**Comment ID:** PSLPP16/2802  **Respondent:** 8555041 / Adrian Platt  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

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

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

My first comment is that I am deeply shocked to see that little or no attention has been paid to the comments made by a significant number of residents in the last consultation. The overwhelming local view that the Green Belt must be maintained at all costs, and that brown field sites should be used for a large part of the housing needs, has been completely ignored.

Once again the method of communicating to Home Owners and Occupiers is totally unacceptable. In January 2014, I had sent a suggestion of how the Borough might **directly** write to every Home Owner or Occupier so that they are fully aware of the proposals. This is because so many key people were not aware of the plan or the needed action. I had an email from the then Councillor in charge of the Local Plan agreeing that their consultation must be improved. This has not been done and so many people may be disenfranchised.

These points above show that the much needed democracy to progress such an important plan is destroying the credibility of the process.

Whilst I will leave official bodies, such as Parish Councils, to comment in more detail on the specific Policy Issues, I now set down my principal concerns.

First and foremost I **object** to the number of new homes proposed for the Borough. By every calculation this target would increase the population of the Borough at a rate higher than at the latest 10 year period as measured by the censuses. Furthermore this figure is totally unsustainable by any measure.

I strongly **object** to the use of the brown field sites for industrial or office development. There is no justification whatsoever to show that there will be an adequate demand for such space. Indeed it seems highly unlikely that such space would be able to be let or sold in our high cost area. Therefore the reassurances made by GBC officers, after the last consultation, to use brown field sites for housing have been ignored. This is of such importance that I find that this complete lack of attention to this point is insulting.
I object to the whole 2016 Local Plan since firstly the consultation process is undemocratic, secondly because much of the information is inaccurate or misleading, thirdly most of the plan has been shown to be unsustainable with inadequate addressing of the infrastructure needs, fourthly no convincing argument for "exceptional circumstances" has been made to wreck the Green Belt which is a vital feature of our Borough.

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

Attached documents:

Comment ID: pslp172/83  Respondent: 8555041 / Adrian Platt  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Introduction

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

Answer (if comment is on questions 1-7 of the questionnaire): ()

I refer to your letter of the 7th June, inviting me to put forward comments on the new Local Plan.

After making an extensive visit to the “drop-in” event at East Horsley village Hall, my first and horrified comment is that the wider consultation that I referred to in my November 2014 has not been acted upon. If you refer to that letter, which I understand will be seen by the Government Planning Inspector, you will see that, after the 2013 consultation, I made a very strong point to the then Leader of GBC and the Councillor responsible for that plan that the most important stakeholders were not being adequate information in order to make their comments. I am specifically referring to house owners, house occupiers and people on the electoral roll. They agreed that the consultation was not good enough and, as I understand it from the Officers at the drop-in session, no general advice has been given. You may feel that it is not necessary because some may not comment or destroy the document. But that is not the point and, unless some very prompt action is taken to advise ALL households, many people are disenfranchised and the whole plan has no credibility. To illustrate my point we had an intelligent couple who own a house in the Borough and they were not aware of the existence of a new 2017 plan.

As long as the Government Planning Inspector will definitely see all the previous comments that I and others made for the 2014 plan, I will limit my comments.

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

Attached documents:

Comment ID: pslp172/85  Respondent: 8555041 / Adrian Platt  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A35

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

Answer (if comment is on questions 1-7 of the questionnaire): ()
On Policy A35 about the proposed Wisley development, I strongly believe that it is still irresponsible to consider the high number of 2,000 houses. Whilst I am delighted about the infrastructure that the scheme would provide, the benefit of this is totally outweighed by the extreme traffic problems that this scheme would cause. One of you officers told me that there would be a bus every 15 minutes to reach East Horsley and its station. This was put forward as a solution for the traffic chaos but firstly the frequency and size of buses in our narrow lanes would be appalling and secondly the lack of frequency of use of buses in our area would not solve the problem. Whilst your latest plan does cover collaboration with National Highways to find smooth flow through the Wisley roundabout and onto the A3/M25, I really do not believe that your team understand what chaos there is on those roads at many times of day. In order to have an acceptable solution, a really massive investment would be needed. I generally support the concept of using Wisley for a good number of houses but believe that the acceptable number may be nearer to 1,000. I know that this may not be enough houses for the developers to provide their proposed infrastructure but let us remember that this would not just be for the benefit of new Wisley residents. All local residents will need this infrastructure before other houses in the Horsleys are built. I suggest employing a special expert to examine and advise on what is really practicable.

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

Attached documents:

Comment ID: pslp172/87  Respondent: 8555041 / Adrian Platt  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A36

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

Answer (if comment is on questions 1-7 of the questionnaire): ()

Brownfield Development, where I understand that you feel that you have used up all GBC brownfield sites. Whilst I know that you are required to consult with neighbouring Boroughs, I would like to be categorically assured that GBC have examined with Waverley and other Boroughs the possibility of using their brownfield sites before encroaching on our Borough’s green belt.

Sites A36 and A41. I am in favour of the elimination of these potential sites in the plan.

I look forward to hearing from you again as the consultation progresses.

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

Attached documents:

Comment ID: PSLPA16/3056  Respondent: 8555073 / Adrian Bathurst  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North

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

Answer (if comment is on questions 1-7 of the questionnaire): ()
Development of these four sites is expected to put 445 new homes in a relatively small area of East and West Horsley, this is excessive and disproportionate, the density is inappropriate for the villages and I object to these policies.

Paragraph 2.22 of the draft Local Plan (Key Facts about the Borough: infrastructure) acknowledges that road and rail networks and local facilities in village settlements are facing increasing pressure. It is anticipated that smaller allocated sites will provide the majority of housing supply in the first five years so it can be expected that planning work will start immediately following the implementation of the Local Plan. An East and West Horsley traffic management and environmental improvement scheme is listed in the Infrastructure Delivery Plan (IDP) for delivery by Surrey County Council (SCC) between 2019 and 2023 but no details are given. Comprehensive information is needed now to explain how the Council intends to deal with the consequences of additional development so that residents can make informed comments.

Paragraph 1.23 of the IDP states that new or improved infrastructure to support development should be available when it is first needed; paragraph 5.25 states that the Horsleys are likely to be impacted by new housing planned for the first five years of the Plan and that primary school places will be available in Clandon and Ripley, SCC officers consider it most suitable to fill those schools before looking at expansions at other primary schools in the area; when the strategic aim is that primary schools should be within walking distance this statement will be a disappointment to the community and it does not inspire confidence in the Council’s ability to deliver other pledges in the Plan.

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

Attached documents:

Comment ID: PSLPS16/6149  Respondent: 8555073 / Adrian Bathurst  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

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

Answer (if comment is on questions 1-7 of the questionnaire): ()

Although their planning application was refused, the developers continue to promote their proposed sustainable development “based on Garden City principles”. In my opinion this site will not deliver the concept successfully. As each phase of the development is completed the residents will find their promised quality of life degraded by the increasing frustrations of daily travel.

Being a popular London commuter area I would expect any major new development in the borough to have easy access to a railway station that is able to provide a service capable of handling a large increase in passenger numbers; only suburban stopping services are provided from the two nearest stations and peak time trains into the capital are already over capacity; the operators, South West Trains, have seen passenger numbers more than double in the 20 years that they have held the franchise and are currently running the maximum number of trains possible; there is no mention of the impact on rail services in the IDP.

The rural area means that many workplaces and schools will not be covered by any public transport offering so the car will be the only satisfactory method of transport. Although employment opportunities are proposed, the percentage of residents that will be employed there is difficult to predict and it is likely that a significant number of workers would commute from other districts by car. There will be a vast increase in traffic volumes in the villages, the promised significant bus network adding to the problem, gridlocked rush hour roads are inevitable. Many of the sustainable transport suggestions will remain unsuitable for safety reasons or will simply be incompatible with the busy lives of working families.

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

Comment ID: PSLPP16/12688  Respondent: 8555073 / Adrian Bathurst  Agent:

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

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

Answer (if comment is on questions 1-7 of the questionnaire): ()

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

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

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

Please register my objection.

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

Attached documents:

Comment ID: PSLPA16/4559  Respondent: 8555233 / Safeguard Coaches Ltd (Mr A J Halliday)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

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

Answer (if comment is on questions 1-7 of the questionnaire): ()
Solutions

To address these concerns the Local Plan must be amended to demonstrate a strong commitment to:

- implementation of the whole of the ‘Anticipated Improvements’ documented in the Guildford Borough Transport Strategy 2016 before any of the proposed additional development commences;
- implementation of the majority of ‘Aspirations’ documented in the Guildford Borough Transport Strategy 2016 within the first five years of the Local Plan period commencing (a specific ‘by date’ must be quoted). Crucially, this commitment must include all those ‘Aspirations’ shown under the ‘Local Roads and Parking Strategy’. A commitment to build the proposed A3 tunnel must be made within the first five years of the Local Plan period commencing but we are realistic enough to accept that completion will take rather longer;
- protecting land required for the proposed Sustainable Movement Corridor;
- protecting land required for the proposed A3 tunnel portals;
- protecting land required for a high quality and well positioned central bus facility in, or immediately adjacent to, the heart of the Town

In addition a new road bridge over the River Wey and railway must be built to help movement in our physically divided town and provision should be made for this in the Local Plan, otherwise the opportunity to provide this much needed infrastructure will be lost forever.

The Guildford Town Centre Transformation Package, referenced in the Guildford Borough Transport Strategy 2016, must include good access and priority for local buses serving all areas of the Town, not just those serviced by the proposed Sustainable Movement Corridor (SMC). For example, Guildford Park Road and Aldershot Road (to name but two of the areas Safeguard serves) will not benefit from the SMC.

Failure to make it clear in the Local Plan that these infrastructure developments must occur before developments starts is vital, otherwise we believe developers will take commercial advantage and undertake development without the necessary infrastructure being in place first which would be an unmitigated disaster for Guildford.

Summary

We are surprised and concerned at the scale of development proposed in the draft Local Plan, given its present deficit of transport infrastructure and the barriers to easy movement.

Traffic congestion and the consequent lengthening, and unpredictability, of journey times and the negative impact on customer experience is a major issue.

The revised draft Local Plan pays insufficient attention to the much needed transport infrastructure upgrades meaning that further proposed development will put more pressure on the existing transport systems, particularly the local and strategic road network, creating major difficulties for public transport, hampering economic growth in the area and damaging local businesses.

The Local Plan must be amended to demonstrate a strong commitment to implementing the whole of the ‘Anticipated Improvements’ in the Transport Strategy before any of the proposed additional development commences and to implementing the majority of ‘Aspirations within five years of the Local Plan period commencing.

Land required for the proposed Sustainable Movement Corridor, A3 tunnel portals, well positioned central bus facility in the heart of the Town Centre and a new road bridge over the River Wey and railway must be protected in the Plan.

Offer of Further Engagement
I will be pleased to engage with Guildford Borough Council officers and/or councillors to discuss our concerns in order to ensure that the Local Plan delivers a Guildford that works for all - residents, businesses and visitors alike - and is a Plan that we can all be proud of.

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

Attached documents:

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**Safeguard Coaches' Response to Guildford's Revised Draft Local Plan**

**Introduction**

Safeguard Coaches is an award-winning family-owned bus and coach business which has been based in Guildford for over 90 years. It operates 10 local buses (on Routes 4 and 5 to/from Park Barn and the Hospital) and 30 coaches and employs over 60 staff, approximately half of which work in Guildford.

**Our Concerns**

Safeguard Coaches accepts that some development will be required in Guildford and its environs. **However, we are both surprised and concerned at the scale of development proposed in the draft Local Plan, given its present deficit of transport infrastructure and the barriers to easy movement created by the North Downs (Guildford is a 'gap' town), the River Wey and the main railway.**

Guildford is a wonderful, historic and vibrant town with a potentially great future ahead of it. However, there is a widely-held view that the Town's Achilles heel is its road transport system which lacks adequate capacity and resilience because very little investment has been made despite the Town growing substantially over recent years. Consequently the Town suffers appalling traffic congestion which blights the Town's economy and people's enjoyment of the Town's amenities.

For Safeguard Coaches traffic congestion and the consequent lengthening, and unpredictability, of bus and coach journey times and the negative impact on customer experience is a major issue.

There has been a noticeable worsening in the situation since September 2015, particularly at peak hours, perhaps as a result of reduced fuel prices encouraging greater car use and increased numbers and length of car-borne home-to-school journeys.

Over the last 10 or so years the time to undertake a single trip (with appropriate recovery time at Guildford Bus Station) on our Route 4 and 5 local bus route (‘Town Centre-Hospital-Park Barn Westborough-Town Centre) has increased from 40 minutes to 52/53 minutes in peak hours, a 30% increase (the equivalent increase in off peak periods is 5 minutes or 12%). Average peak hour bus speeds are now as little as 8 mph (10 mph excluding recovery time at Guildford Bus Station).

We are in danger of entering a spiral of decline with yet more resources (hence costs) required but with bus patronage reducing (due to increased journey times, unreliability etc) with all the adverse consequences this will have for sustainable travel in and around Guildford.
Safeguard Coaches believes that the revised draft Local Plan pays insufficient attention to the much needed transport infrastructure upgrades meaning that further proposed development will put more pressure on the existing transport systems, particularly the local and strategic road network, creating major difficulties for public transport, hampering economic growth in the area and damaging small local businesses like ours.

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

Attached documents:

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Comment ID: pslp173/725  Respondent: 8555233 / Safeguard Coaches Ltd (Mr A J Halliday)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Appendix D: Evidence base

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

Answer (if comment is on questions 1-7 of the questionnaire): ()

Consultation on the Amended Local Plan: Provision for Bus-based Public Transport

As well as (or as part of?) its consultation on the proposed Amended Local Plan, Guildford Borough Council is also consulting on the future of Guildford’s Friary Bus Station and alternative options as part of its plans to regenerate the ‘North Street Quarter’.

As a significant commercial bus operator in the Guildford area carrying in excess of 850,000 passengers per annum I write to explain our position concerning the options tabled by SYSTRA on behalf of Guildford Borough Council in March 2017 (report released 28 June 2017). This is highly relevant to the Local Plan.

Unleashing the Potential for Bus-based Public Transport in Guildford

With an estimated 7.5 million bus journeys[1] already being made annually in Guildford we believe that bus-based public transport has a vital role in supporting Guildford’s economy, addressing traffic congestion[2] and improving air quality, particularly in the Town Centre, and therefore that generous provision should be made for it, particularly within the heart of the Town.

This will be even more critical if further development of Guildford, as suggested in the draft Amended Local Plan, is to proceed without causing significantly greater amounts of traffic congestion and worsening air quality.

Bus networks are very flexible and responsive and consequently lead times for improvements can be fairly short. In contrast to other modes, investment in bus services is generally not expensive – and is capable of delivering relatively quick returns.

However, to be commercially viable and appealing to existing customers and current non-users alike, bus-based public transport must be more convenient than using the car.

Crucially this means that buses must be able to use direct, quick and efficient routes into and around the Town Centre and be able to drop off and pick up customers very close to where they want to get to. The vast majority of passengers wish to access the heart of the Town Centre which is why the location of current bus station is so appreciated.

These views are absolutely consistent with the tenor of ARUP’s Technical Note on Existing Conditions Commissioned by GBC and SCC dated 27 May 2016, the Guildford Town Centre and Hinterland Masterplan Report by Allies and Morrison (October 2015) and comments by Councillor Paul Spooner (as Leader of the Council), former Managing Director Sue...
Sturgeon and Councillor Matt Furniss[3]. The fact that, at 7.4%, Guildford already has a higher bus mode share than the national average (5%) suggests that there is already a solid (if small) base to build on.

Guildford cannot continue to grow and compete with other retail and employment centres without providing more sustainable and attractive means of accessing and moving around its Town Centre. Attractive-to-use bus-based public transport will, of necessity, play a key role in facilitating this as there is very limited scope to increase other modal provision in the short to medium term.

In summary, we believe that buses should be seen as the solution and not the problem and we would encourage you to think similarly.

Critique of the Options Tabled by SYSTRA on behalf of GBC

Neither SYSTRA’s Primary Option (relocation of stops to Leapale Road/North Street with some additional layover at Bedford Wharf) or the Secondary Option (relocation of stops to Leapale Road/North Street and provision of layover at Bedford Wharf along with some bus departure bays) will allow buses to fulfill their true potential. SYSTRA’s report on the stakeholder engagement exercise makes this quite clear. Consequently, we cannot support either Option as they stand.

Specifically, both Options would result in buses serving points South, West and North of Town (services in the latter two directions being the most frequent and heavily used) not being able to drop off and pick up customers and workers close to where they want to get to without significantly increased journey times which will reduce the appeal of the bus service to existing and potential bus users and increase operating costs. Terminating services at Bedford Wharf without first accessing the heart of the Town Centre is not an acceptable alternative.

Rather than facilitate the exciting vision outlined above, we believe that the resulting extended bus service routings will deter large numbers of existing and potential users from using the bus as their mode of travel to the Town Centre because a key selling point – that of convenient access to the heart of the Town – will be seriously eroded for the majority of passengers. Reduced bus use, together with increased operating costs, will result in higher fares and/or reduced frequency of service (impacting disproportionally on the more marginalized in society who are more dependent on bus services to access jobs and other facilities) and/or increase the call on scarce public funds through a greater need for bus service support.

We therefore consider that there is a real danger that the Options - as currently drafted – could cause bus transport to become marginalized and increasingly a mode of necessity rather than one of choice, reversing current positive patronage trends.

Failure to embrace the opportunity – already being taken by many towns and cities across the UK[4] – to harness the potential of buses to support sustainable economic growth in Guildford and its environs would be a huge opportunity missed to help address Guildford’s chronic traffic congestion and poor air quality[5]. This is because provision of excellent public transport as a viable and attractive alternative to the car would allowing a greater degree of restraint on car use to be considered politically, socially and economically acceptable, thereby helping to achieve the modal shift which is so often talked about when considering how to release Guildford’s town centre from the ‘vice-like grip’ of unfettered traffic volumes and congestion and make it a more attractive place to live, work, shop and relax.

What We Propose

Our natural preference would be the re-provision of a modern state-of-the-art central Bus Station as part of the North Street Quarter development, for example at the south end of a widened Leapale Road with excellent bus and passenger access via Leapale Road and the whole length of North Street.

However, we are not entirely dismissive of the concept of the relocation of stops to Leapale Road/North Street and provision of additional layover at Bedford Wharf along with some bus departure bays (effectively a hybrid of SYSTRA’s Primary and Secondary Options) but, crucially, to make this work we additionally require that:

- bus access to, and customer facilities in, the whole length of North Street is provided in order that:
1. buses serving the South, West and North of Town and beyond can follow a direct, quick and efficient route into and around the Town Centre viz North Street, Leopale Road, Onslow Street;

2. there is sufficient opportunity for buses to drop off/pick up customers in the heart of the Town Centre and have adequate opportunity for recovery time between journeys to ensure service reliability without buses on high frequency routes having to travel to the proposed Bedford Wharf bus layover facility as this would not be operationally or commercially viable;

- all other through vehicular traffic is removed from the whole of North Street and Leopale Road so that these roads become more pleasant environments for pedestrians, create space for buses and other sustainable modes and assist bus network reliability.

It is vital to appreciate that a central bus station and/or allowing buses to access the whole of North Street will not undermine the viability of the proposed redevelopment of the North Street Quarter. Rather it will enhance its viability (and that of the Town Centre as a whole) by allowing buses to bring large numbers of customers and workers close to these places and play an increasing part in resolving the chronic traffic congestion (and consequent unpleasantness evidenced by poor safety, air quality, pedestrian connectivity and visual intrusion) which is currently blighting the Town Centre, thereby making Guildford an increasingly desirable place to live, work, shop and relax.

In order to help create an attractive and sustainable Town Centre which is not blighted by traffic we also believe that:

- Bridge Street should be dedicated solely to buses, pedestrians and cycles (plus very limited vehicular access to premises) travelling in both directions following removal of the Gyratory system in order to speed up bus journeys (both in actual terms and viz-a-viz the car), allow better bus/rail interchange close to the main entrance of Guildford Railway Station and making Bridge Street a more pleasant and safer environment for pedestrians and cyclists;

- car parking provision should largely be located just outside the central core of the Town (eg Millbrook, Bedford Road[6], Guildford Park Road etc), as opposed to right in the centre (eg on-street in North Street, Leopale Road multi-storey car park, Portsmouth Road surface car park[7]). Much more emphasis should be placed on directing motorists, especially long stay and contract permit holders, to the Town’s Park & Ride facilities[8], all of which have spare capacity. This would help to remove traffic from the central core which would reduce congestion and visual intrusion, increase space for sustainable transport modes, improve safety and air quality and allow more public spaces and living streetscapes to be created;

- vehicular deliveries to Town Centre premises must be strictly limited to those times which do not interfere with peak travel demand or retail activity;

- provide additional road infrastructure, in particular an additional river/road crossing, to relieve the Town Centre and the existing Gyratory area and resolve the propensity of the A3 bottleneck to cause widespread congestion throughout the Town[9].

**Bus Routings**

Allowing buses to access the whole of North Street (as opposed to just the part east of Leopale Road) is essential to provide direct, quick and efficient bus services into and around the Town Centre for customers arriving from/departing to all points of the compass.

Inability to access (lower) North Street would result in buses (hence passengers) having to undertake a significant detour, presumably via York Road and (narrow) Chertsey Street to reach (upper) North Street and Leopale Road. This would add significantly to journey times and operational costs and reduce customer appeal.

A ‘sustainable modes only’ Bridge Street could also be served by buses using the proposed Sustainable Movement Corridor (SMC).

We have drafted provisional bus routings and recommendations for bus passenger infrastructure which we would be happy to discuss with you.
Reciprocal Commitments from Bus Operators

In exchange for excellent access into the heart of a relatively traffic-free Town Centre and provision of high quality bus stands as described above Safeguard Coaches would be pleased to discuss:

- an Enhanced Partnership arrangement (as provided for in the new Bus Services Act) between themselves, Guildford BC, Surrey CC and other stakeholders to promote bus-based public transport, achieve high standards of bus service reliability and coordinate initiatives (including common ticket products for the Guildford area);
- minimum bus service levels, including during evenings and Sundays/Public Holidays;
- even more attractive fares for young people and maximum adult/child fares according to distance travelled, M-ticket and contactless payment options;
- improved customer WiFi on all buses;
- minimum environmental standards of vehicles used in shared spaces (primarily Bridge Street, North Street and Leapale Road) by specified dates; and
- excellent staff training/management/control of driver behaviour when navigating shared spaces.[10]

Summary

Safeguard Coaches absolutely believe buses have a central part to play in helping to resolve the issues facing Guildford and in particular its Town Centre and maintains that, without excellent provision for this form of transport, the Council’s vision for an expanding Guildford (as indicated in the proposed Amended Local Plan) will not be realizable.

However, we cannot support either the options which were the focus of SYSTRA’s stakeholder consultation exercise on commercial and operational grounds and have already raised concerns over the impact of the proposals on the ability of Guildford’s bus network to support and enhance Town Centre retail and leisure activity, access to job opportunities, traffic congestion etc.

While our first preference would be a new, high quality bus station of the same size as the current facility built as part of the North Street Quarter, we think that other solutions could work and have developed exciting and workable ideas which have the potential to meet the requirements of both bus passengers and operators, in particular bus facilities in the heart of the Town Centre (where most people want to go) and quick and reliable access to them.

Re-provision of a central bus station and/or allowing bus access the whole of North Street will not undermine the viability of the proposed redevelopment of the North Street Quarter but rather will enhance it by allowing them to bring large numbers of customers and workers directly to it.

Key to success in this regard will be restraint on car use in the Town Centre through:

- implementation of a ‘drive to, not through’ policy for general traffic;
- removal of through vehicular traffic from the central area and restrictions on deliveries;
- relocating car parking to edge-of-centre locations;
- greater use of existing Park & Ride facilities, especially for long stay and contract parking;
- provision of additional road infrastructure to relieve the Town Centre road network.

We urge the Council to be ambitious in its aspirations to create a Town Centre that we and our children can be proud of and believe that, in this context, bus-based public transport will be able to help deliver much needed improvements in terms of connectivity, sustainability, air quality, safety and social inclusion at an affordable price and in a realistic timescale.

Safeguard Coaches urges GBC to engage meaningfully with us and the Town’s other principal bus operators and existing/potential bus passengers in a spirit of true partnership such that the very best solution for Guildford can be found and implemented. For our part, we are prepared to work with other stakeholders to achieve that outcome but will not accept ‘watered down’ versions.
I trust that this letter provides a helpful synopsis of Safeguard Coaches’ position, in particular making quite clear that we cannot support the proposals as currently tabled by SYSTRA but suggesting that there are other really exciting and more sustainable solutions available while offering to work in partnership with Guildford Borough Council and other stakeholders to deliver bus-based public transport that Guildford can be proud of.

[1] Information provided by Laurie James, Passenger Transport Section, Surrey County Council.

[2] Recent research by traffic monitor Inrix has revealed Guildford to be the most congested town in the country, only exceeded in this respect by the cities of London, Manchester, Aberdeen, Birmingham and Edinburgh (Surrey Advertiser, February 2017).


[4] According to Bus Users UK many towns and cities have seen significant growth in bus passenger numbers through highly-visible bus services that operate in close proximity to the main shopping areas.

[5] Poor air quality is particularly evident around the Gyratory and its approaches.

[6] Bedford Road car park could be linked to the Town Centre by a new larger and iconic pedestrian bridge across Onslow Street. Millbrook car park could be double-decked.


[8] Oxford, York and Winchester are great examples of how effective such a strategy can be. Winchester Crown Court will only refund jurors’ Park & Ride fees, not Town Centre car parking fees, thereby positively encouraging jurors not to drive into the centre of the City. We also recommended increase in town centre parking charges. We consider that reduced revenue from car parking will be more than compensated by the many benefits arising from parking policies designed to reduce town centre congestion and land take.

[9] Ideally by a tunnel.

[10] Evidence from other towns (High Street in Exeter, Fleet Street in Torquay, South Street in Worthing and Terminus Road in Eastbourne are good examples) would suggest that allowing bus access to otherwise largely pedestrianized zones can be achieved without compromising safety while enabling a much-improved streetscape.

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

Attached documents:

Comment ID: pslp172/5203  Respondent: 8555233 / Safeguard Coaches Ltd (Mr A J Halliday)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A6

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

Answer (if comment is on questions 1-7 of the questionnaire): ()
As well as (or as part of?) its consultation on the proposed Amended Local Plan, Guildford Borough Council is also consulting on the future of Guildford’s Friary Bus Station and alternative options as part of its plans to regenerate the ‘North Street Quarter’.

As a significant commercial bus operator in the Guildford area carrying in excess of 850,000 passengers per annum I write to explain our position concerning the options tabled by SYSTRA on behalf of Guildford Borough Council in March 2017 (report released 28 June 2017). This is highly relevant to the Local Plan.

**Unleashing the Potential for Bus-based Public Transport in Guildford**

With an estimated 7.5 million bus journeys already being made annually in Guildford we believe that bus-based public transport has a vital role in supporting Guildford’s economy, addressing traffic congestion and improving air quality, particularly in the Town Centre, and therefore that generous provision should be made for it, particularly within the heart of the Town.

This will be even more critical if further development of Guildford, as suggested in the draft Amended Local Plan, is to proceed without causing significantly greater amounts of traffic congestion and worsening air quality.

Bus networks are very flexible and responsive and consequently lead times for improvements can be fairly short. In contrast to other modes, investment in bus services is generally not expensive – and is capable of delivering relatively quick returns.

**However, to be commercially viable and appealing to existing customers and current non-users alike, bus-based public transport must be more convenient than using the car.**

Crucially this means that buses must be able to use direct, quick and efficient routes into and around the Town Centre and be able to drop off and pick up customers very close to where they want to get to. The vast majority of passengers wish to access the heart of the Town Centre which is why the location of current bus station is so appreciated.

These views are absolutely consistent with the tenor of ARUP’s Technical Note on Existing Conditions Commissioned by GBC and SCC dated 27 May 2016, the Guildford Town Centre and Hinterland Masterplan Report by Allies and Morrison (October 2015) and comments by Councillor Paul Spooner (as Leader of the Council), former Managing Director Sue Sturgeon and Councillor Matt Furniss. The fact that, at 7.4%, Guildford already has a higher bus mode share than the national average (5%) suggests that there is already a solid (if small) base to build on.

Guildford cannot continue to grow and compete with other retail and employment centres without providing more sustainable and attractive means of accessing and moving around its Town Centre. Attractive-to-use bus-based public transport will, of necessity, play a key role in facilitating this as there is very limited scope to increase other modal provision in the short to medium term.

In summary, we believe that buses should be seen as the solution and not the problem and we would encourage you to think similarly.

**Critique of the Options Tabled by SYSTRA on behalf of GBC**

Neither SYSTRA’s Primary Option (relocation of stops to Leapale Road/North Street with some additional layover at Bedford Wharf) or the Secondary Option (relocation of stops to Leapale Road/North Street and provision of layover at Bedford Wharf along with some bus departure bays) will allow buses to fulfill their true potential. SYSTRA’s report on the stakeholder engagement exercise makes this quite clear. Consequently, we cannot support either Option as they stand.

Specifically, both Options would result in buses serving points South, West and North of Town (services in the latter two directions being the most frequent and heavily used) not being able to drop off and pick up customers and workers close to where they want to get to without significantly increased journey times which will reduce the appeal of the bus service to existing and potential bus users and increase operating costs. Terminating services at Bedford Wharf without first accessing the heart of the Town Centre is not an acceptable alternative.
Rather than facilitate the exciting vision outlined above, we believe that the resulting extended bus service routings will deter large numbers of existing and potential users from using the bus as their mode of travel to the Town Centre because a key selling point – that of convenient access to the heart of the Town – will be seriously eroded for the majority of passengers. Reduced bus use, together with increased operating costs, will result in higher fares and/or reduced frequency of service (impacting disproportionately on the more marginalized in society who are more dependent on bus services to access jobs and other facilities) and/or increase the call on scarce public funds through a greater need for bus service support.

We therefore consider that there is a real danger that the Options - as currently drafted – could cause bus transport to become marginalized and increasingly a mode of necessity rather than one of choice, reversing current positive patronage trends.

Failure to embrace the opportunity – already being taken by many towns and cities across the UK [4] – to harness the potential of buses to support sustainable economic growth in Guildford and its environs would be a huge opportunity missed to help address Guildford’s chronic traffic congestion and poor air quality[5]. This is because provision of excellent public transport as a viable and attractive alternative to the car would allowing a greater degree of restraint on car use to be considered politically, socially and economically acceptable, thereby helping to achieve the modal shift which is so often talked about when considering how to release Guildford’s town centre from the ‘vice-like grip’ of unfettered traffic volumes and congestion and make it a more attractive place to live, work, shop and relax.

**What We Propose**

Our natural preference would be the re-provision of a modern state-of-the-art central Bus Station as part of the North Street Quarter development, for example at the south end of a widened Leapale Road with excellent bus and passenger access via Leapale Road and the whole length of North Street.

However, we are not entirely dismissive of the concept of the relocation of stops to Leapale Road/North Street and provision of additional layover at Bedford Wharf along with some bus departure bays (effectively a hybrid of SYSTRA’s Primary and Secondary Options) but, **crucially, to make this work we additionally require that:**

- bus access to, and customer facilities in, the whole length of North Street is provided in order that:
  1. buses serving the South, West and North of Town and beyond can follow a direct, quick and efficient route into and around the Town Centre viz North Street, Leapale Road, Onslow Street;
  1. there is sufficient opportunity for buses to drop off/pick up customers in the heart of the Town Centre and have adequate opportunity for recovery time between journeys to ensure service reliability without buses on high frequency routes having to travel to the proposed Bedford Wharf bus layover facility as this would not be operationally or commercially viable;
- all other through vehicular traffic is removed from the whole of North Street and Leapale Road so that these roads become more pleasant environments for pedestrians, create space for buses and other sustainable modes and assist bus network reliability.

It is vital to appreciate that a central bus station and/or allowing buses to access the whole of North Street will not undermine the viability of the proposed redevelopment of the North Street Quarter. Rather it will enhance its viability (and that of the Town Centre as a whole) by allowing buses to bring large numbers of customers and workers close to these places and play an increasing part in resolving the chronic traffic congestion (and consequent unpleasantness evidenced by poor safety, air quality, pedestrian connectivity and visual intrusion) which is currently blighting the Town Centre, thereby making Guildford an increasingly desirable place to live, work, shop and relax.

In order to help create an attractive and sustainable Town Centre which is not blighted by traffic we also believe that:

- Bridge Street should be dedicated solely to buses, pedestrians and cycles (plus very limited vehicular access to premises) travelling in both directions following removal of the Gyratory system in order to speed up bus journeys (both in actual terms and viz-a-viz the car), allow better bus/rail interchange close to the main entrance
of Guildford Railway Station and making Bridge Street a more pleasant and safer environment for pedestrians and cyclists;

- car parking provision should largely be located just outside the central core of the Town (eg Millbrook, Bedford Road[6], Guildford Park Road etc), as opposed to right in the centre (eg on-street in North Street, Leapale Road multi-storey car park, Portsmouth Road surface car park[7]). Much more emphasis should be placed on directing motorists, especially long stay and contract permit holders, to the Town’s Park & Ride facilities[8], all of which have spare capacity. This would help to remove traffic from the central core which would reduce congestion and visual intrusion, increase space for sustainable transport modes, improve safety and air quality and allow more public spaces and living streetscapes to be created;

- vehicular deliveries to Town Centre premises must be strictly limited to those times which do not interfere with peak travel demand or retail activity;

- provide additional road infrastructure, in particular an additional river/road crossing, to relieve the Town Centre and the existing Gyratory area and resolve the propensity of the A3 bottleneck to cause widespread congestion throughout the Town[9].

**Bus Routings**

Allowing buses to access the whole of North Street (as opposed to just the part east of Leapale Road) is essential to provide direct, quick and efficient bus services into and around the Town Centre for customers arriving from/departing to all points of the compass.

Inability to access (lower) North Street would result in buses (hence passengers) having to undertake a significant detour, presumably via York Road and (narrow) Chertsey Street to reach (upper) North Street and Leapale Road. This would add significantly to journey times and operational costs and reduce customer appeal.

A ‘sustainable modes only’ Bridge Street could also be served by buses using the proposed Sustainable Movement Corridor (SMC).

We have drafted provisional bus routings and recommendations for bus passenger infrastructure which we would be happy to discuss with you.

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**Reciprocal Commitments from Bus Operators**

In exchange for excellent access into the heart of a relatively traffic-free Town Centre and provision of high quality bus stands as described above Safeguard Coaches would be pleased to discuss:

- an Enhanced Partnership arrangement (as provided for in the new Bus Services Act) between themselves, Guildford BC, Surrey CC and other stakeholders to promote bus-based public transport, achieve high standards of bus service reliability and coordinate initiatives (including common ticket products for the Guildford area);

- minimum bus service levels, including during evenings and Sundays/Public Holidays;

- even more attractive fares for young people and maximum adult/child fares according to distance travelled, M-ticket and contactless payment options;

- improved customer WiFi on all buses;

- minimum environmental standards of vehicles used in shared spaces (primarily Bridge Street, North Street and Leapale Road) by specified dates; and

- excellent staff training/management/control of driver behaviour when navigating shared spaces[10].
Summary

Safeguard Coaches absolutely believe buses have a central part to play in helping to resolve the issues facing Guildford and in particular its Town Centre and maintains that, without excellent provision for this form of transport, the Council’s vision for an expanding Guildford (as indicated in the proposed Amended Local Plan) will not be realizable.

However, we cannot support either the options which were the focus of SYSTRA’s stakeholder consultation exercise on commercial and operational grounds and have already raised concerns over the impact of the proposals on the ability of Guildford’s bus network to support and enhance Town Centre retail and leisure activity, access to job opportunities, traffic congestion etc.

While our first preference would be a new, high quality bus station of the same size as the current facility built as part of the North Street Quarter, we think that other solutions could work and have developed exciting and workable ideas which have the potential to meet the requirements of both bus passengers and operators, in particular bus facilities in the heart of the Town Centre (where most people want to go) and quick and reliable access to them.

Re-provision of a central bus station and/or allowing bus access the whole of North Street will not undermine the viability of the proposed redevelopment of the North Street Quarter but rather will enhance it by allowing them to bring large numbers of customers and workers directly to it.

Key to success in this regard will be restraint on car use in the Town Centre through:

- implementation of a ‘drive to, not through’ policy for general traffic;
- removal of through vehicular traffic from the central area and restrictions on deliveries;
- relocating car parking to edge-of-centre locations;
- greater use of existing Park & Ride facilities, especially for long stay and contract parking;
- provision of additional road infrastructure to relieve the Town Centre road network.

We urge the Council to be ambitious in its aspirations to create a Town Centre that we and our children can be proud of and believe that, in this context, bus-based public transport will be able to help deliver much needed improvements in terms of connectivity, sustainability, air quality, safety and social inclusion at an affordable price and in a realistic timescale.

Safeguard Coaches urges GBC to engage meaningfully with us and the Town’s other principal bus operators and existing/potential bus passengers in a spirit of true partnership such that the very best solution for Guildford can be found and implemented. For our part, we are prepared to work with other stakeholders to achieve that outcome but will not accept ‘watered down’ versions.

I trust that this letter provides a helpful synopsis of Safeguard Coaches’ position, in particular making quite clear that we cannot support the proposals as currently tabled by SYSTRA but suggesting that there are other really exciting and more sustainable solutions available while offering to work in partnership with Guildford Borough Council and other stakeholders to deliver bus-based public transport that Guildford can be proud of.

[1] Information provided by Laurie James, Passenger Transport Section, Surrey County Council.

[2] Recent research by traffic monitor Inrix has revealed Guildford to be the most congested town in the country, only exceeded in this respect by the cities of London, Manchester, Aberdeen, Birmingham and Edinburgh (Surrey Advertiser, February 2017).

[3] Matt Furniss: ‘Improvements to the bus services are key to achieving a modal shift in the town’ (Surrey Advertiser, 24 March 2017), ‘We remain committed to encouraging sustainable, integrated transport and quality passenger facilities’ (Surrey Advertiser, March 2017).

[4] According to Bus Users UK many towns and cities have seen significant growth in bus passenger numbers through highly-visible bus services that operate in close proximity to the main shopping areas.

[5] Poor air quality is particularly evident around the Gyratory and its approaches.
[6] Bedford Road car park could be linked to the Town Centre by a new larger and iconic pedestrian bridge across Onslow Street. Millbrook car park could be double-decked.


[8] Oxford, York and Winchester are great examples of how effective such a strategy can be. Winchester Crown Court will only refund jurors’ Park & Ride fees, not Town Centre car parking fees, thereby positively encouraging jurors not to drive into the centre of the City. We also recommended increase in town centre parking charges. We consider that reduced revenue from car parking will be more than compensated by the many benefits arising from parking policies designed to reduce town centre congestion and land take.

[9] Ideally by a tunnel.

[10] Evidence from other towns (High Street in Exeter, Fleet Street in Torquay, South Street in Worthing and Terminus Road in Eastbourne are good examples) would suggest that allowing bus access to otherwise largely pedestrianized zones can be achieved without compromising safety while enabling a much-improved streetscape.

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

Attached documents:

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Comment ID: PSLPA16/1410   Respondent: 8555297 / Mrs G M Aish   Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

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

Answer (if comment is on questions 1-7 of the questionnaire): ()

Objection to Guildford Borough Council Proposed Submission Local Plan

I am writing because I strongly object to the new Guildford Local Plan. Little consideration has been paid to your Council Taxpayers’ criticisms of the previous draft Local Plan.

The housing need figure seems to be based on a methodology which is unknown by the public and councillors alike. How can a plan be formed without any knowledge of how the figures were obtained? Surely before spending so much of our Council Tax on consultants and the whole Local Plan process it should have been agreed that the method used to determine the figures would be made available. It should now be reviewed also to reflect the consequences of Brexit; one widely expected consequence is a reduction in the number of overseas students through concern at their ability to continue their studies. I object to the housing need proposals.

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

Attached documents:

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Comment ID: PSLPS16/2551   Respondent: 8555297 / Mrs G M Aish   Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The Planning Department recommended refusal and the Planning Committee unanimously refused permission on 6th April 2016 for an Application for building 2068 houses and other aspects of the large development on the Former Wisley Airfield. After 14 months of negotiations by the developer in response to widespread serious objections raised by authoritative sources, including Highways England, Thames Water, NATS and the Environment Agency, resolutions could not be found. Since it has been established that there are sufficient brownfield sites and land not in the Green Belt available in the Borough, it cannot be argued that there are exceptional circumstances to justify taking the site 35 out of the Green Belt. I object to Site 35 being taken out of the Green Belt.

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

Attached documents:

Comment ID: PSLPP16/5664  Respondent: 8555297 / Mrs G M Aish  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

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

Answer (if comment is on questions 1-7 of the questionnaire): ()

The infrastructure in many of the areas specified is completely incapable of taking the large increase in the number of people and cars. Roads are already busy and often grid locked. drainage is unable to cope. and car parking at shops and stations is already saturated. The Plan does not adequately provide for the additional schools. doctor's surgeries. other medical care. libraries. policing. etc. Air quality is already at serious levels of pollution, particularly along the A3 corridor; recent research has shown the serious harm being done to the lungs. particularly of young children. by the high levels, in breach of regulations, of NOx gases and particulates. I object that all these considerations have been ignored.

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

Attached documents:

Comment ID: PSLPP16/5648  Respondent: 8555297 / Mrs G M Aish  Agent:

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

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

Answer (if comment is on questions 1-7 of the questionnaire): ()
The policy on which the Conservative party councillors and Government were elected was to protect the Green Belt. Surely to ignore this pledge would be undemocratic and dishonest. The whole point of the Green Belt is to preserve open land and to prevent the sprawl of the metropolitan area. Your Council tax payers certainly did not give you a mandate to remove so many of the villages in Surrey from the Green Belt, with the detrimental effect on the Borough of Guildford FOREVER. I object to the re-designation of Green Belt Boundaries.

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

Attached documents:

Comment ID: pslp172/4109  Respondent: 8555297 / Mrs G M Aish  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A35

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

Answer (if comment is on questions 1-7 of the questionnaire): ()

I am disappointed that my previous objections to the draft local plan have not been reflected in the latest draft.

Please confirm that all of these comments together with all my previous comments are passed to the Inspector.

I continue to object to the inclusion of policy A35, Three Farms Meadows in the draft Local Plan for many reasons including the following:

1. No effort has been made to demonstrate exceptional circumstances for the removal of any land from the Green Belt. I object that the green belt has been preferred over brownfield land in the urban area without taking notice of the response to previous consultations.
2. It is adjacent to the most popular visitor attraction in the south-east, the RHS at Wisley where visitor numbers will increase by 500,000/annum. The Plan has not taken into account the associated daily traffic increase to and from the RHS as well as for the regular events at the RHS which attract 1000’s more visitors several times a year.
3. It is the least sustainable strategic site identified in this version and in previous versions of the plan because of the constraints on the site and the physical location.
4. The identified mitigation to address the impact of increased traffic will not address the commuters travelling to Woking rail station
5. It is adjacent to the most congested stretch of strategic road network in the county and close to one the most congested junction in the country (J10)
6. Local roads are at capacity particularly when the SRN is not free-flowing (accidents, diversions, roadworks etc)
7. Any public transport provision such as bus services to/from Guildford will have to negotiate the over-crowded SRN and will therefore be unreliable and subject to frequent delays.
8. Any public transport (bus services) provision to Horsley will impact the safety of the local road network as the lanes are not wide enough to accommodate PSVs, particularly as sustainable methods of travel such as cycling and walking are being promoted at the same time. This is totally unrealistic and unsafe.
9. There is insufficient employment available onsite so that almost all residents will have to travel to work. It is unrealistic and unsafe to assume people will walk/cycle on narrow unlit local roads on a regular basis.
10. The identified mitigation to address the impact of increased traffic will not address the commuters travelling to Woking rail station
11. It remains unclear when and if the Ockham DVOR/DME beacon will be decommissioned as the timetable has already slipped. This constrains the site significantly in terms of building heights etc.
12. The changed “Opportunities” listed in this policy reinforce why this site is totally inappropriate despite talking of “good urban design”
13. Opportunity (3) should be common to all sites and is not unique to this site.
14. I object to the increased area of the site as this now abuts and overlooks the Ockham Conservation Area.
15. I object to the fact that the increased area, being on the south of the site facing the North Down AONB will increase the negative impact of the views from the AONB.
16. I object to the change of site boundaries as these are not identified correctly on the plan (Appendix H p16).
17. I object to the removal of additional 3.1 ha to be removed from the green belt without any justification.
18. I object to the change in green belt boundary to the eastern end of the site as this now encloses an area of high archaeological impact.
19. I object to para 21 which “limits” development in flood zone 2 and 3. Development should be excluded in flood zone 2 and 3.
20. I object to para 22 as this does not reflect the impact of the buildings on the surrounding area.
21. I object to the fact that the council has failed to remove this site from the local plan despite receiving many thousands of objections from local residents and statutory consultees in two full consultations.
22. I object to the proposed Submission Local Plan because the significant modifications made to the plan mean that this should not be a Regulation 19 consultation. A regulation 19 consultation needs to be on the totality of the plan rather than the proposed changes.
23. The changes to the plan can only be made if the previous plan was ‘unsound’ and the changes should explain how they will make the plan sound. I object to the absence of proper procedure, leaving an unsound plan not capable of being accepted.
24. I object to the Council wasting tax payers and residents’ time and money not following due process and in particular ignoring previous representations.
25. I object to the inclusion of a 10% buffer in the housing number over the plan period. This is unnecessary.
26. I object to the evidence base especially the West Surrey SHMA and the Guildford addendum 2017 which is not transparent and has been challenged by other experts including NMSS.
27. I object to the inclusion of Site A35 as it will not contribute to the 5-year housing projection due to many constraints including the provision of a new sewerage facility.
28. I object to the Housing number which is unsound and open to legal challenge.
29. I object to the disregarding for the impact on the Thames Basin Heaths SPA, particularly the damage caused by nitrogen deposition and high pollution levels.
30. I object to Policy S2 where it states: “4.1.9a The figures set out in the Annual Housing Target table sum to a total of 12,426 homes.” yet the figures in the table add up to 9,810. The difference of over 20% demonstrates the lack of understanding of the housing requirements of the Borough. It is also an example of why the Plan is not sound.

For the reasons listed above and numerous other reasons I consider that the plan is unsound and not fit for purpose.

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

Attached documents:
The Submission Local Plan seeks to achieve an appropriate balance between needs of protecting environmental qualities, including the historic environment, and the necessary growth and development to ensure Guildford’s continued vitality and economic, social and environmental sustainability. In its high incidence of references to heritage and the historic environment, and the role this plays in achieving sustainable development, the plan largely succeeds in this respect.

There are a few matters of detail that Historic England would like to see addressed in the final version of the plan, but we do not think these are fundamental impediments to its adoption.

The heritage evidence base, referred to as being contained in the GBC Historic Environment Information (April 2016) requires further work; we note this is still in draft form and could be enhanced by inclusion of assessments of significance and value of historic environment as a whole and constituent assets. It would be useful to identify any actions necessary to sustain and enhance the significances of the historic environment and, in particular, how issues affecting the long-term sustainability of heritage assets, such as this at risk, may be addressed.

A clearer explanation of how this evidence links to and underpins a positive strategy for the historic environment in the Local Plan should be included.

We support Policy P1: Surrey Hills Area of Outstanding Natural Beauty in particular the intention to protect objects of historical significance.

Re. Policy E7: Guildford Town Centre; we broadly support both the Vision (p 84) and policy for the town centre. A key characteristic of and a significant factor in its success is the historic environment, focussed on the setted High Street, and the range and concentration of heritage assets and features (ref. para 4.4.68). However, it will be important to proactively sustain these qualities and integrate their protection and enhancement into efforts to improve the retail and associated offer of the town, and we would like to see the wording of the policy strengthened in this respect; for instance, by the addition of an additional bullet point to this effect in the first paragraph of the policy or by explicitly connecting this policy to Policy D3.

We support Policy D1: Making better places.

We think that Policy D3: Historic environment is weak in its wording though supported by a good introduction and an appropriate reasoned justification. The weakness in the policy arises from its focus being reactive, and we would suggest a more proactive form of wording is sought that reflects some of the intentions set out para 4.5.45. As with other areas of policy, the NPPF requires the local plan to actively promote and support actions to sustain, enhance and enjoy the historic environment (ref. paras 126 and 157, final bullet) addressing, in particular, heritage at risk.

We support Policy D4: Development in urban areas and inset villages. In view of the proposed removal of a number of historic villages form the Green Belt it is suggested, where appropriate, that conservation area appraisals are updated and revised to ensure any new development respects and reinforces the character, distinctiveness and setting of the settlements (this could be linked to Policy D3).

Allocated Sites - with regards to allocated sites, Historic England will be pleased to advise on development proposals as they come forward in respect of any effects on the historic environment or heritage assets within or in proximity to the sites. Some of the more significant (strategic) sites will require archaeological investigation / assessment prior to development especially where there is known to be historical activities that may be retain structures or remains of heritage significance (e.g. at former Wisley Airfield, heritage assessment needed in relation to the sites historic association with aviation development/innovation).

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

Attached documents:

Comment ID: pslp17q/289  Respondent: 8555425 / Historic England (Alan Byrne)  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Question 6: Any other comments?

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

Answer (if comment is on questions 1-7 of the questionnaire): ()

Targeted consultation on Guildford Borough Council’s Proposed Submission Local Plan (2017)

Thank you for your email of 8 June 2017 inviting comments on the above document.

As the Government’s adviser on the historic environment Historic England is keen to ensure that the protection of the historic environment is fully taken into account at all stages and levels of the local planning process and welcomes the opportunity to comment upon this key planning document.

Historic England’s is content with the proposed changes to the draft Local Plan in as far as they relate to its remit. In our letter of 15 July 2016 we noted a number of issues that we believed should be addressed in future iterations of the plan and this has largely been done. We still have some concern that the link between the evidence base for the historic environment and the plans policies on heritage (see earlier letter) is not demonstrated as clearly as it might be but this is a matter for drafting rather than a fundamental deficiency.

Historic England would strongly advise that the Council’s own conservation staff are closely involved throughout the preparation of the Local Plan, as they are often best placed to advise on local historic environment issues and priorities, sources of data and, consideration of the options relating to the historic environment, in particular the requirement to set out a positive strategy for the conservation and enjoyment of the historic environment (NPPF para 126).

These comments are based on the information provided by you at this time and for the avoidance of doubt does not reflect our obligation to advise you on, and potentially object to, any specific development proposal which may subsequently arise from this or later versions of the plan and which may, in our view, have adverse effects on the historic environment.

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

Attached documents:

Comment ID: PSLPS16/227  Respondent: 8555489 / Alan Norris  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A29

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

Answer (if comment is on questions 1-7 of the questionnaire): ()

Site A29 - Land to south and east of Ash and Tongham;

I note the following comment re roads linking new estates to provide alternative distributor roads:

Proposed road layout or layouts to provide connections between both the individual development sites within this site allocation and between Ash Lodge Drive and Foreman Road, providing a through road connection between Ash Lodge Drive and Foreman Road, in order to maximise accessibility and to help alleviate congestion on the A323 corridor.
The reserved matters planning application (16/P/00980) for the 400 house development on land to south of Ash Lodge Drive is currently in the planning approval process. The plans for this development should include a link road between the estate distributor road and a made up Ash Green Lane West. This road would provide a link between the new and proposed developments accessed from Ash Green Lane West comprising a total of 60 + 26 + 55 + 14 units (total = 155 houses), in line with the proposed Local Plan policy statement.

(I have submitted this comment in respect of planning application 16/P/00980 - but the Local Plan team may wish to reiterate it as part of the planning application comments.)

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

Attached documents:

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Comment ID: PSLPS16/226  Respondent: 8555489 / Alan Norris  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A30

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

Answer (if comment is on questions 1-7 of the questionnaire): ()

I have the following comments on Site A30 - Ash station railway bridge. The land on both sides of railway between the diverted road via the new bridge and the existing Guildford Road should be used for additional car parking for station users and a pick up/set down area plus relocated bus stops close to the station entrance(s).

Ash station could be developed as park and ride by train facility for commuters and others travelling to Guildford and Reading (and also London via Guildford). Car parking should be free (or a nominal amount as at Ash Vale - £1 per day), and not at the level of £3.50 weekdays as currently charged by South West Trains, which is a disincentive to use the car park when paid in addition to the train fares. This is shown by the current level of on-street commuter parking near Ash station and regular vacant spaces in the 22 space station car park.

Some of the surplus land in the A30 area could be used for a new convenience store (with some time limited parking) to serve the new developments already approved and built in south/east Ash and likely to be built in the areas in Site A29. By siting a convenience store close to the station, it would be a useful facility for rail users as well as local residents and could reduce the number of car journeys - i.e. a rail user could visit the shop before leaving the car park, instead of having to drive to a shop some distance away, and then onto their home. Existing shopping facilities in Ash - both in Ash Street, at Ash Vale (Wharf Road) and on Guildford Road depend on on-street parking with limited off-street parking with consequent congestion. The new Tesco convenience store close to Ash Vale station appears to be well used, and is in an area with a limited number of shops nearby.

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

Attached documents:

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Comment ID: PSLPS16/228  Respondent: 8555489 / Alan Norris  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A39
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Site A39 - Land near Horsley Railway Station

Part of this land nearest to the main road through East Horsley should be reserved for additional car parking for Horsley station users. This land is within a short walk of Horsley station. Demand for car parking at Horsley station could exceed the capacity of current station car park, particularly as this station could be the preferred station by commuters from the proposed Wisley airfield development.

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

Attached documents:

Comment ID: PSLPP16/14933   Respondent: 8555489 / Alan Norris   Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

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

Answer (if comment is on questions 1-7 of the questionnaire): ()

Guildford station - new road bridge over railway.

Land immediately to the north of the station should be left undeveloped to allow for a road bridge to be constructed as part of a link road between Guildford Park Road and York Road. This would provide an alternative route to Farnham Road bridge to connect the west and east sides of the town on either side of the railway and river. If the gyratory system is downgraded to reduce town centre congestion and traffic across Farnham Road bridge is restricted to buses and emergency vehicles (as I have read in some transport proposals), then there will be no alternative route for motorists to travel across Guildford apart from using the A3 between Woodbridge Road and the Cathedral junction. These traffic proposals assume that motorists from the west side of the town can park near the station (e.g. Guildford Park Road and Farnham Road car parks) and walk into the town centre. This may be acceptable if their destination is in the lower part of the town centre, but it is a significant distance to walk to the upper part of the town, particularly for those with impaired mobility. The withdrawal of the town centre free bus service a few years ago was a retrograde step.

For traffic in the opposite direction - e.g. residents from the east side of the town and the A281 corridor going to and from the Royal Surrey Hospital and the University, both significant destinations, would also have to use the congested A3 for one junction if access over Farnham Road bridge is restricted and there is no alternative road across the railway in the vicinity of the town centre. It is unsatisfactory that local traffic has to use the A3 for a short distance between the Woodbridge Road junction and the Cathedral / University junction, thus causing regular congestion at peak hours. It is therefore imperative that passive provision is made in the Local Plan for an alternative road bridge over the railway to relieve Farnham Road bridge.

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

Attached documents:
Site allocation A29 (and the deleted A30)

Land adjacent to Ash Station needs to be reserved for car parking / pick-up and drop-off areas and local bus stops. As the road bridge and access roads (previously shown in deleted site allocation A30) have now been incorporated into site allocation, there is no distinction between the land for housing and the land for the road / bridge / station and transport purposes. By not segregating these two different land uses, there will be pressure from developers for housing right up to the station area, without leaving adequate land for the essential transport purposes. With a good rail service to Guildford, Ash station could become an effective transport interchange and provide a park and ride facility to Guildford for the 2000+ new houses approved or proposed in the Ash / Tongham area and for existing residents, thus relieving car use on the A31 and A323 roads. Once land close to Ash station is developed for housing it is no longer possible to use that land for transport services. In such a scenario there would be increased parking pressure on nearby residential roads, as there are at present due to the limited car park spaces at Ash station.

(Ash Vale station is an example where there is inadequate parking provision (all the available places are filled by 7.00am on weekdays) and because of close by housing there is no land available for additional parking.)

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

Attached documents:

Site allocation A29 (and the deleted A30)

Land adjacent to Ash Station needs to be reserved for car parking / pick-up and drop-off areas and local bus stops. As the road bridge and access roads (previously shown in deleted site allocation A30) have now been incorporated into site allocation, there is no distinction between the land for housing and the land for the road / bridge / station and transport purposes. By not segregating these two different land uses, there will be pressure from developers for housing right up to the station area, without leaving adequate land for the essential transport purposes. With a good rail service to Guildford, Ash station could become an effective transport interchange and provide a park and ride facility to Guildford for the 2000+ new houses approved or proposed in the Ash / Tongham area and for existing residents, thus relieving car use on the A31 and A323 roads. Once land close to Ash station is developed for housing it is no longer possible to use that land for transport services. In such a scenario there would be increased parking pressure on nearby residential roads, as there are at present due to the limited car park spaces at Ash station.
(Ash Vale station is an example where there is inadequate parking provision (all the available places are filled by 7.00am on weekdays) and because of close by housing there is no land available for additional parking.)

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

Attached documents:

Comment ID: pslp171/1457  Respondent: 8555489 / Alan Norris  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy E2

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

Answer (if comment is on questions 1-7 of the questionnaire): ()

Transport interchanges: (Ref Policy E2 = page 76, para 4.4.18)

I have reservations on the proposed designation of the on-street town centre bus stops (replacing the bus station) as an integrated public transport interchange. The distance between the furthest bus stops should not be more than (say) 250m - otherwise the fragmented bus stops spread across the town centre cannot really be considered as a reasonable and effective interchange. This will lead to reduced use of public transport.

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

Attached documents:

Comment ID: pslp17q/277  Respondent: 8555489 / Alan Norris  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Question 6: Any other comments?

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

Answer (if comment is on questions 1-7 of the questionnaire): ()

Finally a couple of spelling errors:

Page 22 - first paragraph, 3rd line = located mispelt as loacted

Page 328, Open Space OS6 = Spoil Road should be Spoil Lane, Tongham (Spoil Lane is shown correctly on Policy A31)

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

Attached documents:

Comment ID: PSLPP16/1462  Respondent: 8555713 / JDC (Alan McClafferty)  Agent:
**Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H2**

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

**Answer (if comment is on questions 1-7 of the questionnaire): ()**

Affordable Housing - As a local employer we constantly see young people moving out of the area due to lack of housing. The Council has had building targets for years which they have consistently missed. Until a target for affordable housing is set which is actually enforceable I do not see the position changing. My suggestion is to incorporate a higher target for affordable and introduce an incentive or penalty system to ensure the target is achieved.

Employment - Unfortunately, GBC has a generally poor reputation amongst businesses in the area for being unresponsive, slow to action and lacking understanding of businesses needs. Although this is improving there is still a long way to go. I suggest this section of the plan be enhanced to include response time targets and feedback systems from businesses.

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

**Attached documents:**

**Comment ID:** PSLPA16/3002  **Respondent:** 8555745 / Mr Alan Short  **Agent:**

**Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base**

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

**Answer (if comment is on questions 1-7 of the questionnaire): ()**

I OBJECT to the limited consultation period, especially to the last minute inclusion of new sites with less than 2 weeks notice.

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

**Attached documents:**

**Comment ID:** PSLPP16/12490  **Respondent:** 8555745 / Mr Alan Short  **Agent:**

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

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

**Answer (if comment is on questions 1-7 of the questionnaire): ()**

**Comment ID:** PSLPA16/3002  **Respondent:** 8555745 / Mr Alan Short  **Agent:**

**Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base**

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

**Answer (if comment is on questions 1-7 of the questionnaire): ()**
I OBJECT to all erosion of the Green Belt, building on the Green Belt should NOT be approved to all Brown sites are used.

I OBJECT to all “in-setting” of any villages from the Green Belt, villages are an important part of the fabric of our Country and should not be removed.

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

Attached documents:

Comment ID: PSLPP16/12491  Respondent: 8555745 / Mr Alan Short  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

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

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the lack of any evidence for the alleged housing need and numbers

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

Attached documents:

Comment ID: PSLPS16/2607  Respondent: 8555777 / A Back  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A37

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

Answer (if comment is on questions 1-7 of the questionnaire): ()

I write to you with regard to the Proposed Local Plan, as I am the owner of [Response has been redacted due to statement containing personal data which cannot be disclosed due to the provisions of the Data Protection Act 1998], which constitutes part of one sites in the plan allocated for development, namely of A37: Land at and to the rear of Bell and Co/vii, Epsom Road, West Horsley on pages 209 and 210 of the plan.

Whilst I am not educated in land development matters I feel is important you have input from a homeowner and village resident whose circumstances will be affected by the proposed plan.

Initially, I write to state that I wholeheartedly support the plan. Whilst my family and I enjoy living in West Horsley, and enjoy the delights of a semi-rural environment, we have long felt that the area should be sharing the national burden for housing and that is unacceptable to continue to "fight off development" and expect other locations to deal with the challenge. Furthermore if we are to sustain our rural villages into the future we need to ensure that there is sufficient and suitable housing that encourages young people and families to live in them.
It is clear to me that Guildford Borough Council's plan has been well researched and thought through, and offers the best solution for increased housing whilst protecting the rural feel of the borough. Infill between existing dwellings, on sites such as ours, are definitely more acceptable than extending village boundaries into large areas of open fields.

The plans to make West Horsley an inset village, and specifically the allocation of the site we form part of are both sensible and executable such that the majority of the site is away from pubic gaze, and can be developed in a sensitive way, in-keeping with the context of the village, to provide suitable additional housing required, and contribute to the Council's housing requirements.

As I am sure you are already aware, the site is made up of land owned by four different people. I have marked up the owners, including myself, on the diagram below:-

I am in dialogue with [Response has been redacted due to statement containing personal data which cannot be disclosed due to the provisions of the Data Protection Act 1998] and [Response has been redacted due to statement containing personal data which cannot be disclosed due to the provisions of the Data Protection Act 1998], both of whom have confirmed that they are keen to develop their land either individually, or together.

I myself am agreeable to development [Response has been redacted due to statement containing personal data which cannot be disclosed due to the provisions of the Data Protection Act 1998], individually or as part of the whole plot, including road access either through my plot from The Street, or via Bell and Colvill.

It should be noted, for reference, that I have a pre-emption agreement with Mr Witherby, since his land was originally part of [Response has been redacted due to statement containing personal data which cannot be disclosed due to the provisions of the Data Protection Act 1998], that should he come to sell his land I have first option to purchase his land.

Since the publication of the draft plan, I have been approached by a number of "developers" and "land agents/consultants", all of whom have formulated plans which suggest between five and seven houses of three to four bedroom size and a similar number on the land adjoining [Response has been redacted due to statement containing personal data which cannot be disclosed due to the provisions of the Data Protection Act 1998] owned by [Response has been redacted due to statement containing personal data which cannot be disclosed due to the provisions of the Data Protection Act 1998] (red and green areas on the diagram above) could be built in line with planning regulations.

The houses' design and appearance would be in keeping with the village, thus retaining the village's integrity and character.

My current position is that I would look to move plans forward quickly in consultation with the Council planning department as soon as possible, within the confines of the Local Plan coming into force.

With specific reference to the National Planning Policy Framework, I am flexible as to whether the site falls within the 6-10 year timescale for the wider site development, or it can be developed on a smaller scale as either just [Response has been redacted due to statement containing personal data which cannot be disclosed due to the provisions of the Data Protection Act 1998], or to include the adjoining land within the shorter timescales of 0-5 years.

Additional factors that make the site both suitable and attractive for development are:-

- It is not agricultural land
- It is not contaminated by previous use such as a former industrial site
- It would not require change of use as it has an existing dwelling and outbuildings
- Direct access to the public highway can be provided from The Street
- It does not represent a major site, and therefore will have minimal effect on biodiversity
- The site is solely under my ownership

In summary I firmly believe that the site can be developed quickly, and in keeping with the character of the village to support the Council's need to provide additional suitable housing in the Borough, and I would very much like to keep it in the plan as available for development.

I fully support the plan and the inclusion of our site and if I can be of any further assistance please do not hesitate to contact me.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents: [Capture3.JPG](92 KB)

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With regard to site A37 in the plan. I am one of the landowners and would like to re-state my support for the proposed development of the site. I understand that the phasing has been amended for the site and is now due for delivery in the first 5 years of the plan. Again I am in full support of this and believe the site can easily be delivered in that timescale.

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

Attached documents:

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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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I object to the proposal to move the green belt boundary so that the open fields behind the Shalford village hall lose their green belt protection.

I also object to the proposal to move the village settlement boundary which has existed for several decades and there is absolutely no reason to move it in this part of the village. The boundary follows the readily recognisable boundaries of mostly residential properties on the edge of the village and a public footpath. The only possible change might be to include within the village the bowling green, upper village hall and tennis courts where there is an easily recognisable boundary that is likely to be permanent.

I am extremely disappointed that the council do not appear to be listening or supporting the local residents’ wishes, which was reflected when over 700 local residents signed a petition objecting to the proposed settlement boundary change last year. This issue has widespread support throughout the entire local community, with old and young, clubs and societies all uniting behind our passionate belief that these fields should be left as they are, outside the settlement boundary.
These fields contribute to the rather unique, open character of the village and lie at the heart of village life and our community facilities which are open for all to use. The elevation of this land is the highest in the area, rising to over 32 feet above Kings Road, and so any potential development on it would dominate the entire local area and tower over the local houses and village community facilities.

The proposal for ‘open space’ in the current version of the plan does not retain the same long term protection as if the fields were left as they are, both outside the settlement boundary and within the green belt. We know that developers have already been working on a plan to develop the land, so I therefore challenge why the council would then make the above proposed changes as this would then result in this precious land losing its protection and being open for development?

I appreciate the council are by this classification of ‘open space’ acknowledging that this land is of unusual significance to the entire village, but I would ask for your support in not making changes for the sake of it when the entire local community are united behind their desire to keep this attractive and open land protected, and the settlement and green belt boundaries left as they are in relation to these fields.

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

Attached documents:

Comment ID: PSLPP16/15400  Respondent: 8556161 / Alison Hubbard  Agent:

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

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

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the fields behind Shalford village hall being removed from the green belt and being included within the proposed settlement boundary.

I enjoy playing tennis at the Shalford tennis club with my friends and really like the fact that the open fields make the heart of the village feel like we are in the countryside, and not in a built up village.

Please do not move the green belt boundary or settlement boundary in the new version of the local plan- things are just fine as they are.

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

Attached documents:

Comment ID: PSLPA16/4436  Respondent: 8556385 / Guildford Residents Association, EGRA (Amanda Mullarkey)  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy I1: Infrastructure and delivery

and Appendix C- Transport infrastructure

This has been reviewed in detail by Richard Jarvis, a qualified civil engineer and expert in transport planning. His reports of the transport modelling and non road proposals are attached in Appendix 2. Also see comments on questions 1 to 3.

The transport infrastructure proposals are best summed up by “too little, too late”.

The Sustainable Movement Corridor is only shown as a concept. Its reliance on existing roads means its impact will need to be assessed and we do not have any indication of use. For example, will London Road traffic be deflected along Epsom Road and what will happen to queuing time at junctions for traffic that is not prioritised?

An appropriate site for a central bus interchange, so you can go in any direction from one point, has not been allocated.

There is no additional road bridge over the river and railway for our physically divided town.

We strongly welcome the Leader’s clear call that development should be contingent on infrastructure delivery and the policy that infrastructure should be available “when first needed”. However, policy I1 needs to be considered alongside the infrastructure proposals in Site Allocation policies A24, A25, A26 and A35 184-192, 211- 212 for strategic sites. These are discussed here to avoid duplication.

The following wording is of concern: “regard will be had to the delivery and timing of delivery of the key infrastructure requirements on which the delivery of the plan depends, set out in the Infrastructure Schedule in the latest Infrastructure Delivery Plan, or otherwise alternative interventions which provide comparable mitigation.”

We believe the weak wording “have regard to”, on which this policy hinges, needs to be tightened. Also the option of alternative mitigation could be used to justify a sticking plaster approach and to kick infrastructure provision into the long grass. We refer to our letter in Appendix 4 and the positive reply from the Council leader.

We are delighted to see reference to an A3 tunnel beyond the Plan period but we are concerned that land is not safeguarded for entrances or works areas. Even for projects within the Plan, it is not clear that all requisite land has been safeguarded (eg railways stations and sustainable movement corridor).

Object: Inadequate

[From appendices:]

Appendix 2: Transport Infrastructure Part 1 and Part 2

These reports, the first looking at highways and traffic, the second at transport other than the strategic and local road network, are prepared by Richard Jarvis BSc, MS, CEng, FICE, FCIHT.

Richard Jarvis is a retired planning and management consultant. He has many years’ experience as a transport planner, managing a wide range of projects in the UK and around the world. He led studies for highways, city planning and public transport. He has acted as an expert witness at public inquiries.
1. The highways network is under stress at peak times in many parts of the borough. Queueing is the daily experience of drivers going to and from work. The Plan recognises the problems in para 2.14. Much of the road network is single-carriageway, and junctions act as constraints.

2. The key evidence on future traffic conditions is provided in the Strategic Highway Assessment Report (SHAR) which summarises the results of the tests carried out by SCC at the request of GBC. Five scenarios were examined using SCC’s strategic traffic model. Scenario 1 contains all developments and planning permissions in the borough from 2009 to date. It represents today’s circumstances, with the addition of growth in traffic to 2031 outside the borough and in Waverley in line with their plan. The results for this scenario correspond to the current unsatisfactory traffic conditions in peak periods.

3. Scenario 5 represents the position at the end of the plan period, including all development and highways schemes in the Plan. The Scenario 5 results show that there will be widespread congestion in the morning peak hour across the network in 2031. The key strategic routes, the A3 through Guildford NE bound, and the M25 between Junctions 10 and 11 will be at or over capacity. The summary network statistics presented in the SHAR, while useful, require some interpretation because the analysis of vehicle-hours is derived from link speeds only, and does not reflect junction delays and queues. The tables that show the ratio of flow to capacity and level of service are especially helpful to gaining an understanding of the conditions on the network in the forecast. Where the forecast traffic volume is above or close to capacity, flow becomes unstable and there is congestion. The SHAR results provide evidence that congestion will be worse in 2031 than it is today on much of the network.

4. It is the case that the traffic modelling does not take into account the potential for increased use of other modes, but the trip rates used for developments already have built in the typical level of use of other modes, and services will be required to meet that need. It is also the case that the model does not allow for park and ride, which would improve matters in the town centre.

5. In order to gain an insight into conditions across the network, it is necessary to combine information from several tables in the SHAR. Table 4.5 shows that the M25 and A3 will be at capacity in Scenario 5. The other roads that will have poor levels of service include those in Table 4.5 but also those in 4.12 (except the A3), and those in Tables 4.3 and 4.4 with levels of service E and F that will not benefit from the improvement of the A3 in Scenario 5. Paras 4.10.3, 4 and 5 point out that there will be increased congestion. Given that the starting point is unsatisfactory, there can be no expectation that the schemes in the Infrastructure Development Plan will provide an overall improvement. There will be some local benefits, such as the Ash rail bridge for example, but in general conditions will be as bad and in many places worse. So the statement in the SHAR para 4.2.5 that ‘the combined mitigation as reflected in Scenario5...indicates that at the strategic level it accommodates the additional PSLP demand’ needs qualifying – ‘at the cost of a lot of queuing’.

6. The cumulative effect of the additional traffic generated by the developments in the Plan will be to increase congestion, even with the proposed highway schemes in place. More detailed analysis of the junctions and queuing is required. So we do not accept the conclusion that the developments would have ‘an acceptable impact on the capacity of the highway networks in terms of the policy test set in paragraph 32 of NPPF’.

7. Appendix 3 of the Transport Topic Paper shows the phasing of housing development and transport infrastructure. The major improvement scheme being studied by Highways England for the A3 between the A31 and the A320 is scheduled for delivery in the period 2023/24 to 2027/28. The strategic developments at Blackwell Farm and Gosden Hill Farm are shown as being phased in from 2021/22 onwards. The Garlick’s Arch development is shown as starting in 2019/20. Therefore there will be a period in which the existing A3 will have to carry additional traffic associated with those developments before extra capacity is provided.

The following comments regarding the strategic sites are taken from the SHAR:

- Blackwell Farm – there will be congestion at the A31 junction, and the problems at the Tesco junction, and the Egerton road /Gill Avenue junction (para 4.9.5). Traffic is likely to access the Surrey Research Park and the RSCH through the development (para 4.7.3)
- Gosden Hill Farm – there will be an increase in traffic through Burpham. There will be pressure on the A3100/B2234 roundabout (paras 4.7.6, 4.7.7 and 4.7.8)
Wisley Airfield—traffic will increase on minor roads to gain access to the A3 (N and S bound) and to other routes (para 4.7.11). The development will add more traffic to the A3. The Burntcommon slips help alleviate the traffic through Ripley according to the model, but queuing on the A3 could mean this does not happen (para 4.7.14)

Normandy/Flexford – the report has little to say about the impact of this large development. The increase in flow on Westwood Lane is noted (para 4.5.7). Tables 4.10 and 4.11 show junction delay reducing at the Westwood Lane, B3000 junction, but increasing at the Puttenham Hill/Millbrook junction

Ash – development in Ash is not specifically addressed, but there are large increases in traffic on a number of roads. The new rail bridge will bring relief (but traffic will move to the next junction)

Slyfield – there are no remarks relating to SARP, and as there are no additional trips shown in and out of the Slyfield residential zone in Tables 3.3 and 3.4, it is possible that this development has been omitted in error. There is a significant increase in trips to and from the Slyfield industrial zone, which will impact on the A320 and Clay Lane

Town Centre – the report has very little to say about the town centre. The model results forecast severe congestion on the approaches to the town centre, such as the A281, the A31 Farnham Road, and Woodbridge Road for example. There are no highway mitigation measures in the PSLP for the centre. In the Transport Strategy, GBC states that the intention is to adopt Allies & Morrison’s Scenario 2 which would have the effect of significantly reducing the capacity of the town centre road system. The implications have not been examined in the SHAR, but traffic using the A281 from Waverley, for example, would be affected. The PSLP does include a new park and ride facility at Gosden Hill and the Sustainable Movement Corridor, which is discussed in a separate note.

8. The PSLP does not state an objective for congestion. The two strategic objectives that are included for infrastructure refer to supporting sustainable development and delivering a balanced system. However, in para 2.15 there is an aspiration expressed about opportunities ‘to improve the performance of the road networks through transport infrastructure and service improvements’, which taken with the previous paragraph includes reducing congestion. The evidence so far shows that this will not happen.

9. The mitigation proposed is not sufficient to overcome the problems that will be caused by the level of growth in the PSLP. Congestion will worsen. The network will lack resilience and be vulnerable to disruption due to incidents. Minor roads will have to cope with a lot more traffic, to which they are unsuited. The model results show an increase of 47% over 2009 in Scenario 5.

Appendix 2: Transport Infrastructure Part 2

COMMENTARY ON THE PROPOSED SUBMISSION LOCAL PLAN AND TRANSPORT INFRASTRUCTURE — part 2

1. Appendix C of the Plan includes the following categories of transport infrastructure in addition to the Strategic Road Network and the Local Road Network which are discussed in a separate note:

- Park and Ride
- Sustainable Movement Corridor
- Bus Transport
- Active Modes

Each of these is considered below.

Park and Ride

2. There is one Park and Ride project in the Infrastructure Development Plan which is a new facility at Gosden Hill Farm. This is to be delivered by the developer of the site and the Transport Topic paper states that the intention is that it will operate without any public funding with 500-700 spaces. It is expected that the site will be use by drivers on the A3 southbound heading into Guildford town centre (TTP para 5.60). It is not clear how this ‘mitigates the traffic impact of the Gosden Hill Farm site’ (PLSP App C P&R1), though there could well be residents of the new development who may choose to use the P&R bus service. The Park and Ride facility is not related to the proposed new Merrow Station.

3. There is an absence of any park and ride proposal east of the town centre, which would surely benefit from one.
Sustainable Movement Corridor

4. This is an ambitious concept. Policy I3 in the Plan states that the SMC ‘will provide a priority pathway through the urban area of Guildford for buses, pedestrians and cyclists’. It will link the new developments in the west to those in the east via the town centre. It is estimated to cost £70-90m, with funding coming from developers and the Local Growth Fund. The recognition of the importance of sustainable travel is welcome. Connecting new developments to the town centre, as in the case of SMC1 and SMC2, is sensible, but the need for a ‘corridor’ is unproven.

5. The latest information on the project has been supplied in a paper ‘Progress Update on the SMC Scheme’ published by GBC on 6 June 2016. This explains that studies have been carried out for sections 1-5 of the proposed route, and further work is needed. The SMC will use existing roads for the majority of its length, so this means that it will affect the allocation of carriageway between road users. Two design formats have been identified, ‘type 1’ involving separate lanes for the SMC, and ‘type 2’ in which bus priority measures are introduced at congestion sections and interchanges. The majority of the route is likely to be ‘type 2’ according to Table 1 of the Progress Update. This will be challenging because the road width on several sections will limit what can be achieved without a major impact on other traffic.

6. The Plan states in para 4.6.24, that ‘journeys will be rapid and reliable by bus and safe and direct on foot and by bike’. The ability to deliver rapid bus services in peak periods has not been demonstrated. There has been no quantification of the potential demand to use the SMC. Securing funding from the Local Growth Fund requires an economic justification.

Bus Transport

7. There are two projects in the Plan relating to buses. The first is labelled ‘New Guildford town centre bus facilities’. This is essential and the absence of a site for a bus station in the Plan is a serious weakness. Delivering a focus for town centre bus services and the SMC surely should be a key feature of town centre planning. The improvement of bus connections to the station is also needed.

8. The second project is for bus/rail interchange at Effingham Junction station (or Horsley) is desirable if the Wisley Airfield development proceeds.

Active Modes

9. The schemes listed are welcomed.

Rail

10. There six projects listed in the Plan of which four will be delivered by Network Rail as part of their investment programme. The other two are the new stations, Guildford East and West, which will increase rail access to development sites, and the hospital in the case of the West station, and are to be welcomed for that reason.

11. The Plan does not deal with the fact that the Portsmouth/London main line is extremely busy in peak periods. Commuters from Guildford to London frequently have to stand, and this is in spite of longer trains having been introduced. Capacity is limited in the area between Surbiton and Waterloo and this is the focus of Network Rail investment (project NR5) that is scheduled to start in 2029. The growth proposed in the Plan for Guildford will undoubtedly mean more people will want to commute, adding to pressure on the congested services, in the period before the frequency of services can be increased.

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

Attached documents:

Comment ID: PSLPS16/8109  Respondent: 8556385 / Guildford Residents Association, EGRA (Amanda Mullarkey)

Agent:

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| A10: Sustainable Movement Corridor, off Walnut Tree Close |
| See comments under Questions 1 to 3 and transport policies |

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

**Attached documents:**

| Comment ID: PSLPS16/8110  | Respondent: 8556385 / Guildford Residents Association, EGRA (Amanda Mullarkey) |
| Agent: |
| Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A11 |

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| A11: Guildford Park Car Park |
| Welcome. Important to avoid overdevelopment and limit the height of development |

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

**Attached documents:**

| Comment ID: PSLPS16/8111  | Respondent: 8556385 / Guildford Residents Association, EGRA (Amanda Mullarkey) |
| Agent: |
| Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A21 |

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A21: Land at Westborough allotments

Welcome

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

Attached documents:

Comment ID: PSLPS16/8112  Respondent: 8556385 / Guildford Residents Association, EGRA (Amanda Mullarkey)
Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A24

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

Answer (if comment is on questions 1-7 of the questionnaire): ()

A24: Slyfield Area Regeneration Project

Welcome. Important to avoid overdevelopment and limit the height of development

See Appendix 4

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

Attached documents:

Comment ID: PSLPS16/8113  Respondent: 8556385 / Guildford Residents Association, EGRA (Amanda Mullarkey)
Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A25

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

Answer (if comment is on questions 1-7 of the questionnaire): ()

A25: Gosden Hill Farm

See comments on questions 1 to 3

Policy on green approaches needs strengthening

Land for A3 tunnel entrance and works areas needs safeguarding

See Appendix 4
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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

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

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

Answer (if comment is on questions 1-7 of the questionnaire): ()

A26: Blackwell Farm

See comments on questions 1 to 3

See Appendix 4

Oppose road development in the AONB

Policy on green approaches needs strengthening

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

Attached documents:

Comment ID: PSLPS16/8115  Respondent: 8556385 / Guildford Residents Association, EGRA (Amanda Mullarkey)
Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A32

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

Answer (if comment is on questions 1-7 of the questionnaire): ()

A32: Surrey Police Headquarters, Mount Browne

Object to erosion of AONB or removal from Green Belt

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

Attached documents:
| Comment ID: | PSLPS16/8116 | Respondent: | 8556385 / Guildford Residents Association, EGRA (Amanda Mullarkey) |
| Agent: | | | |
| Document: | Proposed Submission Local Plan: strategy and sites 2016 / Policy A33 |
| Do you consider this section of the document; complies with the Duty to Cooperate? | ( ) |
| is Sound? | ( ) |
| is Legally Compliant? | ( ) |
| Answer (if comment is on questions 1-7 of the questionnaire): | ( ) |

A33: The University of Law

Object to erosion of AONB or removal from Green Belt

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

Attached documents:

| Comment ID: | PSLPS16/8117 | Respondent: | 8556385 / Guildford Residents Association, EGRA (Amanda Mullarkey) |
| Agent: | | | |
| Document: | Proposed Submission Local Plan: strategy and sites 2016 / Policy A35 |
| Do you consider this section of the document; complies with the Duty to Cooperate? | ( ) |
| is Sound? | ( ) |
| is Legally Compliant? | ( ) |
| Answer (if comment is on questions 1-7 of the questionnaire): | ( ) |

A35: Land at former Wisley airfield

See comments on questions 1 to 3

See Appendix 4

Policy on green approaches needs strengthening

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

Attached documents:

| Comment ID: | PSLPS16/8118 | Respondent: | 8556385 / Guildford Residents Association, EGRA (Amanda Mullarkey) |
| Agent: | | | |
| Document: | Proposed Submission Local Plan: strategy and sites 2016 / Policy A43 |
| Do you consider this section of the document; complies with the Duty to Cooperate? | ( ) |
| is Sound? | ( ) |
| is Legally Compliant? | ( ) |
A43: Land at Garlick's Arch, Send Marsh/ Burnt Common

See comments on questions 1 to 3

Policy on green approaches needs strengthening

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

Attached documents:

Comment ID: PSLPS16/8119  Respondent: 8556385 / Guildford Residents Association, EGRA (Amanda Mullarkey)

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A46

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

Answer (if comment is on questions 1-7 of the questionnaire): ()

A46: Land to the south of Normandy and north of Flexford

See comments on questions 1 to 3

See Appendix 4

Policy on green approaches needs strengthening

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

Attached documents:

Comment ID: PSLPS16/8107  Respondent: 8556385 / Guildford Residents Association, EGRA (Amanda Mullarkey)

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A6

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

Answer (if comment is on questions 1-7 of the questionnaire): ()
**A6: North Street redevelopment**

Need to allocate land for an attractive all-direction bus interchange

Question mix of housing and retail

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

**Attached documents:**

<table>
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<th>Comment ID: PSLPS16/8108</th>
<th>Respondent: 8556385 / Guildford Residents Association, EGRA (Amanda Mullarkey)</th>
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**A7 Land at Guildford railway station**

Important to avoid overdevelopment and limit the height of development

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

**Attached documents:**

<table>
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<tr>
<th>Comment ID: PSLPP16/18102</th>
<th>Respondent: 8556385 / Guildford Residents Association, EGRA (Amanda Mullarkey)</th>
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<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy D1</td>
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<td><strong>Answer (if comment is on questions 1-7 of the questionnaire):</strong></td>
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**Policy D1: Making better places**

There is much to be welcomed in this policy and text.

4.5.5 and 3.5.6 We need a Local Plan Development Management Policies Document urgently. We will be vulnerable without development control and design policies in place. Can relevant policies in the 2003 Plan be saved, at least to fill the gap?

The policy to “provide convenient and safe routes through the development and to nearby areas for pedestrians and cyclists” is particularly welcome given experience of developers failing to provide this.
We warmly welcome the addition of promoting green approaches to 4.5.8 which reads “The relationship of the built environment to the landscape must be taken into account and the transition from urban to rural character will need to be reflected in the design of new development with the green approaches to settlements respected.”

However, this approach should go beyond respecting to promoting. We propose that green approaches – both soft green edges to settlements and greenery along roads into settlements - are such a valued, distinctive feature of Guildford that this should be in the policy itself to guide developers. For example, “green approaches to settlements and” could be inserted after “with” in the following:

“All developments will:...promote and reinforce local distinctiveness to create a sense of place, with green approaches to settlements and innovative architecture encouraged and supported in the appropriate context.” We suggest “and supported” is superfluous.

Green approaches to settlements are just as important as innovative architecture in Guildford. Promoting green approaches is a dynamic concept not a brake on development. It affects how you do things and applies equally well to the design of settlement extensions and to managing change in established areas. We rely so heavily on green approaches to shape change for the better at inquiries and when responding to applications. It will become more important during a period of growth if we want to retain the qualities that distinguish Guildford and prevent it being a “could be anywhere” town.

Monitoring Indicators

Again we are concerned to avoid perverse consequences, with the possibility of reluctance to refuse due to poor design to avoid the risk of unsuccessful appeals.

Object: seeking improvements

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

Attached documents:

Comment ID: PSLPP16/18101  Respondent: 8556385 / Guildford Residents Association, EGRA (Amanda Mullarkey)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E7

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

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy E7: Guildford Town Centre

“a new retail-led, mixed-use development of 45,000 sq m (gross) of additional comparison goods floorspace on the North Street regeneration site within its primary shopping area.”

We question the wisdom of expanding retail floor space on this scale given the demand from competing priorities in our constrained town and given the need to ensure resilience for the high street in the face of trends in retailing.

“approximately 1,172 new homes, particularly on upper floors as part of mixed use developments;”
Homes should not be confined to upper floors and care needs to be taken to ensure development heights are stepped to reflect the rise of the land. Extensive residential storeys, all on one level on top of large retail units, should be avoided.

Vision

The objective of giving pedestrians priority needs to be qualified. The extent of pedestrian areas needs to be tempered by the reality that Guildford is a crossing point in the downs and that its geography is not amenable to a ring road strategy that normally accompanies extensive pedestrianisation. If central roads are closed to through traffic, vehicles will be displaced to more residential and rural roads with unacceptable consequences. Further, steep slopes mean there is a requirement for access to transport along the length of the main shopping streets to help those who cannot cope with the gradients. This means you cannot adopt an approach of bus stops around the periphery of the retail area with no central interchange.

Object: See comments on questions 1 and 3.

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

Attached documents:

<table>
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<th>Comment ID: PSLPP16/18096</th>
<th>Respondent: 8556385 / Guildford Residents Association, EGRA (Amanda Mullarkey)</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy H1: Homes for all

4.2.1 We question the wisdom of adding you want to meet “demand”. For example, there has been demand by foreign investors for homes to be bought as an investment and left vacant.

“Development that results in the net loss of housing or specialist housing, including sites allocated for housing within the Local Plan will not be permitted.”

This should be qualified with “normally”. It will be necessary to be able to make adjustments to the number of homes given permission “in principle” or in outline where a site survey shows that the envisaged number of units cannot be accommodated without causing unacceptable impact (eg space is needed for sustainable drainage). Also, within the context that some town centre properties are changing from business to residential, it may be appropriate to make some changes from residential to business. In some instances, it may not be inappropriate for a house in multiple-occupation to be reinstated as a family home.

Density- Policy and Justification

We strongly welcome this approach with an overall presumption and decisions taken on what is appropriate on a case by case basis. This has been a game changer in enabling positive schemes in Guildford. Previous targets were too blunt to be
useful having no relevance where higher densities could be achieved and driving harmful schemes and avoidable appeals in those instances where a lower density was appropriate.

Students

“We expect 60 per cent of the University of Surrey eligible student population (full time equivalent) to be provided with student bedspaces and accommodation on campus.”

This percentage is far too low given the mix of pressures on Guildford as a university, London commuter belt and constrained gap town. We have a thriving University that is an engine for our economy and also for population growth. With that comes responsibility. We ask the University to provide far more campus accommodation making it attractive so 80-90% of their students will want, and expect, to live on campus. This will free up much needed affordable homes in the town. (See comments on Soundness and Annex 3)

Object: seek changes and inadequate

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

Attached documents:

Comment ID: PSLPP16/18103  Respondent: 8556385 / Guildford Residents Association, EGRA (Amanda Mullarkey)  
Agent: 
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy ID2

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

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy I2: Supporting the Department for Transport's "Road Investment Strategy"

We welcome inclusion of this policy although we consider the proposals inadequate to address the backlog of investment and future needs. Guildford should be a very cost beneficial place to invest.

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

Attached documents:

Comment ID: PSLPP16/18104  Respondent: 8556385 / Guildford Residents Association, EGRA (Amanda Mullarkey)  
Agent: 
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy I3: Sustainable transport for new developments

4.6.24 The Sustainable Movement Corridor will provide a priority pathway

The impact on non-prioritised users and knock-on effects for surrounding roads need to be assessed.

Object: Inadequate

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

Attached documents:

Comment ID: PSLPP16/18105  Respondent: 8556385 / Guildford Residents Association, EGRA (Amanda Mullarkey)
Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID4

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

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy I4: Green and blue infrastructure

We welcome this policy.

We propose that “slow the flow” and sustainable drainage schemes, intended to reduce flood risk, should be considered as also contributing to blue green infrastructure due to their wider benefits.

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

Attached documents:

Comment ID: PSLPP16/18098  Respondent: 8556385 / Guildford Residents Association, EGRA (Amanda Mullarkey)
Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P1

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

Answer (if comment is on questions 1-7 of the questionnaire): ()
Policy P1: Surrey Hills Area of Outstanding Natural Beauty (AONB)

We very warmly welcome improvements to this policy which better captures the importance and value of the AONB.

We further suggest the following clarifications to avoid ambiguity:

- It is most important that “promote its enjoyment by the community and visitors to the area” specifies “enjoyment of its special landscape qualities”.
- After “proposals will be assessed on their individual merits, add, “as to whether they are consistent with conserving and enhancing the special landscape qualities.”.
- The text should note that potential AONB will be based on landscape assessment by Natural England on behalf of the Minister and may include land not currently designated as AGLV.

We suggest the monitoring indicator is inappropriate. It should track absence of major development (which is in principle harmful to the statutory purpose even when deemed in the public interest) not avoidance of appeals. The currently proposed indicator could encourage the perverse behaviour of avoiding appeals.

Object: seeking improvements

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

Attached documents:

Comment ID: PSLPP16/18099  Respondent: 8556385 / Guildford Residents Association, EGRA (Amanda Mullarkey)
Agent:

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

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

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy P2: Green Belt

4.3.13, 4.3.15 and 4.3.16

Object: See comments on Questions 1 to 3,

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

Attached documents:

Comment ID: PSLPP16/18100  Respondent: 8556385 / Guildford Residents Association, EGRA (Amanda Mullarkey)
Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy P4: Flooding, flood risk and groundwater source production

We welcome this policy and ask that reference is made to the recently increased climate change allowances required when considering flood risk. In view of these, the encouragement given to reducing flood risk on sites that include 'developed' flood zone 3b (functional floodplain) should be strengthened.

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

Attached documents:

Comment ID: PSLPP16/18094  Respondent: 8556385 / Guildford Residents Association, EGRA (Amanda Mullarkey)

Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

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

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy S1: Presumption in favour of sustainable development

We appreciate that this is model wording. However, experience since this was first produced now shows that this wording is inadequate to communicate accurately to users of the Plan:

1) the concept of sustainable development including the five guiding principles
2) the policies in the NPPF as a vehicle for achieving sustainable development
3) the positive presumption in favour of sustainable development,

While fully appreciating that it is important the Local Plan does not duplicate the NPPF, the reasoned justification could usefully clarify the three components of policy S1.

Object: inadequate, unclear

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

Attached documents:

Comment ID: PSLPP16/18095  Respondent: 8556385 / Guildford Residents Association, EGRA (Amanda Mullarkey)

Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy S2: Planning for the borough - our spatial development strategy

“4.1.6 Our preference is to focus growth in the most sustainable locations, making the best use of previously developed land (including in the Green Belt if appropriate). “

Need to be clear that in Green Belt openness is the determinant. Hence, previously develop open land should not be preferred.

“4.1.8 Whilst these sustainable locations are our preferred locations for new development, they are unable to accommodate all of the new development we need. We will therefore release allocated land for development in other areas. “

This policy sequence moves too readily to allocating green field sites and omits to encourage efficient use of previously allocated land or initiatives to assemble brownfield sites. This reflects weaknesses, until recently, in the Council’s own approach. There is a risk the policy as drafted will also encourage developers to turn too readily to greenfield sites rather than to engage in redevelopment initiatives.

There are errors in the development need identified and the harmful consequences of meeting need have not been weighed in an appropriate assessment.

“13,860 new homes,” The OAN on which this is based is exaggerated.

“4.1.10 This is a higher level of development than experienced in Guildford borough during the previous Local Plan period, and represents an increase in new homes and employment floor space in line with the aims of NPPF, NPPG, our Economic Strategy, and the best available information on the likely levels of development required by 2033.”

Constraints have not been applied arising from an assessment weighing meeting needs versus harm. Need is exaggerated.

“4.1.12 Table 1 shows a number of new homes that is greater than the figure in the policy. This is to build flexibility into the plan and demonstrate that our strategy is capable of delivering the target. Further details of these and other sites are provided in the site allocations policy of the Local Plan.”

It in inappropriate to designate more land than required given the constraints.

Monitoring Indicators

There is no indicator to track the location of development and the objective that overall brownfield land will be developed first.

Object: departures from Green Belt policy including purpose 5, housing figure based on inaccurate and flawed assessment of need

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Comment ID: SQLP16/2059  Respondent: 8556385 / Guildford Residents Association, EGRA (Amanda Mullarkey)

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<th>Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents</th>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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

Strategic Housing Market Assessment

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

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

The current SHMA inflates the proposed housing figure due to

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

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

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

- even with a relatively strong pre ‘Brexit uncertainty’ economy, and using a stronger trend period than the one used by GLHearn for migration flows within the UK, the GLHearn OAN figure was too high.
- simply making a few post ‘Brexit uncertainty’ adjustments to economic and demographic need, as currently calculated by GLHearn, would not be an adequate response because their approach to the economic data is flawed and they have not corrected for large errors in the historical data on international migration,
- student flows should be better understood and separated out to avoid distortion of the forecasts and, especially given the significance of flows of international students in Guildford, separate modelling of the student population will become more significant in future.
NMSS has advised that the new projections issued on 12 July 2016 should make little difference in Guildford as the household formation rates on which they are based are not significantly different from the 2012-based set.

It is most disappointing that demographic and economic model assumptions have been withheld by GLHearn so that the whole process cannot be cross checked. This means the OAN taken from their SHMA cannot be substantiated.

**Green Belt and Countryside Study**

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

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

**Transport Evidence**

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

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

For more detail refer to Appendix 2.

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

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

Air Quality and Noise

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

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

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

Comment ID: SQLP16/2060  Respondent: 8556385 / Guildford Residents Association, EGRA (Amanda Mullarkey)

Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 2: Legal compliance

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

Answer (if comment is on questions 1-7 of the questionnaire): ()

GRA Comment: The Plan preparation process has had inadequate regard for national policy which attaches “great importance” to the “openness” and “permanence” of Green Belt. The test of “exceptional circumstances” that might justify allocating Green Belt land for development in a Local Plan has not been rigorously and transparently applied at a strategic level.

The Sustainability Appraisal seems to have lost sight of the concept of Sustainable Development as described in the National Planning Policy Framework to the extent that we question whether it complies with the requirement.

Green Belt

It is unacceptable to treat Green Belt as a readily available source of development land during Plan preparation, notwithstanding that this is the time when any boundary review deemed necessary takes place. Any such review should be mindful of the “great importance”, “openness” and “permanence” of Green Belt and take a long term perspective towards this planning mechanism.

The Mayor of London intends to respect London’s Green Belt boundary.

The test of “exceptional circumstances” that might justify allocating Green Belt land for development in a Local Plan has not been rigorously and transparently applied at a strategic level. Releasing Green Belt to fund infrastructure (eg “support delivery of A3 junction upgrades” or “facilitate delivery of new strategic infrastructure including a rail station, park and ride and a secondary school”) or to fully meet exaggerated need does not pass this test. Nor does building on open, previously-developed Green Belt.
Opportunities to channel development towards locations beyond the outer Green Belt boundary, linked to sustainable transport and the duty to cooperate, have not been adequately considered at a strategic level. This assessment should involve more than just looking at a small area of countryside within the borough immediately beyond the Green Belt boundary, or indeed the rather meaningless Housing Market Area.

In view of the extent of the Area of Outstanding Natural Beauty, Special Protection Area and Green Belt in Guildford Borough, which restrict the availability of land suitable for development, it is important that the potential for sustainable travel is considered. This needs to be balanced against the option of minimising distances between work and home which is usually treated as a more sustainable approach.

It is not credible to suggest the Green Belt is being treated as permanent when its boundary was changed as recently as 2003 as part of the last Local Plan review. Indeed, land released in 2003 is neither fully developed nor efficiently used. An approach of eroding the Green Belt at each Local Plan review without considering the bigger picture is not sustainable. Proposed erosion of Green Belt to development and “insetting” in this Plan should be put in the context of cumulative loss. Since the Metropolitan Green Belt was established, just over 6% has been lost (6.24%), noting that a modest proportion of Green Belt lost to “insetting” will be protected as open space in villages.

If there is a case for Green Belt development, this would need to have been proven through the application of policy. In addition, careful thought would need to be given to the pace at which Green Belt is developed using a long term reserve site approach. It would be unsustainable to release all potential last resort greenfield options within one plan period, denying future generations any such options.

The Green Belt and Countryside Topic Paper refers to the issue of Green Belt safeguarded for development. It suggests in paragraphs 4.64 to 4.71 that the Plan will not safeguard sites for future development because so little land can be identified and more strategic solutions will be required. It concludes that any further Green Belt development would result in ribbon development, a stretched urban area and merging of villages with the urban area*. In view of the fact that such ribbon development would be wholly unacceptable, the more strategic approach referred to in paragraph 4.70 is required now. The current Local Plan review should both constrain the overall scale of development in this Plan and also very carefully pace any releases deemed necessary over several generations.

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*4.68 “Given the limited central ribbon within which development could potentially occur, safeguarded land in Guildford would result in an unsustainable pattern of development. It would create an oblong-shaped urban area...”

4.69 “there will inevitably be a limit to the extent that Guildford urban area can expand before it would begin to merge with surrounding villages. This would have a detrimental impact on the character of the countryside and our rural communities.”

4.70 “…a more strategic approach to growth or protection will need to be considered, in cooperation with our neighbours.”

**Sustainability Appraisal**

The extent to which the current Sustainability Appraisal fails to test the sustainability of the spatial options in a meaningful way casts doubt over whether sustainability has been assessed. The report

- accepts the Council’s corporate objectives, which have not gone through proper consultation, as consistent with sustainable development when this has not been tested,
- treats various major development sites in Green Belt, contrary to the importance attached to protecting Green Belt, as “a given”,
- fails to consider options that constrain development or that make greater use of brownfield or previously-released greenfield land,
• focuses on a range of options that involve developing on even more Green Belt around Guildford in order to protect countryside around Woking
• does not consider environmental limits or impact on the next generation in terms of weighing demand for homes alongside the use of all possible last resort greenfield options by one generation.

The National Planning Policy Framework requires that objectively assessed needs should be met unless:

• “any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole;
• or specific policies in this Framework indicate development should be restricted.”

The specific policies described include several of particular relevance to Guildford including sites protected under the Birds and Habitats Directives, Sites of Special Scientific Interest, Green Belt, Local Green Space, Area of Outstanding Natural Beauty, designated heritage assets and locations at risk of flooding. In this situation, we do not consider it appropriate for the Appraisal to rule out not meeting needs in full from a sustainability perspective.

Notwithstanding that the Sustainability Appraisal should be proportionate, realistic, strategic, and look at significant matters, the assessment appears deficient and biased in the spectrum of alternatives it considers to the point that it is questionable whether it meets the requirements.

We note that the Government’s Local Plans Expert Group has advised (March 2016) that “Whilst we recommend significant reductions in other elements of the local plan evidence base…, we propose that a proportionate Assessment of Environmental Capacity should be an important part of plan making.” The group confirms that “Objectively assessed needs for all types of development are the starting point but it is then necessary for the authority to consider the extent to which the plan can meet those needs consistently with the policies of the Framework.” They continue, “Despite the clear test set by paragraph 14 of the NPPF, few authorities compile an assessment of the environmental capacity of their area, making it difficult for Planning Inspectors to apply the NPPF policy”. They go on to say “We recognise that the NPPF does not require authorities to meet the full identified need for development in all circumstances, even within the Housing Market Area, if there is insufficient environmental capacity but we encountered significant uncertainty about how the appropriate balance should be struck. We make recommendations to remove that uncertainty and to confirm the legitimacy of applying the tests set out in the NPPF to ensure that needs are met up to the point where the adverse effects of doing so can be shown to outweigh the benefit of meeting the need.”

An adequate Sustainability Appraisal, which considers environmental capacity alongside social and economic aspects of sustainable development, should enable reasonable alternative scenarios to be tested against environmental capacity. We suggest the alternative scenarios selected in the current Appraisal, ranging from fully meeting exaggerated need to also meeting all of Woking’s need that would be unmet due to the application of constraints, did not test a meaningful spectrum of options. Indeed, it seems bizarre to place such emphasis on developing Green Belt in Guildford to protect countryside in Woking.

The Expert Panel was concerned at the number of authorities that cannot demonstrate soundness because they have constrained development without adequately testing the point at which adverse effects of meeting need can be shown to outweigh the benefit of doing so. The concern is that Guildford has gone the other way: it has been so eager to get the Plan through that it has failed to give sufficient weight to harm to the environment from fully meeting need, such that it proposes an inadequately tested option that would constitute unsustainable development.

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

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

Answer (if comment is on questions 1-7 of the questionnaire): ()

GRA Comment: It is unsound and unsustainable to develop on the scale proposed. The overall housing target (13,860 new homes) and 40% increase in retail space should be reduced to take account of the constraints of our gap town and growth in online retailing. Opportunities to provide greater accommodation on campus for university students, to provide more homes as part of the North Street development, to plan the river corridor achieving flood risk betterment, to promote sustainable commuting and to open up access across the railway for our physically divided town have not been considered positively.

We do not consider that the proposed housing target of 693 homes a year is soundly based, notwithstanding the intention that this should be skewed to later in the Plan period or the aspiration that this should be linked to timely delivery of infrastructure. We are also concerned that a target of “about 695” homes a year and a focus on strategic sites in the Green Belt were suggested very early in the Plan-making process and we would be concerned if the Plan had been prepared around these working assumptions.

Green Belt and Sustainability

The Council’s case set out in the Green Belt and Countryside Topic Paper paragraph 4,62, is as follows: “We consider that in general terms there are exceptional circumstances that justify the amending of Green Belt boundaries in accordance with the NPPF, paragraph 83. Our evidence base identifies a high level of need for market and affordable housing (including traveller accommodation) and employment. Given the extent of Green Belt across the borough (89 per cent) and the lack of sufficient suitable and deliverable sites located outside the Green Belt, to not amend boundaries would lead to a significant undersupply of homes compared to the identified needs – approximately half. The consequences of this within Guildford would be to exacerbate the existing affordability issues and have an adverse impact on economic growth in the area, which would lead to unsustainable commuting patterns. Each addition or removal to the Green Belt is also separately considered above and in the Housing Delivery topic paper.”

We do not accept this assessment.

- The NMSS SHMA review indicates that the evidence base exaggerates the level of housing need and that the employment housing need assessment is flawed. Increasing housing supply beyond the level suggested by the demographic OAN would not have a discernible effect on affordability but simply mean more people who can afford high prices moving to the area.
- We submit that the economic need should be tested on a sector by sector basis and that the priority given to retail expansion should be questioned.
- Suitable deliverable alternatives, such as significantly increasing campus accommodation, thereby freeing up homes in the town, and provision of more homes on North Street in lieu of a 40% increase in retail, have not been pursued.
- Options for meeting revised need in larger settlements beyond the outer Green Belt boundary linked to sustainable transport have not been fully explored.
- The option of not fully meeting needs in recognition of constraints, including Green Belt, has not been balanced against the positive and negative consequences of fully meeting need (as revised) as should happen in a meaningful Sustainability Appraisal that takes account of environmental capacity.
- Commuting by sustainable means, especially in the context of the current high levels of inward- and outward-commuting, should not be dismissed as an unsustainable option in all the circumstances.
- It would be irresponsible and unsustainable to use up all potential least-worst, last resort Green Belt sites within one plan period.
- High-added-value, knowledge-based businesses and homes should be given priority over expansion in retail land.

Constraints
Guildford is physically constrained being a gap town set in the Surrey Hills AONB and in Metropolitan Green Belt. Significant parts are affected by the Thames Basin Heath Special Protection Area. There are also notable areas of river, surface water, groundwater and sewer flood risk. Constricted road and rail routes converge to cross the downs seeking to avoid both high ground and floodplain. These compete with housing for land and there is no space for road widening or a conventional ring road approach. High rise buildings would be inappropriate due to the important contribution views and the rise and fall of the land make to both urban and rural character, including the nationally significant Surrey Hills AONB. The river and railway divide the town and there are too few crossing points; a further constraint. Air quality and traffic noise are not insignificant considerations in some locations.

The Local Plan process envisages that the housing target should be lower than the “objectively assessed need” if there are valid constraints. GRA considers it would be harmful to rural, suburban and urban character, quality of life and the economy of Guildford not to reduce the new housing units delivered by 2033 to a number significantly below 13,860. We submit it would be counter to sustainable development as a whole (in particular to living within environmental limits and achieving a sustainable economy) and contrary to policy to develop on the scale currently proposed. We are concerned that insufficient attention has been paid to cumulative impacts with constraints considered separately for each site.

Transport infrastructure is also a constraint. Current congestion is severe by any meaningful definition and there is a backlog of infrastructure investment. Assessment of the very late and incomplete transport evidence by expert, Richard Jarvis, using the information made available to date, indicates that the overall effect of completing the proposed schemes and development in the Plan would be congestion to a level that makes it hard to conclude that the test in paragraph 32 of the NPPF is passed. See extract below and Appendix 2. Any notion that building 13,860 homes is going to deliver infrastructure that will overcome Guildford’s traffic problems seems misguided.

“The cumulative effect of the additional traffic generated by the developments in the proposed submission local plan will be to increase congestion, even with the proposed highway schemes in place. More detailed analysis of the junctions and queuing is required. So we question the conclusion that the developments would have “an acceptable impact on the capacity of the highway networks in terms of the policy test set in paragraph 32 of NPPF”.”

“The mitigation proposed is not sufficient to overcome the problems that will be caused by the level of growth in the proposed submission local plan. Congestion will worsen. The network will lack resilience and be vulnerable to disruption due to incidents. Minor roads will have to cope with a lot more traffic (47% more than in 2009), for which they are unsuitable. “

In view of the extent of physical constraints, protective designations and congestion, it is likely that even a more accurate, lower OAN housing target would need to be constrained.

We submit that Guildford BC should:

- revise the SHMA to make corrections and to better account for student need
- undertake a proper assessment of constraints, informed by a strategic Green Belt review and a Sustainability Appraisal that tests environmental capacity and considers meaningful alternatives to establish an appropriate balance between adverse effects and fully meeting (revised) need
- test the transport evidence that should inform the plan and which points to congestion.

Any housing figure adopted in the context of considerable uncertainty would need to be kept under regular review.

If any land releases were deemed necessary following a rigorous, strategic and accountable approach to Green Belt review, these should be measured and paced, arising from a robust assessment of the balance between benefits and adverse effects, taking full account of environmental capacity.

Guildford has not currently provided the evidence to derive a housing figure arising from such a process. It is notable that Woking has proposed constraining its OAN by 50%.

In Guildford, if one uses a revised OAN of 10,200 over 20 years (510pa) and assumes no Green Belt development and that 50% of need can be met through positive initiatives in the town, this results in a target of 255 homes pa which would be below the previous target of 322pa. This reinforces the extent to which Guildford is constrained. This would be broadly
consistent with the urban capacity assessment undertaken for the last Surrey Structure Plan and with the concern about the risk of town cramming in Guildford identified in the SE Plan.

If one uses a revised OAN of 10,200 over 20 years (510pa) and assumes 20% of all last-resort Green Belt land is released to development in each of the next three Plan periods, this results in a target of 340pa for the current 20 year Plan period.

More strategic solutions, such as development beyond the Green Belt linked to sustainable commuting or a tunnel for the A3, are required now. They cannot be left until the next Plan period as proposed.

**Neglected Opportunities**

A more sound and sustainable approach to planning positively in Guildford should include greater emphasis on the following:

- **Campus accommodation:**

  Higher priority should be given to providing attractive campus accommodation so a very high proportion of university students will want to live on campus thereby freeing up affordable homes in the town. Significantly, this could deliver homes within the challenging first five year period of the Plan.

There has been some late progress towards meeting the modest 60% student accommodation target agreed in the previous 2003 Plan as a result of residents expressing concern at the lack of progress in meeting the undertakings. However, the opportunity to increase significantly the proportion of university students attracted to live on campus has not been pursued. Neither nostalgia by decision makers for student days spent living in shared houses in the town, nor eagerness by the University to support a case for development on Blackwell Farm, should deflect attention from the opportunity to free up homes in the town for use by others. Nor is it adequate to reject the possibility of increasing campus accommodation by saying the percentage is at the higher end compared with other tertiary institutions or to be sceptical about uptake and funding. We need to plan positively to find sustainable ways to sustain a thriving university in a constrained, commuter belt gap town.

Appendix 3 provides more information on the opportunity.

- **Flood risk:**

  Higher priority should be given to work on integrating flood risk management and development in the town centre. The 2014 Draft Local Plan failed to include a Flood Risk policy and was not informed by a flood risk sequential test or Level 2 Strategic Flood risk Assessment. Subsequent application of the necessary tests has resulted in some residential allocations being removed and some zone 3 non-residential allocation proposed under the exception test.

Overall, progress has been painfully slow in planning positively along the river corridor in a way that achieves flood risk betterment and also enhances the natural and built environment. Time was lost with a first iteration Town Centre Master Plan that paid insufficient attention to the significant flood risk. The margin required for climate change reinforces the importance of factoring in flood risk and moving away from the old approach of seeking to justify development in even the functional zone 3 floodplain.

- **Sustainable commuting:**

  Far more attention should be given to the potential for enabling sustainable commuting recognising that Guildford has a high-value-added economy in a constrained gap town location. Rather than destroying the qualities that underpin the town’s economic success by overdeveloping, the scope for making it easy and affordable to commute by sustainable means from less constrained settlements should be pursued as a priority, both for the short and long term.

The context is that levels of both inward and outward commuting are extremely high. Almost half the working population commutes out to work and almost half of the workforce commutes in. In many households, occupants work in different locations and people do not necessarily move when they change jobs. In 2001, more people commuted out to Rushmoor than vice versa and more commuted in from Waverley than vice versa.
In a Guildford context, the aspiration that more people should live where they work needs to be balanced with other sustainability considerations.

- **All-direction, central bus interchange:**

Failure to identify a central location, and to allocate appropriate land, for an attractive all-direction bus interchange in the town is a grave failing that undermines the soundness of the Plan and should be addressed as a matter of urgency. A central interchange is needed in view of levels of congestion, the gradients involved in town centre journeys, the limited options for crossing the railway and river, and the need to provide sustainable transport options to support complex commuting and travel patterns.

- **Town centre plan:**

**Better progress, and a more joined up approach, in town centre planning is required.** The slow pace has meant opportunities for coordinated brownfield development are not available as part of this Plan. The need to have brought forward town centre options in a timely way should have been foreseen. Guildford had already used up its green field sites within its Green Belt boundary by the time of the 2003 Local Plan.

It is a problem that Guildford BC has chosen to tackle the town centre after the Plan via an Area Action Plan in which it intends to incorporate Scenario 2 from the Allis & Morrison /Arup proposals that will reduce highway capacity in the centre. This prevents joined up planning. For example, the Plan should face up to the implications of constraints being applied to roads such as the A281, A31 and A322.

- **New cross-town road bridge:**

An additional bridge over the river and railway is required to improve connections across the railways and river for our physically divided town. We want to see the townscape improved, with better use of the river. Achieving this, while maintaining accessibility, will be much easier with a new crossing.

**Sustainable Choices**

Given the scarcity of land arising from being a constrained gap town, the Plan should consider a wider range of sustainable strategies than simply expanding across the board.

- **Balance between retail expansion and town centre homes**

The Plan should weigh the case for a 40% increase in retail space, especially given trends in internet shopping, with the opportunity to provide accessible and sustainable town centre homes. Increased town centre housing provision for the elderly could also have the beneficial knock-on effect of freeing up existing family homes. All types of town centre housing would help support the evening economy.

The wisdom of such massive retail expansion, on top of already generous retail provision, needs to be challenged in view of the fate of the high street in many places. The mix of homes and retail, with its relatively low added-value, in the North Street development should be reconsidered. Residents were dismayed that the Bellerby theatre site was used for yet another supermarket rather than primarily homes.

- **Balance between high-value-added, knowledge-based economy and retail expansion**

Similarly, the mix between land allocated to the high-value-added, knowledge-based economy in the town and to retail expansion should be carefully reviewed. Knowledge-based enterprises yield returns between 3 and 4 times greater than retail.

**Planning ahead**

In order to deliver sustainable development, it is important to plan ahead. Sites for entrances and, in the shorter term construction areas, for an A3 tunnel through Guildford should be safeguarded. Land should also be allocated for more immediate projects such as an additional crossing over the railway for local journeys.
We welcome the approach adopted by local councils in Surrey of working together based on Memoranda of Understanding, although we note that neighbouring Waverley has not signed.

We are concerned that the Strategic Housing Market Area is not meaningful and omits nearby communities in Hampshire, such as Rushmoor, that are very important for planning housing, employment and transport in Guildford. Further, a strategic approach to Green Belt planning and commuting requires cooperation with more distant communities with transport and economic links. Aldershot, Frimley and Portsmouth are all relevant to Guildford.

Within the somewhat arbitrary Strategic Market Area, differences in approach have a distorting effect, as seen in Guildford’s Sustainability Appraisal.

Several large developments are proposed in neighbouring Plans that would have a very significant effect on Guildford and it is of concern that the impact of these has not been specifically addressed as part of Guildford’s Local Plan process.

There is no discussion in the transport papers about the traffic generated by Dunsfold or Cranleigh wanting to use Guildford’s roads. For example, the A281 is forecast to be far over capacity at Millbrook. Guildford BC is saying, in its views on the Town Centre Master Plan and the Transport Strategy, that it wants to opt for Scenario 2 which means a reduction of say 30% in capacity. So what will happen to traffic from Waverley that wants to go to the hospital or University? Will it try using the B3000? This does not appear to have been thought about.

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

Attached documents:
Guildford Residents Association (GRA) has

- engaged positively in the Local Plan process from the outset,
- agreed “Aspirations for Guildford” and Local Plan consultation responses with the support of 26 Residents Associations and four Parish Councils,
- encouraged and supported residents to participate in the Plan-making process
- through contributions from residents groups, raised funds to commission an expert to review the SHMA, and
- drawn on the knowledge of environmental, planning, engineering, flood risk management, economic, commercial and transport experts to inform its contributions.

GRA does not consider the Plan to be sound for the reasons set out and we wish to make the case for changes we consider necessary to achieve this. These concerns, which relate to the overall approach, manifest themselves in policy throughout the Plan. Hence, our interest is overarching rather than confined to specific issues.

We would like to participate in all matters at the inquiry on behalf of the many residents who have worked together to establish a collective voice through the GRA. We would also like to be accompanied by an expert witness for the SHMA and for transport-related matters.

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

Attached documents:

Comment ID: SQLP16/2064  Respondent: 8556385 / Guildford Residents Association, EGRA (Amanda Mullarkey)
Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 7: Any other comments?

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

Answer (if comment is on questions 1-7 of the questionnaire): ()

Residents wish to register concern and disappointment at the poorly judged decision to produce, promote and spend public money on a film to represent the views of “some residents”. A number of those “residents” represent institutions that have interests in proposed development that were not declared. There was no attempt to achieve balance. The film was inconsistent with the fair approach proposed in the Statement of Community Engagement. Use of the video on the Local Plan homepage could bias the Regulation 19 consultation. The suggestion that housing proposed will make a material difference to affordability or that congestion will be solved by development is to be tested. Indeed, the traffic evidence was not available when the video was produced and some of the data needed to assess congestion is not yet available.

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

Attached documents:

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

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

Answer (if comment is on questions 1-7 of the questionnaire): ()

Our vision and ambition

Strategic Objectives

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

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

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

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

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

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

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

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

Attached documents:

Comment ID: pslp173/655  Respondent: 8556385 / Guildford Residents Association, EGRA (Amanda Mullarkey) Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Appendix C: Infrastructure Schedule

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

Answer (if comment is on questions 1-7 of the questionnaire): ()

SRN1 and SRN 6 should be reinstated.

The addition of LRN 23, LRN24 and LRN25 is supported.

The funding sources for many of the Local Road Schemes have been changed to ‘Developer’ only. The highway authority, SCC, is not proposing any schemes of its own. Is this due to lack of funds, or a belief that nothing more is needed?
The addition of BT5 and BT6 is supported

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

Attached documents:

| Comment ID: | pslp171/2583 | Respondent: | 8556385 / Guildford Residents Association, EGRA (Amanda Mullarkey) |
| Agent: | Document: | Proposed Submission Local Plan: strategy and sites 2017 / Key facts |
| | Do you consider this section of the document; complies with the Duty to Cooperate? | ( ), is Sound? | ( ), is Legally Compliant? | ( ) |
| | Answer (if comment is on questions 1-7 of the questionnaire): | () |

Key facts about the borough

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

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

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

Attached documents:

| Comment ID: | pslp172/4274 | Respondent: | 8556385 / Guildford Residents Association, EGRA (Amanda Mullarkey) |
| Agent: | Document: | Proposed Submission Local Plan: strategy and sites 2017 / Policy A21 |
| | Do you consider this section of the document; complies with the Duty to Cooperate? | ( ), is Sound? | ( ), is Legally Compliant? | ( ) |
| | Answer (if comment is on questions 1-7 of the questionnaire): | () |

Welcome

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

Attached documents:
Welcome. Important to avoid over development and limit the height of development
Policy on green approaches needs strengthening

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

Attached documents:

See comments on questions 1 to 3
Policy on green approaches needs strengthening
Land for A3 tunnel entrance and works areas needs safeguarding

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

Attached documents:
Question mix of housing and retail

Remain concerned at extent of proposed expansion of retail floor space. Delete minimum retail requirement. Could be residential and high tech hub.

Research shows millennials buy online and want a retail experience that requires less retail and stock floor space.

Welcome caveat re bulk but strong concern about bulk and massing and loss of bus interchange with no appropriate facility or alternative location being identified.

Sustain objection – loss of bus interchange

Need to allocate land for an attractive all-direction bus interchange

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

Attached documents:

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Comment ID: pslp171/2596  Respondent: 8556385 / Guildford Residents Association, EGRA (Amanda Mullarkey)

Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy D1

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

Answer (if comment is on questions 1-7 of the questionnaire): ()

We oppose the proposed deletion of the last paragraph of D1. Getting design and character right in larger schemes will be as important for the economy of Guildford as broadband.

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

Attached documents:

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Comment ID: pslp171/2597  Respondent: 8556385 / Guildford Residents Association, EGRA (Amanda Mullarkey)

Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy D4

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

Answer (if comment is on questions 1-7 of the questionnaire): ()
The policy itself should include promoting “green approaches”, which should apply to arterial routes into and through settlements not just to the outer edges of settlements. This feature is part of local distinctiveness in the borough.

The proposed monitoring target does not work. It will have the perverse consequence of discouraging opposing insensitive development to avoid appeal. Suggest annual assessment of indicators by a borough design panel.

If there is a desire to avoid duplication and bring all design, density and character policy into one place, it is suggested the sequence is changed so D4 becomes D 2. This would assist a user of the Plan to follow the logic more clearly. The linkage between D4 (as currently labelled) and D1 should be made clearer. The expectation larger schemes will apply both policies should also be clearer.

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

Attached documents:

Comment ID: pslp171/2592  Respondent: 8556385 / Guildford Residents Association, EGRA (Amanda Mullarkey)
Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy E2

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

Answer (if comment is on questions 1-7 of the questionnaire): ()

4.4.15 We sustain our objection to directing development to locations within 500m of a public transport interchange while the list includes stations in residential, school and rural areas (eg London Road, Merrow (ref 4.4.16), West Horsley) unless there is clear guidance on the need to respect character and consider other impacts. We suggest these stations are moved to an expanded version of 4.4.17

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

Attached documents:

Comment ID: pslp171/2593  Respondent: 8556385 / Guildford Residents Association, EGRA (Amanda Mullarkey)
Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy E6

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

Answer (if comment is on questions 1-7 of the questionnaire): ()
Welcome stronger link to environmental character.

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

Attached documents:

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**Comment ID:** pslp171/2594  **Respondent:** 8556385 / Guildford Residents Association, EGRA (Amanda Mullarkey)  
**Agent:**  
**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy E7

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

Answer (if comment is on questions 1-7 of the questionnaire): ()

Even with the revisions, we question the wisdom of expanding retail floor space on this scale given the demand from competing priorities in our constrained town and given the need to ensure resilience for the High Street in the face of trends in retailing.

The retail allocation for North Street has not been reduced sufficiently to accommodate the desirable increase in housing. Six storeys along North Street, as required to achieve the proposed quantum of mixed use development, would have a harmful effect. The retail element should be reduced further, shops developed along North Street, a bus interchange retained and the potential for some flexible high tech business space considered.

Our previously stated concerns stand.

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

Attached documents:

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**Comment ID:** pslp171/2587  **Respondent:** 8556385 / Guildford Residents Association, EGRA (Amanda Mullarkey)  
**Agent:**  
**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy H1

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

Answer (if comment is on questions 1-7 of the questionnaire): ()

Net Loss - We oppose the proposed changes to H1 (2) as too inflexible. Exceptional circumstances will arise.

Density - We oppose the deletion of the section on density although we considered the last sentence on the town centre to be superfluous. We consider this section worked well as part of a policy that also looks at the range of types of home needed. The approach of an overall presumption in favour of efficient use of land and decisions taken on what is appropriate on a case by case basis has been very helpful locally in enabling positive schemes in Guildford. Previous
targets were too blunt to be useful having no relevance where higher densities could be achieved and driving harmful schemes and avoidable appeals in those instances where a lower density was appropriate.

Student Accommodation – We oppose the proposal that only 60% of “full time Guildford based” students should be on campus rather than of all students. In practice, this means far fewer than 60% which is already far too low given the challenges of identifying acceptable sites in Guildford. Change in this policy to at least 80% on campus would make a significant difference to affordable housing availability for others in the town and could transform Guildford’s ability to meet its housing need in the first five years.

Paragraph 4.2.3 This break down cannot be ‘known from the SHMA’ given the demographic and economic need errors.

Paragraph 4.2.8 We oppose deletion of this text which enables developers to appreciate the links between housing type and density when identifying an appropriate mix for a site. It supplements the NPPF well.

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

**Attached documents:**
4.6.18 We are troubled reference to an A3 tunnel beyond the Plan period has been deleted and that land is not safeguarded for entrances or works areas.

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

Attached documents:

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Comment ID: pslp171/2602  Respondent: 8556385 / Guildford Residents Association, EGRA (Amanda Mullarkey)

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy ID3

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

Answer (if comment is on questions 1-7 of the questionnaire): ()

The change from ‘will expect’ to ‘will be required’ in point (2) is supported. The similar revised wording in point (7) is also supported.

The lack of specificity about the Sustainable Movement Corridor makes it difficult to make an informed comment on point (3).

It is very likely that the claims made for the SMC exceed what can be delivered, and the plan should be based on realistic forecasts and a sound business case.

Para 4.6.24 states the aim and means of implementing the SMC. The provision of the corridor should be ‘subject to a sound business case’.

We oppose the very open-ended new policy on new public car parks without assurances on design and character or clarity on whether this relates to expansion of existing or conversion from another use. Interceptor car parks could be close to residential areas or landscape features and not all sites will be suitable. They could require careful siting and design.

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

Attached documents:

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Comment ID: pslp171/2606  Respondent: 8556385 / Guildford Residents Association, EGRA (Amanda Mullarkey)

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy ID4

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

Answer (if comment is on questions 1-7 of the questionnaire): ()
The introductory text has improved a little but the policy itself remains inadequate and lacks the joined up thinking required. The policy launches straight into “biodiversity” obligations.

We welcome the proposed SPD to set out opportunities and shape delivery of integrated multifunctional Blue Green Infrastructure.

We propose that “slow the flow” and sustainable drainage schemes, intended to reduce flood risk, should be considered as contributing to blue green infrastructure due to their wider benefits.

The addition of 4.6.49a is out of place here. It puts inappropriate focus on a specific proposal. It is already covered by national policy so an application can be considered with reference to this. Planners are well placed to balance and weigh different policy objectives when considering any application where the public interest requires a trade-off. Once you start referring to specific proposals in plan policies, where do you draw the line? Legitimate transport or health or flood risk management needs?

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

Attached documents:

Comment ID: pslp171/2588  Respondent: 8556385 / Guildford Residents Association, EGRA (Amanda Mullarkey)

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P1

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

Answer (if comment is on questions 1-7 of the questionnaire): ()

We welcome inclusion of AGLV and the clarification of this policy apart from two issues:

• the addition “as designated on the Policies Map”. Natural England is the designating body not GBC and it has emerged that there are errors in the boundary used by GBC in the 2003 Local Plan. We propose deletion of this reference or reference to the statutory map.
• the need to add “and views” at the end of P1 (2).

Paragraph 4.3.10 could usefully refer to the importance attached to:

• conserve wildlife, historic objects or natural phenomena within it
• promote its enjoyment by the community and visitors to the area
• support the rural economy of the Surrey Hills area
• provide or maintain public access to the AONB.

These are enduring features, if not statutory purposes, that will survive any update of the Management Plan. Development will benefit from this steer.

We sustain our objection to the Monitoring Indicator which could encourage the perverse behaviour of avoiding appeals.

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

Attached documents:
Comment ID: pslp171/2589  Respondent: 8556385 / Guildford Residents Association, EGRA (Amanda Mullarkey)
Agent:

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

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

Answer (if comment is on questions 1-7 of the questionnaire): ()

See comments on evidence.

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

Attached documents:

Comment ID: pslp171/2590  Respondent: 8556385 / Guildford Residents Association, EGRA (Amanda Mullarkey)
Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy P4

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

Answer (if comment is on questions 1-7 of the questionnaire): ()

We welcome addition of the new climate change allowance.

We ask for policy on developed Zone 3b floodplain to, where possible, encourage the layout of development within a site to be changed to reduce the footprint within the functional flood zone and to make more space for water. Currently, the policy reinforces existing layout (albeit with reference to an assessment).

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

Attached documents:

Comment ID: pslp171/2591  Respondent: 8556385 / Guildford Residents Association, EGRA (Amanda Mullarkey)
Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy P5

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

Answer (if comment is on questions 1-7 of the questionnaire): ()
In 4.3.50c, it should be clear that mitigation requires a new opportunity for recreation in natural greenspace or an improvement to the natural qualities available to be enjoyed in an existing green space. It is not acceptable to repackage, overly manicure or introduce intrusive recreational features in an area of natural beauty already enjoyed by the public.

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

**Attached documents:**

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**Comment ID:** pslp171/2585  **Respondent:** 8556385 / Guildford Residents Association, EGRA (Amanda Mullarkey)

**Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy S1

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

**Answer (if comment is on questions 1-7 of the questionnaire): ( )**

We welcome the additions to 4.1.1 and 4.1.4

4.1.2a The three pronged approach is how the objective of sustainable development is achieved not a definition. It is important to use the definition as agreed for the NPPF relating to meeting needs without compromising future generations and the five guiding principles.

You could also refer to the Government’s commitment for this generation to leave the environment better than it inherited it.

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

**Attached documents:**

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**Comment ID:** pslp171/2586  **Respondent:** 8556385 / Guildford Residents Association, EGRA (Amanda Mullarkey)

**Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy S2

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

**Answer (if comment is on questions 1-7 of the questionnaire): ( )**

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

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

We welcome the realism that some sites will not be able to deliver until later in the plan period and the link to infrastructure. However, we do not accept that many of the sites in the SHLAA are appropriate for development.
Constraints have not been applied arising from an assessment weighing meeting needs versus harm. Need is exaggerated.

It is inappropriate to propose a large development buffer given the constraints.

**Monitoring Indicators**

There is no indicator to track the location of development and the objective that overall brownfield land will be developed first.

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

**Attached documents:**

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

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

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

**Answer (if comment is on questions 1-7 of the questionnaire):** (No)

**Question 1: The evidence base and submission documents**

**West Surrey Strategic Housing Market Assessment: Guildford Addendum Report 2017**

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

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

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

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

**Executive Summary**
i. This report reviews key elements of GL Hearn’s report, “West Surrey Strategic Housing Market Assessment: Guildford Addendum Report 2017” that relate to Guildford’s objectively assessed need for housing (OAN). It follows up an NMSS report in June 2016 on the aspects of the West Surrey SHMA that related to the Guildford OAN.

Producing projections for Guildford is challenging due to the large number of students and errors in the historical data

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Housing Delivery Topic Paper

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

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

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

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

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

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

From paragraphs 4.39 on Green Belt, please refer to our comments in the Green Belt topic paper.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents: [Review of GL Hearn's Guildford Addendum to the West Surrey SHMA Final SV.pdf](#) (1.2 MB)

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

Answer (if comment is on questions 1-7 of the questionnaire): ()

**Green Belt Topic Paper**

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

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

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

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

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

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

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

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

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

Amending Green Belt boundaries

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

Exceptional Circumstances

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

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

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

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

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

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

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Answer (if comment is on questions 1-7 of the questionnaire): ()
Transport Evidence and Submission Documents

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

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

Evidence on bus travel is fundamentally compromised because there is still no clear and workable location for a bus interchange to inform the evidence, policies and sites and to provide a basis from which bus routes can be planned.

More generally, uncertainty over transport planning for the town centre continues to be a problem. The Plan does not adequately address the traffic issues in the town centre including a route for a new bridge connecting the town across the railway to maintain accessibility and to provide greater resilience in this key part of the road network.

The following comments are provided by transport expert Richard Jarvis.

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

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

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

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

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

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

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

With regard to the comments on Policy A6: North Street redevelopment (page 9), the model used for the Strategic Highway Assessment is not sufficiently detailed to provide a satisfactory assessment of conditions on the town centre road network. This has been recognised by GBC and has led to the commissioning of more detailed analysis using a simulation model. Added to which, there is uncertainty over the highway capacity implications of the Sustainable Movement Corridor in the town centre and possible changes to the town centre gyratory, as discussed in the draft Town Centre Regeneration Strategy, which indicates that the intention is to reduce the capacity of the town centre network. The experimental closure of Walnut Tree Close is already being planned. Taking into account the demand forecast on the A281, the A322 and A31 in Table 4.12, the consequences of such a reduction will be far-reaching.
Policy A26: Blackwell Farm has been amended and now the proposed development includes a secondary school with up to six form entry. This will add to morning peak hour traffic which was not included in the 2016 modelling. The SHAR findings indicate that there will be congestion in peak periods on the network that will serve this development. The A3 will be at or over capacity which means that the network will lack resilience, as it does today. The roads connecting to the town centre will continue to be under pressure. The SMC concept is more advanced on this section than elsewhere, but the effect on capacity has yet to be established. There will be queuing on the A31 on the approach to the new signalised junction that will give access to the Blackwell Farm site. The A31 is regarded as a key route by the LEP and LA partners.

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

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

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

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

Doct Ref T13 Transport Strategy

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

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

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

Section 4 Strategic roads. Surely the strategy should be aligned with the position of Highways England set out in the Topic Paper on Transport, where it is evident that the improvement of the A3 will not be completed until 2026/27, or even 2027/28? The removal of schemes SRN1 and SRN6 from the list of key infrastructure for the plan, and redesignating them as ‘aspirational’, is inconsistent with the safety objectives of the borough and surely of Highways England and Surrey County Council as the highway authority. Under the strategy and the Plan, the issues for Beechcroft Drive and the weaving and merging issues on the existing A3 will not be addressed until half way through the plan period.
Section 5 Local roads. While welcoming the aspiration to transform the town centre, the traffic implications have not been dealt with in the strategy or the Plan. Section 1 correctly included the issue of “severance of the town and its constituent neighbourhoods resulting from a combination of the A3 trunk road, railway lines and the River Wey”. The case for a new crossing of the river and railway relieving pressure on the Farnham Road railway bridge should be taken very seriously and examined in depth. There is a real risk that a significant reduction in capacity in the town centre, both the gyratory and Walnut Tree Close, and on routes carrying the SMC, will lead to road users transferring to minor roads around the town that are unsuited to carrying more traffic.

The M25 SW Quadrant study report recommends that alternative routes are developed to carry orbital traffic, and this could mean more use of the A31/A331 in Guildford. There are local roads where capacity is already an issue and planned growth will add to problems that are not mentioned in this strategy. The scope of this element of the strategy is not wide enough.

The bus transit strategy is welcome. However, there is insufficient information on the Sustainable Movement Corridor to gauge either what it might deliver and its potential impact on road capacity. The statement under ‘Anticipated improvements’ that the New Sustainable Movement Corridor provides rapid and reliable bus journeys in Guildford urban area and links...’ has not been demonstrated. Consultants have been carrying out studies but the results have not been made public in time to inform this consultation.

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

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

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

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

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

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

Topic Paper: Transport

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

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

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

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

Air Quality Assessment

We welcome this new evidence, especially given revised estimates of premature deaths and health impact, issues with vehicle emission controls and misplaced optimism regarding congestion reduction in 2011.
The air quality effects of anticipated increased congestion on roads around the town centre should be carefully modelled and monitored. The cumulative effects of more development, rerouting buses, traffic displacement including pedestrianisation and interceptor car park expansion should all be considered. For example, York Road continues to be a sensitive site having experienced NO2 exceedances over several years. It has vulnerable school children in the vicinity and is expected to cope with much diverted traffic even though it is already beyond capacity and congested at peak times.

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

Traffic noise from the A3 should also be reported.

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

Attached documents:

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**Comment ID:** pslp17q/472  **Respondent:** 8556385 / Guildford Residents Association, EGRA (Amanda Mullarkey)

**Agent:**

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

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

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

**Retail and Leisure Study addendum (2017)**

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

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

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

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

**Monitoring Report 2015/16 (2015)**

**Open Space, Sports and Recreation Assessment 2016**
Rural Economic Strategy 2017

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

The report identifies significant effects.

West Surrey Functional Economic Market Area (FEMA)

Guildford Town Centre Regeneration Strategy 2017

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

Attached documents:

Comment ID: pslp17q/473  
Respondent: 8556385 / Guildford Residents Association, EGRA (Amanda Mullarkey)

Agent:


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

Answer (if comment is on questions 1-7 of the questionnaire): (No)

It is unsound and unsustainable to develop on the scale proposed.

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

Even taking account of all the proposals in the 2017 Plan, including skewing of development to later in the plan period and linking development to infrastructure, congestion which is already severe is set to get worse over the plan period.

In view of flawed new housing evidence and the implications of emerging transport evidence, Guildford’s proposal for more than 12,426 homes (plus a buffer of 1,155 homes) is excessive and will result in needless loss of Green Belt and green character, sprawl along the A3 and increased congestion, that cannot be justified in our heavily constrained borough.

If the Council fails to apply Green Belt protection or constrain expansion to reflect widespread, legitimate environmental and transport constraints, the 2017 Plan will cause harm to the qualities that underpin the economic success of Guildford and aggravate congestion.

The overall housing target and increase in retail space should be reduced to take account of the constraints of our gap town, growth in online retailing and potential for sustainable commuting.

Opportunities to provide greater accommodation on campus for university students and to open up access across the railway for our physically divided town have not been pursued sufficiently positively.

The revised proposal that only 60% of full time Guildford based University students will be provided with accommodation on campus puts unnecessary pressure on housing stock in the town. An 80% target could help by freeing up affordable homes relatively quickly.
Allocating too much land for development in the 2017 Plan will also result in Guildford being required to assess whether it can provide homes for Woking on our Green Belt. This is folly given the constraints in Guildford, a gap town with constricted roads set in the Surrey Hills AONB.

**Green Belt and Sustainability**

We do not accept the assessment the Council’s case for exceptional circumstances.

- The NMSS SHMA review indicates that the evidence base exaggerates the level of housing need and that the employment housing need assessment is flawed. Increasing housing supply beyond the level suggested by the demographic OAN would not have a discernible effect on affordability but simply mean more people who can afford high prices moving to the area.
- We submit that the economic need should be tested on a sector by sector basis and that the priority given to retail expansion should be questioned.
- Suitable deliverable alternatives, such as significantly increasing campus accommodation, thereby freeing up homes in the town, and provision of more homes on North Street in lieu of a large increase in retail, should be pursued.
- Options for meeting revised need in larger settlements beyond the outer Green Belt boundary linked to sustainable transport have not been fully explored.
- The option of not fully meeting needs in recognition of constraints, including Green Belt, has not been balanced against the positive and negative consequences of fully meeting need (as revised) as should happen in a meaningful Sustainability Appraisal that takes account of environmental capacity.
- Commuting by sustainable means, especially in the context of the current high levels of inward- and outward-commuting, should not be dismissed as an unsustainable option in all the circumstances.
- It would be irresponsible and unsustainable to use up all potential least-worst, last resort Green Belt sites within one plan period.
- High-added-value, knowledge-based businesses and homes should be given priority over expansion in retail land.

**Constraints**

Guildford is physically constrained being a gap town set in the Surrey Hills AONB and in Metropolitan Green Belt. Significant parts are affected by the Thames Basin Heath Special Protection Area. There are also notable areas of river, surface water, groundwater and sewer flood risk. Constricted road and rail routes converge to cross the downs seeking to avoid both high ground and floodplain. These compete with housing for land and there is no space for road widening or a conventional ring road approach. High rise buildings would be inappropriate due to the important contribution views and the rise and fall of the land make to both urban and rural character, including the nationally significant Surrey Hills AONB. The river and railway divide the town and there are too few crossing points; a further constraint. Air quality and traffic noise are not insignificant considerations in some locations.

The Local Plan process envisages that the housing target should be lower than the “objectively assessed need” if there are valid constraints. GRA considers it would be harmful to rural, suburban and urban character, quality of life and the economy of Guildford not to reduce the new housing units delivered by 2034 to a number significantly below 12,426. We submit it would be counter to sustainable development as a whole (in particular to living within environmental limits and achieving a sustainable economy) and contrary to policy to develop on the scale currently proposed. We are concerned that insufficient attention has been paid to cumulative impacts with constraints considered separately for each site.

Transport infrastructure remains a constraint. Current congestion is severe by any meaningful definition and there is a back log of infrastructure investment. Assessment of the transport evidence by expert, Richard Jarvis, using the information made available to date, indicates that the overall effect of completing the proposed schemes and development in the Plan would be congestion to a level that makes it hard to conclude that the test in paragraph 32 of the NPPF is passed. Any notion that building over 12,426 homes is going to deliver infrastructure that will overcome Guildford’s traffic problems seems misguided. He writes:
“In terms of its transport aspects, the Plan cannot be regarded as sound. GBC has provided vivid descriptions of the conditions on the network today and the evidence is that these will be as poor, and in some cases worse, at the end of the plan period, even with the mitigation measures. Growth and infrastructure have to be better aligned. While the level of growth in homes in this latest draft plan is somewhat lower than that in the 2016 version, it is still substantial and growth is also planned outside the borough. The evidence provided indicates that congestion will be widespread on much of the highway network in peak periods, even with the proposed highway schemes and with the measures to encourage the use of public transport in place.”

In view of the extent of physical constraints, protective designations and congestion, it is possible that even a more accurate, lower OAN housing figure, once it has been identified, would need to be constrained.

We submit that Guildford BC should:

- revise the SHMA to make corrections and to better account for student need
- undertake a proper assessment of constraints, informed by a strategic Green Belt review and a Sustainability Appraisal that tests environmental capacity and considers meaningful alternatives to establish an appropriate balance between adverse effects and fully meeting (revised) need
- continue to improve the transport evidence which points to congestion and work up transport proposals such that both can better inform the plan.

Any housing figure adopted in the context of considerable uncertainty would need to be kept under regular review.

If any land releases were deemed necessary following a rigorous, strategic and accountable approach to Green Belt review, these should be measured and paced, arising from a robust assessment of the balance between benefits and adverse effects, taking full account of environmental capacity.

Guildford has not currently provided the evidence to derive a housing figure arising from such a process. It is notable that Woking applies constraints to its OAN.

More strategic solutions, such as development beyond the Green Belt linked to sustainable commuting or a tunnel for the A3, are required now. Such alternative strategies cannot be left until the next Plan period. Indeed, it is troubling that the proposal for an A3 tunnel has been dropped as an aspiration. This should be being planned now and any necessary land at Gosden Hill and Compton safeguarded.

Neglected Opportunities

A more sound and sustainable approach to planning positively in Guildford should include greater emphasis on the following:

- **Campus accommodation:**
  Higher priority should be given to providing attractive campus accommodation so a very high proportion of university students will want to live on campus thereby freeing up affordable homes in the town. Significantly, this could deliver homes within the challenging first five year period of the Plan. We need to plan positively to find sustainable ways to sustain a thriving university in a constrained, commuter belt gap town. Just as if you provide attractive cycle facilities they are used, if you provide attractive student accommodation, it is used.

- **Sustainable commuting:**
  The revised plan evidence describes commuting as “unsustainable”. This need not be the case. Far more attention should be given to the potential for enabling sustainable commuting recognising that Guildford has a high-value-added economy in a constrained gap town location. Rather than destroying the qualities that underpin the town’s economic success by overdeveloping, the scope for making it easy and affordable to commute by sustainable means from less constrained settlements should be pursued as a priority, both for the short and long term.

  The context is that levels of both inward and outward commuting are extremely high. Almost half the working population commutes out to work and almost half of the workforce commutes in. In many households, occupants work in different...
locations and people do not necessarily move when they change jobs. In 2001, more people commuted out to Rushmoor than vice versa and more commuted in from Waverley than vice versa.

In a Guildford context, the aspiration that more people should live where they work needs to be balanced with other sustainability considerations.

- **All-direction, central bus interchange:**

  The current site has been declared available for development in an agreement with a developer without an appropriate alternative location being identified in the revised Plan. Failure to identify a central location, and to allocate appropriate land, for an attractive all-direction bus interchange in the town is a grave failing that undermines the soundness of the Plan and should be addressed as a matter of urgency. A central interchange is needed in view of levels of congestion, the gradients involved in town centre journeys, the limited options for crossing the railway and river, and the need to provide sustainable transport options to support complex commuting and travel patterns.

- **Town centre plan:**

  Better progress, and a more joined up approach, in town centre planning is required. The slow pace has meant opportunities for coordinated brownfield development are not available as part of this Plan. The need to have brought forward town centre options in a timely way should have been foreseen. Guildford had already used up its green field sites within its Green Belt boundary by the time of the 2003 Local Plan.

  GBC’s decision to tackle the town centre after the Plan is preventing joined up planning. The implications of an approach of constraining cross Guildford movement has major implications that need to be understood.

- **New cross-town road bridge:**

  An additional bridge over the river and railway is required to improve connections across the railways and river for our physically divided town. We want to see the townscape improved, with better use of the river. Achieving this, while maintaining accessibility, will be much easier with a new crossing.

**Sustainable Choices**

Given the scarcity of land arising from being a constrained gap town, the Plan should consider a wider range of sustainable strategies than simply expanding across the board.

- **Balance between retail expansion and town centre homes**

  The Plan should weigh the case for a major increase in retail space, especially given trends in internet shopping, with the opportunity to provide accessible and sustainable town centre homes. Increased town centre housing provision for the elderly could also have the beneficial knock-on effect of freeing up existing family homes. All types of town centre housing would help support the evening economy.

  The wisdom of such massive retail expansion, on top of already generous retail provision, needs to be challenged in view of the fate of the high street in many places. The mix of homes and retail, with its relatively low added-value, in the North Street development should be reconsidered.

- **Balance between high-value-added, knowledge-based economy and retail expansion**

  Similarly, the mix between land allocated to the high-value-added, knowledge-based economy in the town and to retail expansion should be carefully reviewed. Knowledge-based enterprises yield returns between 3 and 4 times greater than retail.

**Planning ahead**
In order to deliver sustainable development, it is important to plan ahead. Sites for entrances and, in the shorter term construction areas, for an A3 tunnel through Guildford should be safeguarded. Land should also be allocated for more immediate projects such as an additional crossing over the railway for local journeys.

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

Attached documents:

Comment ID: pslp17q/474  Respondent: 8556385 / Guildford Residents Association, EGRA (Amanda Mullarkey)

Document: Proposed Submission Local Plan: strategy and sites 2017 / Question 4: Duty to cooperate

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

Answer (if comment is on questions 1-7 of the questionnaire): (No)

We sustain our previous comment about the need to cooperate with settlements beyond the Green Belt and outside the supposed HMA.

We are concerned the impact of development at Dunsfold needs to be better planned and managed.

Please refer to our comments on unmet need from Woking under evidence and soundness. Cooperation is only meaningful if all parties apply policy on a common basis and GBC is failing to apply constraints appropriately to prevent sprawl and congestion.

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

Attached documents:

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

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

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

Answer (if comment is on questions 1-7 of the questionnaire): ()

Strategic Objectives
Concerns upheld

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

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

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

Attached documents:

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Comment ID: PSLPS16/4017  Respondent: 8556673 / Andrew French  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

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

Answer (if comment is on questions 1-7 of the questionnaire): ()

In addition, a further 2,000 dwellings are proposed at the former Wisley Airfield site, further exacerbating the pressure on local infrastructure, such as local railway stations, schools and public services.

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

Attached documents:

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Comment ID: PSLPS16/4016  Respondent: 8556673 / Andrew French  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A41

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

Answer (if comment is on questions 1-7 of the questionnaire): ()

I also have a particular concern about site A41 because of its prominence and its contribution to the Green Belt setting of the village. This site was added in the current consultation and is the most unsuitable of all the proposed village sites by virtue of its location.

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

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

Answer (if comment is on questions 1-7 of the questionnaire): ()

• No provision, either in terms of land or finance, has been made for the required increase in primary and secondary school provision that this would entail and yet the existing local schools are fully subscribed;
• The existing infrastructure in East and West Horsley would be unable to cope with the significant growth in the village settlements, particularly where site development is incremental. This includes the existing village shopping provision, roads, public transport (particularly the local train network) and utilities.

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

GUILDFORD BOROUGH COUNCIL DRAFT LOCAL PLAN

I am writing to object strongly to the revised Draft Local Plan and, in particular, the scale and density of development in West Horsley and the surrounding area. The grounds for my objection are set out below.

Policy S1: Presumption in favour of Sustainable Development

A total of up to 385 houses have been proposed on four separate sites in West Horsley, together with an additional 100 houses right on the parish boundary in East Horsley. There are a number of reasons why this is not in line with existing planning policy:

• The proposed housing densities for these sites is well in excess of existing densities in either village;

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

Attached documents:
More generally, it appears that the objectively assessed housing need appears to have outweighed any consideration of the damage that the plan does to Guildford’s existing Green Belt protection, particularly in the East of the Borough. Appropriate constraints to development, such as the need to retain Green Belt except in exceptional circumstances and the demands on existing infrastructure appear to have been completely overridden by housing need. There do not appear to be any circumstances under which the overall housing numbers would have been constrained, regardless of how high they were. I do not believe that is a correct interpretation of Government planning guidance.

I do not wish to argue that there should be no development on any part of the Borough’s (or indeed, West Horsley’s) Green Belt. I recognise that there is real pressure on the Borough to increase its housing provision in the face of a rising population, increasing birth rate and other demographic trends. However, it is the scale of development proposed in the immediate area that is unacceptable. Growth in the village of around 10% over the plan period, resulting in a release of one or two of the proposed Green Belt sites for development during the plan period would allow the village to grow organically and accommodate some much needed affordable housing. That would also balance the demands on the infrastructure, while going some way to accommodating housing need. However, proposals on this scale, all of which are scheduled in the plan’s first five years, will transform the face of the village forever and not for the better, which is why I wish to make a strong objection.

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

Attached documents:
Comment ID: PSLPS16/5377  Respondent: 8557217 / Mrs Angela Gray  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A46

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

Answer (if comment is on questions 1-7 of the questionnaire): ()

To The Planning Inspector of Guildford Borough Council

- I object to the 1100 homes that GBC want to build on A46 (between Glaziers Lane and Westwood Lane in Normandy and Flexford). This site gets water-logged as we have natural springs at Wanborough that flow through Flexford and Normandy, not helped as the soil type here is clay. This land has always historically been agricultural and therefore ‘greenbelt’. The greenbelt is there to STOP urban sprawl. We already have low water pressure and this will only worsen.

- The approach to Wanborough station (in Normandy and on the edge of A46) gets flooded on numerous occasions each year. Rail commuters now keep a pair of wellingtons to hand as it is the only way to get through to the platforms as it gets to 15 cm deep in places and that’s more than a shoe full of dirty water. Plus there are only 8 spaces for cars to park at the station. Do not be fooled in thinking the 2,000 odd residents (average of 2 per household) will be using the ever expensive train to get to work as we know from residents currently living in Flexford and Wanborough only a small proportion use the train.

- How is the Victorian railway bridge on Glaziers Lane going to cope with an extra 1,500 plus cars going over it twice a day? There is already a crack in the brickwork.

- I object to even more cars on our busy roads. The improvements that are talked about are just not enough for such a busy area. At peak times we cannot get out at the crossroads with the A323 and Glaziers Lane. The traffic piles down Wanborough Hill in the mornings and evenings plus anytime there is an accident on the A31 and A3.

- I object to the burden that will be added to the Doctor’s surgery where already we have to wait for 2 weeks for an appointment to see the doctor. This will also have an enormous knock on effect at the Royal Surrey where waiting times will get even longer to see a consultant or have an operation, goodness knows how A&E will cope with sites like Blackwell Farm and Slyfield possibly being developed.

- I object to having a Secondary School built on land A46 which is red sensitive land. It is ludicrous as we only have around 50 children of secondary school age currently in Normandy and Flexford. So this can only mean it is developer led as the other 1000 odd spaces will be for children outside of our village. Currently Ash Manor and Kings College are under subscribed. The thought of children being driven by parents and bused in to Normandy is going to put even greater pressure on our roads around the village, don’t think they’ll cycle as their parents will not let them go the distance on our dangerous busy pot holed roads.

- People currently living in Normandy and Flexford chose to pay a premium to live here because of the rural setting in the greenbelt. As all know who live in the village at peak times it is difficult to get up Wanborough Hill, and turn (especially right towards Guildford) out of the village from Glaziers Lane and Westwood Lane. As soon as there is an accident on the A3, A31, A331 and the A323 the village becomes gridlocked. This would only get worse with 1,100 new homes with an average of 2 cars per house (taking into account some may only have one car and others may have children living with them driving). It is an unthinkable thought. Anyone living at the Flexford end of the village has to cross Glaziers Lane 3 times, where footpaths disappear (before and after the railway bridge and on the bend where the stream goes under the road). So mums with pushchairs and toddlers have to negotiate this traffic problem to get to the nursery school on Glaziers Lane, the doctors surgery and village hall.

- Looking at the plan for the area of SANG provision on a field that sits on clay so in the winter it is soggy underfoot and would soon get all churned up from dog walkers. Did you know that 24% of homeowners have dogs and 17% cats (Found on PFMA Pet food manufacturers website)? I am a dog owner and I do not walk the fields around the village between October and March due to clay becoming claggy so difficult to walk in and my dog getting filthy. I go to the Normandy part of the Ash Ranges which happens to be SSSI where I can walk my dog on lovely drained heathland. I love it so much over there that I actually walk it throughout the year. If these houses get built it will not take long for the owners who have dogs to work out that 1 km away there is a lovely dry walk. With all these additional dog owners trampling over the SSSI that has the following red listed birds
dartford warbler, woodlark, tree pipit and nightjar (all ground nesters) plus linnet and lesser redpoll and migrants
cuckoo, whinchat and hen harrier. Our heath land is also important for the rare smooth snake, sand lizard and
heath tiger beetle (all are only found on Surrey, Hampshire and Dorset heathland). It would be the fault of GBC if
numbers in these rare species start declining due to this huge housing estate being built far too close to a SSSI
site.

- Our bats use the land in question to forage and nest in the trees and barn owls use the fields to hunt prey. Plus
there is likely to be the arboreal dormouse in the Ancient Woodland on sites at Pussey’s and Walden’s Copse.
Normandy has a good population of hedgehogs a heavily declining species which needs up to 2 km of foraging
with interconnecting garden routes to roam, they will not survive such a huge development taking place and then
the gardens of new homes are so small that many tend to just deck or patio over which has zero habitat for them
and other wildlife.

- My husband and I bought our house 23 years ago in the village when there were 5 shops and 3 pubs. These were
never used enough to make viable businesses so they all eventually closed. Those who have not got cars can now
use the village mini bus for shopping trips, internet shopping/food deliveries is huge in Normandy and Flexford.
So there is no point in providing any new shops/pubs as we didn’t use them before.

- I object to yet more traveller pitches on site A46. What can I say, do the numbers and you will see that
Normandy has a large community already living off the A323 and travellers site at Cobbett Hill plus Palm Nurseries

- To conclude there is only one thing that is pushing this and that is greedy developers who by all accounts has
written and made phone calls to residents backing onto Glaziers Lane to try and get them to sell their houses and
gardens so they can be knocked down for new road access entrances onto the proposed site. GREED is pushing
this development and it’s about time that us villagers have our voice’s heard. GBC have been heard to say they
would prefer to be dealing with one large developer than lots of smaller ones which will take up more time. Well
what an excuse, for something that will ruin the villages and approach to Guildford. I feel that if every village
took a small number of housing say between 50 and 100 each it is a much fairer way.

- Has GBC thought about using the brownfield sites in Guildford to build affordable flats or apartments that those
living there can then either walk to their place of work in Guildford or walk to the Guildford Mainline station that
then opens up to get them to Woking, London, Portsmouth etc for work? I feel that Guildford does not need any
more retail shops it has plenty and we have enough businesses. Really and truly businesses should be looking to
move up north where sites are cheaper to buy and there is high unemployment so gives communities a chance for
work again.

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

Attached documents:
Firstly, I am very relieved to see the removal of sites A46 and A47 (however very disappointed that a private application has been submitted for this site and I will send a separate objection letter shortly about this).

I object to the Insetting proposed in Normandy and Flexford. What are the exceptional circumstances needed for removing this from the green belt? The openness of this area is very important to see and for our wildlife who need corridors of land to move freely in and not squeezed into small areas where they can’t flourish.

With regard to the Palm House Nurseries (A49) travellers site and Showmen of Whittles Drive (A50) I feel this should remain in the greenbelt and not ‘inset’ and they should not be given permanent status. In respect of Palm House nurseries the travellers set up illegally on that land and in my view should never have been given temporary status as it is going to be difficult to ever move them on.

My biggest worry is the 10,000 or so houses being built within a 10 mile radius of Normandy. Where is the new road infrastructure? I think this area will become gridlocked as it does every time there is an accident on the A3 or A31 in the Guildford area.

Blackwell Farm is a beautiful open site of Agricultural land as you leave Guildford to climb the Hogs Back it is an AONB. The thought of seeing this full of housing horrifies me. It will be the start of Guildford merging with Aldershot. This is prime agricultural land and should remain so in the green belt. It is the fault of the University that own this land that there is such a shortage of family homes in Guildford. Many have been bought up and made into bedsits for thousands of students which I have heard are 80% foreign. If the university had not become so large there would be more housing left in Guildford.

I attended a meeting in Normandy a couple of years ago were Matt Furness said GBC are proposing a tunnel like that at Hindhead for Guildford to help with the dreadful traffic problems on the A3. I don’t think you can begin to think about building on Blackwell Farm until such a tunnel is in place. What with The Royal Surrey Hospital with an A+E department so close to this site plus the Surrey Business Park. Traffic has improved since the new traffic light system has been in operation but if building goes ahead it will be chaos in that area.

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

Attached documents:

We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPS16/3974  **Respondent:** 8557473 / Mrs Anne Benzecry  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

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

Answer (if comment is on questions 1-7 of the questionnaire): ()

Proposed local plan (June 2016) and to continued inclusion in the plan of former Wisley Airfield, now known as three farms meadows. Allocations A35 – for the phased development of new settlement of up to 2100 dwellings.

I object to the above plan for many important reasons.

1. I object to the removal of (FWA/TFM) from the green belt. This serves a vital road in stopping urban sprawl from London
2. I object to the disproportionate allocation of houses in this particular part of the borough. It is not the right area for such developments because of the infrastructure.
3. I vehemently object to the ruining of a historical rural village namely Ockham. It is just not suitable for large amounts of traffic which would be needed to contain all these houses. There are very narrow lanes which flood when under a lot of rain. No street lights and all these this would be a blight on a very lovely village representing English heritage, also included are many listed houses.
4. I object because these roads will be hazardous to cyclists and pedestrians alike
5. I object also on the grounds of air pollution which I gather is already very high in the area.

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

Attached documents:

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**Comment ID:** PSLPS16/7413  **Respondent:** 8557761 / Nigel Farley  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

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

Answer (if comment is on questions 1-7 of the questionnaire): ()
**Former Wisley Airfield**

The Wisley new settlement proposal is contrary to relevant legal provisions and NPPF guidance. It should not form part of the delayed Local Plan when adopted.

In summary, this is because:

**General evidence base is inadequate to support the proposal**

- There is no proportionate evidence base to support such a large and poorly located major allocation which has emerged very late in the LDF. Quite apart from the specific legal deficiencies in the plan-making process relating to this proposed major new settlement (see below), the information provided as the basis for the new settlement proposal is inadequate and at times inconsistent with the guidance and information contained or referred to in the evidence base.

- For example, the application of the "critical mass population of 4000" in section 24 of Volume V of the Green Belt Study (April 2014) does not appear to be justified by the reference works and guidance listed in paragraph 6 of that Volume and it is not justified in relevant paragraphs of the NPPF.

- Appendix B to the Interim SA Report (August 2014) is extremely difficult to read and/or understand. It is illegible unless printed on a scale too large for A3 printers and the electronic version is difficult to understand. This appendix should also be supplemented by fuller narrative text to explain and justify the conclusions pithily reflected in the detailed appraisals. It also needs to be expanded to look at possible options on other sites within the relevant settlements that could be sustainably redeveloped to provide the homes and facilities needed.

- Volume V of the Green Belt Study appears to have been prepared on the basis of justifying the Wisley new settlement proposal rather than providing an objective comparison of the green belt impacts of this proposal compared to other more sustainable green belt releases in areas which have existing services and The unexplained application of "critical mass population of 4000" as a cap for this purpose (see above) may be related to the desire to promote the Wisley new settlement instead of the expansion of more sustainable locations in the larger villages.

- Despite the remaining runway and hardstanding areas, the former Wisley airfield site provides a large and tranquil area of countryside, with a network of public access routes, both within and around it, to enable it to be enjoyed by wildlife and the public and affording satisfying public views across the surrounding countryside as well as attractive natural features on the site. The following photographs show views within the Wisley and Ockham Commons area (immediately to the north of the proposed new settlement site) and across the proposed Wisley new settlement. It takes little imagination to see that, even with the proposed SANG, the openness and natural tranquillity of this essentially rural area will be dramatically harmed by the proposed new settlement. (Image 1) (Image 2)

- There are no visual assessments or ecological assessments providing a sound basis for such a radical and unsustainable development proposal.

- There is also no clear evidence in the LDF evidence base to demonstrate that sustainable delivery of the proposed new settlement will be viable or that the timescales within which the necessary public transport and other infrastructure needed to make the new settlement sustainable (if that is even remotely possible) will be deliverable. The unsubstantiated claims to sustainability and the timescales set out in the site schedule for this site and the related evidence base lack credibility, bearing in mind that this is a privately-owned site with no direct rail connection, no existing services or community infrastructure and no meaningful programme for its funding and this is a long way from meeting the principles identified in the studies and guidance referred to in paragraph 21.6 of Volume V to the Green Belt study, as the following quotations illustrate:

  "Securing transport links that are public - rather than private transport-based will clearly be a major factor in ensuring that such places advance the cause of reduced carbon emissions."

  "It hardly needs stating that excellent public transport is essential to a networked cluster".

"Securing transport links that are public - rather than private transport-based will clearly be a major factor in ensuring that such places advance the cause of reduced carbon emissions."

"It hardly needs stating that excellent public transport is essential to a networked cluster".
• It is also a long way from fulfilling the Core Principles set out in paragraph 17 and paragraphs 29-39 of the NPPF.

• The case studies cited in the Volume V of the Green Belt study show that transport issues have arisen where settlements identified for growth did not have existing access to public transport. The former Wisley airfield site does not adhere to the well-known "beads-on-a string" concept of growth in the south-east and the London hinterland. However, in contrast with the Wisley new settlement proposal, the expansion of other settlements in the district, including Horsley and Effingham, could function very effectively as networked growth areas in accordance with that concept and with strong sustainable transport links to Guildford, London and other centres of employment, facilities and community services. The rejected draft Guildford Local Plan (due to be re-written after the election in May 2015) and the related evidence base did not appear to have examined properly the opportunities for linked settlements with a "connecting thread of public transport".

• The information presently contained in the LDF evidence base lacks the detail and clarity needed to enable sound comparisons of the impacts and sustainability of the options being considered across a range of This means that local communities are being denied a genuine opportunity to participate on an informed basis in the plan-making process.

• All potential belt releases require properly detailed quantitative and qualitative information to enable sound decisions to be made as to what is the best opportunity for providing sustainable development in the district. Such assessments should be made objectively and on a consistent basis, having proper regard to the principles of sustainability. It is impossible to see how the Wisley new settlement proposal can be justified on the basis of such an approach and there is currently no reliable or proportionate evidence base to justify it or (equally important) to justify rejecting alternative potential allocations in more sustainable locations in favour of the Wisley new settlement proposal.

Unlawful to allocate without a proper assessment under the Habitats Directive and related UK regulations

• There has not been an adequate appropriate assessment in accordance with the Habitats Directive to show that there will be no significant impact on the ecological integrity of the important European Site which is located immediately to the north of the proposed new settlement, albeit with an area of SANG proposed as a buffer.

• The site schedule for Site 66 states:

"Appropriate assessment required at project level to consider impact on the Thames Basin Heath Special Protection Area (SPA) and Environmental Impact Assessment to consider impact on the Site of Nature Conservation Interest".

• A similar statement appears in Table 6 ("HRA Screening of Guildford Site Allocations") on page 45 of the HRA (July 2014).

• These are clear acknowledgements that the proposed new settlement is likely to have significant impacts on the important protected ecological assets in this SPA and that they have not yet been properly addressed. This is an issue that should be properly addressed in an appropriate assessment under the Habitats Directive and a strategic assessment under the SEA Directive before the Local Plan is adopted rather than at the subsequent project stage. This major allocation (and therefore the Local Plan as a whole) cannot be considered to be legally compliant or sound unless and until this has been properly undertaken.

• The proposed new settlement will include development for uses other than residential. In accordance with the specific terms of the Thames Basin Heathlands Special Protection Area Avoidance Strategy 2009-2014, the other uses contemplated in this proposed allocation for a mixed use new settlement is not "exempt" from the need for an appropriate assessment, even if such an exemption could conceivably be claimed for a 2500 residential development on a land so close to the SPA (which is highly doubtful).

• The mix of uses proposed on the site, together with the necessary infrastructure works (on-site and off-site) are likely to have significant impacts on the ecology and wildlife in and around the site, with direct and indirect effects on the ecological integrity of the SPA and its ecological.

• For example, the country lanes that would serve the proposed Wisley new settlement are already dangerous for pedestrians and cyclists to use -the widening and other "urbanising" works needed to make them safe (as a means of sustainably accessing good public transport and other facilities in Guildford, Effingham, Horsley and other existing settlements) will have serious impacts on habitats, as well as in terms of "urban" encroachment into the countryside, with the likely loss of hedgerows and woodland as well as other valuable habitats and open There is
no sign that such impacts have been meaningfully addressed in the Interim Sustainability Appraisal Report (August 2014) or in the HRA (July 2014) or in the Green Belt Study (April 2014).

- The proposed new settlement will occupy land and habitats that are likely to be functionally related to the European If so, there would be significant direct and indirect impacts on the ecological integrity of the European Site (which also comprises the SSSI) and the species it supports. Such impacts must be assessed before any such allocation could be promoted. On the basis of the current information in the evidence base there can be little doubt that the proposed new settlement may cause significant ecological harm to these internationally valuable habitats and to the Priority species that they support, despite the proposed SANG area which is to address principally the human intrusion impacts on ground-nesting birds. Other aspects of harm have not yet been described or assessed.

- Such harm would not be justified under Article 6 of the Habitats Directive or the UK regulations transposing the Directive into English law, bearing in mind the Annex 1 species and other important flora and fauna identified as being supported by the This attaches a particularly onerous obligation on the LPA in terms of permitting development which might harm the ecological integrity of the site. It is likely that the harm identified in an appropriate assessment will not be capable of being overridden or mitigated to enable the proposed Wisley new settlement to proceed.

Unlawful to allocate without a Sustainability Appraisal, including a proper assessment under the SEA directive and the related UK regulations

- There has not been an adequate Sustainability Appraisal or Strategic Environmental Assessment in accordance with Section 19(5) of the 2004 Act and/or the SEA Directive and/or the 2011 SEA Regulations.
- For example, the ecological impacts referred to in the preceding section are likely significant impacts in their own right and the failure to carry out an SEA on the project (including an appropriate assessment) would undermine the lawfulness of the Local Plan on that ground alone.
- In addition, there are other likely significant impacts of the Wisley new settlement proposal, as generically identified within the SA scoping report, which have not been assessed in any systematic and comprehensive Environmental Report for the purposes of the SEA Regulations.
- This appears to be the result of a last-minute retro-fit of this major and anomalous If the LPA wishes to pursue this development proposal further then the SEA and Sustainability Appraisal of all proposed allocations should be re-visited so as to ensure that an objective and unbiased assessment of all reasonable options is taken before the forthcoming draft Local Plan is adopted. For example, the provision of significantly increased services and facilities is presumed not to be practicable or deliverable in the context of the larger villages identified for growth in the Settlement Hierarchy, whereas in relation to the Wisley new settlement proposal their provision is presumed to be viable and deliverable with minimal (if any) economic or viability appraisal or programming.
- The question of whether sustainable transport objectives will be fulfilled has not been properly assessed or Judged by the SA objectives relating to sustainable transport and climate change, this proposal for a new settlement should be rejected because the site is remote from public transport facilities and the level of services and facilities needed to encourage sustainable transport choices. It is unlikely to be other than a highly car-dependent development. The level of development proposed will inevitably generate large numbers of car trips which will use the rural roads in this area which are not adapted for safe pedestrian or cycle trips. There has been no attempt to describe or assess these proposals (or the necessary mitigation measures and the likely impacts of such measures) in the context of these important policies or to compare these impacts with the benefits and impacts of reasonable alternatives which are better located to avoid or mitigate such impacts, including expansion of the existing urban areas or the larger villages or sustainable networks of settlements.
- Recent studies by Surrey County Council and Guildford Borough Council in relation to traffic congestion and air quality point to the inappropriateness of the proposed allocation of a new settlement close to an already heavily congested trunk road and junction (M25/A3 Junction 10) and in a location which is unlikely to encourage sustainable travel Such studies add to the strategic importance of ensuring that Guildford’s growth is capable of being achieved on the basis of a sustainable transport strategy rather than encouraging a large-scale, car-dependent scheme such as the proposed Wisley new settlement.
- The last minute and superficial assessments in the Interim SAR (August 2014), the HRA (July 2014) and Sections 22 to 24 of Volume V of the Pegasus Green Belt Study (April 2014) are inadequate and provide scant justification (if any) for the harm to the green belt and environment that will inevitably be caused in this attractive and environmentally valuable part of the green belt. Whilst the site undeniably bears the signs of its past airfield
use, the remaining structures are almost all surface level (runways and hard-standing areas) with virtually no above-ground built structures or other features which undermine or harm the openness of the green belt. There are also clear signs of the runways being "naturalised" over time by vegetation and the rural character and beauty of the areas around site is predominant.

National Planning Policy Framework (NPPF) and the importance of community engagement

- There is clearly massive community opposition to the proposed allocation of the former Wisley airfield as a new settlement and such opposition is based on sound sustainable planning principles.

- The Habitats and SEA Directives (and the regulations transposing them into English law) require such assessments to be carried out and to be properly consulted upon (including public consultation as well as with the relevant statutory bodies) before the relevant plans and programmes are Failure to do so is unlawful.

- Paragraphs 165 - 167 of the NPPF also require these matters to be dealt with in the plan preparation process and it is clearly inappropriate to promote a major new settlement before the necessary assessment, appraisal and consultation procedures have been completed and consulted upon.

- Reference is made above to the lack of transparency and consistency of approach in the site appraisals at Appendix B to the Interim SAR report (August 2014). Also to the unjustified "cap" on the critical mass level when evaluating the potential for expansion of larger villages which, in contrast with Wisley airfield do have good public transport connections and significant physical and community It is unclear why other sites within such larger villages (other than those specifically promoted in the plan) are not considered as "reasonable alternatives" for the purposes of the Interim SAR, including sites which might be available for sustainable development if the Horsley inset map were to extend up to the corner of Long Reach and Green Lane (and other possible extensions of the inset boundary). There are likely to be other opportunities for sustainable development in Horsley and other larger villages as reasonable and more sustainable options than the Wisley new settlement proposal.

- Failure to consider and consult upon these reasonable alternatives undermines the LPA's promotion of the Wisley new settlement proposal, in the light of the following guidance in paragraph 52 of the NPPF:

"The supply of new homes can sometimes be best achieved through planning for larger scale development, such as new settlements or extensions to existing villages and towns that follow the principles of Garden Cities. Working with the support of their communities, local planning authorities should consider whether such opportunities provide the best way of achieving sustainable development."

Summary and Conclusion

The LPA should abandon the proposed Wisley new settlement allocation and refuse permission for this application because:

- It has not been properly assessed in accordance with Section 19(5) of the 2004 Act and/or the Habitats Directive and/or SEA Directive and/or paragraph 165-167 of the NPPF and the relevant regulations as referred to above;

- It is in an unsustainable location which is likely to result in a very large car-dependent community causing serious harmful impacts on road safety (particularly pedestrians and cyclists using the rural lanes around the site), traffic congestion and air quality;

- Its proximity to the SPA, SSSI and SNCI and the scale and character of the proposed mixed-use development will seriously harm the ecological value of these important sites and other valuable ecological assets in the area;

- The large-scale development of this attractive, large and tranquil part of the green belt will be inconsistent with the objectives of green belt policy and will harm the public interest in maintaining and enhancing the valuable network of public ways and routes through and around the site and the attractive countryside views and experiences they provide.

In the light of this, the LPA should seriously reconsider drawing village inset boundaries and making additional residential and other allocations to provide for sustainable development in larger villages and settlements which will:

1. encourage sustainable transport choices, including walking, cycling and public transport;
2. strengthen the well-located larger villages to achieve "critical mass" populations of 4000-5000 (or sustainable networks of larger villages and settlement) in accordance with the guidance and studies referred to in paragraph 6 of the Green Belt Study (April 2014) to enable them to sustain and increase the quality and range of services and community facilities that they could provide and in the interest of a better environment and the well-being of the communities that live there; and

3. allocate suitable sites for development within and on the edges of such settlements so as to enable such settlements to be master planned to ensure that high quality and integrated designs produce developments to improve the overall quality of the settlements and the well-being of the communities living there, whilst properly protecting the landscapes and rural environments in which they exist.

I trust that these representations will be of assistance to the Local Plan consultation process.

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

Attached documents: [IMAGE 1.jpg](591 KB)  [IMAGE 2.jpg](131 KB)

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2. At no stage in the previous draft Local Plan process and subsequent consultation did this site appear for consideration, now suddenly it has been included in the present draft Local Plan Strategy & Sites increasing the development burden within West Horsley.

2. The site to the south of East Lane, adjoining Lollesworth Lane is an important green space to be viewed and enjoyed when traversing East Lane in either direction.

1. This site is unsustainable and unsuitable for the proposed density of development due in part to its green belt status; in part to infrastructure fragility and incapacity (drainage and road surfaces - both of which are already failing due to lack of ongoing investment to improve capacity)

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

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

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

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

Attached documents:

Comment ID: PSLPP16/16476  Respondent: 8557761 / Nigel Farley  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

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

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policies S1 Presumption in favour of Sustainable Development, 52 Borough Wide Strategy, H1 Homes for all, H2 Affordable Homes

1. Policy S2 states that provision will be made for 13,800 new homes over the Plan Period 2013 to The number of homes is too high and unsustainable in Guildford's villages. The Site Allocations list totals 12,698.
2. Village expansion is With only one small shop, no post office,a very limited weekday only bus service through the village, it is clearly unsustainable for the proposed high volumes of new housing development.
3. The development of 385 homes on the 4 proposed sites are at much higher densities than currently exist in the village settlement and will be totally out of character with the existing mix of different housing styles and layout of the village.
4. The homes building proposals are unsustainable in terms of schooling,drainage, roads capacity, shops, parking in East Horsley (shops and station), public transport.
1. The need for so many houses to be built in West Horsley over the first 5 years of the Plan period 2018 to 2033 is totally unproven.

2. The West Horsley Parish Council and Surrey Community Action Housing Survey conducted in May 2015 identified a limited need for some 20 affordable homes for local people who want to remain in the village, i.e. for young people and for elderly people who wish downsize to a smaller home.

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

Attached documents:

Home Farm, Effingham Page 402

We are pleased to see that sites earlier proposed for development at Home Farm, Effingham have been removed from the submission local plan as these developments are now in hand.

Maps, Appendix H Effingham Page 12

We note that the revised inset boundary is an improvement on the previous plan. However, we note it does not meet our previous submission which should be re-considered at examination.

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

Attached documents:
Paragraph 2.10a Page 14

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

Paragraph 2.14a Page 15

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

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

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

Attached documents:

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

Answer (if comment is on questions 1-7 of the questionnaire): ()

Section 3.1 Wisley Page 383-4

We do not consider the Green Belt inset should be expanded at Wisley. Indeed, we believe it would be better to reduce the inset to ensure more defensible boundaries and more sustainable development. Guildford Borough Council is defending a current appeal for development at Wisley as an overdevelopment and disproportionate attempt to locate 2068 dwellings within the ancient village of Ockham. The planned inset would result in a similar overdevelopment of the site.

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

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<td>Proposed Submission Local Plan: strategy and sites 2017 / Vision and objectives</td>
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We welcome the reduction in the housing target to 12,426 by 2034. However, we believe greater weight should be given to the constraints of infrastructure and Green Belt resulting in a further reduction in housing numbers. We note that our neighbouring Mole Valley District Council are consulting on a very much lower housing commitment which we believe takes more account of these constraints.

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

Attached documents:

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Comment ID: PSLPA16/1537  Respondent: 8557985 / Artington Parish Council (Philip Gorton) Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

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

Answer (if comment is on questions 1-7 of the questionnaire): ()

Arlington Parish Council response to the draft Guildford Local Plan with regards to the Strategic Housing Market Assessment (SHMA)

Arlington Parish Council’s (APC) comments on the Borough's proposed housing numbers are dealt with separately in this letter from those matters particularly affecting Artington, which are dealt with another letter of today's date.

The draft Plan proposes building 13,800 new homes based on a 25% increase in the Borough's population over the Plan period to 2033, necessitating 693 houses per annum to be built, 70% within the Green Belt. The use of the Green Belt for this purpose would be irreversible.

A PC objects to the lack of reliable up-to-date evidence to support the population increase and the pivotally interconnected housing need numbers. Inevitably, by reason of the passage of time, the Strategic Housing Marketing Assessment (SHMA) published in September 2015 has no regard not only for the significant findings of three well researched studies received during the consultation period, but also for Britain’s decision to leave the EU following the referendum on 23rd June.

The three studies are those undertaken by GBC Cllr Reeve, Mr Niels Laub and Mr Neil McDonald. GBC will be familiar with these studies, so no useful purpose is served by reciting their findings here other than to note that the 693 houses per annum proposed in the draft Plan is at least 35% greater than the number evidenced by the studies. This material potential overstatement of housing needs is even before taking into account the decision to depart from the EU, expected to have significant economic and immigration consequences, both nationally and locally. These consequences were all unforeseen when the SHMA and draft Plan were published and approved by GBC. They are likely to conspire to reduce the need for new dwellings in the Borough.
While APC is sympathetic to the difficulties and inconvenience involved in revisiting the draft Plan at this stage, normal professional standards require that any important exercise such as the preparation of the draft Plan should be revisited in the light of significant new information and/or subsequent events, e.g., those which call into question key features of the evidence on which the draft Plan is based. Accordingly, APC considers that the SHMA and the draft Plan should be reviewed by GBC and its advisers to address these important issues before the draft Plan is submitted to HM Inspector.

Concern has repeatedly been expressed by borough councillors that failure to move forward on the basis of the higher number of houses being built may well result in HM Inspector unilaterally imposing an even higher number. Particularly in the exceptional circumstances that have arisen since the preparation of the SHMA and the draft Plan, APC considers it both alarming and wholly unacceptable that this should be regarded as a valid concern or a justification for not revisiting the draft Plan.

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

Attached documents:

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Comment ID: PSLPS16/2858  Respondent: 8557985 / Artington Parish Council (Philip Gorton)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A32

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

Answer (if comment is on questions 1-7 of the questionnaire): (

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Re-development of Mount Browne

Mount Browne has been assessed as an area of ‘high sensitivity’. The potential development of 116 houses or of commercial redevelopment on Mount Browne would constitute a major development for this site. Paragraph 116 of the NPPF states that planning permission should be refused for major developments in AONB designated areas unless exceptional circumstances are demonstrated. The plan and GBCS Volume V provide no evidence of exceptional circumstances to support such major development or removal from the Green Belt.

The re-development of this rural site could have a major impact on the open character of the area that lies between the North Downs and Farncombe and also between Guildford and Godalming. This area is clearly visible from adjacent areas and is treasured by local residents, the larger community and visitors to the area.

Mount Browne and the adjacent University of Law are regarded as an essential part of the green lung which separates Guildford and Godalming. They represent the first line of defence against the risk of urban sprawl.

It is crucially important to ensure that it remains essentially open in character and be protected by AONB and Green Belt planning guidelines and constraints.

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

Attached documents:

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Comment ID: PSLPS16/2863  Respondent: 8557985 / Artington Parish Council (Philip Gorton)  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A33

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

Answer (if comment is on questions 1-7 of the questionnaire): ()

The University of Law, also assessed as of "high sensitivity," merits similar consideration to the neighbouring Mount Browne site. The University of Law and Mount Browne are almost connected and should not be considered in isolation.

In the GBCS Volume V justification for in-setting discusses the whole University of Law site but then in-sets just the car park in the Local Plan. APC finds this incongruous.

In the Local Plan the site is potentially allocated for student accommodation to be located on the site of an existing car park. This car park currently provides an open vista from the footpath to the north which would be lost if development was above ground level.

To provide protection to the essentially open character the site must be protected by AONB and Green Belt planning guides. Its removal from the Green Belt would not accord with Paragraph 85 of the NPPF. There is no exceptional circumstance, justification or need for The University of Law car park to be in-set.

APC believes the case to in-set has not been made and, accordingly, objects to the proposal to in-set the University of Law car park from the Green Belt.

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

Attached documents:

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Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

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

Answer (if comment is on questions 1-7 of the questionnaire): ()

Artington's contribution to the Borough's heritage

Residents passionately believe that Mount Browne and The University of Law sites should be considered as an integral part of the wider environmental setting. This setting represents a unique feature of the Borough's heritage, yet disappointingly is not recognised as a separate entity in the Draft Local Plan.

Broadly, the setting covers the area contained within the boundaries of the small parish of Arlington, other important features of which include:

- to the north, the historic North Downs Way and also Sandy Lane, the latter with several houses of great architectural interest;
- to the east, the River Wey crossed by North Downs Way, with St Catherine's Hill and its chapel;
- to the south, outstanding views over a rural landscape and more houses of architectural
interest along the Old Portsmouth Road.

With its interconnecting network of footpaths, the whole of this area is very attractive and accessible to visitors, with the attendant benefits they bring to the Borough.

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

Attached documents:

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

Answer (if comment is on questions 1-7 of the questionnaire): ( )

Major external development and its impact on local minor roads

The draft plan contains little information on local infrastructure. Artington parish and neighbouring communities have particular concern that the proposed neighbouring major developments would have a serious impact on the fragile local network of minor roads, especially the B3000.

Although not within Arlington parish, Blackwell Farm has been identified as a potential new 'Urban Local Centre' with a potential for 1800 homes. In addition there is the potential for 100 homes at Broadford Business Park and the major development of Dunsfold New Town. If implemented, these major developments would have a significant impact on existing communities such as Puttenham, Compton, Famcombe, Peasmarsh, Shalford and Artington, particularly with regard to the local road network. Of particular concern is the already overloaded and inadequate B3000 rail bridge, which has been risk-assessed as being unsafe and in urgent need of replacement. This hazardous nature of this narrow humpbacked rail bridge on the 83000 is compounded by its limited visibility. There are no plans or available funding to provide separate provision for cyclists and pedestrians, nor update the bridge to make it suitable for today's volume of traffic, which exceeds 5 million vehicles per year, a number being driven by the opening of the Hindhead Tunnel and the A3 bottleneck moving to Guildford resulting in drivers seeking alternative routes to the A3. This number is likely to be greatly exceeded if the potential developments mentioned above proceed resulting in gridlock on the already overloaded local minor roads.

The existing infrastructure simply does not support the proposed house build, particularly having regard for Guildford's exceptional 'gap town' characteristics, and the draft Local Plan does not recognise the problem. This is clearly untenable. Going forward, the supporting infrastructure must be commensurate with the future housing population. It is crucially important firstly to demonstrate the feasibility of implementing the necessary infrastructure improvements and then, where appropriate, the cost of providing such needs to be factored into the overall development cost. Not to do so would be irresponsible.

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

Attached documents:
**Relationship between Green belt and Surrey Hills AONB**

In his foreword Councillor Spooner stresses that the Local Plan will conserve and enhance the unique qualities of our natural and built environment, especially in the Surrey Hills Area of Outstanding Natural Beauty'. However, the plan proposes to in-set from the Green Belt parts of Mount Browne and The University of Law sites, both of which lie within the Surrey Hills AONB. Paragraph 115 of the NPPF makes it clear that AONBs should be afforded the highest level of protection in relation to landscape and scenic beauty, indeed AONB has equal statutory protection to a National Park.

Development proposals within and adjacent to the AONB should conserve and enhance its special qualities. The proposal to in-set removes a level of protection and is contrary to Councillor Spooner's stated goals.

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

Attached documents:

<table>
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<tr>
<th>Comment ID: PSLPP16/6255</th>
<th>Respondent: 8557985 / Artington Parish Council (Philip Gorton)</th>
<th>Agent: Green Balance</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Arlington Parish Council response to the Draft Guildford Local Plan and its direct impact on the Parish Arlington Parish Council (APC), after due consideration of the Draft Guildford Borough Local Plan, would like to comment on those aspects which directly impact Arlington Parish. In particular:

APC strongly objects to the in-setting from the Green Belt of the Mount Browne and the University of Law sites as the case is not made.

APC strongly objects to the adverse impact that the proposed neighbouring major developments would have on the local minor roads and in particular the B3000, for which there are no mitigating proposals in the Local Plan.

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

Attached documents:

<table>
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<tr>
<th>Comment ID: pslp172/3435</th>
<th>Respondent: 8557985 / Artington Parish Council (Philip Gorton)</th>
<th>Agent: Green Balance</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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

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

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

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

Traffic generation in relation to road capacity

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

- the traffic generation model used in the Local Plan allows no merge delay at junctions: this is clearly not the case at present and is not claimed by GBC to be the case even after new road infrastructure has been built. As Mouchel point out, the effect of the model is to make the A3 and A31 particularly attractive roads because they are assumed to be readily accessible and to draw traffic towards them, whereas in reality there will be less ready access and greater use of the local road network;
- the model uses average peak period traffic movement figures across the three hour period 07.00-10.00, which will tend to understate movements in the true peak hour (circa 08.00-09.00). That will have a significant impact on congestion during periods when the network is most heavily used and, in the vicinity of Blackwell Farm, overloaded.
4. The SHAR indicated that the total vehicle generation anticipated by the whole Blackwell Farm development would be 717 vehicles leaving in the weekday average morning peak hour (Table 3.3, zone 576). How these vehicles would get out of Blackwell Farm has still not been properly resolved. Policy 26 includes a Plan showing an access to the development site (indeed the only access to the development site) from the A31 at its junction with the very minor road called Down Place. In June 2016 the Local Plan stated that this would be the “Primary vehicular access to the site allocation”. This would “provide a new route to the Surrey Research Park, the University of Surrey’s Manor Park campus and the Royal Surrey County Hospital.”

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

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

7. The network effects described in Figure 4.3 of the SHAR omit potential rat-running in the morning peak hour from the A31 through Blackwell Farm to Egerton Road. Drivers passing through Guildford northbound might try to miss the existing substantial queues on the A3 by leaving the A31 just before its junction with the A3 and taking the new link road which allowed them to join the A3 at the Tesco roundabout. Other drivers eastbound on the A31 aiming for Guildford could try to avoid the existing substantial queues both on the A31 and on the A3, as the new road would give them a new means of entry into Guildford from the west. The pressure for rat-running could be considerable if the link was built. Figure 4.7 in the SHAR shows that even after the A3 has been widened there will still be overcapacity and congestion on the A31 close to the A3 junction (and on the A3 through Guildford): this is likely to encourage significant numbers of drivers to dodge the queues on these roads through the Blackwell Farm development. The issue is reviewed in paragraphs 30-35 below, which show that the constraint on rat-running is most unlikely to be effective.

8. In the 12 months since the 2016 Proposed Submission Consultation by the Borough Council (working with Surrey County Council as Highways Authority and Highways England responsible for the A3), the prospect of adequate network road access to Blackwell Farm has not only made no progress but deteriorated. There are some indications of this in the alterations in the June 2017 Proposed Submission:

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

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

Traffic on the A3

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

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

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

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

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

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

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

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

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

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

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

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

“It should be noted that the A3 RIS 2 scheme is not a committed scheme and no funding has been allocated at present. The details of the RIS 2 A3 Guildford scheme itself are not yet known and so the modelling and testing of an A3 scheme at this stage is considered premature. As such Highways England's view is that this scheme cannot be relied upon by Local Plans to form mitigation for the development proposals.”

17. So far as we are aware, this remains the position in July 2017. The response subsequently advised that the inadequate evidence base meant that the Plan was considered unsound.

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

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

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

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

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

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

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

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

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

22. The Borough Council’s own evidence in both the SHAR and Arup report is that widening the A3 will increase congestion in the town rather than relieve it, with associated deterioration in air quality, noise impacts, land use impacts and severance. Blackwell Farm would damage the whole of Guildford. The likelihood of the A3 capacity being increased is less now than it was one year ago. So far as we can see, the ‘do nothing’ option for the A3 remains squarely on the table and is an increasingly likely outcome.

23. In summary, the evidence on the A3 consolidated during the last year shows that it is currently simply not known:

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

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

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

[Text continued in next comment]

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

Attached documents: 
- 226389 - Sketch drawing ‘Initial Junction Arrangement’ provided by University of ....pdf (210 KB)
- 2017-06-28 TN02.pdf (254 KB)

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

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

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

Answer (if comment is on questions 1-7 of the questionnaire): ()

[Text continuing from previous comment]

Access from the A31 Hogs Back

Junction with the A31

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

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

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

Access road between the A31 and Blackwell Farm

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

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

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

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

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

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

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

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

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

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

**Impact of the link road on air quality in Compton**

36. New information on air quality has become available since the consultation on the Proposed Submission Local Plan in 2016. In particular, Guildford Borough Council has issued an admirably brief and clear 2016 Air Quality Annual Status Report, September 2016. This shows that a specific area of the B3000 road through the village of Compton (in whose parish Blackwell Farm partially lies) has one air quality monitoring position which consistently reveals concentrations of Nitrogen Dioxide (NO2) well in excess of the legal limit adjacent to a dwelling (and the highest figure in the Borough). This is the only location in the Borough where this combination arises. (There were two other places with lesser exceedance of the legal limit, but one was located well away from dwellings and the other was unreliable having only 33% data capture rather than the 75% required.) Other monitoring positions nearby in Compton had NO2 pollution approaching the legal limit.

37. There is no doubt whatever about the cause of the pollution problem: through traffic passing through the village. Large numbers of cars pass through and lorries on the relatively narrow road can cause additional congestion. Further monitoring and modelling is taking place to ascertain whether any further action is required, notably using Advanced Dispersion Modelling Software (since June 2016). The Guildford Borough Transport Strategy 2017 reports that in respect of Compton “The Council is considering whether to declare an Air Quality Management Area and, working with Surrey County Council, will use the results of an ongoing study looking at the pattern of daily exposure to design and implement appropriate mitigating measures” (page 19). The Council has proposed no means of achieving in the short term a permanent reduction in traffic volumes through Compton. On the face of it, an AQMA may well therefore already be needed: under its legal duties the Council must designate one if it is unlikely that the objective values (i.e. less than 40g/im3) will be met in a given timescale, and the Council must then prepare an Air Quality Action Plan (AQAP) with the aim of achieving value objectives.

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

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

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

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

(i) “it is predicted that if little development takes place within the area and vehicles emissions are reduced by technological advances these objective exceedance should reduce to below the objective in to the future, without additional measures being required locally” (section 2.3). The reference to little development in the area is absurd: a major urban extension is proposed in the Parish. The suggestion that technological advances in emissions will solve the problem is fanciful in anything other than the long term, whereas there is an immediate need for action to reduce vehicle passage through Compton.

(ii) “The assessment identified a risk of exceedance if traffic flows, primarily on the B3000, increased. The area was not declared as an AQMA as the assessment noted that emissions from traffic were expected to decrease into the future which should lead to a decrease in NO2 concentrations measured in the area” (section 4.1). This finding is simply wrong: Table 4.5 of the SHAR anticipates a 16% increase in traffic in Compton from the A3 widening, not counting any increase generated along the Down Place link road.

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

(iv) A review of the air quality impact of the Local Plan on Compton (section 5.2.4) similarly fails to appreciate the evidence. This states in full: “There is one large land allocation within the parish of Compton, A26 Blackwell Farm, discussed above. The additional traffic flows predicted to be generated by this development are not predicted to have a significant adverse effect on air quality in the area of the village of Compton. There are no other large allocations local to Compton Village. As a result the implementation of the GBC Draft Local Plan should have little effect on future traffic flows through the area and thus negligible impact on local air quality.”
Rather than address the air quality consequences of Blackwell Farm at the Local Plan stage, when decisions can still affect air quality in Compton, Aecom choose to defer any consideration of the issue until a time when little can be done about it. On four occasions in the Executive Summary the issue is recommended as a matter which can be dealt with ‘through the planning application process’. Once allocations of land are made for development, strategic reasons for resisting them (e.g. on air quality grounds) are typically overruled as matters which should have been resolved at the plan-making stage. Leaving air pollution consequences of proposed development until the planning application stage is an exercise in trying to sweep the issue under the carpet.

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

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

**Connection to Guildford**

**Linking the Research Park Extension to the road network**

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

45. However, this arrangement would introduce development into Green Belt and the setting of the AONB at Blackwell Farm, breach the excellent existing screening of development from the west, add substantial additional traffic to the heavily congested Egerton Road, and in all likelihood be opposed by existing users of the Research Park who would be unlikely to want a significant thoroughfare in their midst. We therefore consider this proposal unacceptable. We note, too, that the proposed SMC may now stop short of the Research Park Extension (at the roundabout on Gill Avenue at the top of the hill), as indicated in the Sustainable Movement Corridor – Update 20 February 2017 in Figure 4. How or whether the SMC would link into Blackwell Farm or the Research Park Extension has become a mystery.
46. We do not accept that the sensibilities of existing staff in the current Research Park should dictate the most appropriate access route to a Research Park Extension. However, if the intention (and this is unstated in the Local Plan) is that the Research Park Extension could only proceed if a new road link was made to it from the A31, to avoid access only through the existing Research Park, there would be even less justification for the development going ahead. Not only would the scheme still intrude into Green Belt and the setting of the AONB at Blackwell Farm. It would also be partly responsible for requiring major development of a road in the AONB and so could only be justified in ‘exceptional circumstances’ (which it has neither claimed nor demonstrated). Given that the Extension would now be physically separate from the existing Research Park, it would be unable to claim Blackwell Farm as an essential location. So far as we can see, the Extension does not need to be in this location at all, and a more fundamental review of its future location would be in order. That would also help avoid traffic growth on Egerton Road.

Linking Blackwell Farm to Egerton Road and the Tesco roundabout

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

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

48. Egerton Road is one of the worst congestion hotspots in Guildford and the wider area. Egerton Road provides the main access to the Surrey Royal County Hospital and a superstore, and the only access to Surrey University’s Manor Park student village, Surrey Sports Park and the entirety of Surrey Research Park. The demand for access to all these destinations is growing, notably with building programmes at Manor Park and the Research Park. The high level of existing congestion will therefore get worse, even before Blackwell Farm is contemplated. Egerton Road is accessed principally from Guildford to the east but its capacity is fundamentally constrained by the pinch-point of the A3 underpass, which is a single-carriageway road capable of providing for two lanes of cars each way (but not wider vehicles). Overloading of the roundabouts at either end of the underpass, which both have links to the A3 and other destinations, also act as pinch-points for traffic from numerous sources and cause traffic to back up onto the roads into them (even onto the A3). The likely additional traffic generation at the Egerton Road/Gill Avenue crossroads, immediately west of the Tesco Roundabout, was noted in paragraph 6 above.

49. The concept of adding the major Blackwell Farm estate and a 10-11ha Research Park extension, both accessed from Egerton Road, without any significant vehicle capacity increase on Egerton Road itself, seems astonishing to the point of being hardly believable. The Strategic Highway Assessment Report June 2016 accompanying the Proposed Submission Local Plan a year ago states of the Blackwell Farm development: “in Scenario 2, without either new highway schemes or specific access arrangements, trips from Blackwell Farm load onto the A31. But with the access arrangements modelled together with an access road through the development to the Surrey Research Park, this assessment indicates that significant pressure could be placed on Gill Avenue, the Hospital junction and other parts of the network in that area” (paragraph 4.5.4). Paragraph 4.9.5 of the SHAR specifically identifies that “the additional access to and from the Blackwell Farm development via Gill Avenue results in a significant increase in trips on this part of the network. This is, in turn, impacting on junctions for which there are no schemes proposed at the moment, highlighting where additional improvements may be necessary. An example of this is the Egerton Road/Gill Avenue junction adjacent to the Royal Surrey County Hospital.”

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

**Sustainable Movement Corridor**

51. Back in 2014 Arup prepared a report *Guildford Town and Approaches Movement Study* for the Borough Council, a vision statement on transport in Guildford to 2050, which included a very broad indicative route at a scale that was difficult to apply on the ground. This has been endorsed by the Council. The purpose was to facilitate sustainable movement, strongly emphasising public transport, walking, cycling and demand management at the expense of travel by private car. The centrepiece of the scheme was a corridor segregated to be available to fast buses (and possibly trams), cyclists and pedestrians, linking the key existing areas of the town that are drivers of growth. There would be new bridges over the railway (in the town centre) and over the River Wey (across the floodplain near Stoke Lock). The estimated total cost was broadly £75-100 million though clearly not costed in detail. Cars would be banned from the Corridor which, because it would be based on using existing roads, some of them major roads, would represent a highly significant reallocation of space away from cars to buses, cycles and walkers, with consequent impediments to car usage. Car parking charges would be increased, 20mph zones introduced, some roads be closed to through traffic and others pedestrianised. The Proposed Submission Local Plan supports this kind of corridor but, strikingly, none of these intentions and assumptions is made clear in the 2016 or 2017 Consultations.

52. The 2016 Consultation proposed a Sustainable Movement Corridor, included in the Plan at the last moment (Spatial Vision, Policy I3 and paragraph 4.6.24). Various land allocation policies required co-ordination with the Corridor. Paragraph 4.6.24 explained that the Sustainable Movement Corridor would link major developments to Park-and-Rides, including Blackwell Farm (at its western end), and stated that the Corridor would be ‘largely on existing roads’. ‘Route sections’ were listed in the Infrastructure Schedule (Appendix C) with six itemised segments with some broad cost figures suggested (£80-90m in total). No route for the Corridor was included in the Plan, but instead the evidence base included a Progress Update on the Sustainable Movement Corridor scheme (GBC, June 2016). This showed a revised indicative route and possible road layouts at some key junctions and sections. It showed variations from the Arup study, notably with: a spur to Slyfield based on the existing A320 rather than a river crossing further east and also a lengthy new corridor up the A3100 to Gosden Hill Farm. The Arup Corridor would be downgraded in many lengths to shared roadspace with existing traffic (i.e. normal roads) but with bus priority measures. A land bridge over the A3 to provide a connection to the Research Park was downgraded to using the existing Egerton Road underpass: the recommendation was ‘to consider further the potential for tidal bus lane on Egerton Road as it passes under the A3 trunk road, with signalised control at either end controlling its use by buses, whilst retaining two working lanes of general traffic. It would be anticipated that the tidal bus lane would be used westbound in the morning peak period and eastbound in the evening peak period.’ Changes to the Tesco roundabout would also be needed. Development would begin in the town centre and be phased later for other sections (to 2033).

53. The 2017 Consultation has made little progress on the Sustainable Movement Corridor. Policy ID3 now mentions a Supplementary Planning Document on the topic, but there is no sign of this even in first draft despite the passage of another year. This is an unacceptably inadequate basis upon which to plan for major urban development at Blackwell Farm. However, a further report Sustainable Movement Corridor – Update published in February 2017 does for the first time include a published small-scale street map on which the Sustainable Movement Corridor (SMC) is superimposed and clearer proposals for an initial western section. However, the Council clearly have insufficient confidence in this to include it in the Local Plan. The 2017 Update shows changes from the 2016 Update, notably with an additional crossing of the railway beside Yorkie’s Bridge and an additional north-south corridor along Woodbridge Road and Onslow Street between the A25 and the gyratory.

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

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

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

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

58. If the modal shift fails to happen, the level of congestion in Guildford will become significantly worse. Modal shift is the only means by which the Council can find any practical means of moving additional people at scale into and out of Blackwell Farm (and the associated 10-11ha expansion of the Research Park). Even so, given the existing very high levels of congestion and over-capacity on Egerton Road and Gill Avenue, especially in peak periods, there is no certainty that there will be sufficient roadspace for vehicles, people and goods to reach the Blackwell Farm development even after the Sustainable Movement Corridor has taken a proportion of travellers (itself taking up roadspace).

59. The Council has not demonstrated a credible strategy for actually achieving modal shift in practice, notably by removing both roadspace for cars and destination car parking spaces. Modal shift is not mentioned in Policy A26, despite its imperative importance to the delivery of Blackwell Farm. The strong impression given by the Plan is that the SMC has been greatly downgraded from the original proposals by Arup to which the Council subscribed, and is therefore unlikely to deliver the modal shift which is essential for the development proposals in the Plan to be feasible. It seems to us that the likelihood is that the Sustainable Movement Corridor in the Blackwell Farm area will be massively inadequate. As the Council’s heart does not appear to be in modal shift, we consider that the Blackwell Farm proposal will be undeliverable and we recommend that the proposed allocation in Policy A26 is withdrawn.

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

Funding the transport infrastructure necessary for Blackwell Farm

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

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

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

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

Attached documents:

<table>
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<th>Comment ID: pslp172/3438</th>
<th>Respondent: 8557985 / Artington Parish Council (Philip Gorton)</th>
<th>Agent: Green Balance</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A59</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Save Hogs Back supports this railway station in principle, irrespective of the Blackwell Farm development. It is important to appreciate that its contribution within the Local Plan period will be limited, probably not being operational until at least 2029. The Topic Paper: Transport explains at paragraph 5.31 that Guildford West (Park Barn) railway station is likely to be brought forward only in 2024-2029 because “August 2024 corresponds with the anticipated start date of the South Western franchise period subsequent to the recently awarded franchise for the 2017-2024 period. Delivery from or subsequent to 2024 allows for the servicing of the new rail stations to be included within that new South Western franchise covering the period from 2024”. On this basis, progress with the construction of a station is feasible but far from assured. In particular, although the Plan recognises the need to deliver the project by working with Network Rail, there is no indication in the Plan that Network Rail has identified the technical feasibility and cost of the project or formally committed to it. It may simply not be in a position to deliver this project.

The new railway station will create a new destination for traffic. On the south side of the railway line, behind the hospitals, there will be a requirement for disabled parking together with access for buses, taxis and passenger drop-off. This will add to the congestion on local roads, notably Egerton Road. However, the anticipated vehicle activity associated with the new station has not been included in the traffic model for the area, and this needs to be rectified urgently. This is yet another contributor to excess congestion on Egerton Road if the Blackwell Farm development were to proceed.

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

Attached documents:

Comment ID: pslp171/1668  Respondent: 8557985 / Artington Parish Council (Philip Gorton)  Agent: Green Balance

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P1

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

Answer (if comment is on questions 1-7 of the questionnaire): ()

65. Save Hogs Back welcomes the proposed changes to Policy P1. In particular we support the more positive approach to sustaining AONB qualities and the greater attention given to protecting the setting of the AONB in paragraphs (3) and (5). We also particularly welcome the retention of the AGLV designation in the manner set out in paragraph (5).

66. We also welcome the updated clarification of the status of Areas of Great Landscape Value in paragraph 4.3.8 of the Reasoned Justification.

67. Unfortunately, the policy (particularly as amended) is not always applied through the Plan as a whole. The strategic allocation of land for housing in Policy A26 at Blackwell Farm is in direct conflict with Policy P1 as amended and is the most significant proposed release of a greenfield site that has major adverse impacts on the AONB. A small part of the allocation is also included within the AGLV. The Blackwell Farm site allocation conflicts with Policy P1 and should be removed from the Plan.

68. The proposal in Policy A26 would in summary involve:

– constructing major development in the form of a significant new access road to the Blackwell Farm development and the extended Research Park, by crossing the AONB down the steep northern face of the Hog’s Back, causing immense damage to the AONB (and increasing the impact of the development on those passing through the AONB);
– major development in the immediate setting of the AONB, in an area which (apart from some University expansion) has been relatively little-damaged to date;

Save Hogs Back & Compton PC 22 by Green Balance

– taking land for major development which ought to be included within the AONB and has a real prospect of being so
included following the Surrey Hills AONB boundary review to be carried out by Natural England (paragraph 4.3.8 of the Plan refers): an independent landscape consultancy working for Compton and Worplesdon Parish Councils applied the AONB boundary evaluation methodology in detail, recommending that Down Place and much of Blackwell Farm should also be designated as AONB.

More information on the impact of Policy A26 on the AONB was set out in section 3 of our submission in 2016. 69. We consider that the monitoring arrangements for Policy P1 are unwise as they are limited to the outcomes of appeals, over which the authority has no control. The measure is also pointless: we doubt that the Council is really saying that it would change its policy on protecting a nationally important landscape if a few Inspectors made different judgements (how many, how often?) about the application of the policy in particular cases.

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

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70. The Guildford Borough Proposed Submission Local Plan: Strategy and Sites June 2017 is unsound for the following reasons, which are additional to those we reported in July 2016:

(1) The Plan is not consistent with national policy, in the following respect:

- Policies ID2 and A26 particularly would cause substantial deterioration in air quality in Compton, where air quality monitoring shows that NO2 pollution is already (and has persistently been) in breach of legal limits, by attracting additional vehicular traffic through the village to access both the A3 and Blackwell Farm/Surrey Research Park via a new road link from the A31: this is in breach of NPPF paragraph 109 policy for “preventing both new and existing development from contributing to…. unacceptable levels of…. air…. pollution”.

(2) The Plan will not be effective, in the following respects:

- Policy ID2 is unlikely to be deliverable within the Plan period in respect of widening the A3 through Guildford, which is a precondition for implementing Policy A26. Even if it was, it would not meet its own objective of providing appropriate access to the strategic road network to accommodate future planned growth in the form of the Blackwell Farm development – by virtue of generating congestion rather than alleviating it.
- Policy A26 will not be effective because the volume of traffic the proposed Blackwell Farm development would generate on Egerton Road (even if a link road to the A31 is also in place) would cause levels of congestion so high that the network flow would break down in this area, and the Plan proposes no remedy for this.
- Policy A26 will not be effective because the Plan has failed to identify a means of access from Blackwell Farm onto Egerton Road (Infrastructure Requirement (1)), even though this access has been upgraded in the Plan and is no longer ‘secondary’ to the link to the A31; the 1:10,000 plan accompanying the Policy shows no link at all into Guildford.
- Policy A26 will not be effective because Infrastructure Requirement (3) for a controlled road link through the Blackwell Farm development to limit the users of the road will not be implementable in practice.
• Policy A26 will not be effective because the additional road capacity needed to serve the newly proposed secondary school (Allocation item (9)) within the development has not been provided in the Plan and the road network in the area is already modelled to be well over-capacity when Blackwell Farm is developed.

• Policy ID3(3) on developments having regard to the Sustainable Movement Corridor will not be effective in its western section, because either the modal shift will not be pursued vigorously enough to make a significant difference (which appears to be the Local Plan’s preferred strategy), or, if applied with determination (such as by reducing private vehicle lanes in the A3 underpass from four lanes to two) could not be expected by itself to change driver behaviour significantly; in either case the result would be greater congestion on the local road network than it could take after the development of Blackwell Farm.

(3) The Plan is not justified, in the following respects:

• Policy S2 relies on the completion of the widening of the A3 in sufficient time for the proposed numbers of dwellings to be constructed before the end of the Plan period, but this cannot be a justified proposal because there is no certainty at all that the A3 widening will be completed by 2027, if ever; given the difficulty of finding alternative locations likely not to be dependent on capacity increases on the A3, the most appropriate strategy would be to abandon Policy A26.

• Policy A26 would cause the generation of so much traffic (both by itself and by the construction of the A3 without which Policy A26 cannot be implemented) that the local road network could not possibly cope with it, and documents supporting the Plan acknowledge that local roads would be put seriously over-capacity: such an arrangement cannot reasonably be the most appropriate strategy and the Plan is therefore not justified.

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

Attached documents:

Comment ID: PSLPA16/882  Respondent: 8558305 / Boughton Hall Avenue Residents Association (Mr Alan White)
Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Send

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

Answer (if comment is on questions 1-7 of the questionnaire): ()

I write to OBJECT to the 2016 Draft Plan in as much as it affects the areas of Send, Send Marsh and Burnt Common. I also OBJECT to the massive developments at Wisley Airfield and Gosden Hill Farm, Burpham as both sites will impact on the Send area.

I find the Plan to be misleading and contradictory in its presentation and fundamentally flawed.

The Summer "About Guildford" newspaper states that you have reduced the total number of development sites. Yet you have ENLARGED the Send inset area thereby permitting and encouraging larger developments. You also say Will there be any development along the A3 from junction 10 M25 to the Hogs Back. NO, but then you go on to say that there will be, spaced well apart. NO MEANS NO, NOT YES.

I OBJECT to the removal of some 128ha of Green Belt in the area of the Send, Send Marsh, Burnt Common, and Gosden Hill Farm, Burpham.

I OBJECT to the insetting of the Send area which removes some 38.8 ha. from the Green Belt which would enable residential and industrial development in an area where no perceived need has been proven.
I OBJECT to the destruction of 30 ha. of Green Belt farmland (identified as paddock) at Policy A43 Garlick's Arch. No housing need has been proven in the plan and if approved would stretch existing education and medical resources.

I OBJECT to the destruction of 7000 square metres of Green Belt farmland (identified as paddock) for industrial development at Policy A43 Garlick's Arch when the need for industrial development has been dramatically reduced in Guildford's own statement. Guildford B.C. has 40 ha of developable brownfield land at Slyfield. "About Guildford" states that the Plan rejects any schemes that would have a detrimental effect on the Green Belt. So why has this been included? I find Guildford Council's double standards and apparent falsification of evidence to be alarming.

I OBJECT to the destruction of 4.5 ha. of Green Belt farmland (referred to as paddock) at Policy A43a for the provision of the proposed new junction at Burnt Common. This proposal will attract additional traffic to the area from further afield in a misguided hope that they will be possible to "leap frog" the existing traffic jams on the A3. Residents of the area all know that any so-called highway improvement of this size will gridlock the A247 from Woking through Send to Burnt Common and similarly gridlock the winding A247 through West Clandon with its narrow pinchpoints. The A247 was not designed for such increased traffic volume and is incapable of improvement without much compulsory purchase of property. AND, in the off chance that neither Guildford's planners or consultants have noticed, the A3 northbound is already gridlocked and has been for some 25+ years. A new junction that attracts additional traffic is a very strange miracle cure.

I OBJECT to the removal of 2.4 ha. of agricultural Green Belt at Policy A42 Clockbarn Nursery. The development for 45 dwellings along with the 65 dwellings already approved, will create severe traffic congestion. Tannery Lane is narrow and winding and already has to accommodate large vehicles serving the industrial units. There will be major traffic problems at the Tannery Lane/Send Road Junction.

I OBJECT to the removal of 1.9 ha. of Green Belt amenity area at Policy A44 Winds Ridge and Send Hill. This site was not included in any other Plan and has had no previous consultation. The 40 dwellings will increase the traffic at the narrow Send Hill/Send Road junction, already a local traffic "blackspot" at rush hour and school times. Whilst the Plan acknowledges former quarry workings the description at A44 makes no reference to contaminated land following landfill. Neither does it refer to current venting of the site to disperse underground gasses.

It is evident that the Send area has been targeted by Guildford B.C. to lose some 38.8 ha. of Green belt due to its proximity to the A3. No account has been taken of the social and environmental damage that would occur and it does not appear that any prolonged traffic flow studies have been carried out.

I OBJECT to the lack of any form of infrastructure support for the Send area. The existing schools were at full capacity for the 2014 Draft Plan and still are, as is the Villages Medical Centre.

I OBJECT to the inclusion of this site Policy A35 in the Draft Plan when development of this land has been refused, other than for a waste transfer station.

I OBJECT to the removal of 89 ha. of Green Belt farmland environment at Policy A25 Gosden Hill Farm. Despite proposed road improvements, such massive development will have a major impact on the existing area of Burpham and will also adversely affect Merrow. The Allocation box on Policy A25 sheet clearly shows the destruction that Guildford Council intend to allow to happen to this land. Add together all the proposed uses and it is easy to understand that despite the outlined highway and junction improvements and the railway station, the sheer volume of traffic movements throughout the day for housing, shopping, schools, Park and Ride and general employment will extend the existing daily tailback from Stag Hill/Cathedral Hill almost certainly to the new junction at Burnt Common! This will be gross traffic mis-management.

Summary

I find that the Guildford Borough Council Local Plan for 2016 is illconsidered and fundamentally flawed in its assessment of the needs of area of the Borough to the West of the town centre.

I am appalled that the Send area has been targetted by Guildford Council to satisfy un-substantiated housing and industrial need. Why should the Send area be subjected to such an increase in traffic? Wasn't the A3 Ripley By-Pass built for the express purpose of removing vehicles from the villages?
Finally, WHY is Guildford Borough Council encouraging developers to progress housing proposals as soon as possible to help boost housing supply in the early stages of the Local Plan? By its very wording it appears that Guildford Borough Council is attempting to present a series of "fait accompli" to the Inquiry Inspector and pre-judge the outcome of the Public Inquiry and the Inspector's Report?

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

Attached documents:

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Comment ID: PSLPA16/77  Respondent: 8558369 / A W Hutchins  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North

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

Answer (if comment is on questions 1-7 of the questionnaire): ()

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PLANNING POLICY EAST & WEST HORSLEY

This is to lodge my objections to the proposed future development of East & West Horsley.

Whilst I accept more housing is needed in the country I do not think we should have this much in East & West Horsley. A lot of people worked very hard in years gone by to obtain Green Belt status for this area and now it would appear to be taken away. We who have lived here for many years and do not want our villages turned into Surbiton.

Many of the green fields proposed are water logged in the winter. With housing built on them where will the water go?. The local roads get flooded now due to the building that has happened in the last forty years.

Any development that takes place will need the infrastructure to be in place before building. In the past the infrastructure has not been developed enough. The Medical Centre is not big enough, to obtain an appointment with a doctor of your choice in less than a week is very difficult. The car park is often full. The East Horsley Village Hall car park has a notice to say only parking if on Village Hall business.

Yesterday I tried to park at the doctors, the car park was full, two ladies were on duty at the village hall stopping parking if you were not attending the village hall. I therefore could not go to the doctors. The parking at the East Horsley shops is very difficult. There is not enough at the present time, when the camp site is occupied in the Spring and Summer months it is worse. All this is now, what will it be like if this development is allowed?

I notice in the proposed housing there will be Affordable Housing. Can you tell me what is affordable? If the housing are more than £300,00 young local people working locally would not be able to afford them and this surely is what the idea is and what the developer would hope to get the local people on his side.

The local schools are already over subscribed. The nursery school at the Raleigh School is full until the end of 2014. The Raleigh and the Howard of Effingham Schools is full and not everybody who applies can get in.

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

Attached documents:
Comment ID: PSLPA16/5  Respondent: 8558785 / Beechcroft Drive Residents Association (Mark Payne)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

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

Answer (if comment is on questions 1-7 of the questionnaire): ()

Dear planning - I have read the local plan and am shocked to see that although there is substantial development in my area there is no commitment to providing an access for Beechcroft Drive.

As you are aware the access to Beechcroft Drive is direct into the A3 and is a dangerous junction. This was a commitment in the previous plan that was not delivered and it is essential that the borough includes it in this plan.

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

Attached documents:

Comment ID: PSLPS16/2440  Respondent: 8559041 / Beverley Mussell  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A19

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

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy A19 relating to the development of the old Puttocks car park - "Land off Westway etc..." Conditional support for this proposal.

This vacant piece of land is adjacent to the Northern boundary of the Aldershot Road allotment site. It is an area once used as a truck dealership. It housed a large building and bitumen car park. The building has been demolished leaving a concreted area. The bitumen car park contains the vehicular right of way to the Aldershot Road allotment site and the six allocated parking spaces for tenants as mentioned in Policy 21.

This will be a difficult and costly development to deliver. The concrete needs to be removed. The land is at the base of the hill of the allotment site and pile driven supports will be necessary to stop the proposed dwellings from sliding into the school below.

Already there have been “behind closed doors” negotiations to enhance the development delivery of this land. These have involved the suggested loss of the lower vehicular access to the allotment site and also the relocation of its lower parking spaces. The retention of this lower access for vehicles is crucial for the viability of the allotment site as 80% of tenants use this access. The safety of tenants is also a major concern as this is the only safe access for emergency vehicles.

The key considerations as defined in Policy A19 need to be adhered to.

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

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

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy A21 Strong support

Land at Westborough Allotments – correct title – Aldershot Road allotments according to Leasing Agreement between landowners Guildford Borough Council and managing agents Guildford Allotments Society.

This allotment site should be returned to its original use as all allotments.

Allotments have proven health benefits. They promote healthy exercise and outdoor activity. They encourage the growing of fresh produce and its consumption. This helps combat obesity.

They also promote social cohesion as plot-holders are an eclectic mix of ages, religions, nationalities and personalities. All are bound by a common love of gardening. Loneliness and isolation are disturbing factors in modern society but there’s always someone to talk to on an allotment site and inhibiting factors such as wealth and class are missing.

Westborough is officially described as a deprived area and Project “Aspire” has been started to address this. This allotment site has its own in site association - Westborough Allotments Self Help Association) - (WASHA) - which co-operates,agrees and helps with the aims of ”Aspire”.

. Aldershot Road site has an educational program set up with funding by Big Lottery Local Food - WASHA Family Food Mentoring Program in 2009. This is on going and Local Food monitors have commended WASHA on its successful implementation. It teaches newcomers how to grow food. It provides mentors for management and teaching for 90 plus children each year on the St Joseph's school plot. Children are taught that food has to be grown. It doesn't just appear in a supermarket. They realise by the end of their school year of working on their plot, that it is not easy to grow food and food should never be wasted. They also get a chance to sample the wide variety of produce which they grow and harvest on their plot.

The whole site is an island of biodiversity set amongst the urban sprawl of Guildford. Allotment holders are keen conservationists and there are many plot-holders with specialist knowledge of butterflies, bats, birds, insects and wild-flowers. A wide variety of cultivation methods are used including organic and Permaculture from which others can learn sustainable agriculture principles.

UK has a large food deficit and every allotment site should be valued for its contribution to the UK's food production. Surpluses from this site go out to the local churches, North Guildford Food bank as well as feeding the families of the plot-holders themselves. It has no “food miles” and its production is sustainable.

The decision to return the whole site to allotments is correct and nothing should be done to put the survival of this site in jeopardy. It has been used as allotments since before the First World War.

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

Attached documents:
Policy 14 (Green and Blue Infrastructure) – strong support for its aim of enhancing biodiversity. Paragraph 4.6.31.- For all the reasons mentioned above, please include the word “allotments” in the definition of Green Infrastructure.

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

Attached documents:

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

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

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

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

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

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

Attached documents:
Please take the time to check the "evidence" on which your housing need is based.

The growth in Guildford's population is overestimated by 40% because you have under recorded the number of students leaving Guildford at the end of their studies.

You stressed that you would consider the restraints that should limit Guildford's expansion but you haven't. Guildford's economy is already affected by continuous traffic jams which block the main roads in and out of the town area and affect traffic movement in surrounding roads. The pollution this causes is damaging the health of all residents but particularly those who live in proximity to a main thoroughfare.

Green Belt should be sacrosanct otherwise there is no point to it at all. Nibbling it away a bit at a time as you intend with this plan, will still result in its eventual loss. This is to the detriment of future generations.

Has there been any consideration to the effects of the Brexit vote? Why plan for more housing when it may not be needed. Will developers risk housebuilding for an uncertain future?

We have enough good family homes in Guildford for our population. Unfortunately many of these are used by students who could be housed on campus. Why haven't you raised the target for this? Whole areas of Guildford are blighted by use of family houses for student lets.

Your proposal for 12,426 homes (plus a buffer of 1,555 homes) is excessive. We will lose green belt. The character of Guildford will alter for the worse. Those of us who live here will have increased pollution, noise and congestion while the pressure on amenities, health care and education - already severe - will reach breaking point.

Lastly, what is the point of costly window dressing consultations if you take no notice of the responses?

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

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<td>Answer (if comment is on questions 1-7 of the questionnaire): ( )</td>
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Para. 2.12. Our rail network and connections are here ** underrated**. They are in fact exceptionally good, giving easy connections to anywhere in the country, in most cases without travelling via London. A commitment is needed to better exploit this considerable asset.

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

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

**Attached documents:**

**Comment ID:** PSLPS16/5709  **Respondent:** 8559297 / Holy Trinity Amenity Group (Robert Bromham)  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A12

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

Answer (if comment is on questions 1-7 of the questionnaire): ()

**A12 Bright Hill Car Park.** P151 - 152

We note the statement “Opportunities - Improvements to landscaping and biodiversity given the full extent of hardstanding on this site”. It will be impossible to do this, or provide the special high quality development that this site, which is in the Town Centre Conservation Area, requires, with a development of 60 homes. The current plan proposed 33. **We ask that the target be reduced to 45 or less homes.**

**The Robin Hood pub** is excluded from the development although it is prominent within the site. We ask that the pub be acquired to allow it to become part of, and to enhance, the development as a reminder of the previous Victorian development on the site, and a suitable use found for this locally listed building. We also ask that a feasibility study is made of the design options for underground parking, to maximise the potential of the site.

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

**Attached documents:**

**Comment ID:** PSLPS16/8238  **Respondent:** 8559297 / Holy Trinity Amenity Group (Robert Bromham)  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A2

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

Answer (if comment is on questions 1-7 of the questionnaire): ()
Town Centre Riverside Sites, Open Space.

We welcome the designation of protected open space for the immediate riverside on site A2 (Cinema) and ask that this be continued along Bedford Wharf, and applied wherever possible in the centre, including the Portsmouth Road Car Park.

The designation of much of this area is as “Strategic Employment Site (Office and Research and Development); as above this town centre area may not be suitable for R and D which often requires spacious layout and a low density employees.

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

Attached documents:

Comment ID: PSLPP16/11419  Respondent: 8559297 / Holy Trinity Amenity Group (Robert Bromham)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D2

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

Answer (if comment is on questions 1-7 of the questionnaire): ()

D2. Sustainable design, construction and energy. P97.

The designation of areas where new developments must make provision for connection to CHP networks needs clarification. Some of our established residential area, including Charlotteville, fall within the designated town centre “Heat priority Area”. Only isolated new developments, and extensions, are expected in these areas, and it does not make sense to impose connection requirements on these. No mention is made of provision of Solar PV Power; this needs to be included as an objective, particularly for large business buildings. Where good quality buildings are demolished to allow larger or more “contemporary” buildings to be built the loss of the embedded energy needs to be included in the energy assessment of proposals.

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

Attached documents:

Comment ID: PSLPP16/11414  Respondent: 8559297 / Holy Trinity Amenity Group (Robert Bromham)  Agent:

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

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

Answer (if comment is on questions 1-7 of the questionnaire): ()
E1. Sustainable Employment. P63

While the town centre can be a suitable location for Offices (use B1a) – assuming that journeys to it are not made by car - it may not be so for Research and Development (B1b), which requires spacious sites and usually some industrial equipment and has comparatively low employee numbers. We ask for suitable qualification of this policy.

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

Attached documents:

Comment ID: PSLPP16/11415  Respondent: 8559297 / Holy Trinity Amenity Group (Robert Bromham)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

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

Answer (if comment is on questions 1-7 of the questionnaire): ()

E2. Location for new employment floorspace. P67

We are concerned that the policy is to “direct” B1b use to the town centre, and ask that this is qualified as above.

We disagree with the policy for second choice new employment sites to be within 500m of the “transport interchange” of London Road station. The station is a means of joining a train on a linear route, and it cannot be described as an interchange. The 500m radius would mainly cover an established residential area, including part of ours, which should not be converted to business use.

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

Attached documents:

Comment ID: PSLPP16/11416  Respondent: 8559297 / Holy Trinity Amenity Group (Robert Bromham)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E3

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

Answer (if comment is on questions 1-7 of the questionnaire): ()


Contrary to the statement made we consider the permitted change of use from Business to Residential in the town centre to be beneficial to the town, and we oppose this attempt to over-rule it. Housing must take precedence over Business use.

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

Comment ID: PSLPP16/11417  Respondent: 8559297 / Holy Trinity Amenity Group (Robert Bromham)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E7

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

Answer (if comment is on questions 1-7 of the questionnaire): ()

E7. Guildford Town Centre, P85.

The 45,000sqm of retail (comparison) shopping proposed for the N Street site is too much. The priority need is for more residential use.

In addition it is essential to increase day to day convenience-shopping in the centre for residents like us who have nowhere to do this shopping except the centre – unless we drive out of our area. The decline in convenience and service shopping facilities continues, despite the arrival of Waitrose.

We do not wish to see evening and night-time activities located along the immediate riverside. This would require railing in of the river for safety purposes, and provisions made to safeguard clients during a flood event when the area can be quite frightening. The genuine attractive and green riverside, with its green banks and important biodiversity would be lost. There is no objection to such activities in the area providing they have a reasonable set back from the river and are outside of the flood zone.

There is concern about promoting additional “active” use of the riverside and river. The river is a comparatively narrow navigation, and does not have the capacity to take more boating activity than at present. The attractive towpath is already well used by walkers, runners and cyclists. Commercialisation would degrade the riverside as a key asset of the town.

While supporting the intent behind the banning of new food takeaways within 500m of schools we question whether this is practical. There are a number of schools close to the centre including the RGS and Pewley Down Infants, and this rule would ban takeaways from much of the centre.

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

Attached documents:

Comment ID: PSLPP16/11418  Respondent: 8559297 / Holy Trinity Amenity Group (Robert Bromham)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E9

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
E9. Local Centres 

We have no “local centre” to provide our local community with everyday shopping and service facilities. It is suggested that a part of the upper High Street and the adjoining parts of Epsom and London Road be given a suitable designation to encourage the location of everyday retail and service facilities there, together with Council intervention to ensure rentals are affordable. An indoor market might also help address the problem.

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

Attached documents:

| Comment ID: | PSLPP16/11406 | Respondent: 8559297 / Holy Trinity Amenity Group (Robert Bromham) | Agent: |
| Document: | Proposed Submission Local Plan: strategy and sites 2016 / Policy H1 |

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

Answer (if comment is on questions 1-7 of the questionnaire): ()

Para 4.2.8.

A commitment is needed to set (in the following SPDs) guideline maximum dwelling densities for all areas, together with identification of those areas, such as Charlotteville, where no increase in dwelling numbers will be allowed.

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

Attached documents:

| Comment ID: | PSLPP16/11407 | Respondent: 8559297 / Holy Trinity Amenity Group (Robert Bromham) | Agent: |
| Document: | Proposed Submission Local Plan: strategy and sites 2016 / Policy H2 |

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

Answer (if comment is on questions 1-7 of the questionnaire): ()
H2. Affordable homes, P38.

We would like to see a levy on developments of 5 houses or under to help fund affordable housing; it is illogical and unfair that a requirement is only made on larger developments.

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

Attached documents:

Comment ID: PSLPP16/11420  Respondent: 8559297 / Holy Trinity Amenity Group (Robert Bromham)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

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

Answer (if comment is on questions 1-7 of the questionnaire): ()

I1. Infrastructure and delivery, P108.

We welcome the objective of associated infrastructure being available to occupants as soon as it is needed. However stronger control is needed; we suggest that occupancy is not allowed until it can be shown that the infrastructure is in place.

Our Group would welcome the opportunity to be part of the “officer working group” to prioritise the CIL spending for our area.

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

Attached documents:

Comment ID: PSLPP16/11421  Respondent: 8559297 / Holy Trinity Amenity Group (Robert Bromham)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

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

Answer (if comment is on questions 1-7 of the questionnaire): ()


Provision of a “shoppers bus” that would serve all of the town centre and the adjacent residential area is vital to reduce car journeys to the centre. Drastic improvement to pedestrian facilities for those walking to the centre is also needed.

We support provision of off-street parking for residential developments; this ought also to be an objective for the established areas of older small houses that have no on-site parking of their own. However for non-residential developments located in and around the town centre this is not appropriate; it negates the whole objective of location to allow use of sustainable transport by employees and clients.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<tr>
<th>Comment ID: PSLPP16/11422</th>
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I4 Green and Blue Infrastructure, P116.

We welcome the importance placed on the River Wey as a source of bio-diversity and open space. We suggest that an additional objective be added to make the Wey a continuous wildlife corridor.

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

Attached documents:

<table>
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<th>Comment ID: PSLPP16/11409</th>
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P2 Green Belt, P49.

We welcome the policy statement “We will continue to protect the Green Belt” but this policy is already compromised by the decision to develop on some green belt areas. We seek a more authoritative policy, and reconsideration of the green belt development proposed.

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

Attached documents:

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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P3</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()


We assume that this policy relates to a small area of land, but we cannot find this on the policies map. Some clarification is needed.

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

Attached documents:

Comment ID: PSLPP16/11412  Respondent: 8559297 / Holy Trinity Amenity Group (Robert Bromham)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

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

Answer (if comment is on questions 1-7 of the questionnaire): ()


We welcome the policy to restrict development on the ‘developed’ flood zone 3b. This area does not appear to be shown on any of the Plan maps – we request that it is. The flood zone areas are ideally suited to provide green open space, with increased biodiversity, and we hope this objective can be added to this policy.

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

Attached documents:

Comment ID: PSLPP16/11413  Respondent: 8559297 / Holy Trinity Amenity Group (Robert Bromham)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P5

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

Answer (if comment is on questions 1-7 of the questionnaire): ()
Some requirements are unclear, in particular “Measures must be based on a combination of SAMM and the provision, improvement and/or maintenance of SANG”; this appears to be at odds with the other requirement to provide a minimum of 8ha of SANG land per 1,000 occupants. We consider that the only genuine mitigation measure is the provision of new public access land.

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

Attached documents:

Comment ID: PSLPP16/11405  Respondent: 8559297 / Holy Trinity Amenity Group (Robert Bromham)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

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

Answer (if comment is on questions 1-7 of the questionnaire): ()

The housing and retail targets are too high, see 3 above.

P29, Table 2. The town centre function must include provision for the everyday convenience-retail and service needs of local residents; our area to the SE of the centre has no “Local Centre” and so nowhere else where this function is provided.

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

Attached documents:

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

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

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

Answer (if comment is on questions 1-7 of the questionnaire): ()

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

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

Attached documents:
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<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

If the Inspector decides to investigate issues we have raised we would like to participate in the Examination of these.

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

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<table>
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<tr>
<th>Comment ID: PSLP16/11403</th>
<th>Respondent: 8559297 / Holy Trinity Amenity Group (Robert Bromham)</th>
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<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Vision and ambition</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Para 3.2.

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

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

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

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

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

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<table>
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<th>Comment ID: pslp172/4309</th>
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**Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A12**

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

Answer (if comment is on questions 1-7 of the questionnaire): ()

**P170. Bright Hill Car Park.**

We welcome the reduction in number of dwellings from 60 to 40. However this is still too many if some car parking is to be retained, green space provided, and a quality development provided that is fit for this conspicuous site in the Town Centre Conservation Area. We ask that the number of dwellings be further reduced to 30, which is the target given by the current Borough Plan.

We note that only housing is given as an allocated use in the Site Listings, P142, car parking is not given.

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

Attached documents:

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**Comment ID:** pslp172/4308  **Respondent:** 8559297 / Holy Trinity Amenity Group (Robert Bromham)  **Agent:**

**Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A6**

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

Answer (if comment is on questions 1-7 of the questionnaire): ()

**P156. “North Street redevelopment”.**

Retail (A1) and food and drink (A3 and A4) target space needs to be reduced to allow a quality redevelopment to be obtained, as for P22 above.

- **P157 “North Street redevelopment, Transport. Mitigation measures, including those achieving modal shift to sustainable modes of transport, to accommodate the increased travel demand from the development, and changes to the town centre network for private traffic, deliveries, and buses”**

Add. Key routes across the site for pedestrians and cyclists are to be adopted by the Highways Authority to ensure they are an integral part of the town’s network.

- 

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

Attached documents:
I object to removing Ripley and surrounding villages including Clandon from the Green belt and well as objecting to plans for Garlicks Arch. There are no bus/train services in this area and as the council knows, car traffic is almost at a standstill at peak times. There are no exceptional reasons for these sites to be removed from green belt protection and there is insufficient infrastructure for the plan which is itself unnecessary in many locations in Surrey.

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

Attached documents:

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I object to the building of 400 houses and 7000sq metres of industrial space at Garlicks Arch. This was sprung on the village at the last moment, only 2 weeks notice and without any prior consultation. The infrastructure requirements have not been properly considered and are inadequate to deal with the proposed housing levels. Our roads, doctors and schools will be unable to cope. Industrial space is not needed and if it was could be accommodated on the Slyfield industrial estate.

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

Attached documents:
I object to a new interchange with the A3 at Burnt Common, this would be disastrous for Send and the A247 which is already overloaded and jammed at peak times will become gridlocked. Already noise and pollution levels are excessive and this would certainly worsen to the point of being intolerable.

Send would be taking traffic from the proposed new houses at Wisley, Gosden Hill, Burpham and Blackwell Farm. Much of it would come through the village to and from the A3, M25, Woking and Guildford.

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

Attached documents:
I object to the development of 40 houses and 2 travellers pitches at Send Hill there is insufficient access and it would spoil a high amenity area in beautiful countryside.

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

Attached documents:

Comment ID: PSLPP16/6374  Respondent: 8559745 / Mr Brian East  Agent:

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

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

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the proposed removal of Send from the green belt area and to all proposals to build on green belt at Send and elsewhere in the borough when there are adequate brownfield areas to accommodate what is really needed.

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

Attached documents:

Comment ID: pslp172/1073  Respondent: 8559745 / Mr Brian East  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A42

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

Answer (if comment is on questions 1-7 of the questionnaire): ()

Having already objected to the 2016 plan I'm staggered to see that the latest draft has completely ignored the tens of thousands of objections submitted and has now come up with another draft that is even far worse for the village of Send than previous.

It would seem that the GBC has a predetermined agenda to build on the green belt regardless.

I would therefore like to raise the following objections to the latest changes to the plan.
I object to Policy A42 change at Clockbarn in Tannery Lane because an increase to 60 homes is just too big for this area it will make surface water flooding which is already bad in this area even worse and will worsen access and traffic problems in Tannery Lane and at the A247 junction.

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

Attached documents:

Comment ID: pslp172/1075  Respondent: 8559745 / Mr Brian East  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy A42

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

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to Policy A42 change at Clockbarn in Tannery Lane because an increase to 60 homes is just too big for this area it will make surface water flooding which is already bad in this area even worse and will worsen access and traffic problems in Tannery Lane and at the A247 junction.

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

Attached documents:

Comment ID: pslp172/1074  Respondent: 8559745 / Mr Brian East  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy A58

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

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to Policy A58 at Burnt Common because it was previously deleted from the 2014 draft because of all the objections made at the time and there is no need to build an industrial site in the middle of Green Belt when Slyfield and Guildford still have empty sites and industrial units.

Such a development will further impact the surrounding roads and environment, creating traffic congestion, noise and pollution issues.

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

Attached documents:

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

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy P2
I object to the proposal to inset Send Business Park from the Green Belt because it's an old non-conforming user in an area of outstanding countryside adjacent to the Wey Navigation and vehicle access is restricted in both directions along Tannery Lane.

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

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

Attached documents:

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

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

Answer (if comment is on questions 1-7 of the questionnaire): ()

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

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

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

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

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

1.25 The Spatial Strategy must also be realistic in terms of what may be achieved from smaller sites in order to ensure that overly ambitious objectives do not stifle growth or provide a brake on development.
1.26 The Council cannot rely solely on new development to meet infrastructure needs and both the Council and statutory providers will also need to contribute in order to address existing deficiencies.

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

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

1.29 It is important that the vision is viewed holistically and that no one component is to be afforded any greater or overriding weight. This point should be made explicitly within the Vision text.

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

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

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

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

Recommended Additions:

We suggest the inclusion of the following text additions to the Plan Vision:
• Confirmation that the Vision is a holistic strategy and component parts are equally weighted;
• Jobs, growth and services should wherever possible be grouped together;
• A clearly stated priority for the redevelopment of previously developed land AND sites within or on the edge of existing settlements prior to the wider expansion of less sustainable sites.
• A less rigid approach to the application of development standards.

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

Attached documents:

Comment ID: PSLPP16/3340  Respondent: 8560257 / Patricia Camp  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

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

Answer (if comment is on questions 1-7 of the questionnaire): ()
Guildford Borough Planning Policy

I write to strongly object to the Guildford Borough Draft Local Plan to remove the village of West Horsley/East Horsley from the Green Belt as follows.

No sound case is made justifying changing Green Belt boundaries laid down many years ago by national legislation.

The main purpose of Green belt is to keep a sense of openness between built up areas, in this case around London. The Green Belt also provides opportunities for people to access the country to keep land for agriculture, forestry, and similar land uses, and for nature conservation.

It would be totally irresponsible for the council in that removing the Green Belt would totally destroy it now and for future generations.

Housing

I strongly object to the number of proposed houses, 485, for the Horsley’s the large number of homes would be totally out of character with the existing character and layout of the village.

The village settlement is comprised of low density housing with a considerable mix of ages and housing styles.

West Horsley does require some affordable housing for young people.

Affordable housing for elderly residents to be near the village facilities as many would be unable to walk a great distance to the medical centre, chemist, shops, library or transport.

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

Attached documents:

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Comment ID: PSLPP16/3342  Respondent: 8560257 / Patricia Camp  Agent:  

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1  

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

Answer (if comment is on questions 1-7 of the questionnaire): ()

Infrastructure - Drains

There is a serious under capacity of existing sewers and the treatment works to cope with the large number of dwellings proposed.

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

Attached documents:

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Comment ID: PSLPP16/3343  Respondent: 8560257 / Patricia Camp  Agent:  

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Schools

I am concerned and object to the issue that more families moving into the village would create fewer places for families already with children approaching school age.

The Raleigh (no room on the site for expansion) is the only primary state school in the village and has been full every year for many years.

Secondary school places are limited in number at the Howard of Effingham and other secondary schools, also full are a greater distance from the village.

Village facilities

West Horsley is a small village with very few facilities, which are not enough for the current population.

Parking is very difficult most times of the day for people using the shops and library.

The village does have three disabled parking spaces close to the shops and a small car park.

It is very difficult getting appointments and parking at the single Medical Centre serving East and West Horsley plus areas beyond the village.

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

Attached documents:

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<th>PSLPP16/3344</th>
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<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Transport

West Horsley bus service through the village is extremely limited and only operates twice a day Monday to Friday.

Horsley, inadequate parking spaces, and Effingham Junction have frequent trains to London and Guildford 7 days a week. The early commuter trains are usually full from Guildford on arrival at Horsley and returning from London evening rush hours. You could be standing the entire journey.

Traffic generation from the proposed housing plan would be considerable affecting station traffic movement to/from Horsley and children getting to school. There is no land available for more car park spaces.
I walk; lead walks in the Surrey villages and green belt area often meeting and talking to schoolchildren during May & June from Surrey and the London area taking part in the Duke of Edinburgh Award for all young people to develop skills for life and work, fulfill their potential and have a brighter future.

The London children enjoying opportunities never experienced before are so excited all so keen marveling at seeing the beautiful Surrey villages and countryside, often asking questions about the area.

**Infrastructure - Roads**

Green Lane and most of the roads in and around West Horsley are very narrow, full of potholes often perilous, particularly when large GBC vehicles collecting refuse, garden rubbish, large lorry’s buses and tractors passing through.

The council has failed to properly maintain the roads. Occasional attempts are made to’ make do and mend some of the potholes, but they are beyond the state which could support a significant increase in traffic.

To increase such traffic which would result if the proposed developments were to proceed would be wholly irresponsible.

**Conclusion**

Our generation must not leave a legacy such as this of a concrete jungle.

When the next generation can only look in books and see green fields, character historic Surrey villages - as history and say:

**THIS IS HOW IT WAS IN THE OLDEN DAYS.**

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

Attached documents:
Comment ID: PSLPP16/3341  Respondent: 8560257 / Patricia Camp  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

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

Answer (if comment is on questions 1-7 of the questionnaire): ()

Green Lane - Flooding & drainage

I have lived in Green Lane, 30 years’ since August 1986.

I strongly object to the planned 120 houses Waterloo Farm and 135 houses on Manor off Ockham Road North.

The land slopes significantly from East Horsley and during periods of heavy rainfall causing flooding on Ockham Road North and Green Lane.

Every year this is a problem having personally witnessed the flooding each year during periods of sustained rainfall. See attached photos June 2016

The building of roads and 255 houses on the two green fields currently absorbing the heavy rainfall during the winter and now summer months as experienced June 2016 would increase the flooding by creating a surface that would impact on the already major flood risk in the area.

The proposed 120 houses, A40, and would create a huge risk with increased flooding which was previously experienced when the current property, Oakland Farm was built a few years ago.

In addition the heavy rainfall during June 2016 Green Lane experienced heavy flooding in the road and overflowing the essential ditches. Again the land slopes significantly from Long Reach.

The proposed access via Green Lane to include Waterloo Farm is totally unacceptable, would create massive disruption to the local community along with the lack of drainage and infrastructure in the extremely narrow lane.

The the large lake on the National Camping Club of Great Britain site overflows into the ditch which in turn causing flooding in Green Lane running down towards our property, flooding our front garden. We have had flooding right up to the front door.

The gardens in the smaller private Green Lane previously Bungalow Lane adjacent to Watersmeet all flood during heaving rainfall. Four new properties’ two houses and two bungalows have been built in the lane late 1980/1990. A natural spring on the area of land to build the two bungalows was built over causing flooding to the gardens on the opposite side of the lane resulting in a land drain having to be built the complete length in all of the opposite gardens in the lane.

This involved massive intrusive disruption, months of work digging up gardens, taking down fences, trees and new manhole covers in the garden where we would rather not have had them.

Surrey Country Council/National Rivers Authority, built culverts in Green Lane and Thames Water Flooding, installed a non-returned valve on our property.

Both have made a slight improvement but not solved the flood risk.

The manhole covers have water pumping out along with sewage into the lane and our garden.
During heavy rain the water in the toilets in our house rises to almost overflowing. We are unable to use the toilet or pull the chain, as it would certainly flood the house. The gurgling from the toilet is very alarming also keeping you awake during the night.

Thames Water Sewer Flooding Mitigation arranged a survey to be undertaken by WERM Ltd to help with the sewage and manhole overflow. In 2007 a non-return valve fitted to help the situation. This has not helped as the toilet still overflows during heavy rainfall.

Severe flooding frequently occurs in Green Lane and Long Reach during heavy rain. Running along the eastern boundary, for the full length of the smaller Green Lane adjacent to our property, there is a ditch, which extends beyond the southern point of the private small lane and continues along the eastern boundary. This ditch is a land drain and specifically takes the overflow from the large lake to the south of the land, which is under the ownership of the National Camping Club of Great Britain.

On the front boundary, there is a further ditch which the ditch on the eastern boundary discharges. This is an important drainage ditch. Works of improvement were carried out by National Rivers Authority, two brick culverts were constructed, one of which discharges under Green Lane into a further ditch on the northern side of Green Lane.

John Faithfull originally purchased Watersmeet.now Oakland Farm about 1965 and subsequently purchased three of the adjoining sub-standard bungalows, and re-built these in the late 1960s.

He had his own company specializing in plumbing and flooding having a lot of dealings with Surrey County Council and National Rivers Authority over the ditches and flooding area in Green Lane.

Although considered eccentric by some people, as he got older, he was an extremely knowledgeable man qualified in Hydraulics’ Research, building and flooding risks working tirelessly with and alongside National Rivers Authority.

My husband was employed by The National Physical Laboratory (NPL) at Teddington

The Hydraulic Research Organization department. Predicted the risk of heavy flooding that would result from the indiscriminate building of roads and housing on fields and water meadows. This has now been proven with annual increased rainfall (predicated increased future rainfall) in many parts of England.

The photographs’ of the recent flooding were taken in June 2016.

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

Attached documents: [IMAGE 1.jpg](3.0 MB) [IMAGE 2.jpg](2.7 MB) [IMAGE 3.jpg](3.5 MB) [IMAGE 4.jpg](3.0 MB)
Please bear the following in mind when considering applications to develop the land around the Cathedral:

1. This side of Guildford has recently become much more developed, eg the Research Park, Manor Park, the Sports Park and needs to retain some open green space. Wasn't it given to Guildford to be an open green space to be enjoyed by all?
2. Traffic congestion down The Chase and Madrid Road can be very heavy and not just in the rush hour.
3. The back entrance to the station is wholly inadequate and adds to this congestion, due to two bus stops and cars and taxis picking up and dropping off rail passengers.
4. The entrance to any development would be best taken off the road which leads up to the Cathedral rather than off Ridgemount, which in part has a pavement only on one side. This already feels hazardous as pedestrians frequently walk in the road which is difficult for vehicles. There is also a bus station at the bottom of the road and there are often buses reversing into the five way junction and also parked in the road. (do they have permission to park in the road?).
5. There is instability in the hill. As residents of Ridgemount we, and several of our neighbours, have had to have our homes underpinned.

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

Attached documents:

Comment ID: pslp172/3126  Respondent: 8560833 / Mrs Carolyn Mayne  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A25

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

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy A25 Gosden Hill:

The documents imply that there is a reduction to 1,700 new homes (from the earlier figure of 2,000). But it now appears this is misleading and that the lower figure is still a minimum. In any event, this scale of new homes planned is, in my opinion, so large as to inevitably damage the whole infrastructure of the area.

Infrastructure: The proposed changes to the access to the A3, together with other recent and proposed road system changes will, in my opinion, have such a large negative impact on Burpham as to inevitable cause major traffic disruptions and should be entirely reconsidered.

The proposed development will generate a daily movement of thousands of vehicles the vast majority of which will pass through Burpham. This Plan represents yet another ill-conceived planning proposal, with insufficient thought given to the infrastructure needed.

The last few decades have seen two major housing estates, a considerable number of smaller garden grabbing developments, one super store and, recently, one very inappropriately sited supermarket. Both because of the volume and reduced speed of traffic, these changes regularly lead to severe air pollution which damages the quality of our lives in Burpham. The current Plan represents a major worsening in an already unacceptable traffic and pollution situation.

Traffic at the Burpham roundabout is regularly brought to a standstill with cars and delivery vehicles queuing to get into Aldi's inadequate car park. New Inn Lane and London Road are already subject to long traffic queues at all times of day. Extra traffic will inevitably cause even worse delays and pollution.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Policy S2: The Plan as a whole is undermined by massive errors in the housing need figures.** The housing need has been reduced from 693 per annum last year to 653 per annum, giving a total build over the period of the Plan of 13,893. On the one hand, a reduction of around 5% has minimal impact on concerns about the scale of the housing development’s enormous and negative impact on the Borough as a whole. Equally, I now understand that an over-inflated housing need figure has been used in the Plan. As this affects every aspect of this Draft Local Plan; this one particular renders the whole Plan unsustainable.

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

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I object to the fact that infrastructure requirements have not been properly considered and are inadequate to deal with proposed housing levels. Roads, doctors and schools will be unable to cope

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

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<th>Comment ID:</th>
<th>PSLPS16/2310</th>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

**Gosden Hill (policy A25)**

The scale of the development proposal and its potential impact on the A3 and other local roads is a major concern. The provision of a rail link may help to partially alleviate the problem, but the number of houses proposed is far higher than is suitable for the location and unless the development is invisible from the A3 then it will detrimentally affect the appearance of the borough as a predominantly rural area.

I object to the large proposed development at of 2,000 houses at Wisley Airfield, 2,000 houses at Gosden Hill and 1,850 houses at Blackwell Farm because it will destroy large areas of Green Belt and agricultural land and produce congestion on the A3 and surrounding roads including Send.

I object to the fact that 70% of the proposed 13,860 houses are targeted at the Green Belt strung along the A3 which will destroy the open amenity of the borough and produce gridlock on the A3 and surrounding roads including the A247 which are all already at 100% capacity.

I object to the complete failure of GBC to identify sufficient brownfield sites within the urban area which should be targeted first for development before the open countryside and the Green Belt and the failure to include the Town Centre Masterplan 2015 within the plan.

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

**Attached documents:**

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**Comment ID:** PSLPS16/2482  **Respondent:** 8561057 / Chris Brown  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A25

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

Answer (if comment is on questions 1-7 of the questionnaire): ()

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Policy A42: Clockbarn Nursery, Tannery Lane, Send (page219)

I object to this development because the additional traffic from that development coupled with the traffic from the new marina with 80 berths which you have agreed further down Tannery Lane which is mainly a single lane with passing places.

The Marina was identified as a high priority requirement and something the village apparently ‘had to have’. Having spoken to many locals, it would appear that this would have been so far down their list of requirements to actually not be on the list at all! It was a travesty the development was voted through by GBC when clearly there were valid objections.

These same objections remain and will be compounded by the inclusion of the Clockbarn nursery site. This additional traffic will be unable safely to join the much overused main road through Send. This road is the main through road from Woking to the A3 and M25 which is already used to capacity especially by articulated trucks and heavy vehicles for which the road was never designed. Additional traffic joining from Tannery Lane would have great difficulty and any attempt to ease the problem with a roundabout or traffic lights would simply exacerbate the situation.

The access point is so narrow it would clearly be a safety hazard and a potential accident black spot. Vehicles would not be able to join the main road and so would back up along Tannery Lane at peak times. This would be really dangerous and if there was an emergency then the necessary services would be unable to gain access to the site and attend the incident and this could have serious consequences.

GBC has a responsibility to its residents to ensure proposed developments meet highways safety standards and I fail to see how an access point at a narrow junction of Send Road and Tannery Lane will meet this.

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

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

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy A43: Land at Garlick’s Arch (page 221)

I object to this proposal because the number of homes proposed would add to local traffic congestion which is already excessive at peak travel periods.

This was a sleight of hand by GBC in slipping this application into the Plan at such short notice. The site has never been proposed before and has not undergone a proper and full evaluation.

This site is also located underneath one or more pylons carrying power cables which constitute a health hazard for anyone and especially children living in such close proximity to them. There is evidence suggesting a link between cancer/Leukaemia and power lines and this has not been considered.

I also object to the location of any form of industrial activity which would increase traffic movements in that area leading to even greater traffic congestion. If additional industrial space is needed the ideal location is Slyfield which has the space to cater for it and there is a symbiotic relationship between the various activities on such a site. Slyfield has room to expand and accommodate extra capacity and is well located on the edge of the town.

If Garlick’s Arch proceeds it will create traffic chaos in all the approach roads through the villages of Send, Send Marsh and Ripley. There is simply no proven need to consider this site for industrial or housing, on any scale planned.

I object to the proposed industrial development of 7,000 sq m at Garlick’s Arch because it is simply not required since the latest Employment Land Needs Assessment 2015 (ELNA) shows a reduction of 80% in required employment floor space from the previous draft plan.

If there is a need for 7,000 sq m of industrial space it should be at Slyfield where there is a 40ha site available.

The proposal to build 400 houses and 7,000sq.m. employment space (light industrial/storage, warehousing) on virgin Green Belt land, lying outside the Send Marsh/Burnt Common village boundary, defies all logic. This area which includes ancient woodland is a refuge for deer and other wildlife. It was never considered as a Potential Development Area within the Council’s ‘Issues and Options report’ or identified for development in the 2014 consultation.

In 2014 the Council rejected a planning application from ‘Oldlands’ to build 25 houses in this location on sound planning grounds, so how is can now be considered apt to construct 400 houses and 7,000sq.metres of employment space there?

Apart from the fact that this is all Green Belt land, the infrastructure just cannot support such a development. Send Marsh/ Burnt Common has one just shop (Waitrose), no doctors’ surgery, no schools and the local roads are already filled to capacity.

Any development at all in this area would be totally inappropriate and would be to the very substantial detriment of Send Marsh/Burnt Common as a village. The housing proposal alone would add 960 to the existing population of 2,341, an increase of 41%.

The proposed light industrial/storage facility would significantly detract from the open countryside aspect and add dramatically to the existing road use. It is totally inappropriate and would destroy the village’s demarcation from Ripley, creating urban sprawl.

This very late and very major change to the Local Plan proposals does appear to have not followed the correct due process and therefore shall, if approved by your Council, be subject to immediate legal challenge.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/2479  Respondent: 8561057 / Chris Brown  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

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

Answer (if comment is on questions 1-7 of the questionnaire): ()

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If there is a need for 7,000 sq m of industrial space it should be at Slyfield where there is a 40ha site available.

The proposal to build 400 houses and 7,000 sq m employment space (light industrial/storage, warehousing) on virgin Green Belt land, lying outside the Send Marsh/Burnt Common village boundary, defies all logic. This area which includes ancient woodland is a refuge for deer and other wildlife. It was never considered as a Potential Development Area within the Council's 'Issues and Options report' or identified for development in the 2014 consultation.

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

Attached documents:

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Comment ID: PSLPS16/2483  Respondent: 8561057 / Chris Brown  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

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

Answer (if comment is on questions 1-7 of the questionnaire): ()

Fields around Danesfield, Send Marsh (GU23 6LS)

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

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

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

My comments on this site are as follows:

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

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

1. I know photographic evidence showing the effect of flooding on the site have been sent to GBC and they have accordingly downgraded the site from a Potential Development Area to a Safeguarded Area.
1. Any building or hard standing will reduce the land available to absorb the run off from heavy rain falls and this will exaggerate the flooding. This could cause flooding and damage to adjoining property in Danesfield which may lead to future insurance claims.

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

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

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

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

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

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

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

1. This site should not be removed "inset" from the green belt as this would mean planning permission would surely be granted for the.

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

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

1. Send Marsh does not have any infrastructure. There are no local shops, no school, no doctor's surgery and no public park. It comprises if mainly all houses and so the addition of so many new houses will put huge pressure on the infrastructure on Send and Ripley, both of which can hardly cope with the current pressures. You would have to walk a considerable distance to access any of these services and so this would mean owners would have to use a car. This would seem contrary to the governments' policy for us all being green and reducing pollution.
1. The bus routes to and from both villages are very poor and infrequent, about one per hour. Again it is essential to have a. The roads are too narrow and dangerous for cyclists so this is not really an option.

1. By proposing greenbelt sites in the area means this land will be gone. It is essential we protect the greenbelt or we will simply be a concrete jungle joined to Guildford and Woking with no green space in between. These greenbelt areas are essential to everyday living to provide clean and open space for everyone to enjoy.

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

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

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

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

Attached documents:

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Comment ID: PSLPS16/2307  Respondent: 8561057 / Chris Brown  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

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

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy A43a: Land for new north facing slip roads (page 223)

I object to this proposal because it would do nothing to ease the density of traffic on a road which already suffers from long tailbacks at peak times. The A3 regularly has blocked traffic and adding a slip road which only serves the purpose to access a specific site and no other will only make things worse.

This proposal would encourage additional traffic along the very narrow, winding A247 Clandon Road and the Send Barns Lane/Send Road leading to Woking, the traffic along both of which are already at capacity. Send village is a ribbon development of housing along both sides of Send Road, so there is no scope to widen it, and where it ends at the Old Woking roundabout none of the connecting roads can be widened to ease congestion because of the existing surrounding buildings.

This ill-conceived plan to enable major development at Gosden Hill and Wisley completely fails to take account of the serpentine configuration of the Clandon Road and of the inability to improve the traffic flow along it and the Send Road because of the proximity of existing housing.

The suggestion that the land for the slip roads may be gifted should the Wisley airfield development proposal be accepted means that this is really no gift at all, merely an undisguised attempt by that developer to gain approval to build on protected land.

As such it will, if approved, be subject to legal challenge
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/2480  Respondent: 8561057 / Chris Brown  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

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

Answer (if comment is on questions 1-7 of the questionnaire): ()

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The suggestion that the land for the slip roads may be gifted should the Wisley airfield development proposal be accepted means that this is really no gift at all, merely an undisguised attempt by that developer to gain approval to build on protected land.

As such it will, if approved, be subject to legal challenge

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

Attached documents:

Comment ID: PSLPS16/2308  Respondent: 8561057 / Chris Brown  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A44

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

Answer (if comment is on questions 1-7 of the questionnaire): ()
Policy A44: Land west of Send Hill (page 225)

I object to the inclusion of two travellers pitches on this site which would be in contravention of your own stated policy of having a ratio of two such pitches for every 500 houses.

It is possible that the widening of the Send Hill road would encroach on the area of the site thus reducing its capacity for 40 houses assuming it could even accommodate as many as that which is doubtful. Two pitches among so few houses would certainly have a negative effect on the value of any houses built there and would certainly not secure the best return on the tax payers investment on the land.

Send Hill is certainly not a suitable location for travellers anyway access being difficult from the traffic lights especially with cars parked on one side opposite the school and on the brow of the hill making the approach quite hazardous.

In addition, there is a school at the bottom of Send Hill and at peak school times it is very congested with parents dropping their children. By travellers driving their vehicles with caravans making a long vehicle with potential blind spots then this will only heighten the risk of safety for parents and children.

However, a much smaller development without traveller pitches and in keeping with the surrounding properties could be a possibility. This would be a natural extension of the housing building line up Send Hill and could provide a development in-keeping with the rest of the area.

Traveller issues have arisen in Send several times over the years and Send residents and our Parish Council have expressed their views many times to you the Guildford Borough Council and GBC do not seem to heed our views and now again insist on trying to locate two pitches in a most unsuitable location. These pitches appear to have been randomly dropped into this area as they were originally in the centre of the village in Wharf Lane, which was another equally ill conceived area to site them.

[Response has been redacted due to statements being considered contrary to the Council’s duty under the Equalities Act 2010 to eliminate discrimination, harassment, victimisation against persons with a protected characteristic; and to foster good relations between persons with a protected characteristic and persons who do not share it] and they should be housed in areas where I understand they prefer which are typically more rural and away from the housing developments.

The Local Plan is lacking evidence and detail

I feel there is a big disconnect between the requirements most residents feel they need and the locations they would sight developments against the methods employed by GBC and the seemingly alarming developments proposed.

The plan is considerably lacking in details which does nothing to help the residents who ultimately will determine the plan as a collective. For example

1. There is no explanation of why so much housing capacity is required in this area and who it is for.
2. There are no artist’s impressions of how a development might look or any idea given of what an “affordable house” looks like
3. What is a traveller’s pitch?
4. Are there any conditions attached to the allocation of travellers pitches?
5. How are they to be managed? How are services arranged and paid for?
6. What term do the travellers stay for? Is there a minimum or maximum?

I feel if these questions could be answered then I would be better informed and could make a better decision.

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

Attached documents:
Specific Comments about Policy A44: Land west of Send Hill (page 225)

I know this area well and I grew up nearby. Whilst I recognise there may be some people who wish to object to this site I would like to put forward a more positive viewpoint in respect to possible development, although I offer some reservations as well.

1. The plan suggests the total site may be able to support approximately 40 houses but looking at the area and allowing for access roads to be built within the site, I feel this is a little optimistic. A figure of between 15 to 20 homes could be more realistic.

2. The development of the site should not aim to be high density or high rise. It should be in keeping with the rest of Send Hill and Winds Ridge which would mean either chalet bungalows and smaller houses, with maybe one or two large 4 or 5 bedroom houses added on slightly larger plots to enhance the overall appearance of the site.

3. The proposal to incorporate two traveller pitches as part of a mixed development would seem to be questionable. This site is the ONLY proposed mixed site in the whole of the Draft Local Plan for the Borough and in this regard would seem to be out of context in terms of mixed use compared to the other proposed sites.

If GBC were to develop the site as a mixed site then this would seem to contradict their main directive which is to ensure the best return on assets owned by the tax payer. This is because a close proximity mixed site would potentially mean a lower overall return on the final selling prices achieved for such a development. If this were the case, and was reflected by the mood of potential buyers, and borne out by final house sale prices, then this would be potentially a loss to the tax payer of several hundred thousand pounds. This could be interpreted as ill-conceived and irresponsible of GBC if this were to be reviewed at a future date and questions could be sought.

Considering the site overall, it would seem a better solution overall to not make this a mixed site and transfer the traveller sites to a more suitable location and one where it is concentrated on a traveller site only on one of the other proposed sites.

1. I object to the inclusion of two travellers pitches on this site which would be in contravention of your own stated policy of having a ratio of two such pitches for every 500 houses
2. Traveller issues have arisen in Send several times over the years and Send residents and our Parish Council have expressed their views many times to you the Guildford Borough Council and I find it very disappointing that you do not seem to heed our views and now again insist on trying to locate two pitches in a most unsuitable location. [Response has been redacted due to statements being considered contrary to the Council’s duty under the Equalities Act 2010 to eliminate discrimination, harassment, victimisation against persons with a protected characteristic; and to foster good relations between persons with a protected characteristic and persons who do not share it]
3. If the development was on a smaller scale then the impact on Send Hill would be considerably reduced. Send Hill and the roads off it are very quiet and this is the main appeal of the area. The addition of 15 to 20 more homes would not represent a large increase in road traffic or impact the existing residents.
4. It is true that that Send Hill is a single track country road but with sensible planning and a low density development I do not see this as causing any problems to the existing residents or making a dramatic impact. By contrast, if it were to be a high density development then I think the opposite would be true.
5. The land is in greenbelt and I am a big supporter of keeping the greenbelt and not allowing wide scale development. However, this site when viewed on the map could be considered as an extension of the existing housing line of Send Hill. The site is surrounded by mature oak trees which should remain and is bound on two sides by a footpath which should also remain. This means that the surrounding open fields are all kept intact and the views are unaltered, so residents, dog walkers and members of the public can continue to enjoy the amenity.
6. The sensible development of this site, being at the top of the hill and the highest point, means it would not be subject to flooding and would not be detrimental to the community and increased flood risk.

7. I understand that the land has been infilled over time and it has laid fallow for over 30 years. At one end of the field, the land owned by Guildford Borough Council, which is the main area of infill, there are methane vents. Further environmental tests may need to be reviewed to determine the exact position of any possible continued contamination.

8. By contrast, the far end of the field, closest to the cemetery, and not owned by GBC, this land has not been infilled as I understand it and recent environmental reports (dated as recently as 2015) seem to suggest that there is no contamination on this land. If this is the case, then perhaps this area could be considered for responsible, small scale development, to be in keeping with the current housing line.

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

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

Attached documents:

Comment ID: PSLPS16/2481  Respondent: 8561057 / Chris Brown  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A44

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

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy A44: Land west of Send Hill (page 225)

I object to the inclusion of two travellers pitches on this site which would be in contravention of your own stated policy of having a ratio of two such pitches for every 500 houses.

It is possible that the widening of the Send Hill road would encroach on the area of the site thus reducing its capacity for 40 houses assuming it could even accommodate as many as that which is doubtful. Two pitches among so few houses would certainly have a negative effect on the value of any houses built there and would certainly not secure the best return on the tax payers investment on the land.

Send Hill is certainly not a suitable location for travellers anyway access being difficult from the traffic lights especially with cars parked on one side opposite the school and on the brow of the hill making the approach quite hazardous.

In addition, there is a school at the bottom of Send Hill and at peak school times it is very congested with parents dropping their children. By travellers driving their vehicles with caravans making a long vehicle with potential blind spots then this will only heighten the risk of safety for parents and children.

However, a much smaller development without traveller pitches and in keeping with the surrounding properties could be a possibility. This would be a natural extension of the housing building line up Send Hill and could provide a development in keeping with the rest of the area.

Traveller issues have arisen in Send several times over the years and Send residents and our Parish Council have expressed their views many times to you the Guildford Borough Council and GBC do not seem to heed our views and now again insist on trying to locate two pitches in a most unsuitable location. These pitches appear to have been randomly dropped.
into this area as they were originally in the centre of the village in Wharf Lane, which was another equally ill conceived area to site them.

[Response has been redacted due to statement containing personal data which cannot be disclosed due to the provisions of the Data Protection Act 1998]

The Local Plan is lacking evidence and detail

I feel there is a big disconnect between the requirements most residents feel they need and the locations they would sight developments against the methods employed by GBC and the seemingly alarming developments proposed.

The plan is considerably lacking in details which does nothing to help the residents who ultimately will determine the plan as a collective. For example

1. There is no explanation of why so much housing capacity is required in this area and who it is
2. There are no artist's impressions of how a development might look or any idea given of what an "affordable house" looks like
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4. Are there any conditions attached to the allocation of travellers pitches?
5. How are they to be managed? How are services arranged and paid for?
6. What term do the travellers stay for? Is there a minimum or maximum?

I feel if these questions could be answered then I would be better informed and could make a better decision.

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

Attached documents:

Comment ID: PSLPS16/3106   Respondent: 8561057 / Chris Brown   Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A44

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

Answer (if comment is on questions 1-7 of the questionnaire): ()

Having carefully examined the above Proposed Plan I would like to place on record my objections which I would like to be seen by the Inspector.

I know this area well and I grew up nearby. Whilst I recognise there may be some people who wish to object to this site I would like to put forward a more positive viewpoint in respect to possible development, although I offer some reservations as well.

1. The plan suggests the total site may be able to support approximately 40 houses but looking at the area and allowing for access roads to be built within the site, I feel this is a little optimistic. A figure of between 15 to 20 homes could be more realistic.
2. The development of the site should not aim to be high density or high rise. It should be in keeping with the rest of Send Hill and Winds Ridge which would mean either chalet bungalows and smaller houses, with maybe one or two large 4 or 5 bedroom houses added on slightly larger plots to enhance the overall appearance of the site.
3. The proposal to incorporate two traveler pitches as part of a mixed development would seem to be questionable. This site is the ONLY proposed mixed site in the whole of the Draft Local Plan for the Borough and in this regard would seem to be out of context in terms of mixed use compared to the other proposed sites.

If GBC were to develop the site as a mixed site then this would seem to contradict their main directive which is to ensure the best return on assets owned by the tax payer. This is because a close proximity mixed site would potentially mean a lower overall return on the final selling prices achieved for such a development. If this were the case, and was reflected by the mood of potential buyers, and borne out by final house sale prices, then this would be potentially a loss to the tax payer of several hundred thousand pounds. This could be interpreted as ill-conceived and irresponsible of GBC if this were to be reviewed at a future date and questions could be sought.

Considering the site overall, it would seem a better solution overall to not make this a mixed site and transfer the traveler sites to a more suitable location and one where it is concentrated on a traveler site only on one of the other proposed sites.

1. I object to the inclusion of two travelers pitches on this site which would be in contravention of your own stated policy of having a ratio of two such pitches for every 500 houses.
2. Traveler issues have arisen in Send several times over the years and Send residents and our Parish Council have expressed their views many times to you the Guildford Borough Council and I find it very disappointing that you do not seem to heed our views and now again insist on trying to locate two pitches in a most unsuitable location. [Response has been redacted due to statements being considered contrary to the Council’s duty under the Equalities Act 2010 to eliminate discrimination, harassment, victimisation against persons with a protected characteristic; and to foster good relations between persons with a protected characteristic and persons who do not share it]
3. If the development were on a smaller scale then the impact on Send Hill would be considerably reduced. Send Hill and the roads off it are very quiet and this is the main appeal of the site. The addition of 15 to 20 more homes would not represent a large increase in road traffic or impact the existing residents.
4. It is true that Send Hill is a single track country road but with sensible planning and a low density development I do not see this as causing any problems to the existing residents or making a dramatic change. By contrast, if it were to be a high density development then I think the opposite would be true.
5. The land is in greenbelt and I am a big supporter of keeping the greenbelt and not allowing wide scale development. However, this site when viewed on the map could be considered as an extension of the existing housing line of Send Hill. The site is surrounded by mature oak trees which should remain and is bound on two sides by a footpath which should also remain. This means that the surrounding open fields are all kept intact and the views are unaltered, so residents, dog walkers and members of the public can continue to enjoy the amenity.
6. The sensible development of this site, being at the top of the hill and the highest point, means it would not be subject to flooding and would not be detrimental to the community and increased flood risk.
7. I understand that the land has been infilled over time and it has laid fallow for over 30 years. At one end of the field, the land owned by Guildford Borough Council, which is the main area of infill, there are methane vents. Further environmental tests may need to be reviewed to determine the exact position of any possible continued contamination.
8. By contrast, the far end of the field, closest to the cemetery, and not owned by GBC, this land has not been infilled as I understand it and recent environmental reports (dated as recently as 2015) seem to suggest that there is no contamination on this land. If this is the case, then perhaps this area could be considered for responsible, small scale development, to be in keeping with the current housing line.

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

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

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

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

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

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

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

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

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

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

Attached documents:

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

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

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

Answer (if comment is on questions 1-7 of the questionnaire): ()

**Fields around Danesfield, Send Marsh (GU23 6LS)**

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

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

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

My comments on this site are as follows:

1. This site is on a flood plain. Over 37% of the site is in flood zones 2 or 3, with over 25% in flood zone 3. Therefore, this land is clearly not suitable for development and this was borne out whenever there is heavy rain and the land floods. I am reliably informed that the area becomes almost a large lake when there is a heavy downpour and this can be seen from the road and footpaths.
2. GBC policy and the Environment Agency are against developing on flood zones and so for this reason the land should not be built on or developed. GBC could face legal action from the Environment Agency if they were to go against this and spend tax payer’s funds to defend such a claim. This would be an irresponsible use of tax payer’s money.
3. I know photographic evidence showing the effect of flooding on the site have been sent to GBC and they have accordingly downgraded the site from a Potential Development Area to a Safeguarded Area.
4. Any building or hard standing will reduce the land available to absorb the run off from heavy rain falls and this will exaggerate the flooding affect. This could cause flooding and damage to adjoining property in Danesfield which may lead to future insurance claims.
5. There are many bats on this site which are protected under The Conservation of Habits and Species Regulations.
6. The access into the site is limited to only two points of entry. One entry is onto the busy Send Marsh Road which is narrow and unsuitable to carry more traffic. This entry point is near to a blind bend so there would be a safety concern and a potential accident black spot with approaching traffic from the direction of Send. The other entry
point is into the side of Danesfield where the access is deliberately narrow as it is a residential road where many families live with young children. There is only just enough room to get two cars passing so a massive increase in traffic would be totally impractical as well as dangerous for all the small children who play in the road. Furthermore, there is an old established oak tree on the entry point which would have to be cut down and I believe this has a TPO on it.

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

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

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

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

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

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

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

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

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

16. The bus routes to and from both villages are very poor and infrequent, about one per hour. Again it is essential to have a car. The roads are too narrow and dangerous for cyclists so this is not really an option.

17. By proposing greenbelt sites in the area means this land will be gone forever. It is essential we protect the greenbelt or we will simply be a concrete jungle joined to Guildford and Woking with no green space in between. These greenbelt areas are essential to everyday living to provide clean and open space for everyone to enjoy.

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

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

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

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

Attached documents:
Comment ID: PSLPP16/5528  Respondent: 8561057 / Chris Brown  Agent:

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

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

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy P2 on page 48

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

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

I am concerned that GBC is not calculating their requirements correctly and is mixing up the temporary student requirements at places such as Surrey University, with that of the needs of the local Guildford population. At no point in the 50 years I have lived in the area, have I experienced a supposed demand for such an enormous amount of additional housing in the GBC area and will be shipped in to live and work. If so, I object to this principal.

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

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

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

Attached documents:

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

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

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

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to the new boundaries proposed for insetting the villages of Send and Send Marsh/Burnt Common from the Green Belt (policy P2).

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

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

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

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

Attached documents:

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Comment ID: PSLPP16/5085  Respondent: 8561057 / Chris Brown  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

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

Answer (if comment is on questions 1-7 of the questionnaire): ()

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I object to the number of homes that the Plan intends to deliver over the 20 year period 2013-2033 (policy S2).

The annual target of 693 is significantly higher than the 652 that the Council proposed last year and disregards the constraints which should have been imposed by the high proportion of the borough’s designated Green Belt land and the capacity of the roads, schools, doctors, hospitals and other infrastructure to support such an increase in the population.

There is no further evidence provided as to why so many more houses are required.

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

Attached documents:

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Comment ID: PSLPP16/5530  Respondent: 8561057 / Chris Brown  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

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

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to the number of homes that the Plan intends to deliver over the 20 year period 2013-2033 (policy S2).

The annual target of 693 is significantly higher than the 652 that the Council proposed last year and disregards the constraints which should have been imposed by the high proportion of the borough's designated Green Belt land and the capacity of the roads, schools, doctors, hospitals and other infrastructure to support such an increase in the population.

There is no further evidence provided as to why so many more houses are required.

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

Attached documents:

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Comment ID: PSLPA16/4320  Respondent: 8561377 / The Guildford Society (Julian Lyon)  Agent:

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

Answer (if comment is on questions 1-7 of the questionnaire): ()

The primary concern of the Planning group is that the method of calculation of the Objective Assessment of Need (OAN) for housing - the SHMA - fails to reassure us of the robustness of the process, and the absence of an ‘open source’ interpretation of population and household formation forecasts cannot be helpful to Guildford Borough Council’s cause.

75.1. A recent analysis by Neil McDonald shows that there have been several anomalous assertions and conclusions drawn by GL Hearn, that the SHMA is not sound and does not represent a suitable basis for determining the Object Assessment of Need and, consequently, the housing target in the Local Plan.

75.2. The Society was already concerned that, within the SHMA, there is little justification for the large additional economic need for homes that have been taken into the OAN number. Neil McDonald has shown that the GL Hearn approach double counted the employment-related housing need.

75.3. The failure to properly and comprehensively analyse the impact of transient student numbers on the underlying population growth forecasts (not to mention the flaws in the 2011 census treatment of students highlighted in our original response) has led to an incomprehensible report by GL Hearn, promoting irreconcilable numbers with an arrogance that would be breath-taking were it not so potentially damaging to Guildford.

75.4. The Council should take note of the Neil McDonald report and consider rethinking its Objective Assessment of Need and housing target numbers.

Policy S2 sets out a phased increase in housing target from 500 to 700 homes per year over the first five years and to 790 homes per year by the end of the plan period. This phasing is predicated on the delivery of infrastructure.

The Society is concerned that this will not be manageable in practice and development will come forward faster than the associated infrastructure – the infrastructure needing to be provided across the Borough and beyond, and the developers needing to demonstrate a non-severe impact locally.

The Society notes the potential to have a review process for the Local plan and comments as follows:

78.1. The proposed Local Plan has a long period, 2013 to 2033, twenty years. The previous 2003 Plan had a period of only three years (to March 2006), though it is till current after thirteen years. Much can change in thirty years, and one would expect the Plan to include cognizance of that.

78.2. The proposed Local Plan is premised on certain predictions of population and economic growth. Such predictions are
always subject to error, and the likelihood of error grows the further the predictions extend into the future. Indeed, the certainty of predictions thirty years ahead must be very low indeed.

78.3. Because the proposed Local Plan has such a long time scale, one would expect it to include specific review dates or mechanisms. Paragraph 153 of the NPPF states “Each local planning authority should produce a Local Plan for its area. This can be reviewed in whole or in part to respond flexibly to changing circumstances”. Circumstances are bound to change considerably over thirty years, and may change significantly over much shorter time scales.

78.4. The only reference in the proposed Local Plan to review is paragraph 1.19 in the chapter on Monitoring Indicators. It says: “We will review the Local Plan, if required, by using the outcomes of the Annual Monitoring Report(s). As part of a review, we will consider the proposed level of new homes and employment land. We will examine all available information and, if necessary, undertake further work to develop our evidence base. Should evidence suggest that we are not meeting our objectively assessed need, various options, including identifying potential new site allocations and requesting assistance from neighbouring authorities, will be considered.” This statement covers any need to make upward adjustments, but makes no reference to any need to make downward adjustments.

78.5. The most contentious issue in the proposed Local Plan is the housing target, which has been set equal to the Objectively Assessed Need (OAN). The OAN is taken from the West Surrey Strategic Housing Market Assessment (SHMA), Guildford, Waverley and Woking Borough Councils, Final Report September 2015. The chapter on Monitoring and Review in the Final Report states:

78.5.1. “10.58 Through a proactive monitoring process it will be possible to maintain and develop understanding of the housing market, building on the outcomes of the SHMA. It will allow the implementation of policies to be tailored to evolving circumstances and inform future policy development.

78.5.2. “10.59 Long-term monitoring which addresses indicators of housing need, market signals relating to supply-demand balance, and the housing supply trajectory can inform future development and implementation of planning policies for housing provision.”

78.6. The SHMA therefore foresees a need to review, and makes no presumptions as to what adjustments, upward or downward, may be necessary.

78.7. The Draft Guildford Borough Infrastructure Delivery Plan 2016 is much more positive than the proposed Local Plan as regards review. It states:

78.7.1. “1.2. This draft IDP will be subject to change up to and potentially during the Independent examination of the draft Local Plan. The IDP Infrastructure Schedule is a ‘living document’ that will be reviewed and modified as required throughout the plan period as further information becomes available in order to ensure that it remains up to date.”

78.8. As noted above, the Society’s judgement is that the OAN predictions are fragile and too high. They depend greatly on predictions of population growth, and much of this is ascribed net international immigration. In the present political climate predictions of immigration must be subject to much uncertainty.

78.9. We judge that the proposed Local Plan should include an explicit commitment to review its key targets, especially the housing target, every five years, say. This commitment should use positive wording and should cover all eventualities be they upward or downward.

78.10. At the very least, the wording of paragraph 1.19 should be amended to take this properly and fully into account.

The Reg19 Consultation plan would be more effective if there were more focus on types of housing and allocations—these may come forward in the technical part of the plan in due course but we remain to be convinced that the plan will deliver the types of homes we need.

The Society, fresh from the Solum application where a development of 438 apartments was supposedly not capable of meeting viability tests with more than 10% affordable housing, is concerned to understand how the Council will achieve (and retain) the desired 40% affordable housing. We would like to see stronger words to ensure that legal agreements can secure the amount of affordable (including social) housing in the long term.

We are concerned that imported demand from, say, London could take up as many homes as we can provide and, to the extent possible, we would like to see some priority to provide homes for local residents (especially affordable housing) before new demand is catered for.
Policies should encourage quality town centre housing for local down-sizers to enable the market to be effective and efficient.

We are keen to avoid the insidious pressure where town urban area developments seem to apply a density factor governed solely by the desire to maximise numbers of dwellings.

The Society remains to be convinced that the evidence is strong enough to justify greater retail development at the expense of other town centre uses. The caveat applied by Carter Jonas in their report as part of the Evidence Base is hardly emphatic.

85. Notwithstanding the Town Centre will be the subject of further master planning, the relocation of non-retail uses may free up sites for town centre housing.

86. We note reports of a recent increase in interest in town centre locations from large employers in office accommodation. The Society recognises that a major barrier to large employers is the toxic combination of traffic congestion and a shortage of housing that is affordable for key workers.

87. The Guildford Society has great concern about last paragraph of the Vision statement – ‘Delivery of housing in the later stages of the plan period is dependent upon major improvement to the A3 through Guildford’. This implies that early approval of large schemes will not require improvement to A3. Also concern about the letout clause in each of the four strategic site allocations: ‘...or otherwise alternative interventions which provide comparable mitigation’. We find it difficult to understand how this will work in practice.

88. There is also general concern that without very strong wording in the plan developers will find defensible excuses for not providing infrastructure, especially given the urgency of meeting housing targets. The Plan’s wording and drafting needs to be carefully checked and we fear it could be exploited. Much of it is somewhat too weak, for example, "having regard to..." is too non-committal, and there are many places where we need to see “Require” in place of “expect”.

89. The Guildford Society also has continuing concerns about cumulative impact. How will the Borough decide when the limit has been reached with respect to particular constraints and, therefore, at what points lack of major infrastructure investment will prevent approval of schemes?

90. We are concerned to ensure the Council has a strong capability (in policies and supporting skills) to contest developer claims that they are unable to deliver 40% affordable housing on the grounds of viability.

91. The Guildford Society is concerned to ensure that individual site allocations should refer to the need for sympathetic development to preserve local character—particularly because the qualitative part of the Local Plan (Development Management Policies) is lagging some distance behind this Site Allocations Local Plan. We would have preferred to have at least some idea of the likely detailed policy environment in which development of many of these sites will be brought forward. By way of an example, compare 2003 Policy HE4 on Listed Buildings, which has no let-out clauses, with the let-out in the new draft Policy D3.

92. We are concerned, therefore, to highlight the need for ‘saved’ policies in the 2003 Plan which have not specifically been superseded to be preserved and given currency pending adoption of the Local Plan (Development Management Policies).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
95. There is more within the transport aspirations to commend than to condemn.
96. LEP3 and Enterprise M3 input is good news. These may be subject to EU funding, and, following the ‘Brexit’ vote on 23rd June, there may be some doubt as to whether it will come forward.
97. The sustainable movement corridor is welcomed in principle but this also needs to extend southwards towards Shalford and Artington to achieve the greatest modal shift.
98. The Guildford Society has doubts that much of this will not be confirmed to be deliverable without having funding in place quickly—this may affect the soundness of the Local Plan.
99. We need a strategic plan to achieve affordable and sustainable commuting to better service our physically constrained gap town.
100. The Transport Group doubts that sufficient thought has been given to flexibility in sustainable inter-modal transport planning especially for Guildford Railway Station, where The Guildford Society strongly believes a transport interchange should be located. The considerable modal shift demanded puts the onus on the rail network with which Guildford (town and Borough) is richly endowed.
101. The Guildford Society strongly supports and advocates Guildford Vision Group’s proposed bridge linking York Road to Madrid Road to free up the town centre.
102. The Transport Group acknowledges that parts of the Transport Evidence Base are essentially work in progress, but show worthwhile application of analytical resources.
103. This applies particularly to work on the sustainable movement corridor, and the time is ripe for early consultation with the teams involved.

Local Economy Group Comments
119. The Guildford Society is concerned that the Plan lacks a proper economic statement, that the Evidence Base does not appear to link coherently to the Borough’s Economic Strategy and that some of the crucial messages are absent from the Draft Local Plan.
(www.guildford.gov.uk/economicstrategy)
120. Owing to the missing references to the Economic Strategy, there is no mention of Gross Value Added (‘GVA’) arising from the University, the Research Park, the technology sector generally, etc.
121. We are aware that the Council has received economic reports and that these highlight all economic sectors and a SWOT (Strengths, Weaknesses, opportunities and Threats) analysis of the local economy. This needs to be available alongside the Draft Plan.
122. The Plan provides insufficient focus on housing constraints for skilled workers as distinct from the shortfall of affordable homes.
123. There is an important decision to be taken about retail expansion—which has a low impact on GVA and typically lower skill levels—versus higher GVA sectors of the economy. This is reflected in a general shortfall in specified areas in the Plan for high quality town centre office space to attract large companies and head offices.
124. We strongly believe the Plan needs to have sufficient teeth to change attitudes where developers typically supply viability assessments for all major developments to show that affordable housing thresholds cannot be met. The viability report in the Evidence Base needs to be given much more prominence and the Plan Policy should refer to the need to rigorously apply the RICS Guidance Notes to viability assessments.

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

Attached documents:

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Comment ID: PSLPA16/4319  Respondent: 8561377 / The Guildford Society (Julian Lyon)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix F: Policies overview map

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

Answer (if comment is on questions 1-7 of the questionnaire): ()

Across the Borough as a whole under the Reg19 Consultation plan, there are several strategic sites (shaded in red on the plan below):

<see attachments for complete document>

These sites effectively form a broken chain of developments (whether urban extensions, village extensions or new settlements) as highlighted below at Figure 5.

The constraints imposed on the Borough through national and European Union guidelines, directives, laws and regulations such as Special Protections Areas (Thames Basin SPA) and Areas of Outstanding Natural Beauty (Surrey Hills AONB) serve to squeeze development allocations into a narrow corridor of largely disconnected settlements.

To the north east of Guildford, the sites are strung along the ribbon of the A3 – a failing part of the Strategic Highway Network – and to the west of Guildford, the sites sit largely between the A323 and the A31 – mostly with impaired access to either or both.

These constraints are unlikely to ease substantially during the plan period and, particularly the AONB, can be expected to endure into the next plan period. It is almost inevitable, following the logic of the site allocations in the Reg19 Consultation plan, that this chain will be further developed in subsequent plan periods.

In Figure 5 below, the blue dots show the broken chain between the strategic sites.

In Figure 6 below, the threat to the 5.1km rural gap between the conurbation of Aldershot (including the Ash & Tongham Urban Area), as extended to the east, and Guildford as extended to the west is plain to see.

Figures 4 & 5 show the future vulnerability to coalescence of settlements in the north eastern sector.

The Local Plan must provide for future development and it must regulate for the long term protection of the Green Belt boundaries to preserve the openness and prevent coalescence.

The allocation of sites currently in the Green Belt for development must not fly in the face of the fifth purpose of the Green Belt (to encourage regeneration of brownfield sites). Figure 7 below shows the strategic town centre sites that are allocated in the Reg19 Consultation plan.
The land allocated for development must be used better – Guildford cannot afford sprawling (garden village) developments that use a lot of land. The density of developments needs to be such that:

11.1. Allocated land is not wasted;
11.2. Development creates or enhances sustainable communities;
11.3. The developments must not create or aggravate imbalances within existing communities;
11.4. Densities and quantities of development are such that public transport can be provided efficiently;

On the other hand, Guildford needs to understand how to preserve key views, restrict height of developments to ensure strong and interesting rooflines, and to recognise the key landscape characteristics of the town and its surroundings.

Allocations of land are likely to be required within two local plan periods and suitable safeguards need to be put in place to ensure that sites are released and consented in such a way as to ensure that urban area regeneration can take place to resolve relative deprivation issues in many parts of the Borough.

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

Attached documents: 20160717_GSOC_Response_to_ConsultationDraftReg19LocalPlan_FINAL.pdf (4.2 MB)

Comment ID: PSLPS16/7990  Respondent: 8561377 / The Guildford Society (Julian Lyon)  Agent:

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

Answer (if comment is on questions 1-7 of the questionnaire): ()

125. We reserve our comments made in respect of the Reg18 Consultation, and have attached a side-by-side analysis of the respective 2014 proposed allocations, our comments at the time and the Reg19 Consultation Draft.
126. Specifically, however, we identify below our comments in respect of Gosden Hill which has a larger land allocation than previously promoted.
127. GOSDEN HILL FARM:
127.1. In the deposit draft Local Plan, the area shown allocated for development at Gosden Hill Farm is estimated to have the potential to accommodate some 2,000 homes.
127.2. Whilst, in principle, the Society would regret the loss of open land forming part of the Green Belt, the Society acknowledged that there was potential to develop of a substantial area of land at Gosden Hill Farm and, if development was to take place, the development should provide for a new railway station at Merrow (on the site of the Surrey County Council Depot).
127.3. However, the Society’s position on what was proposed in the draft local plan was clearly set out in our response where we said, inter alia, “The Society does not support any development including P&R north of the east-west tree line dividing the site. (GBCS Potential Development Area C2) Development north of the line would impact adversely on the openness of the views on the approach to the town”.  
127.4. The Society’s full response to Reg18 Consultation is set out below:
“The Society does not support any development including P&R north of the east-west tree line dividing the site. (GBCS Potential Development Area C2). Development north of the line would impact adversely on the openess of the views on the approach to the town. There are substantial pluvial flooding issues that already affect Burpham and the land at C2 often ponds at its lowest points in heavy rain. The development of any of this land needs to have improved overall access to and from the A3. There consequently needs to be a reservation of land and policy support in the Local Plan for a 4-way all movement A3 junction. Without improved access the impact on traffic in Burpham and on London Road will be severe and no development should be permitted. Development of the southern half of the site should include a railway station and the land should be reserved for that purpose The openess of the site in the Green Belt fronting the A3 will be seriously harmed by development which will adversely affect the soft green edge of Guildford on the north side. The Society strongly believes development of this portion of site 59 (C2 in the GBCS Report) should be resisted. To the extent that the area designated C1 in the GBCS Report is not viable or would cause irreconcilable issues in Burpham – and having regard to the emerging Neighbourhood Plan for Burpham – the site should not be allocated and the Green belt boundary left as it is today. The formation of a four-way junction (subject to Highways Agency confirmation and all technical due diligence) should be created so as to give access to the Slyfield area and the A320 without adversely impacting the main population centre of Burpham, and so as to relieve traffic on both the A320 at Slyfield and on the London Road between Burpham and Guildford.”

127.5. The Society’s concern on this issue remains as stated. One of the purposes of the Green Belt is to preserve the distinctiveness of towns and settlements which lie within the designated Green Belt area. At present the approach to Guildford down the A3 from London is that one is not aware of the existence of the built up area of the town until one crosses Woking Road and begins to see the commercial development at Ladymead. If the north facing slope of Gosden Hill Farm is to be developed with housing a key setting of the town will be forever lost. This will have a major impact of the perceived attractiveness of the town.

127.6. Furthermore, the objections we raised at the time of the draft local plan have been given increased cause for concern when, as shown in our side-by-side comparison document annexed to this response, the site at Policy A25 includes an additional area of frontage onto the A3 when compared to the Reg18 Consultation site 59. The impact of that increase in area is that even more housing development will spread alongside the south side of the A3. The impact of further development will be reinforced even further in consequence of the proposal in the deposit draft Local Plan to allocate for housing the triangle of land formed by the ‘new’ A3, the old A3 and Clandon Road at Burnt Common (i.e. the area currently partly occupied by Eubanks Auction Rooms).

127.7. On the 19th January 2015 the Burpham Community Association held a Public Meeting. The guest speaker was Councillor John Furey, SCC Cabinet Member for Roads, Traffic and Flooding. His brief was to consider any planned or proposed road construction or improvements that would impact on Burpham, especially the A3 and the Slyfield/Clay Lane link road.

127.8. It is interesting to note that the plan of the Gosden Hill site as displayed at the Burpham Community Association meeting (see below) shows a greater area of the wooded area being part of the proposed site compared with the deposit draft local plan (see plan on page 5) which shows a greater extent of development alongside the A3.

127.9. In respect of Gosden Hill Farm, the notes of the Burpham Community Association meeting stated. “Mr Furey noted the proposal to build an urban extension comprising 2,000 dwellings, some employment land, a local retail centre, community hall, primary school and GP surgery. The developer, Martin Grant, intend it to be “transport sustainable” with a need for a park and ride, a new railway station at Merrow and a new southbound slip onto the A3 (as shown on the map above). These proposals are subject to the SCC Transport Assessment process and GBC is co-ordinating assessment work in connection with the three main strategic development sites (Gosden Hill, Blackwell Farm and Wisley) to assess whether the wider reaching impacts of the total developments combined with their proposed mitigation will be acceptable. There are no time scales for Gosden Hill – the draft local plan is on hold – so it is possible for a developer to submit an application prior to any formal local plan designation.”

127.10. The note of the Burpham Community Association meeting continues: - “If this development were to go ahead, the impact on Burpham would be horrendous. 2,000 dwellings are likely to lead to 4,000+ extra cars on the road plus any generated by commercial/business activities and people travelling to and from the proposed station at Merrow. The lack of north bound access to the A3 means that traffic will travel through Burpham to the Clay Lane slip road. Traffic wanting to access the south bound A3 at present has to use the old bypass (invariably congested) or go north to Burnt Common and
pick up the south bound there (adds mileage). With a new south bound access at Gosden Hill, people are far more likely to use that – passing through Burpham. If the proposed Wisley development goes ahead, even more traffic will be travelling through Burpham”.

127.11. The Society’s analysis and comment is set out below: 127.11.1. The BCA analysis of the traffic impact is generally correct.

127.11.2. Certainly if the (notional) junction arrangements with the A3 as shown on the plan displayed at the Burpham Community Association meeting are implemented, all traffic from the proposed new development seeking to access the A3 northbound will need to travel through Burpham to access the existing slip road from Clay Lane.

127.11.3. Additionally, all traffic coming off the A3 from the south and seeking to access the proposed new development will tend to leave the A3 at the Cathedral interchange and travel via Ladymead, Parkway and London Road thus putting further pressure on these sections of the already overloaded town road system, albeit traffic could exit at Ripley northbound and double back from the Clandon entry slip.

127.11.4. There needs to be a sensitive solution to the A3 junctions at Burpham and Burntcommon to ensure a workable solution.

127.11.5. If a new Park and Ride facility (planned to provide between 500 and 700 spaces) is incorporated into the proposed development, this facility will be used by drivers from the north of Guildford and, on their return journey, those drivers will also need to travel through Burpham to access the A3.

127.11.6. The proposed new railway station at Merrow will attract traffic. Whilst provision of a new station is supported, the cumulative impact of the traffic generated by the extensive area of new housing and from the proposed Park and Ride facility is of serious concern for the area of Burpham and Merrow.

127.11.7. In addition to the above, residents from the 2,000 dwellings will also seek to travel into the centre of Guildford and whilst many people will no doubt use a new Park and Ride facility (and perhaps also the railway station), inevitably there will be increased traffic on London Road.

127.11.8. In this respect it is interesting to note the Policy for the proposed designation (Policy A25) which states the intention, as part of this development, to provide “associated infrastructure on the A3100 corridor within Burpham” (i.e. along London Road).

127.11.9. Just how the resulting increased traffic levels will be accommodated on London Road – particularly bearing in mind our understanding that London Road is to become part of a ‘sustainable transport route’ favouring cycling and buses – is, as yet, unknown.

127.12. In addition to the impact of additional traffic the issue of visual impact remains as a key issue of concern. If the Borough Council succeeds in securing approval to the principle of development of this extensive area of land then, as an absolute minimum, the Society considers the development must provide a significant depth of tree planting alongside the A3 in order to help minimise the serious adverse impact of this development.

127.13. Figure 8 (above) highlights (yellow) the area of the Bushy Hill LSOA, which, from the CABE analysis we have demonstrated could accommodate almost 1,800 homes. This illustrates that the southern part of the Gosden Hill site (closer to the proposed railway station) could accommodate this number of homes without needing to develop the slopes down to the A3, save as required for properly-designed road infrastructure to and from the A3.

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

Attached documents:
104. The Guildford Society response to this consultation will include both the Town Centre and Urban Guildford.

105. The Guildford Society has a well-publicised suite of policy documents seeking to protect and enhance the character of Guildford, which depends considerably upon its Heritage Buildings, its Conservation Areas and its Topography as a Gap Town within an Area of Outstanding Beauty and our aspirational policy of “Greening the Approaches”.

106. The Local Plan is very dependent on the provision of infrastructure, which if it is delivered at all, will be towards the end of the plan Period. The Design & Heritage Knowledge Group reiterates the concern to ensure that development does not take place until the necessary infrastructure is approved.

107. Constraints cannot be managed on a site by site basis. Good or bad, early proposals will succeed and later proposals will fail—without control, this will not provide the degree of control or predictability that would be expected from a Local Plan process.

108. Large infrastructure projects and modal shift will take many years to achieve, and the plan does not seem to allow for this delay.

109. Once again, the D&H Group echoed that Social Housing is needed throughout the Borough and is concerned about how to enforce the 40% aspiration.

110. Section 3.2 in the LP Document refers to "exemplary design". This reads well, but, “Exemplary Design” means very good and suitable to be copied. It does not require designs to be fit for purpose or respect the character of the area. This is an example of weak language creating loopholes for inappropriate development. [see also comments under Planning Group regarding the South East Regional Design Panel]

111. It also says "All development within the town centre will need to respect and enhance the unique setting and historical character of the town and be of the highest design and environmental standards.” This is welcome; But what about respecting the setting and historical character of the rest of Guildford Borough. It is not just Conservation Areas that need respect. Where people live is also important.

112. Policy P1 uses the phrase “conserve and/or enhance the setting and views of the AONB” is weak, especially to someone not familiar with the topography of Guildford. Parts of the AONB are visible from the Town Centre and there are views from the AONB across Guildford Town, in particular the views from Henley Fort, the Chantries and through the Wey Gap. I would suggest that “conserve and/or enhance the setting and views into and out of the ANOB” would be clearer and therefore easier to manage.

113. The Local Plan does make reference to the Central Government’s “Planning Practice Guidance on Natural Environment – Landscape”, published in March 2014. But only by saying that the AONB Management plan is a material consideration in determining planning applications within and adjacent to the AONB.

114. The Local Plan should emphasize the importance of protecting the setting of AONBs. There is a statutory duty imposed upon planning authorities by the Countryside and Rights of Way Act 2000, Paragraph 3, to have regard to the purposes of AONB designation when considering development proposals situated outside an AONB.
115. These words from the Rights of Way Act 2000 should be included in the Local Plan. “The duty is relevant in considering development proposals that are situated outside National Park or Area of Outstanding Natural Beauty boundaries, but which have an impact on the setting of, and implementation of, the statutory purposes of these protected areas”.

116. Policy D3 4.5.42 states that “Non designated heritage assets are identified by the local authority; the borough’s Local List includes over 200 buildings and structures and the Register of Historic Parks and Gardens includes 52 sites”.

117. Policy D3: Key Evidence lists the Local List, conservation area character appraisals and management plans and existing Conservation Area Character Appraisals. The Local Plan does not, however, provide any protection to these 252 heritage assets or reference any plan to get them designated.

118. In particular, many existing Conservation Areas, particularly in the town centre have no “existing Conservation Area Character Appraisal” or at least none published and accessible on the Council Website. Without a Character Appraisal it is difficult or impossible to judge the merits of a planning application in a Conservation Area, or to uphold decisions at appeal. The Local Plan should include a commitment for every Conservation Area to have a published and accessible Character Appraisal.

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

Attached documents:

Comment ID: PSLPP16/17683  Respondent: 8561377 / The Guildford Society (Julian Lyon)  Agent: 

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

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

Answer (if comment is on questions 1-7 of the questionnaire): ()

Guildford has had very low unemployment figures and in recent surveys has emerged as one of the wealthiest and best educated communities in Britain with successful high economic growth rates.

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

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

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

While there is a need for welfare housing, recently the Office of National Statistics reported Guildford as the least deprived community in Britain.
This does not mean there are no problems in this area, but it needs to be seen in perspective with the need to sustain and encourage an efficient economy without which welfare social and environmental improvements cannot be sustained.

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

Attached documents:

Comment ID: PSLPP16/17682  Respondent: 8561377 / The Guildford Society (Julian Lyon)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

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

Answer (if comment is on questions 1-7 of the questionnaire): ()

The majority of infrastructure (excluding transport and traffic) has not been assessed by the Society in this response.

The traffic and transportation studies are (in many parts) very detailed and these were issued on the same day as the consultation commenced.

The plan at Figure 12 [Figure 4.9 from the Surrey County Council Waverley & Guildford Model Validation Report] shows various routes assessed for journey times.

Given the scope and scale of development in other neighbouring authorities (especially Rushmoor), impact from these other authorities’ land allocations should be taken into account in assessing the Borough’s roads.

The link from the station to the University, Hospital, Research Park, Park Barn and proposed further development at Blackwell Farm among others, is excluded from the plan on Figure 12 because it is not a classified road.

This means that some of the analysis fails to take into account the extent of use of ‘secondary’ roads by the employment, infrastructure and residential sectors.

Figure 13 shows the same plan but with Guildford Park Road, Madrid Road, The Chase, etc., marked on it.

The Guildford Society supports Guildford Vision Group’s proposed linkage by new bridges (‘the GVG Crossing’) of the York Road and Madrid Road routes (see Figure 14, below).

The proposal would avoid east-west traffic having to use the riverside and town centre road network – enabling greater pedestrian priority in that area. This, coupled with one of the Town Centre Master plan solutions, would derive substantial benefits for the town.

If the new road were treated as an extension of the A246 to the hospital, university and Park Barn, this would allow more comprehensive planning of the Integrated Transport Network.

Furthermore, at Figure 15, below, we have superimposed the Town Centre Master Plan Scenario 1 solution onto the GVG Crossing to further illustrate the deflection of traffic away from the core town centre area.

The Society recognises that the Town Centre Master Plan is still work in progress and does not form a settled part of the Reg19 Consultation Draft.

The Society does believe, however, that the modelling of traffic scenarios must include the proper weighting for the linkage of York Road to Madrid Road.
Part of the solution needs to be an understanding of the roles and interaction between the railway station and the bus network.

Position Statement 3 - Infrastructure

The Society fears there is an infrastructure funding circle that may never be closed, but that developers will continue to require their sites to be assessed on the local impacts of their scheme (development being allowed as long as that impact is not ‘severe’).

The Society believes that the Local Plan must be configured to reflect the constraints where funding commitments have not been made, and where it is either not within the Council’s control (eg., Strategic Highway Network, Network Rail, etc), or beyond its the financial reach. Consequently, the Society believes the Council should:

64.1. Constrain the development within the Local Plan to that level that can be supported by existing infrastructure and through new or improved infrastructure where funding and delivery are either within the gift of the Council or firm commitment and all necessary approvals have been received. 64.2. Establish within the Council’s Corporate Plan the intent to deliver additional infrastructure and to obtain the necessary approvals and funding to be in control of its delivery;

64.3. Relax constraints in the Local Plan as part of the regular review process to enable further delivery of development based upon the prior delivery of infrastructure.

The Society is concerned that essential elements of the Transportation Evidence Base (launched on the same day as the Reg19 Consultation) show that some roads (notably Guildford Park Road, Madrid Road and The Chase) are not adequately analysed as they do not form part of the A-road classification network in Guildford. This is a major route which only stands to become more heavily used as proposed land allocations to the west of Guildford (inside and beyond the Borough) have an effect on this route.

Position Statement 5 – Town centre

The Society is keen to see the comprehensive and aspirational regeneration of the town centre.

The Society believes this should be broadly along the lines of the vision and subsequent study prepared by Allies & Morrison but with some crucial comments as follows:

67.1. The absence of provision (in the Reg19 Consultation Draft) for most uses (including the expected traffic generated by those uses), infrastructure requirements and housing numbers makes the overall Draft Local Plan somewhat unrealistic;

67.2. The reliance on a subsequent Area Action Plan is understandable but, as it is not at all envisioned in the Reg19 Consultation Draft, the Local plan itself may be unsound – for example as it relates to commuter parking versus a presumption in the infrastructure evidence base of a reduction of generation of traffic movements in the town centre;

67.3. There is a risk that the Council is standing across the gap between two railway carriages (the Local Plan and the Town Centre Master Plan); the carriages are not yet coupled together, and Guildford risks being torn apart as the gap widens.

67.4. The Society (along with many other residents’ groups and businesses) strongly supports the principle of the GVG crossing, but this option has not even been fully modelled as part of the wider traffic and transport analysis – largely because the route from the Farnham Road Bridge (A31) to the Cathedral, University, Hospital, Research Park and in the region of 7,500 households, is not classified as an A or B route.

The Society would regret this Local Plan process if it fails to deliver regeneration of the town centre and riverside and so the Plan must include sufficient comfort that this will happen.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** PSLPP16/17680 **Respondent:** 8561377 / The Guildford Society (Julian Lyon)  **Agent:** 

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

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

Answer (if comment is on questions 1-7 of the questionnaire): ()

The Society recognises that we need to develop more homes than we have in recent years. We recognise that there is likely to be an impact on the Borough’s Green Belt.

The Society recognises that some substantial strategic developments will be necessary in order for the infrastructure to come forward (through development) to ensure the development can be implemented sustainably.

In Annex 6 of the Society’s original response, we highlighted the land uses and densities of all of the Lower Super Output Areas (‘LSOAs’) across the Borough.

Figure 8, below, shows the allocations nearest to Guildford Urban Area with the LSOA boundaries and with the Bushy Hill area highlighted in yellow.

The details of LSOA Guildford 008E are set out in full in Annex 6 of the original response but some are set out below in Figure 9

The Bushy Hill LSOA is 25.5Ha and comprises 649 households at 25.4 dwellings per hectare.

The Blackwell Farm allocation of 78Ha if developed at the same density would yield 1,985 homes, whereas the allocation is for 1,800 homes.

The development of Blackwell Farm, however (if it is even considered suitable for final allocation), would need to be concentrated nearer to the railway at the lower end of the site so as to protect the openness of the remaining Green Belt, and the views into and out of the AONB.

This example serves to demonstrate that our planning of residential settlements needs to be different from our previous urban extensions.

There are many academic papers referring to the application and implications of higher density development, and it is important for us and our communities to understand this.

An example of typical built densities is at Figure 10 (below), taken from CABE’s report on Better Neighbourhoods – used here because of its simplicity. [http://www.mae.co.uk/assets/pdfs/better-neighbourhoods.pdf](http://www.mae.co.uk/assets/pdfs/better-neighbourhoods.pdf)

The Society’s Annex 6 summary of areas identifies, in the same place for each LSOA, the built densities and the relative deprivation indices.
There are clearly areas of the Guildford Urban Area which would benefit from positive planning policies towards simultaneous densification and the creation of stronger communities and better infrastructure.

To a great extent the Reg19 Consultation Draft is silent on these areas (notably Park Barn, Westborough, Bellfields, Slyfield) where relative social deprivation is particularly poor on a local, regional and even national scale.

Figure 11 (below) shows that the Park Barn area is at approximately 20 dwellings per hectare, but that the relative deprivation (particularly for young people) is in the poorest 3% in the country.

These issues are not without solutions in the long term but the plan must facilitate development in new settlements that does not repeat spatial planning problems of the past and that the emerging Local Plan provides the policy support it can to enable a development-led solution in these areas.

Turning to the Housing target, we fully endorse the study, analysis and findings of Neil McDonald on behalf of GRA, and reject the GL Hearn SHMA in its approach, methodology (especially where this has not been provided for critical analysis), and findings.

The GL Hearn study is merely one professional opinion. It should not be read as a factual or empirically accurate forecast. GL Hearn’s report fails to demonstrate it is more than an educated guess and, in this case, the guess appears to be both poorly founded and wildly inaccurately formed.

GL Hearn has failed to understand the impact of Guildford’s University and wider further education institutions upon the overall demographic make-up of the Borough.

It is unfortunate that the ONS has failed us and the professionals in its own inability to screen for student communities and in the poor structuring of questions in the 2011 Census.

The measurement of inter-census immigration by reference to GP registrations, and the failure to recognise the effect of overseas students leaving their studies without deregistering from GP surgeries, has been completely missed.

The Society’s population analysis (part of the response to the 2014 Draft SHMA, annexed to the Society’s Reg18 Consultation response) highlighted the ineffectiveness of the question to students in Houses of Multiple Occupation (‘HMOs’) relating to non-term-time residence. There was only one area for the nominated head of household to record non-term-time address, where the HMO may have had three to ten students who were resident at the time of the census.

The Society has set out the following POSITION STATEMENT on housing:

Position Statement 1 - Housing

Whilst supportive of the stated intention, The Society is very nervous about the proposed structure of the Local Plan whereby land allocations are made at the outset, where timings are targeted towards infrastructure delivery, and where such control of the pipeline may not be controllable in that way over the course of the Plan.

The Society would like to see:
38.1. a constrained plan with a lower target housing number, an early review and frequent subsequent reviews to establish that there can be no development without the infrastructure;
38.2. allocation of several of the sites for future development beyond the plan period, but with the acceptance that, if the housing need requires AND the infrastructure has been put in place or is already committed, these sites could be brought forward within the plan period – otherwise they would serve (in accordance with NPPF) as identified sites for development beyond the plan period;
38.3. a clear process and commitment by the Council to collect and analyse local household formation rates and population flows to ensure that any distortive effects of the University’s transient population can be taken into account alongside specific structural shortcomings in our local economy’s employment base. This will ensure that the proposed plan reviews are objective and relevant, taking full account of the Office for National Statistics (‘ONS’) background data and local conditions;
38.4. the progressive improvement of key areas of the Evidence Base many parts of which remain incomplete, underwhelming, or simply ineffective and not fit for purpose (this applies particularly to the Settlement Profiles – in particular as it applies to the Guildford Urban Area – which should form part of a strong basis for land allocation decisions and regeneration plans in settlements across the Borough;

This Position Statement is at odds with the Council’s approach but is a pragmatic interpretation of the anticipated ability of the Council (in the context of planning legislation and regulation, and the unpredictability of interpretation of policies in practice).

Position Statement 2 – Housing Numbers

Whilst recognising the need for Guildford, where possible and subject to very real constraints, to provide sufficient housing to meet our needs, we do not have faith in the West Surrey SHMA (for Guildford, Waverley and Woking) prepared by GL Hearn for the combined commissioning authorities.

The Society has studied the SHMA, has observed the evidence, has read the analysis prepared for the Guildford Residents’ Associations (‘GRA’) by Neil McDonald (June 2016) and has studied the census and ONS data.

We have concluded that there is a very high likelihood that the SHMA substantially overstates the Objective Assessment of Need because:

The West Surrey SHMA shrinks from analysis of the underlying population data which show a statistical error in ONS estimates for Guildford far in excess of that for surrounding authority areas. Two charts below show an illustration of the population age ranges where the errors occur, and the corresponding population profiles. It is absolutely clear that GL Hearn has failed to question its data effectively and the Society believes it has made a serious error of professional judgement in its analysis for this important University Town:

The proposed ‘affordability uplift’ is flawed;
45.1. The (usually transient) student population needs to be separated out from the remainder of the population in order to ensure the Local Plan provides appropriately for both groups;
45.2. Housing estimates for economic growth are essentially double-counting and should be removed (or at least properly validated);
45.3. An adjustment is likely to need to be made in the near term depending upon the outcome of post-Brexit decisions (personal, economic and political);
45.4. Consequently, the Society believes our Objective Assessment of Need (‘OAN’) is in the region of 510 homes per year, and that this should be the basis of the Local Plan (with the proposed reviews and analytical approach proposed in Position Statement 1).

In the event the Local plan overstates the OAN, the existing shortfall of infrastructure will come under additional strain, the pressure to develop housing will probably outweigh any delay in or failure to commit funds to infrastructure, and planning policy does not allow for development to finance pre-existing deficiencies in infrastructure.

Housing Density

Using the CABE figures, and planning an urban extension or settlement to have, say, 50% Urban Village, 33% Garden Suburbs and 17% Suburban Semis would generate an overall density of circa 65dpH in masterplanned sites. A development of 1,800 homes would require a land take of around 28Ha and, with a concentrated village core, services (including buses) would become more viable – all the more so if this were concentrated around a new transportation hub such as a railway station.

With this in mind, an area the size of Bushy Hill could accommodate almost three times the number of homes, and a large portion of, say, Blackwell Farm and Gosden Hill Farm (notwithstanding our separate comments about these proposed allocations) could be retained and made a permanent Green Belt boundary and/or Sustainable Area of Natural Greenspace.
The Guildford Society remains seriously concerned about the robustness and accuracy of the Strategic Housing Market Assessment.

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

Despite representations prior to and as part of the 2014 consultation, the Settlements Profiles Report falls a long way short of the necessary standard – it is still full of errors and fails to take any sensible account of the 50% or so of the Borough which lies in the Guildford Urban Area.

There is considerably more traffic data sitting behind this draft. It was unfortunate that this was delivered so late, leaving insufficient time to review it fully. The initial studies of it show there to be several fundamental and yet unexplained assumptions about future traffic use. The detail provided so far in relation to the Sustainable Movement Corridor is not sufficient to support or reinforce the wider traffic assumptions for the town centre, local road network and strategic road network.

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

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

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

Answer (if comment is on questions 1-7 of the questionnaire): ()

The Guildford Society recognises that Guildford Borough Council has taken legal advice in preparing the Local Plan, whereas we and other charitable bodies do not have access to such advice.

The Society expects there to be a legal challenge from some groups in the Borough who object to the removal of land from the Green Belt.

Whilst we regret the need to remove some areas from the Green Belt, we have taken the view in our previous submissions and in our submission in response to this Regulation 19 Consultation, that we will support the notion (noting our concerns about the reliability of the SHMA) that we will need to use some Green Belt land in this plan period to meet our housing need and to allow the time to properly regenerate our urban brownfield sites.

We do not propose to comment on legal compliance for itself, but rather to make the judgement that IF the plan is legally compliant, we wish to ensure it is the best it can be.

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

Attached documents:

Comment ID: SQLP16/2023  Respondent: 8561377 / The Guildford Society (Julian Lyon)  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness

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

Answer (if comment is on questions 1-7 of the questionnaire): ()

The Guildford Society questions the soundness of the Draft Plan on several grounds, not the least of which are: the shortcomings of the SHMA, the Green Belt report, and the highways assumptions.

The Society condemns the failure to provide for a new link between the west of Guildford which will be expanded substantially under the planned site allocations (in the region of 10,000 homes plus the growing university, the hospital, the expanding research park and other centres of employment by the end of the Local Plan period).

Of greater importance is the notion that the plan does not adequately provide for development beyond the plan period. The Society’s full submission highlights the restrictive nature of the Borough and illustrates the likely future pressures to sprawl along a narrow corridor of the Borough as we have to plan for future pressures to grow.

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

Attached documents:

Comment ID: SQLP16/2024  Respondent: 8561377 / The Guildford Society (Julian Lyon)  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 4: Duty to cooperate
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The Guildford Society is concerned that the Duty to Co-operate has not been shown to be applied evenhandedly.

The impact of developments beyond the boundaries of Guildford Borough have not been fully assessed for impact on Guildford’s infrastructure, and, in providing for an inflated Objective Assessment of Need number in full (GL Hearn’s target), it is likely Guildford will have to take additional development from our neighbours who we expect to restrict their development by applying greater emphasis to maintaining Green Belt boundaries.

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

Attached documents:

Comment ID: SQLP16/2025  Respondent: 8561377 / The Guildford Society (Julian Lyon)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination

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

Answer (if comment is on questions 1-7 of the questionnaire): ()

The Guildford Society has

- engaged positively in the Local Plan process from the outset,
- held public meetings (free of charge) to explain elements of the evidence base, plan and process so as to ensure as objective as possible an approach to responding to the Local Plan consultations.
- requested and obtained acceptance from the Director General of the Office for National Statistics that the population projections contained anomalies arising from the (important) transient student intakes in Guildford,
- provided a contribution of some funds to help GRA commission an expert to review the SHMA, and
- drawn on the knowledge of our four knowledge groups, planning, transport, design & heritage and local economy – all of which includes respected experts – to inform its contributions.

The Society would like to participate in all matters at the inquiry. We reserve our position in respect of independent experts we would wish to accompany us be accompanied by an expert witness for the SHMA and for transport-related in respect of specialist matters.

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

Attached documents:

Comment ID: SQLP16/2026  Respondent: 8561377 / The Guildford Society (Julian Lyon)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 7: Any other comments?
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Where possible, the Guildford Society wishes to support Guildford Borough Council’s attempts to adopt a new, sound, progressive and regenerative Local Plan.

We do not agree with some fundamental points – noted herein and in our full submission – and we are concerned that misguided public relations stunts such as the publicly-funded video may skew responses or underpin objectors’ scepticism so as to make the Local Plan process more challenging.

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

Attached documents:

**Comment ID:** SQLP16/2027  **Respondent:** 8561377 / The Guildford Society (Julian Lyon)  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 7: Any other comments?

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

Answer (if comment is on questions 1-7 of the questionnaire): ()

The Guildford Society
The Society started life as the ‘Old Guildford Society’ in 1896, spurred into action by the celebrated designer William Morris who wrote a letter to a prominent local art historian, George Williamson, urging him to form a ‘watching committee’ to guard against threats to Guildford’s unique High Street. It engaged in a number of campaigns, disbanding in 1902.

Re-formed as ‘The Guildford Society’ in 1935, campaigning restarted to protect Guildford’s unique character. The issues then are as now – how to preserve the best whilst accommodating growth and development in a gap town, bisected by a river and surrounded by beautiful Green Belt countryside of which there are grand views from within the town’s centre and boundaries.

By 1960, 57 listed buildings had been demolished (11 in the High Street) to make way for a growing population, increased road traffic and the town’s prominence as a commuter rail hub. The Society itself flagged up 160 buildings it deemed at risk.

The late Lord Onslow, in his role as The Society’s President, noted: ‘There is one thing that we must look out for. Planners have become too frightened of boldness in design. There are some wonderful old buildings and complexes in our town and it must be the object of all of us that what is built in the future lives up to the best of the past…We conserve a town as a living entity and not in aspic.’

Our present Constitution enshrines all these issues in its aims, which can be distilled down to our modern strapline: ‘Speaking up for Guildford’s Past, Present & Future.’

Today, The Society, numbering over 400 subscription-paying members, monitors all aspects of town (and sometimes, Borough) life through three principal Groups – Planning, Transport and Design & Heritage. These are manned by
volunteers, most with appropriate professional and business experience, beneath an umbrella Executive Committee responsible for the overall direction and health of The Society. Members of the 12-strong Executive stand for election for a 3-year term at the AGM, and elect a chairman annually from amongst their number.

The Planning Group screens all planning applications, picking out and examining those it sees as meriting comment. Comment inevitably has to be lodged as an ‘objection’ as that is the way the public planning system works. On larger schemes there is often pre-application discussion with the developer.

The Transport Group monitors road, rail, cycle and pedestrian issues, involving debate with County Council and Highways authorities. There are various public consultation bodies, into which the Transport Group feed its views, often as an established member.

The Society is organised with four quasi professional groups of experienced volunteers with a wealth of relevant expertise (the Planning Group, the Transport Group, the Design & Heritage Group and the Local Economy Group) forming a combined ‘Knowledge’ Group.

This combined expertise has helped us to form an objective response to both the Society’s Reg18 Consultation and the Reg19 Consultation responses.

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

Attached documents:

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**Comment ID:** pslp173/548  **Respondent:** 8561377 / The Guildford Society (Julian Lyon)  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Appendix A1

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

**Answer (if comment is on questions 1-7 of the questionnaire): ()**

**APPENDIX A1 – Maps showing 500m Buffer of Public Transport Interchange**

A. The Guildford Society welcomes the inclusion of this map. We do feel it should show all of the areas within 500m and 1km of each of these transport interchanges and all other railway stations in the Borough to show prime opportunities for sustainable development, providing other national and regional planning policies (notwithstanding special circumstances) permit

[ Guildford Stations Map]

[ Ash Station Map]

[ Ash Vale Station Map]

[ Clandon Station (with Guildford East (Merrow) Station]

[ East Horsley & Effingham Junction Stations]

[ Gomshall Station (entirely surrounded by Surrey Hills AONB)]
B. It is very significant that the Surrey Research Park currently falls well outside the 500m (and even a 1500m buffer from any station. The desirability of the Guildford West Station is self-evident from an employment perspective.

C. Another major employment centre, Slyfield Industrial Estate, also falls outside the range from any station, identifying the benefit that would be derived from the Sustainable Movement Corridor extending to the Estate and a new Park & Ride for business and shoppers at the northern edge of the Estate (as previously proposed in the Guildford Society representations.

D. There remains no solution in the local plan for connecting the town to Guildford Business Park and Cathedral Industrial Estate close to the A3 at the Dennis Roundabout (Wooden Bridge).

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

Attached documents:

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Comment ID: pslp173/679  Respondent: 8561377 / The Guildford Society (Julian Lyon)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Appendix A2

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

Answer (if comment is on questions 1-7 of the questionnaire): ()

E. The Guildford Society welcomes the introduction of this Appendix. It may not be a perfect summary of marketing on each occasion but should help give adequate protections where prescribed in the local plan.

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

Attached documents:

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Comment ID: pslp173/546  Respondent: 8561377 / The Guildford Society (Julian Lyon)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Appendix B: Town Centre Shopping Frontages

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

Answer (if comment is on questions 1-7 of the questionnaire): ()
F. The Guildford Society by and large accepts the hierarchy as shown.

G. It is a pity the Settlement Profiles Report does not provide greater clarity in respect of the quality, role and accessibility of Local and District Centres, as this would allow a more informed policy that also had regard to the state of local public houses and other A3 community uses. This should also extend to farm shops and should provide some clarity in respect of petrol filling stations with associated shops, farm shops and garden centres. There is apparently no clear policy on food retail and out-of-town retail such as the Ladymead Retail Park and car showrooms, all of which have a part to play in our economy and communities as employers and service providers.

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

**Attached documents:**

---

**Comment ID:** pslp173/549  **Respondent:** 8561377 / The Guildford Society (Julian Lyon)  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Appendix C: Infrastructure Schedule

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

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

H. The Infrastructure Schedule has most substantially been changed to place the burden of providing infrastructure onto developers with a change from ‘Developer Contribution’ to ‘Developer Funded’

I. We have tallied up the given costs for developers as £1.169 billion for which developers will be partly or wholly responsible; we also note 46 further lines where developers are either solely or in part required to fund infrastructure works.

J. There has not been (to our knowledge) any adjustment made to the Viability Assessments to establish whether or not the plan remains viable, the strategic objectives of delivering affordable housing and infrastructure will be achieved and, indeed, with development ‘contingent’ on infrastructure, whether there will or even should be any development in the Borough. This is a very poor position from which to judge the soundness of the plan.

K. The most significant comments, however, are that a. there are no accompanying plans for the works that would show what is proposed to be done and allowing us to evaluate or estimate the effect on the remaining infrastructure; and b. there is no indication of the dependencies that are implicit in the statement that developments are ‘contingent’ on infrastructure.

L. Although already committed, we believe that the replacement of Walnut Bridge between 2017 and 2021 may prove to be premature if its design does not take account of both expected development on the Bedford Wharf site to the east and its relationship with any Railway Station development on the west as well as considerations for crossing Walnut Tree Close.

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

**Attached documents:**

---

**Comment ID:** pslp173/551  **Respondent:** 8561377 / The Guildford Society (Julian Lyon)  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Appendix D: Evidence base
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

AIR QUALITY ASSESSMENT (AECOM JUNE 2017)

M. In the Introduction to this report, Aecom note that “The air quality review presented in this report has considered the potential effect of the proposed Draft Local Plan on annual mean concentrations of NO2, PM10 and PM2.5 for sensitive receptor locations within the GBC administrative area. These pollutants have been considered as these are the key pollutants associated with exhaust emissions and these are the pollutants of greatest concern generally within the UK... In summary the findings of the air quality review suggest that the effect of the Draft Local Plan on annual mean NO2 concentrations will be negligible and not a key constraint on development in the majority of the GBC administrative area. However, further detailed modelling would be advisable around roads where notable changes in traffic flows are predicted, at locations in close proximity to sensitive receptors…”

N. It is difficult to understand how modelling could have been carried out in the town centre where there simply is no plan.

O. The study finds there will be ‘negligible change’. This means there will not be any significant improvement, which, given the modelling carried out in Guildford by Goel and Kumar (Annex 3), is frankly disappointing.

P. Changes in traffic flows that may lead to a significant change in air quality include where annual average daily traffic (“AADT”) flows will change by 1,000 vehicles.

Q. In a response to an enquiry made under the Environmental Information Regulations (attached at Annex 4) ref: FOI2016/00440, Guildford Borough identified that the expected impact of the proposed development of 1800 units around 11 miles from Guildford town centre would generate 331 vehicles entering the gyratory during the three hours of the morning peak.

R. It is difficult to believe the development over the plan period of 12,426 homes in the Borough, added to many thousands of homes in neighbouring boroughs, will not, therefore, have an impact of many times the 1,000-vehicle threshold for a likely significant change in air quality.

S. Air quality in the town centre is already poor due to the volume of standing traffic on the gyratory and approach roads at peak hours. It will inevitably get worse.

T. Guildford does not have many electric vehicle charging stations and there is no clear guidance in the local plan – and a general shortfall in electricity infrastructure – to encourage many more charging stations to be built.

[Image]

U. Bizarrely, the Aecom report makes no significant reference to the town centre. The Guildford Society believes that makes this part of the evidence base not fit for purpose.

ASSESSMENT OF THE VIABILITY OF CARBON EMISSIONS TARGETS FOR NEW BUILDS (2017)

V. We have nothing particular to add to the study by Evora Edge, and support the aspiration to reduce our carbon footprint in development.

EMPLOYMENT LAND NEEDS ASSESSMENT (AECOM UPDATE MARCH 2017)

W. On page 5 Aecom has cited the plan period as 2016 to 2034, reducing the period by a year. This time period translates to the employment targets used in the local plan and the figures in the plan may, therefore, be inaccurate.
X. We note the comment made by AECOM: “Where sites are available the Council could seek to encourage office/R&D development in town centres. The town centre is a more sustainable location and there is evidence of demand from potential occupiers which currently do not necessarily have town centre offices that match their needs. The lack of supply of office/R&D premises in town centres is exacerbated by the loss of offices to residential from the prior approval permitted development regime.” We tend to support the approach Guildford Borough Council have taken to direct employment to locations that are easily accessible by public transport as well as cycling and walking.

Y. By our calculations, the local plan as drafted, will have an impact on GVA in the borough of circa £100m per annum in terms of new employment in the borough once all development is completed. We note that by optimising uses of planned buildings, this could be increased by another £70m by focussing on supporting high value employment in preference to relatively low value retail employment.

Z. We also note that if a comprehensive town plan was implemented as proposed by Guildford Vision Group, the gain in GVA in the borough would be even higher, probably at double the gain from the current Guildford Borough Council plan. This again highlights the strategic failings and lack of ambition in failing to bring forward a town centre plan contemporaneously with the local plan.

ENVIRONMENTAL SUSTAINABILITY AND CLIMATE CHANGE STUDY

AA. The document in the Evidence Base is undated and we are not certain as to whether this has been amended in any way.

BB. We have no reason to consider the information is accurate or not. It is clear that greater attention should be paid in the plan to master-planned flood risk management in the town centre.

EQUALITIES IMPACT ASSESSMENT SCREENING (2014)

CC. Out of scope for the consultation

GREEN BELT AND COUNTRYSIDE STUDY, VOLUMES 1-6 AND SUMMARY (2013 - 2015)

DD. Out of scope for the consultation, however, we can find no particular indication in the GBCS report to explain why Wanborough should be deleted from the plan (A47) and Send, for example, should remain in the site allocations.

STRATEGIC HIGHWAY ASSESSMENT FOR THE PROPOSED SUBMISSION LOCAL PLAN (SURREY COUNTY COUNCIL, JUNE 2016) - DELETED

EE. We assume the deletion relates to the incorporation of a different impact assessment document. [Transport Group?]

GUILDFORD TOWN AND APPROACHES MOVEMENT STUDY: STRATEGY REPORT (ARUP, MARCH 2015)
GUILDFORD TOWN AND APPROACHES MOVEMENT STUDY: SCENARIO ANALYSIS AND APPRAISAL OF INTERVENTIONS REPORT (ARUP, MARCH 2015)
GUILDFORD TOWN AND APPROACHES MOVEMENT STUDY: VISION, OBJECTIVES, BASELINE AND BUSINESS-AS-USUAL REPORT (ARUP, MARCH 2015)

FF. All out of scope for the consultation

GUILDFORD STRATEGIC PARKING STRATEGY: STAGE 1: PARKING DEMAND (STEER DAVIES GLEAVE, AUGUST 2013)
GUILDFORD STRATEGIC CAR PARKING REVIEW: STAGE 2: CAR PARKING MANAGEMENT PROPOSALS (STEER DAVIES GLEAVE, AUGUST 2013)

GG. Both out of scope for the consultation although note our comments on the parking policies. We have (at Annex 4) included a paper, published recently by INRIX, showing the social and economic cost of town centre parking, where drivers spend time and fuel looking for vacant parking spaces. The Council should improve both access to and from car parks, but also informative signage and remote applications to direct drivers to the nearest available parking space(s).

GUILDFORD BOROUGH TRANSPORT STRATEGY (JUNE 2016)
HH. We are puzzled as to why the Evidence Base cites the 2016 report when there is a June 2017 version of Guildford Borough Transport Strategy. Our comments, therefore, relate to that document.

II. We note especially some of the comments on our transport networks, notably:

a. The adverse impacts of localised traffic congestion and/or high traffic volumes on the setting and amenity of communities, including in relation to road safety, severance, noise, air quality and the demand for parking, and also the discouragement to walking and cycling.

b. Severance of the town of Guildford and its constituent neighbourhoods resulting from a combination of the A3 trunk road, railway lines and the River Wey.

JJ. The Transport Strategy in respect of the Local Road Network includes (for the town centre) describes as Committed Improvements: Guildford Town Centre Transport Package including vehicle-targeted schemes (whatever those may be); Revised access to Millbrook car park; Experimental closure of Walnut Tree Close. It describes as Anticipated Improvements: None. It describes as Aspirations: Guildford Town Centre Transport Transformation Package, including vehicle-targeted schemes. These packages are hardly enough to keep the town moving without any development. They do not indicate that the town centre will be ready for the level and scale of development envisioned in the local plan – ‘contingent’ upon infrastructure delivery.

KK. There is a helpful schedule at the back of this report that bears at least some resemblance to Appendix C (see above) but is by no means identical.

GUILDFORD DRAFT LOCAL PLAN: EDUCATION REVIEW (MAY 2016)

LL. We have no particular reason to dispute this document excepting that the population numbers are not generally accepted and are being challenged by Guildford Residents Associations (GRA). We support their analysis.

MM. We note the reference to education provision in Guildford town centre:

a. In-fill development in and around the town is likely to require mitigation between three and ten years of the plan. There are limited options for further primary expansion in Guildford Town. Alternative sites and options will be considered with local schools, alongside provision with strategic sites.

NN. We note there is provision for education in the Guildford Vision Group master plan for the town and we support their approach.

WEST SURREY STRATEGIC HOUSING MARKET ASSESSMENT (SHMA), SEPTEMBER 2015 - DELETED

OO. We note the deletion of the 2015 SHMA. Comments in respect of the up to date version are at the Housing Section, towards the beginning of this response.


PP. We have no specific comments on this update, save to stress our comments relating to the provision of SANG for town centre sites made earlier in this response.

HISTORIC ENVIRONMENT INFORMATION (2016)

QQ. We welcome this document although we do not understand why it still watermarked with ‘DRAFT’.

RR. As noted in our responses to the plan itself, we consider that the plan would benefit from a map of heritage assets and, in particular, an indication as to which sites are likely to require archaeological investigations.

SS. Out of scope for the consultation.


TT. The Land Availability Assessment Addendum does provide some insight into changes in allocation but does not explain why, for example, Flexford – Site Allocation A47 – is more sensitive than, say, Send.

UU. The housing trajectory in the plan (especially given the mathematical requirement to build 653 homes per year from 2015 to 2018 inclusive, looks to be unachievable from the graph in the LAA Addendum:

[Table]

VV. The supply trajectory in the LAA Addendum is as follows:

[Table - Five-year housing requirements at 1st April 2017]

[Table - Housing supply at 1st April 2017]

LANDSCAPE (AND TOWNSCAPE) CHARACTER ASSESSMENT (2007)

WW. Out of scope for the consultation.

LOCAL HOUSING NEEDS SURVEYS

XX. As we have pointed out previously, the local plan would benefit from a much more robust (and accurate) Settlement Profiles Report. In this category, there is no assessment of local housing need for the entire urban area of Guildford, covering more than 50% of the Borough’s population.

LOCAL PLAN AND AFFORDABLE HOUSING VIABILITY STUDY (2014)

YY. Although as a 2014 document this is out of scope for the consultation, we are concerned that this document is out of date, cannot possibly take account of the additional burden of developers’ costs (Appendix C) and increases in construction costs in the meantime, and may make Affordable Housing much more difficult to deliver in the sort of numbers called for in the assessment of need.

MONITORING REPORT 2015/16 (2016)

ZZ. This document demonstrates the historic shortfall in housing delivery, and calls into question the robustness of the housing targets when considering the short term (four year) target of 653 homes per year implicit in the local plan.

OPEN SPACE, SPORTS AND RECREATION ASSESSMENT 2016

AAA. This document is out of the scope of the consultation.

RENEWABLE ENERGY MAPPING STUDY 2015

BBB. This document is out of the scope of the consultation

RETAIL AND LEISURE UPDATE STUDY (2014)

CCC. This document is out of the scope of the consultation

RETAIL AND LEISURE STUDY ADDENDUM (2017)
DDD. The Carter Jonas Addendum highlights demand for comparison retail floorspace and food and beverage at circa 47,000 sqm and 9,500 respectively, whereas the amounts in the draft local plan are at 41,000 sqm and 6,000 sqm – all of which is projected to be accommodated in the North Street development.

[Table 4.3: Forecast Food and Beverage Floorspace (sqm gross)]

EEE. Whilst the Guildford Society has a different view of both the prospects for and the desirability of retail space over the plan period, we do expect that the figures need to be consistent between evidence and plan.

FFF. Carter Jonas conclude that 32,665 sqm of comparison shopping is identified during the plan period to 2034 when food & drink (A3) is netted out.

RURAL ECONOMIC STRATEGY 2017

GGG. We have read the Rural Strategy (published during the course of the consultation) and, whilst it makes relatively little mention of the Local Plan, it does not seem to be inconsistent with it.

SETTLEMENT HIERARCHY (2014) AND PROFILES (2013)

HHH. Whilst these documents are notionally beyond the scope of this consultation, we have commented consistently, in every local plan consultation since they were first published, that they need to be corrected. They ideally need to be rewritten and the Guildford Urban Area needs to be broken into local communities to ensure the local plan is providing for local need across the Borough.

III. The local plan is deficient in many areas simply because there is not enough information for plan-makers to provide solutions and much-needed development and infrastructure.

SITES OF NATURE CONSERVATION IMPORTANCE (SNCIS)

JJJ. This document is out of the scope of the consultation.

STRATEGIC FLOOD RISK ASSESSMENT SFRA (2016) – LEVEL 1 AND LEVEL 2

KKK. Although these documents are out of the scope of the consultation, we are disappointed that much of the content of these documents has been passed over in creating the Flood Risk Topic Paper (2017) and, as a consequence, the plan does not deal comprehensively enough with resolving the flood risks from various different sources.

STRATEGIC HIGHWAY ASSESSMENT FOR THE PROPOSED SUBMISSION LOCAL PLAN (SURREY COUNTY COUNCIL, JUNE 2016)

LLL. Although this document is out of scope, it is also out of date. We do understand the Council’s rationale for retaining the older document because the amount of development is reduced, and so the effect on infrastructure is likely to be reduced too. On the other hand, a plan that is ‘contingent’ on infrastructure should have an updated account of the impacts of the developments in order to be able argue effectively the case for the infrastructure before development.

SURFACE WATER MANAGEMENT PLANS

MMM. Although these documents are out of the scope of the consultation, we are disappointed that much of the content of these documents has been passed over in creating the Flood Risk Topic Paper (2017) and, as a consequence, the plan does not deal comprehensively enough with resolving the flood risks from various different sources.


NNN. We note the Sustainability Appraisal Addendum settles on Guildford town centre to the effect that housing provision greater than is expressed in the local plan would be unstable:
“6.6.4 In-line with the sequential approach, there is a need to maximise growth in Guildford town centre, which means allocating or supporting land (henceforth ‘supporting’) for 1,150 dwellings. Whilst there are additional sites that could conceivably be supported in order to deliver a higher number, there is little to suggest the potential to do so sustainably, and so 1,150 dwellings was identified as a ‘given’ for the purposes of developing spatial strategy alternatives. N.B. the figure of 1,150 is 22 homes lower than the equivalent figure in 2016 (1,172 homes). The change reflects A) planning permissions; B) removal of the Telephone Exchange, Leapale Road (100 homes), on the basis that it is unavailable in the plan period; and C) addition of 200 homes at the North Street redevelopment, which is now understood to be suited to higher density development, given its central location.”

OOO. We believe Guildford Vision Group has illustrated a plausible solution for the town centre which could accommodate two thousand more homes. We firmly believe this should be investigated.

PPP. Significant for The Guildford Society Transport Group is the statement, as in 2016, that: “It is difficult to draw strong conclusions in the absence of detailed transport modelling evidence (a new Strategic Transport Assessment is in preparation, which will take account of proposed mitigation measures, e.g. junction upgrades); hence uncertain effects are predicted.”

QQQ. The vulnerability of the plan with respect to the Sustainable Movement Corridor being developed by Guildford Borough Council is revealed by the lack of any quantifiable benefit.

RRR. The proviso “leads to concerns” keeps recurring, and the conclusion is that the report does little to reassure as to the overall “sustainability” of the Plan.

SSS. The document itself seems to give a reasonable summary of the process and thinking behind it. We may disagree with the treatment by Guildford Borough Council of the town centre and its infrastructure in developing the local plan, but the appraisal itself seems to be complete and broadly supportive of the plan itself.

THAMES BASIN HEATHS SPECIAL PROTECTION AREA AVOIDANCE STRATEGY 2009-2016 (2010)

TTT. This document is out of the scope of the consultation, although please note our comments about SANGs for the town centre housing at various stages throughout our representation.

TRAVELLER ACCOMMODATION ASSESSMENT (20172)

UUU. We have no particular comment to make about this document.

WATER QUALITY ASSESSMENT

VVV. This document is out of the scope of the consultation

WEST SURREY STRATEGIC HOUSING MARKET ASSESSMENT (SHMA), SEPTEMBER 2015

WWW. This document is out of the scope of the consultation although we would draw attention to our response to the 2014 and 2016 consultations.

WEST SURREY STRATEGIC HOUSING MARKET ASSESSMENT: GUILDFORD ADDENDUM REPORT 2017

XXX. We do not accept GL Hearn’s methodology and consider the approach taken on behalf of the Guildford Residents Associations (GRA) to be more robust, considered and capable of interrogation. A copy of the report for GRA is attached (Annex 2)

WEST SURREY FUNCTIONAL ECONOMIC MARKET AREA (FEMA)

YYY. [We do not have any specific comments to make other than to note it varies from the previous Travel-to-Work Area and may not have enough reference to Aldershot, Farnborough and the Winnersh triangle.]
FUTURE RESEARCH
Rural Economic Strategy
We have reviewed this document and are broadly supportive.
Land Availability Assessment (annual update)
Sites of Nature Conservation Interest NCI surveys (ongoing programme)
WHAT YOU TOLD US DURING EARLIER CONSULTATIONS
Local Plan Strategy and Sites Issues and Options Consultation (Oct – Nov 2013)
Who needs housing? (May-July 2011)
Core Strategy Further Options consultation (March - April 2009)
Core Strategy Preferred Options consultation (June - July 2006)
Site Allocations Issues and Options (November 2007 - January 2008)
OTHER LOCAL PLAN DOCUMENTS
Community Involvement in Planning (2013)
Local Development Scheme (2017)
OTHER PLANS AND STRATEGIES
Corporate
Guildford Town Centre and Hinterland Masterplan Report (Allies and Morrison Urban Practitioners, final draft report for consultation October 2015)
Guildford Borough Economic Strategy 2013-2031
Guildford Borough Corporate Plan 2015-2020
Guildford Town Centre Regeneration Strategy 2017
We note this has no planning status, but it represents the only attempt to plan the town centre referred to within the local plan itself. This is very disappointing.
Guildford Housing Strategy 2015-2020
Guildford borough Local Plan 2003
Planning Policy for Traveller Sites (2015)
South East Plan (2009)
Surrey Waste and Minerals Plans
Surrey Transport Plan (LTP3, 2011 and subsequent updates)
The Enterprise M3 Delivery Plan - 2014-2020

(Please Refer to image/Chats on uploaded rep)

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

Attached documents:

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<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2017 / Appendix E: Superseded policies</td>
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APPENDIX E – Superseded Policies
The new paragraphs above the table are very welcome and helpful. This Appendix will help bridge the gap until the second part of the local plan – The Development Management Local Plan – is brought forward and adopted.

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

Attached documents:

Comment ID:  pslp173/554  Respondent:  8561377 / The Guildford Society (Julian Lyon)  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Appendix G: Policy and monitoring

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

Answer (if comment is on questions 1-7 of the questionnaire): ()

APPENDIX G – Policy and Monitoring
We have not cross-checked with the individual policies to establish whether these are complete and accurate, and where we have made comments about monitoring, these have been made in the sections on the policies themselves.

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

Attached documents:

Comment ID:  pslp171/3260  Respondent:  8561377 / The Guildford Society (Julian Lyon)  Agent:

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

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

Answer (if comment is on questions 1-7 of the questionnaire): ()

Forward

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

Key facts

b) The Guildford Society agrees the introduction of paragraph 2.10a: “Pressure on existing infrastructure and additional stress caused by planned growth must be addressed if we are to maintain and enhance the borough’s prosperity and quality of life. Many people are attracted to Guildford by the quality of life and environment...”
c) It is also worth noting that the IMD subdomain data (as illustrated by The Guildford Society in our 2014 response) points to some major areas of relative deprivation across the Borough. As a result, the Society has rerun the data for the Lower Super Output Areas (Annex 1). The Settlement Profiles Report should highlight these issues and the evidence should point to solutions rather than simply justifying policies and strategies.

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

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

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

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

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

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

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

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

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

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

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

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A1. The Plaza, Portsmouth Road Guildford – we note the increase from 70 to 90 dwellings (contrasted with the current planning application for 104 homes) at a density of 237 dpH. We are concerned that, at this density there is likely to be very little amenity on site and/or the massing of development will intrude inappropriately on the skyline. We do welcome the addition of the words “and views into and out of surrounding conservation areas.” We hope ‘innovative design’ does not translate into a design which is out of place on the site or in the heart of an ancient market town.

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

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Land for Sustainable Movement Corridor Town Centre Phase 2, Off Walnut Tree Close, Guildford – We have no comment with regard to the amendment of this Policy, but we have some lack of clarity as to where the remaining parts of the proposed corridor are provided for in the land allocations. Surely the entire corridor should be allocated (to the extent possible).

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

Attached documents:
Kernal Court, Walnut Tree Close, Guildford – We are keen to see development of a number of sites on Walnut Tree Close as a consolidated master-planned exercise including flood management systems. It is not clear why a development on this site should be obliged to facilitate the Sustainable Movement Corridor when many of the prospective residents may make relatively little use of the new corridor that they could not already have done via Yorkie’s Bridge and Walnut Tree Close.

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

Attached documents:

Comment ID: pslp172/3911  Respondent: 8561377 / The Guildford Society (Julian Lyon)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A14

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

Answer (if comment is on questions 1-7 of the questionnaire): ()

Wey Corner, Walnut Tree Close, Guildford – This site is already under development subject to a planning permission for residential use for 56 units (hence the amendment to the plan (at a density of 147 dPH). In principle, we consider the Walnut Tree Close sites should be considered together to allow for improvements to roads, paths, towpaths, river frontages and flood risk protection.

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

Attached documents:

Comment ID: pslp172/3915  Respondent: 8561377 / The Guildford Society (Julian Lyon)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A16

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

Answer (if comment is on questions 1-7 of the questionnaire): ()

Land between Gill Avenue and Rosalind Franklin Close, Guildford – We recognise the need to include the provision to support the Sustainable Movement Corridor. We have prepared a paper in response to the Council’s proposed route that helps to connect sites like this to the movement corridor. This will be an important part of linking development to public transport and alternatives to the car.

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

Attached documents:

Comment ID: pslp172/3918  Respondent: 8561377 / The Guildford Society (Julian Lyon)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A17
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Land south of Royal Surrey County Hospital, Rosalind Franklin Close, Guildford – We recognise the need to include the provision to support the Sustainable Movement Corridor. We have prepared a paper in response to the Council’s proposed route that helps to connect sites like this to the movement corridor. This will be an important part of linking development to public transport and alternatives to the car.

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

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

Answer (if comment is on questions 1-7 of the questionnaire): ()

Land at Guildford College, Guildford – We note that Application 17/P/00509 seeks to develop this site for 527 bedspaces by contrast to the allocation for 200 (increased from 100 in the previous draft). The Guildford Society has made representation in respect of the Planning Application, but wishes to note that we are keen to ensure the viability of Guildford College, whilst also being concerned to retain the openness of Stoke Park and the long range views from the park to the Cathedral and vice versa.

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

Attached documents:
Land at Westway, off Aldershot Road, Guildford – There were no amendments to this policy.

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

Attached documents:

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

Answer (if comment is on questions 1-7 of the questionnaire): ()

A2. Guildford Cinema, Bedford Road, Guildford – we understand the rationale for the amended wording here but we do consider that GVG’s plans for the riverside are vastly superior and would create a fine addition to the town.

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

Attached documents:

Slyfield Area Regeneration Project, Guildford – Whilst the Guildford Society was involved in early iterations of the proposed development of this site, there has been relatively little dialogue with the Council for many months and years. The allocation for 1500 homes (half as many again as previously proposed) is hard to comprehend without an indicative master plan of the project. We broadly agree with the amendments to the requirements and recognise the opportunities as realistic. If the density of residential is lower than 75 dpH for the area of the site allocated for housing, we would consider this as a suitable reallocation site for business uses from Walnut Tree Close and Woodbridge Meadows, where a density of 150 to 250 dpH can probably be accommodated.

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

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

Answer (if comment is on questions 1-7 of the questionnaire): ()

Gosden Hill Farm, Merrow Lane, Guildford – Notwithstanding and without prejudice to our previous comments in respect of this site, we broadly accept the amendments made to Policy A25. We do think land should be considered for the relocation of employment uses from Walnut Tree Close and Woodbridge Meadows which can accommodate homes at a much higher density than an urban extension site. We are also sorry to see the release of Green Belt land, largely as an admission of failure, on the part of decades of successive Councils, to comprehensively evaluate and regenerate brownfield sites. Allocation of Gosden Hill must also bring with it a commitment on the part of the Council to seek out planned densification opportunities in existing urban areas so as to ensure the redrawing of the Green Belt boundary is and remains permanent. We are concerned (Other Issues (22)) to see a Strategic Employment site divorced from the station and transport infrastructure, and occupying a site that very nearly coalesces with the south-western reaches of Send.

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

Attached documents:

Comment ID: pslp172/3925  Respondent: 8561377 / The Guildford Society (Julian Lyon)  Agent:

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

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

Answer (if comment is on questions 1-7 of the questionnaire): ()

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

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

Attached documents:

Comment ID: pslp172/3926  Respondent: 8561377 / The Guildford Society (Julian Lyon)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A32

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

Answer (if comment is on questions 1-7 of the questionnaire): ()
Surrey Police Headquarters, Mount Browne, Sandy Lane, Guildford – we recognise this is likely to come forward for development and we support a carefully designed and scaled development providing a small hamlet or village nestled in the Surrey Hills AONB.

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

Attached documents:

Comment ID: pslp172/3927  Respondent: 8561377 / The Guildford Society (Julian Lyon)  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A33

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

Answer (if comment is on questions 1-7 of the questionnaire): ()

The University of Law, Guildford – this site will provide some accommodation for students on-site and seems an appropriate development assuming it can blend well into its rural environs.

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

Attached documents:

Comment ID: pslp172/3719  Respondent: 8561377 / The Guildford Society (Julian Lyon)  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A4

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

Answer (if comment is on questions 1-7 of the questionnaire): ()

A4. Deleted – Telephone Exchange, Leapale Road, Guildford – We had hoped this site could be included in the Local Plan (even if it was aspirational and represented extra homes over and above the housing target). We understand the lease expires in 2025 and BT may need to identify an alternative (or smaller) facility nearby. The Local Plan should help to facilitate this. The quantum of development, if emulating Printing House Square but, perhaps with an additional floor or two, could in reality, accommodate 150 homes.

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

Attached documents:

Comment ID: pslp172/4343  Respondent: 8561377 / The Guildford Society (Julian Lyon)  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A4
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We had hoped this site could be included in the Local Plan (even if it was aspirational and represented extra homes over and above the housing target). We understand the lease expires in 2025 and BT may need to identify an alternative (or smaller) facility nearby. The Local Plan should help to facilitate this. The quantum of development, if emulating Printing House Square but, perhaps with an additional floor or two, could in reality, accommodate 150 homes.

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

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A5. Jewsons, Walnut Tree Close, Guildford –

We are not sure how the boundary of the site marries up with the Sustainable Movement Corridor and the extension of Station View. There may be some scope to introduce a little more height on this gateway site, but the configuration of development has been somewhat stymied by the Taylor Wimpey development recently completed next door. Access to the pedestrian and cycling corridor is noted and welcomed.

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

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A58. New Rail Station at Guildford West (Park Barn) – New Allocation – we support this.

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

Attached documents:

Comment ID: pslp172/3789  Respondent: 8561377 / The Guildford Society (Julian Lyon)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A6

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

Answer (if comment is on questions 1-7 of the questionnaire): ()

North Street Redevelopment, Guildford – The Guildford Society is engaged with the developers and the Council in discussions around this important strategic site. We are concerned about the allocation of uses and areas when compared to the total stated need for the town. We welcome a successful development of this site and we have already articulated our concern that the future of retailing is by no means assured, the GVA generated from retail trails far behind other uses, and there is a need to ensure the development is successful. We would be keen to see a policy direction that looks towards space that can easily be brought into alternative uses – particularly a greater amount of residential use. The use of some of the development to displace the Odeon cinema would help to increase the overall amount of residential development in the town centre. We have already stressed that retail development has a low GVA. A principal concern on this geographically-constrained site is difficult traffic access The amount of retail development proposed, some 39,000 sm, is close onto 40 % of current retail and far too great for an already constrained town centre. More specifically the retail forecast used is based on a Consultant’s report by Carter Jonas which has four basic flaws.

1. the retail data used is national data which ignores Guildford’s access problems.
2. internet shopping has had a huge growth in Guildford and many shops have closed.
3. the plan itself does not appear to take into account the existence of an already well established retail centre (The Guildford Society recognises this and urges the Council to assess the impact, which it does not appear explicitly to have done).
4. finally, and most important this is a retail forecast for private development to the exclusion of other uses and assuming land is plentiful for all competing uses rather than constrained as it is in Guildford town centre. Guildford, in our judgement, needs a much better-balanced solution with housing and town centre employment playing a much larger part.

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

Attached documents:

Comment ID: pslp172/3790  Respondent: 8561377 / The Guildford Society (Julian Lyon)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A7

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

Answer (if comment is on questions 1-7 of the questionnaire): ()
Land and Buildings at Guildford Railway Station, Guildford – We note the reference to the Sustainable Movement Corridor and we consider the station needs to be interlinked to all bus services, not only those using the SMC. We do not understand why the reference to the River Wey Conservation Area has been removed. We would wish to see a more ambitious overall view of the railway station and its surroundings including the land at Policy A8, Policy A3 and Policy A11.

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

Attached documents:

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**Comment ID: pslp172/3902  Respondent: 8561377 / The Guildford Society (Julian Lyon)  Agent:**

**Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A9**

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

**Answer (if comment is on questions 1-7 of the questionnaire): ()**

77 to 83, Walnut Tree Close, Guildford - We believe Guildford Borough Council should grasp the nettle with this site by making it a green site fronting the river as a first stage of the linear riverside park. Many of the policy directions, especially A9 Requirements (3) and A9 Opportunities (5) are more consistent with the site being green open space.

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

Attached documents:

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**Comment ID: pslp171/1863  Respondent: 8561377 / The Guildford Society (Julian Lyon)  Agent:**

**Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy D1**

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

**Answer (if comment is on questions 1-7 of the questionnaire): ()**

nnnn) The title to Policy D1 has been amended from ‘Making better places’ to ‘Place Shaping’. This seems to be a positive step inasmuch as the policies have been tightened up, but there must also be a recognition of the scope for major regeneration to transform areas and this would be properly described as Place Making. We would like to suggest this heading be ‘Place Making and Place Shaping’

oooo) At 4.5.1 there is an amendment from ‘urban areas’ to ‘settlements’ which we agree with as the original was too restrictive. We are concerned, however, that the Settlement Profiles Report is so poor that it provides little or no support to this policy and the character assessments are hopelessly out of date.

pppp) The Settlement Profiles Report lets down the Guildford Urban Area the most as it comprises a facile agglomeration of the entire urban area – more than 50% of the residents in the Borough – into a collection of general comments that do not ring true for any Residents Association area or even for the Town Centre.
qqqq) We approve of the strengthening of Policy D1(1) with the use of ‘must’ but we disagree with the substitution in Policy D1(2) of ‘must’ with ‘should’.

rrrr) We agree with the introduction of Policy D1(2)(e).

ssss) We are concerned about the deletion of the section of Policy D1 that commences ‘All developments will…’ and paragraph 4.5.8, which have largely been moved to Policy D4. This deals with new development which, on the face of it, seems more appropriate, but our concern remains that this does not cover changes of use and may not cover refurbishments. We would like to see some safeguards, perhaps by including such works in a definition of new development at Policy D4.

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

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

Answer (if comment is on questions 1-7 of the questionnaire): ()

In Policy D2 there are four instances where ‘must’ has been deleted and replaced with ‘are required to’. If this is a Statutory obligation, the legal instrument should be quoted. Otherwise, we would prefer the use of ‘must’.

The Guildford Society is very concerned about the availability of energy infrastructure in Guildford Borough and also the lack of provision for the generation of renewable energy and the shortage of facilities for charging electric vehicles.

Policy D2 (9) refers to a reduction in carbon emissions in new developments, but does not take account of existing building stock. There is a target of 20% for carbon reductions for new developments but no indication is given in the policy as to the baseline for this measure, albeit this is explained at 4.5.30. It would be helpful if the baseline were included in the policy itself.

We do not understand why there is a blanket exemption in Policy D2(10) for retail developments in the Town Centre, and although this is partly explained in paragraph 4.5.37a, there should be a recognition in these paragraphs rather than a specific policy exemption (after all, exactly the same argument could have been applied to Affordable Housing). We would recommend the removal of Policy D2(10).

At 4.5.30a there is reference to a financial viability test. There must be some form of hierarchy of viability tests to establish the sequence in which policy requirements (subject to viability) are withdrawn. For example, does the energy requirement come before or after Affordable Housing? It would be helpful to have a specific, clear policy on Viability as part of the Local Plan.

Otherwise we broadly agree with the amendments to Policy D2.

[Evidence Base – Viability Assessment]

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

We would recommend the removal of Policy D2(10).
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

### POLICY D3 – Historic environment

aaaaa) We agree the amended wording of Policy D3.

bbbbb) Paragraph 4.5.42 is acceptable but the character assessments are ten years old and should at least be reviewed to confirm they are current and defensible.

cccc) In paragraph 4.5.42a, there is reference to ‘sites of archaeological significance’. There needs to be a plan showing where it is considered archaeological remains may be discoverable.

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

Attached documents:

### POLICY D4 – Planning for development

dddddd) With the reservation expressed above (under Policy D1), we are generally very happy with the proposed newly worded Policy D4 which should serve the Borough well. We are, however, concerned that the height, bulk and massing of buildings is not well covered in this section and, in the absence of a Development Management Local Plan, we feel this needs to be expressed in more robust terms here – including the retention and protection of key cross-town views and views to the surrounding AONB.

eeeee) On the whole, the new paragraphs 4.5.49a and 4.5.49b are acceptable to the Society.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
ddd) The Guildford Society agrees that Guildford has been one of the most economically successful towns over the past 30 years, and supports the importance of the University, Surrey Research Park and The Pirbright Institute as key enablers of the growth of high value enterprises with high value jobs. The Society also supports efforts to expand and retain existing corporate and professional services operations, particularly in the town centre.

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

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

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

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

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

jjj) The Guildford Society believes in enabling economic growth but it should be high quality, high value whilst delivering environmental quality for the community. The current draft Local Plan fundamentally fails to consider how this can be achieved in the planning area as a whole.
jjj. a) There needs to be a statement on employment priorities which highlights that professional workers with high GVAs have been largely responsible for Guildford’s impressive economic growth.
jjj. b) Due to high housing costs, many of these types of employees cannot afford to live here.
jjj. c) Companies and Government utilities, hospitals and schools cannot recruit skilled staff.
jjj. d) Priority should be given to the provision of skilled worker housing. This does not eliminate the need for supporting less skilled workers, or for welfare housing, but recognises the need to strike a balance between them. Without promoting the most productive labour skills the others will not prosper.

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

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Answer (if comment is on questions 1-7 of the questionnaire): ()

kkk) We have already highlighted that Policy E2 has a sequential test that the land removed from the plan at Flexford and Normandy would have passed (E2(1)(b)). We note at 4.4.15 Wanborough Rail Station has been deleted. Sequentially, in the context of this Policy E2, development of part of the site at A47 (deleted) would be better than some of the other sites included (e.g., at Send), and we do not understand the explanation given.

III) Policy E2(1) and paragraph 4.4.14 give priority to the town centre, but this is not reflected in the site allocations. The issue of specific town centre uses is discussed in 4.4.22 but not resolved.

mmm) Policy E2(2) should continue to include reference to the Research park (Policy E4) because of its importance to the Borough and its economy.

nnn) Policy E2(1) sets the sequential approach which needs to be followed to determine where new office and research & development floorspace will be located. Guildford Town Centre has preference then it is given to areas within 500m of a transport interchange, and then to strategic employment sites.

ooo) Policy E2(2) has been changed to now state that the sequential approach does not apply to proposed floorspace included in the site allocations in the Local Plan.

ppp) The inclusion of this part of the policy significantly undermines the overall strategy for the provision of floorspace in the borough. The addition of this wording is in direct contradiction to the first part of the policy which directs development to the town centre. It now demonstrates that there has been little rationale to including employment space on the strategic allocations other than to meet the need specified in Policy E1.

qqq) Paragraph 4.416 within the definitions section of Policy E2 states that: “When developed, the two new rail stations, Guildford East (Merrow) and Guildford West (Park Barn), will each be treated as a transport interchange.”

rrr) Guildford West (Park Barn) as a transport interchange would, if additional land is made available for employment uses nearby, reinforce the rationale of promoting the provision of high density, residential units on Woodbridge Meadows in close proximity to the town centre.
ss) Guildford East (Merrow) station as a transport interchange would, if additional land is made available for employment uses nearby, reinforce the rationale of promoting the provision of high density, residential units on Woodbridge Meadows in close proximity to the town centre.

ttt) Whilst Woodbridge Meadows is zoned for Employment Uses in the Plan, there is no specific allocation or strategic site. This is despite a) the freeholds being in the Council’s ownership, b) significant amounts of land being vacant or underused and c) the need for a comprehensive flood protection scheme to hold water upstream of the constraint caused by the 1930s A25 Guildford Bypass southbound bridge which is low over the river.

EMPLOYMENT - TOPIC PAPER (2017)
We broadly agree with the summary of other sources in the Topic Paper.

At paragraph 4.28, Wanborough is missing from the list of stations – it should, according to the local plan, be in the second list (excluded stations), although the Guildford Society is not convinced by the arguments for removing allocation A47 from the plan whilst retaining less well-connected places in the land allocation schedule.

At paragraph 4.35, there is reference to a solitary 3,000sqm office (B1a) site in the town centre by 2034. We consider this to be a matter of planning choice rather than of fact. In adopting an approach like the Guildford Vision Group plan, it would be possible to generate significantly more office space, albeit some of it would be a like-for-like replacement of demolished buildings.

We have identified the benefits of displacing employment land at, say, Walnut Tree Close and Woodbridge Meadows to one or more of the well-connected urban extension sites.

By allocating more employment at each of Blackwell Farm and Gosden Hill Farm proposed urban extension sites, employment uses can be relocated to sustainable locations and the vacated land used for higher density homes.

The Guildford Society was in support of the use of land to the north of Slyfield Industrial Estate (with a suitable permanent buffer and screen to Jacobs Well) for employment land (rejected in Paragraph 4.63) and also for a Park and Ride facility at the end of the Sustainable Movement Corridor which could be for commuters, shoppers and also serving a SANG at Burpham Court Farm.

We recognise the plans to retain strategic employment sites – although we were of the understanding that some parts of the Bell Court complex were in residential use.

We would like to see special, specific policies in the plan to encourage apprenticeships in areas particularly where the LSOA relative deprivation score for the subdomain ‘Young Persons Education and Skills’ is particularly poor.

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

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

Answer (if comment is on questions 1-7 of the questionnaire): ( )
uuu) The Guildford Society is in broad support of the amendments to Policy E3. We agree that care must be exercised with converting commercial to housing use as it may significantly reduce commercial opportunities in the town centre. We would like to see some encouragement to and provision for apprenticeships in the Borough, particularly in the rural areas and near to those LSOAs which score particularly poorly in the relative subdomain deprivation indices relating to young person skills and education.

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

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

Answer (if comment is on questions 1-7 of the questionnaire): ()

vvv) The Guildford Society supports the protection of the Surrey Research Park in Policy E4, and recognises the need to expand the park by 10Ha, even though we regret the incursion onto Green Belt land. We believe there needs to be sufficient expansion space for the Research Park in this plan and safeguarded for subsequent plans.

www) The Society agrees that Surrey Research Park is a critical economic resource for the borough. It is aware that the Research Park is in danger of suffering from limits being placed on its growth due to infrastructure issues, e.g. access to A3, difficulties getting to airports etc. We believe it is important to ensure the park is well linked to high quality space in the town centre, Pirbright and other centres. We therefore support the Guildford West station as one means to create a sustainable transport link to the town centre. We note the plan is silent on how Surrey Research Park to Pirbright links might be supported.

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

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

Answer (if comment is on questions 1-7 of the questionnaire): ()
POLICY E5 – Rural Economy

xxx) The Guildford Society has no objection in principle to the amendments to Policy E5.

yyy) We agree the Council’s plans to support the local economy. We note, however, that the plan is silent on the planned frequency increase on the North Downs Railway Line which we believe provides an opportunity to bring small scale enterprises in the Dorking to Guildford and Ash to Guildford corridors into good contact with the Town Centre and Surrey Research Park on a sustainable basis. The plan highlights that stations such as Shalford will not be transport interchanges, whereas we believe some minor development of bus services and parking may be desirable.

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

Attached documents:

Comment ID: pslp171/1848  Respondent: 8561377 / The Guildford Society (Julian Lyon)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy E6

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

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY E6 – The leisure and visitor experience

zzz) The Guildford Society agrees with the draft policy on economic grounds. It is recognised that retailing is undergoing a major transition and complementary leisure experiences are essential in order to extend dwell times.

aaaa) Guildford is clearly well placed to bring forward the River Wey navigation as a visitor experience, complementing amenities such as the Castle, Sports Centres, and surrounding Green Belt. The introduction of pedestrianisation and removal of traffic from the town centre, which are not provided for in the plan, can produce additional benefits.

bbbb) It is noted that better rail services complemented by re-aligned bus services if planned would make the Surrey Hills more accessible in a sustainable manner. The post-Olympic cycling boom in the Surrey Hills shows no sign of abating and better transport plus local business support e.g. cycle repair could support this long term.

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

Attached documents:

Comment ID: pslp171/2042  Respondent: 8561377 / The Guildford Society (Julian Lyon)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy E6

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

Answer (if comment is on questions 1-7 of the questionnaire): ()
LEISURE AND TOURISM – TOPIC PAPER (2017)

We recognise the benefit of leisure and tourism uses in Guildford and in the context of the local plan. We would have preferred to see a comprehensive approach within the plan to the regeneration of the town centre and riverside. This would provide a more vibrant place (think Richmond Riverside) and increase dwell time, benefitting our retailers, our arts and heritage offerings. By and large there is insufficient prize in the local plan as drafted.

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

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POLICY E7 – Guildford Town Centre

At Policy E7 – Guildford Town Centre we consider the retail amounts are wrong and relate only to the North Street site rather than the town centre as a whole.

a) Guildford has traditionally been a market town with a prosperous commuting labour force. This has changed in the last few decades and retail only employs around 10% of the labour force compared with professional services over three times that. The GVA from professional services employees averages out at around £ 75,000 pa compared with retail GVA on an equivalent basis of less than £25,000.

b) This has important planning implications in determining which areas are most important for development, what housing and infrastructure requirements need to be met. The current emphasis on retail development needs to be reconsidered in view of these changing needs, with greater emphasis on the cluster of high-value activities around the University Research Park and hospital. Housing, especially for skilled workers, should have a higher priority over retail development.

cccc) We strongly welcome the inclusion at 4.4.54 of the phrase: ‘The historic built environment also significantly contributes to Guildford’s appeal.’ We would like the Council to add reference here to the setting in a gap in the North Downs, and to the importance of cross-town views.

dddd) The Society is very disappointed that the Vision (between 4.4.72 and 4.4.73) has been deleted – albeit parts of the vision do appear elsewhere. This was a fine statement of intent and the additional words in 4.4.74 do not adequately compensate for its loss. Not only should it be retained, but the Vision should also include the new strategic infrastructure necessary for the good functioning of the town – especially the future of the gyratory and bus interchange provision. We would advocate the new bridge proposed by Guildford Vision Group.

eeee) The Society is also devastated to see the removal of the part of Policy E7 that calls for ‘more varied uses during the evening and night time, including along the riverside, with residents and visitors feeling safe; active use of the riverside and the river; more effective routes within and across the town centre for pedestrians and cyclists; new public squares and other informal meeting areas.’ We request that these aspirations be reinstated as part of Policy E7.

ffff) We do, however, agree with the added wording at paragraph 4.4.74 although it does not by itself make up for the loss referred to above.
At least some of the deleted paragraph 4.4.86 should be reinstated as an indication of intent. We recommend rewording rather than deleting 4.4.86 as follows: “River flooding risk is currently a significant constraint in redeveloping Guildford town centre. Several prominent riverside sites that have no building footprint cannot be allocated for redevelopment because of river flooding without a comprehensive plan to try to resolve these flooding issues, including technical solutions to remove the sites from the floodplain.”

Under Monitoring Factors, there is a target for A1 Retail space and A3 Food and Beverage space of 41,000sqm and 6,000sqm respectively – exactly the same as the revised Policy A6 provision at North Street. This implies no other new A1 or A3 space anywhere else in the town centre for twenty years. Many of our members (including our Local Economy Group) believe that a major retail development at North Street should be rejected on the grounds of the scale of retail provision, where the Carter Jonas report seems to struggle to justify the quantum, and where there is a recognised need for more residential units. Planning decisions on this site, where the Local Planning Authority has a landed interest, should be made based on public benefits not commercial ones.

The Guildford Society is concerned for the future of retail, and is keen to point out the relatively poor contribution retail space makes to Gross Value Added (GVA) when compared to business space and residential accommodation. The use of GVA needs to be introduced to assist in determining better resource allocation, especially between housing versus retail development, and helping identify optimum locations.

This Policy E7 should include a clause on the provision of employment floor space (see our comments on Policy E2(1) above). As it stands the plan is inconsistent here. There should also be a Monitoring Indicator for the amount of net employment floorspace provided.

The Guildford Society strongly believes that it is misguided to strike out the Allies & Morrison Vision and Town Centre Master Plan as Key Evidence, and to qualify the Town Centre Regeneration Strategy as carrying no weight. The result is that there is no strategic spatial evidence for this, the most important part of the Borough.

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

Attached documents:


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

Answer (if comment is on questions 1-7 of the questionnaire): ()

ABSENCE OF TOWN CENTRE PLANNING

Our first observation and comment, therefore, is about the absence of planning for a most critical part of the Borough’s infrastructure – Guildford Town Centre.

The Evidence Base is lacking in crucial detail and the plan is silent on most planning matters relating to the town centre. The Local Plan suggests 931 homes for an area of the town centre where the Guildford Vision Group has identified scope for 3,367 homes. The Local Plan allocates some sites, but is missing others. The almost complete absence of detail puts at risk the entire Local Plan – for instance (and by no means exhaustively):

• how do we know what the town centre infrastructure can cope with when it already grinds to near-gridlock at peak hours?

• there is relatively little remedial traffic infrastructure proposed in the town centre
• we know from Council minutes that it is intended that the bus station will be relocated – Compulsory Purchase Order notices may well have been served by the time the Local Plan consultation draws to a close – and yet there is no reference to the potential impact of such a relocation on any of the settlements who rely on buses, nor for the propensity to introduce modal shift.

• on the basis the delivery of homes in the town centre is uncertain, how can we know whether the housing numbers in the remainder of the Borough are (a) correct; and (b) not going to overburden the fragile town centre infrastructure?

Guildford Vision Group, a voluntary group of mostly retired professionals, in their own time and with very limited financial resources, have managed to develop a comprehensive growth-based town centre plan – largely in the face of apparent resistance (or at least obstruction) from the Borough Council. The Guildford Society is in broad support with the objectives and approach adopted by the Guildford Vision Group, and, consequently with its emerging plan. We recognise that there would be some need for reallocation of land uses, such as the displacement of Employment Land around Walnut Tree Close and Woodbridge Meadows, but these could easily be accommodated by commuting an equivalent amount of (low density) residential land near both of the proposed new railway stations for use for employment (in accordance with Policy E2)(1)(b)) in order to unlock higher density urban land for housing development.

Irrespective of whether the housing numbers are correct, this strategy would displace about 10Ha of employment land to one of the new urban extensions with proposed rail and bus connections, where housing would have been developed at circa 40dpH (dwellings per Hectare) and replace it in the northern section of the town centre with housing at a density of, say, 160dpH, leading to a potential reduction of the need for Green Belt development of around 30Ha. We recognise that this area may need to be safeguarded for a subsequent plan.

Clearly, failure to include an operable plan for the Town Centre (one that optimises land uses, can deliver assured development volumes and can resolve transport and traffic infrastructure shortcomings) represents a core and crucial missing element of the proposed submission Local Plan which, the Guildford Society fears, makes the whole Local Plan unsound.

This is a hugely disappointing example of the Council failing to understand the notion of efficient and effective spatial planning, and the need for clarity and plan-led regeneration of the town centre, despite the amount of effort put in by the community over many years.

(Refer to Diagrams on uploaded Rep)

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

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

Answer (if comment is on questions 1-7 of the questionnaire): ( )
RETAIL AND TOWN CENTRES - TOPIC PAPER (2017)

The Guildford Society largely recognises the context and content of this report. We are concerned that the Settlement Profiles Report is so poor that much of the retail hierarchy has been arrived at without the benefit of a solid local evidence base. The lists of retail centres (town centre, district and local) ignore key leisure facilities such as pubs and restaurants, omit out-of-town retail facilities like supermarkets and retail warehouses (several of which have automatic A1 use) – these two classes are major traffic generators and have been expressly excluded (4.26 and 4.27) – and fail to identify trade counters and motor dealerships in the retail mix. The retail and food and drink floorspace targeted in the local plan do not seem to bear much relationship to the tables in the Topic Paper and underlying evidence base. There is no reference to the relatively low GVA contribution made by retail uses relative to other economic activities. The long-term impact of internet is barely mentioned (although in the underlying paper by Carter Jonas, this is given as a key factor that would result in major changes to the forecast need). Very little attention is paid to the need to change focus from ‘retail and footfall’ to ‘retail and dwell time’. A fantastic town centre will be one of the best ways to ensure the success of our retail developments and businesses. The Madrid Road, Guildford Park local shopping centre is adversely affected by peak hours traffic, and delivery lorries are often parked up at peak hours, causing further traffic delays.

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

Attached documents:

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Policy E8 – District Centres

The Guildford Society has no comment to make on the amendments to Policy E8 except to note the introduction of ‘Main town centre uses’ and to question whether these should not also have similar relevance to Policy E7. We wonder also why the marketing approach in Policy E9 is not also relevant to Policy E8.

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

Attached documents:
POLICY E9 – Local Centres and isolated retail units

The Guildford Society has no specific comment to make on the amendments to Policy E9, although it is a pity the Settlement Profiles Report does not provide greater clarity in respect of the quality, role and accessibility of Local and District Centres, as this would allow a more informed policy that also had regard to the state of local public houses and other A3 community uses. This should also extend to farm shops and should provide some clarity in respect of petrol filling stations with associated shops, farm shops and garden centres. There is apparently no clear policy on food retail and out-of-town retail such as the Ladymead Retail Park and car showrooms, all of which have a part to play in our economy and communities as employers and service providers.

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

**Attached documents:**

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**bb)** In Policy H1, the reference to Density has been removed. There always was a difficulty with the general wording provided but the remedy should have been more qualitative and should have avoided a potential battle with developers to respect existing fabric and structures in our built environment – this will inevitably be unsatisfactory unless or until the Development Management Local Plan is brought forward and adopted.

**cc)** We support the inclusion of Accessible Homes (H1(3)) but it should be noted that some of our topography may make sites less well suited to providing accessible homes, in which case there should be some provision for commuted sums to enable other homes to be adapted.

**dd)** We broadly agree the policy in respect of Student Accommodation (H1(5)) but note that not all further education establishments are in a position to comply with this policy, and there will need to be some pragmatism required to implement it fairly and reasonably. We accept the 60% threshold as a starting point but note there are no policies in the plan to prevent students from renting homes off campus in the local property markets.

**ee)** We note the inclusion a policy for self-build homes and we broadly welcome this policy.

**ff)** We note the definition of active and comprehensive marketing at Appendix A2 and recognise it is broadly in accordance with market practice.

**gg)** Paragraph 4.2.3 refers to the SHMA Addendum Report 2017 – we have commented about that elsewhere in this document.

**hh)** Paragraph 4.2.18 contains a reference to windfall sites for student accommodation. Windfall sites will also contribute to meeting general housing need and the local plan should take account of this.

**ii)** The requirement at 4.2.27c for ‘the delivery of a significant proportion of self-build or custom build plots [to be] expected within the first phase of development’ may need to be rethought due to potential conflicts of viability (leading to a slower and perhaps lower provision of Affordable Housing) and delivery (especially where developer funded infrastructure may also be front-loaded). Early delivery may also result in self-builders being required to sign up to s106 and CIL obligations in planning agree.
The Guildford Society recognises the need to increase our housing stock. This is particularly the case for down-sizers, first-time-buyers and those needing affordable homes (see comments to separatetopic paper). We also fail to comprehend and agree with the obscure and obtuse GL Hearn Strategic Housing Market Assessment and subsequent amendments. We have attached to our response a copy of the report carried out by Neil MacDonald (Annex 2) on behalf of the Guildford Residents Associations (GRA). This fundamental disagreement notwithstanding, we recognise that Guildford Borough Council has settled on a housing target of 654 homes per year. We have made our site-specific comments in response to this and earlier iterations of the plan and do not propose to repeat these here. We do believe the approach outlined in this document, and the local plan itself, demonstrates a signal lack of planning in the town centre which could (as the Guildford Vision Group has shown) accommodate substantially more dwellings than the local plan suggests. We are concerned by the figures in sections 4.190 to 4.193.

The proposed housing trajectory must surely be a mathematical error. It places the local plan and the Borough at great risk from aggressive developers – not least Solum seizing on it as an opportunity to press for reversal of the planning refusal on appeal due to a monumental shortfall in five-year housing supply against the target of 654 homes per year. On the whole, we understand the approach taken by Guildford Borough Council to phase development contingent upon infrastructure and of allocation of sites (notwithstanding our concerns about the relatively small numbers of housing units planned for the town centre).

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

Attached documents:
ss) The Guildford Society has no objection to the amendments made to Policy H3.

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

Attached documents:

Comment ID: pslp171/1876  Respondent: 8561377 / The Guildford Society (Julian Lyon)  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy ID1

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

Answer (if comment is on questions 1-7 of the questionnaire): ()

ffff) Paragraph 4.6.1 refers to the Guildford Borough Infrastructure Delivery Plan which we considered at the previous Regulation 19 consultation in 2016.

gggg) Policy ID1(1) has clearly been carefully reworded to act as a handbrake on development, but the NPPF test to hold back development is calibrated on the basis of Severe Impact. It is not clear that Guildford Borough Council’s approach is defensible and it is likely the course of development would be uncertain and unpredictable. For a plan to set out to be uncertain and unpredictable suggests to the Guildford Society either a gambler’s game of chance or negligence towards the borough and its current and future residents.

hhhhh) So much of our infrastructure is a legacy of past failures over several decades. Development controls, such as Section 106 Agreements and Community Infrastructure Levy, are typically intended to mitigate incremental impacts of development and not to have to fix past issues. Policy ID1(2) may not be lawfully enforceable by planning condition or planning obligation due to, at least in part, the need to fix historic problems.

iiiii) Policy ID1(4) refers to the criticality of infrastructure listed in Appendix C, which has been changed for the most part to require developers to fund in full many elements. There is no indication of the impact on other parts of the plan if individual developers demonstrate that they cannot or will not finance infrastructure.

jjjjj) At 4.6.2 we agree the use of the Planning Act 2008 definition of infrastructure. We also think that the Town Centre and District and Local Centres should be listed as core infrastructure for the community, area and Borough.

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

Attached documents:

Comment ID: pslp171/1881  Respondent: 8561377 / The Guildford Society (Julian Lyon)  Agent:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

kkkkk) We are concerned that Policy ID2 is not sufficiently robust as to require works to be carried out as part of such developments in the neighbourhood of the A3 and M25.

lllll) We note at 4.6.18 reference to A3 widening and/or a tunnel option have been deleted. There needs to be a statement of intent to work towards a long-term solution to the A3 past Guildford which, in the opinion of the Society, will require a new alignment or approach.

mmmmm) No major resolution is likely to be forthcoming during the plan period. It is entirely likely that adding the proposed new four-way junction at Send will increase traffic and rat-running until a permanent solution to the A3 is found. The proposed Ockham junction will have a similar effect.

nnnnn) A more significant characteristic of the A3 past Guildford is that it climbs almost 100 metres in around 3.5km from the point at which it crosses the River Wey to the cutting at the top of the Hog’s Back.

[Image]
ooooo) The turning off towards Farnham at the apex of a long steep climb causes problems due to slow-moving, nose-to-tail traffic in the inside lane conflicting with traffic in the outside lane wishing to exit onto the A31.

ppppp) Widening the A3 will not especially help solve the problems associated with the 1 in 35 climb that quickly lead to a build-up at the Dennis Roundabout junction where traffic joins from the town, and then backs up quickly beyond that to the A320 turn.

qqqqq) Showing an extended line to near the Compton roundabout demonstrates the impact of crossing over the North Downs in either direction.

[Image]

rrrrr) Whilst these graphics are very basic and approximate, they do show part of the challenge caused by the current configuration of the A3 that has been running at capacity for around 20 years at peak hours, the overspill traffic rat-running through the town and neighbouring villages and residential areas.

(Please refer to chats Page 25. On uploaded document)

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

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Answer (if comment is on questions 1-7 of the questionnaire): ()

TRANSPORT – TOPIC PAPER (2017)
In addition to points made elsewhere in our response, we are concerned that Guildford Borough Council seems to be putting far too much emphasis on the A3 improvements (and an aspirational tunnel) to solve all their problems. Traffic (and its knock-on effect on other forms of transport) will get a lot worse in the interim in the town centre, however much they attempt to delay development. The net effect will be strangulation rather than encourage it.

DUTY TO COOPERATE – TOPIC PAPER (2017)
Guildford Borough Council has, by and large, made good efforts to cooperate with other Boroughs and agencies, and it takes two to cooperate in each case. We are disappointed at the number of references to third parties (such as Highways England) that have been removed from this draft plan because agreement has not been reached. We also believe the duty to cooperate should apply to cooperation with residents’ groups and community organisations such as the Guildford Society. There are too many loose ends that prevent the plan being satisfactorily completed, but we recognise that Guildford Borough Council wishes to press ahead towards adoption of its plan.

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

Attached documents:
opportunities to use active modes, bus and rail – are intended to result in a modest modal shift over the period to 2034, we forecast that there will also be an absolute increase in overall traffic volumes. ’

And then in 4.6.30a: ‘Roads in Guildford town centre carry high volumes of traffic and are subject to recurrent traffic congestion during peak periods, especially the gyratory and its immediate approaches. Over the weekday hours of 07:00-19:00, around a quarter of car trips passing through the Guildford gyratory either begin or end at a public car park in the town centre.’

xxxxx) These two statements accurately describe not only the dire existing situation with traffic in Guildford but also recognise that volumes are expected to increase to make matters worse. The last underlined sentence, though, is totally misleading, as is the suggestion, later in the paragraph, that increasing peripheral parking capacity will make a significant difference, thus diverting attention from the main issue.

a. Firstly, the statement refers to cars only, and
b. secondly, it refers to an average over the 12 hours of a weekday. As stated below, under Parking, peak hour behaviour is totally different, so it can be expected that a large proportion of the Town Centre parking would be by shoppers at off-peak times.
c. Thirdly, it identifies this behaviour with 25% of car trips through the gyratory, totally omitting any data or measures to deal with the remainder, to total over 2500 vehicles per hour, including heavy goods vehicles, at peak in 2011.

yyyyy) We believe that, by including Bridge Street, Onslow Street and Woodbridge Road -where these traffic flows occur - as part of the SMC, its objective to: ‘provide a prioritisation pathway through the urban area of Guildford for buses, pedestrians and cyclists, . . . and. . . for journeys to be rapid and reliable by bus and safe and direct on foot and by bike’ is unlikely to be achievable without significantly more serious investment aimed at diverting major through traffic away from this artery.

zzzzz) We do not believe the wording of Policy ID3(4) is workable or able to promote goodneighbourliness, and we consider a more appropriate way to address this is to promote the use of car clubs where there are limited resident parking bays available, with all new developments required to establish a car club or join an existing one which is or will also be available to existing residents. This can supplement or replace ID3(6).

aaaaaa) In terms of Policy ID3(5), the Guildford Society considers there needs to be a completerethinking of the way town centre parking (on street and in car parks), park & ride and public transport interact. For example: A return bus fare from Onslow Village costs £4.50 per person (assuming no pensioners); a return fare (including parking) from Onslow Park & Ride costs £1.50 per person return; Parking in York Road car park costs £2 for 2 hours plus £1 per hour thereafter. For a family of three, there is no point getting the bus at £13.50 return; the Park & Ride would cost £4.50; for £4.00 the family could drive into town and park in the York Road car park for up to four hours and still save money. If the price of rail travel from the proposed new Guildford West railway station is similar to travelling from Shalford, a fare of around £2.60 per person before railcard discounts, would suggest that the similar journey would cost £7.80. This illustrates the complete lack of a coherent transport and parking strategy, which will fail to alleviate the traffic and transport problems in and around Guildford.

bbbbbb) We strongly urge the Borough Council to consider expanding the Park & Ride network and to consider running services through the town centre from one Park & Ride facility to another so as to enable a greater number of stops in the town centre to be serviced by a single bus.

cccccc) We commend Guildford Borough Council’s Parking Strategy. However, as we commented to them in August 2016, when the draft was first published, no analysis has been made of the timing of off-street parking usage. We believe that it is important to distinguish between activity during peak times, when travel to and from work and schools is key, and other times when visitors and shoppers display totally different patterns of behaviour and are more likely to use town centre car parks.

dddddd) The wording of Policy ID3(7) needs some greater clarity. We think we understand what the policy is driving at but we are not sure. This indicates a need for a rethink, although we believe the substance is broadly appropriate.

eeeeee) We have already highlighted issues we have with the change from ‘Developer Contributions’ to ‘Developer Funded’ in the Infrastructure Schedule at Appendix C. We note the requirement of Policy ID3(8) and reiterate our caution that this may be part of a gamble intended to avoid development altogether rather than to enable it.
We broadly agree with the amended wording of Policies ID3(9), ID3(10) and ID3(11).

We broadly support the content of most paragraphs following the Policy.

We are concerned about the apparent finality of the text in paragraph 4.6.28 which seems to suggest both that there is a need for more infrastructure and that all necessary infrastructure has already been identified in Appendix C. We fundamentally disagree with this notion because planning for the entire town centre (infrastructure included) is missing from the plan.

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

Attached documents:

Comment ID: pslp171/2030  Respondent: 8561377 / The Guildford Society (Julian Lyon)  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy ID3

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

Answer (if comment is on questions 1-7 of the questionnaire): ()

The first point to make regarding infrastructure is that there is a colossal amount of additional or revised evidence referred to in the Local Plan directly, and the evidence base indirectly, which makes like-for-like comparison very difficult and which should place additional burden on the Council to explain the impact, and to ensure the remainder of the evidence and the plan in general relates well to the amendments. The Council has done none of these things.

Consequently, the Society has attempted to review the entire infrastructure evidence.

TRAFFIC & TRANSPORT

As part of the process of understanding the proposed infrastructure framework and its place in (a) justifying the level of development, and (b) enabling it, the Guildford Society organised a transport open day in the Guildhall in Guildford High Street.

The pivotal problems with the town centre’s traffic infrastructure, and, to a substantial extent this ripples out into the alternative road transportation network, stem from the limitations of the gyratory system.

Traffic data is generally inconsistently gathered and presented, and there is no long-term Data capture that is publicly available other than monitoring by Google, TomTom and INRIX. The latter have identified the following:

INRIX REPORT EXTRACT and Source – Attached at Annex 4

Academic environmental studies demonstrate the way this impacts the air quality in the town centre – in particular those below where data was collected in Guildford:

KUMAR REPORT EXTRACT and Source – Attached at Annex 3

In terms of the gyratory system, we have read many reports and Council papers relating to the congestion and shortcomings of the system, particularly at peak hours – not many of these documents have been retained as part of the evidence base which, therefore, has the impression of a selective exercise designed to justify the plan and not the other way around.
As a consequence, there is no cohesive plan for the town centre traffic in the Draft Submission Local Plan. Guildford Borough Council seem to be gambling on an outside bet – namely, that (a) the A3 will be fixed soon enough in the Plan period; and (b) most traffic will use the A3 instead of travelling through the town centre.

The Guildford Society recognises that there is at least some sense in the premise that the A3 has been at or near peak capacity at rush hours for the past twenty years or so, and that some traffic will rat run through the town centre and other surrounding roads. It is desirable that the A3 be urgently addressed.

The Society does not, however, believe that failing to tackle the town centre in the meantime is in any way sustainable, and that any development in the Borough might be considered unsustainable in the context of NPPF in the absence of a proper plan to fix the traffic in the town centre.

From the Society’s perspective, there is a major long-term issue in the town centre, namely, that the traffic canyon and so-called ‘concrete collar’ making up the gyratory system in Onslow Street and Friary Bridge, Park Street and Bridge Street respectively.

One of the key challenges for the gyratory system is the fact there are several short lengths of road between traffic lights which do not accommodate any reasonable capacity.

Another challenge to analysing the system is that, despite there being several lanes in places, it is often the case that one lane is gridlocked whilst others are all but empty. At various times of day, it is a different lane that is full by comparison to the others.

There is much that could be done in the short term to alleviate the traffic problems by co-ordinating traffic lights and reorganising lanes. It is hard to see that any short-term measures will enable a better and safer environment for cycling. They will also not do much to allow for more efficient scheduling of buses, and will not enable capacity in the town centre to facilitate the proposed Sustainable Movement Corridor.

Consequently, the Council has put forward a Draft Submission Local Plan that does not show that it can be delivered comprehensively. A plan in which only some parts are viable cannot in reality be considered a sound plan.

The Guildford Society endorses the Guildford Vision Group approach to traffic in the town centre and its accommodation of increased freedom of bus and cycle movement to enable modal shift and to redistribute traffic away from the heart of the town and riverside.

There would need to be careful design and co-ordination of signals for the junctions but there seem to the Society, given all we have read and studied over many years, to be very real merits and ample reasons to safeguard the route in order to at least bring more of the traffic and transport infrastructure within the control of the Local Planning Authority.

On Saturday 15th July, the Guildford Society – with invitations to, and rejections from the Deputy Leader of Guildford Borough Council who is the lead member for infrastructure, and the Head of Strategic Projects – held a public workshop in the Guildhall in Guildford High Street, aimed at exploring alternative transportation options in the town. This was intended to begin a public conversation about the issues and canvass views of the bus station, cycling, bus routes and trains.

The information displays and stands included:

1. A ‘best guess’ at the proposed location of the relocated bus station (discussed and approved at an ‘in camera’, closed session of a Council meeting a couple of weeks previously):

2. A display showing concepts for the bus station relocation – largely ignored by the ‘stakeholder exercises’ conducted ARUP and Systra:

3. Guildford Vision Group’s plan and images – including its fly-through model:

4. Guildford Bike User Group (GBUG)

5. Guildford’s Bus Companies, represented by Compass and Safeguard
6. Guildford Borough Council’s Sustainable Movement Corridor plan (in the absence of Guildford Borough Council we adopted plans from the Local Plan and Evidence Base.

7. Illustration of future rail options.

8. An aerial photo of Guildford for attendees to put post-it notes with any location-specific comments.

Looking in greater detail at the GVG plan, we have the following observations as this relates directly to (a) the absence of Town Centre planning in the Regulation 19 Submission Draft Local Plan; and (b) as it relates to the ability to quantify development in the town centre in the context of the Regulation 19 plan.

Assuming traffic at 11th June 2011 levels (when the Sky High Traffic Studies were undertaken for Surrey County Council), we have no better information other than consider it reasonable to assume that the origins and destinations onto and off the town centre road system would be broadly the same.

Looking at the existing gyratory system, we have allocated the traffic to lanes based on the current layout (diagram on the next page):

We have then calculated the traffic through each lane (table below): [Table]

The key lanes from which the table was compiled are set out below, followed by two traffic graphs and a summary of the traffic on each short stretch of the gyratory: [Image]

The main finding from this exercise is the disparity between lanes, for example between the four lanes on Friary Bridge. Lane 4 is for traffic heading for the A31 where there is a dysfunctional pedestrian and vehicular traffic light that does not interact with its fellow traffic signals, causing a back-up onto the gyratory: [Table]

Equally, in Onslow Street, there is a considerable volume of traffic throughout the day (lane 28 is heading towards the A281 where there is a dysfunctional pair of pedestrian crossings that cause a build-up of traffic on the gyratory: [Table] [Image].

The volume of vehicles in morning and evening peak traffic is substantial and it is not clear how such volumes can be accommodated alongside the proposed town centre stretch of the Sustainable Movement Corridor.

Along Friary Street (needing to run in both directions) the traffic is never lower than 450 vehicles per fifteen minutes – 1,800 per hour – and currently peaks in the morning and evening at 2,500 vehicles per hour.

We have attempted to understand the data and apply it to the local plan proposals. We do agree this will improve by implementing the proposed changes to car park access at Millbrook. A similar approach to Bedford Road Car Park would improve this still further.

In the absence of any real impact assessment on town centre traffic, we really only have one other alternative to model the traffic against, and that is the proposal by the Guildford Vision Group. In the model below, it is clear that traffic on Park Street (A-B) and the new road B-C and C-D will be at a similar level to the current two-direction traffic on Onslow Street, but it will be the junctions that determine whether the town centre can keep moving.

The Guildford Vision Group plan will allow the town centre portion of the Sustainable Movement Corridor to be implemented and would route traffic away from the area.

Working through the analysis and the Guildford Vision Group draft master plan, it seems the road network can work well, given the following assessment:

First, here is the layout proposed by GVG marked with the four junctions that replace seven junctions on the existing gyratory system with much longer legs between junctions than the current arrangement: [Image]

We have assessed the junction movements for the above as set out below: [Image]
We have then assessed the anticipated traffic flows for each traffic movement (recognising that (a) there is no
differentiation between vehicle types in the original survey, (b) changed layouts will almost certainly change behaviours,
(c) there is no data for traffic stopping at town centre car parks, and (d) the data was zeroed out for vehicles using the
gyrotary to effectively make a U-turn). [Table]

This table is calculated from data for each 15-minute slot from 7am to 7 pm on 11th June 2011. [Image]

The most traffic-intensive stretches of road are the new roads and Park Street – the highest volume is southbound alongside
the station between 4.30 and 5.30pm at 1589 vehicles per hour (26.5 vehicles per minute). There will inevitably still be
peak hours congestion but the greater simplicity of the system and junctions should allow this to be minimised in a way the
current system cannot.

The Guildford Society believes this is a critical component of enabling the town to accommodate growth and to cope with
the growth in surrounding areas. It will be possible to mitigate some of that growth by resolving issues on the A3 and by
encouraging modal shift.

GUILDFORD TRANSPORT STRATEGY 2017

This declares itself as an aspirational document and we consider its objectives to be commendable. The substance,
however, relies heavily on the delivery of the Sustainable Movement Corridor (SMC). We entirely support the concept of
the SMC but have serious concerns about its ability to function effectively as currently conceived alongside existing
unmitigated traffic volumes (especially when adjusted to accommodate for growth). See our comments specifically at
Policy ID3(3). We broadly agree with the traffic analysis carried out by the Guildford Residents’ Associations (GRA).

From a FoI response (Annex 5) we are aware that analysis of the impact of 1,800 homes at Dunsfold showed an increase of
an average 110 cars per hour in the three-hour morning peak. A planned increase in housing in the plan period of 12,426
homes in the borough plus fifteen to twenty thousand in the influencing neighbouring boroughs will mean (mathematically)
we may need to plan for an additional 1,800 cars per hour in the absence of suitable transport alternatives. Even if a fraction
of this number actually reaches the current gyratory system, Guildford will fail to cope and the town will lose ground to
Woking and other centres.

(Please Refer to Diagrams on uploaded Rep)

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

Attached documents:

Comment ID:  pslp171/2041  Respondent:  8561377 / The Guildford Society (Julian Lyon)  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy ID4

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

Answer (if comment is on questions 1-7 of the questionnaire): ()
The first and most important point to make is that the Guildford Society has supported, and does support the intent of Guildford Borough Council to adopt a Local Plan for the Borough as soon as possible that protects and enhances our past heritage and urban and rural character, whilst promoting and enabling sustainable growth. We do not seek to frustrate this process, but we do need to see a robust, reliable and effective Local Plan: a sound Local Plan.

There is much to like about the revisions to the plan. In some places, the draft plan has been strengthened with greater emphasis on and preservation of heritage, countryside and visual amenity, notably in the following policies and paragraphs:

Contents List Policy P1: paragraphs 2.1, 4.1.1, and 4.1.4; Policy P1 (inclusion of Areas of Great Landscape Value); paragraphs 4.4.56, 4.4.59, 4.4.67, and 4.4.68; several items in Policy D1, and many in D4. We welcome all of this.

There remain areas about which we are particularly concerned, not least of which is the omission of any real planning for the regeneration of and infrastructure in the town centre.

We have been, and remain, concerned that we have not seen the second part of the Local Plan: the Development Management Local Plan in any shape or form and we are not sure (a) what protections that plan will afford, nor (b) how effective reliance on parts of the Local Plan 2003 will be in the meantime. This second part of the local plan will be an important document, and many of our comments on this first part of the plan may be dealt with in the second part.

We recognise the amount of hard work the Officers and Lead Councillors have done to get the plan to this stage and the several million pounds paid on consultants to help inform the plan.

We have, however, been disappointed by the lack of interaction Guildford Borough Council with groups like the Guildford Society during the process of getting the draft plan to this second Regulation 19 consultation (in contrast to the Local Plan Forum which was convened following the 2014 consultation and disbanded in 2015), and we are struck by the amount of red ink on the amended plan and, moreover, by a substantial reorganisation and rewriting of key parts of the evidence base. Our response has been prepared as a community group without recourse to professional advice. We have responded as a suite of documents due to the complexity of making our comments through the online portal. We believe there is no reason why such a response made in this way should receive any less consideration than comments received through the portal. For ease of reference, (but not to the exclusion of any part of this document) we have attempted to provide responses, in the next section of this document, to the questions provided.
There have been substantial and substantive changes to the Local Plan and its Evidence Base. The Guildford Society’s team of volunteers have tracked each successive consultation (including its associated evidence base at the respective times) and these are available to view on the Guildford Society website and at:

http://wp.me/p3KMtD-64

2014: Regulation 18 Consultation Documents

http://wp.me/p3KMtD-8Y

2016: Regulation 19 Consultation Documents

http://wp.me/p3KMtD-iN

2017: Regulation 19 Consultation Documents

http://wp.me/p3KMtD-nc

The Guildford Society has held several public meetings to help explain to our members and wider public about the various evidential documents and consultations, and feedback from those sessions have informed our responses to each successive, respective consultation:

2013: Issues & Options Consultation Response

http://wp.me/p3KMtD-6M

2014: Regulation 18 Consultation Response

http://wp.me/p3KMtD-dG

2016: Regulation 19 Consultation

http://wp.me/p3KMtD-mH

Whilst the 2017 Regulation 19 draft submission plan has tracked changes and the scope of the consultation is required by Guildford Borough Council to be limited to the changes, there are sufficient alterations to the evidence as to throw the integrity of the plan itself into question, and so this response is not restricted to the red lines in the plan. We have attempted, however, to restrict our comments and responses to the changes in plan and evidence base since the previous Regulation 19 consultation in 2016.

We would also like to point out that a considerable amount of this commentary could have been provided informally to Councillors and Officers have been managed accordingly, had the leadership of Guildford Borough Council (Leader, Deputy Leader and the then Managing Director) not decided to restrict access by the Guildford Society and the Guildford Vision Group to officers and Councillors.

The Guildford Society has recognised the urgent need for a Local Plan and has sought to be firm but objective. We have been concerned from the beginning of the process (well before any consultations, and bearing in mind this plan has been in gestation for about ten years) that the Plan was developed first, followed by the evidence. There remain gaping holes in the draft Local Plan itself, not least in the Town Centre, where there is an almost complete absence of plan making.

The Society has formally pointed out errors and omissions on three separate occasions (upon publication of the evidence base as part of the Issues and Options consultation, and the R18 and R19 regulation consultations in 2014 and 2016 respectively). For example, the errors strewn throughout the Settlement Profile Report – e.g., Peasmarsh still shows as having as its nearest convenience shopping the parade at East Horsley, a substantial distance on the opposite side of Guildford! This is a Council-generated document, and could have been corrected at any stage. Far worse, in that same document, is the lazy treatment of the Guildford Urban Area (including more than half of the Borough’s residents) as a single settlement – making it much more difficult to plan proactively and proactively for much of the urban area. Our most comprehensive response was to the initial Regulation 18 consultation in 2014.
We do not intend to repeat the representations made at that time. We are, however, disappointed that, three years later, many of our commentshave gone unresolved and unrecognised for example, lan in a timely manner, that may have been understandable in 2014. It beggars belief in 2017 that the evidence has not been completed and suitable adjustments made. There is much to like about the revisions to the plan. In some places, the draft plan has been strengthened with greater emphasis on and preservation of heritage, countryside and visual amenity, notably in the following policies and paragraphs:

I. Contents List Policy P1;
II. paragraphs 2.1, 4.1.1, and 4.1.4;
III. Policy P1 (inclusion of Areas of Great Landscape Value);
IV. paragraphs 4.4.56, 4.4.59, 4.4.67, and 4.4.68;
V. several items in Policy D1, and many in D4.

We welcome all of this.

This response is extensive as we recognise the amendments are also substantial when the updated evidence base is taken into account. It may often seem as though our comments are negative or obstructive. That is not our intention. We aim to help Guildford Borough Council to settle on the best plan we can achieve, and we stand ready to work with Guildford Borough Council to achieve it.

The evidence base itself points to work streams (for example on flood risk management) that are ongoing but incomplete. We recognise there will always be ongoing work to better understand and plan for the town and borough, and it is likely, therefore, that we will be asked to adopt an incomplete plan. It is, however, very hard to respond to this plan without highlighting areas in which it is incomplete or deficient. We fear some of these areas may in themselves make the plan unsound, and we highlight those areas.

We hope, should the plan be submitted in more or less the form we have commented on, that there will be constant and early reviews to enable key topics such as the town centre, infrastructure and flood risk to form a comprehensive, firm basis for planning the borough’s spaces and places.

tt) We welcome the addition of ‘Area of Great Landscape Value’ to Policy P1.

uu) At Policy P1(2)The Guildford Society does not perceive that a new junction on the A31 linking to Blackwell Farm, etc, is compliant with the ‘presumption against major development in the AONB except in exceptional circumstances and where it can be demonstrated to be in the public interest’, although we suspect this form of words has been introduced as a Trojan Horse to seek to achieve such development. We consider the paragraph should end at AONB

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

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>pslp171/1792</th>
<th>Respondent:</th>
<th>8561377 / The Guildford Society (Julian Lyon)</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2017 / Policy P2</td>
<td></td>
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</tbody>
</table>

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

Answer (if comment is on questions 1-7 of the questionnaire): ()
vv) The Guildford Society has no comment to make on the minor amendments to Policy P2.

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

Attached documents:

Comment ID: pslp171/1793  Respondent: 8561377 / The Guildford Society (Julian Lyon)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P3

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

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY P3– Countryside -

ww) The Guildford Society has no comment to make on the amendments to Policy P3.

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

Attached documents:

Comment ID: pslp171/1825  Respondent: 8561377 / The Guildford Society (Julian Lyon)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P4

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

Answer (if comment is on questions 1-7 of the questionnaire): ()

xx) The section on Flooding (Policy P4) does not provide much support for development or for a cohesive, comprehensive solution. We do not see that the policy is helpful enough and, read with the Infrastructure Delivery Plan at Appendix C, provides very little comfort to developers or local communities.

yy) The Guildford Society is adamant that the SANG policies – administered as an interpretation of the European Birds Directive – will bring about a massive failure to deliver Affordable Homes, particularly in the town centre. We believe that Policy P5 should be amended so that homes in the town centre are not required to deliver contributions to SANG because there is ample undesignated alternative natural greenspace (at Pewley Downs, The Chanters, the River Wey, Guildown, The Mount and the Hog’s Back) within walking distance and this should be sufficient to avoid harm to ground-nesting birds.
zz) Such an approach would need the cross-boundary co-operation of several local authorities but will enable Guildford to increase its yield of sustainable town-centre affordable housing.

aaa) We note the new references to climate change in 4.3.37, 4.3.43, 4.3.46 and Policy P4(C).

FLOODING AMENDMENTS

The Topic Paper ‘Flood Risk’ (June 2017) is a new addition to the Evidence Base.

Section 2.3 sets out the categories of Flood Risk zoning and notes that 3b is known as the ‘functional floodplain’ where water has to flow or be stored in times of flood.

The failure to identify in the plan suitable arrangements for managing flood water in any better or more organised way than hitherto is an opportunity missed and belies the importance of plan-led regeneration in the context of a brand new Local Plan aimed at providing for the next 16 years or so.

The Guildford Society has greater confidence in the comprehensive planning advocated by the Guildford Vision Group in aiming to store water and provide for greater areas of floodplain within less sensitive areas such as undercroft parking, terraced public areas and retention reservoirs below public squares.

The GVG plan also has the benefit of seeking to create walkways that should allow dry access for pedestrians to homes and business premises during a flood event.

There is no such plan or comprehensive aspiration in the Local Plan.

The Paper also cites the sequential testing in NPPF 101. This generates a circular argument in the Local Plan inasmuch as there is insufficient alternative land allocated for development to enable flood plains to be avoided, creating an increased likelihood that there will need to be development in the floodplain, and yet there is no specific flood mitigation plan in the town centre in the absence of any town centre planning within the Local Plan.

At 3.5 i) there is part of sentence missing – it is by no means clear what this is meant to be.

The local context identifies past flooding events and pays relatively little attention to pluvial flood risk which must become more prevalent with the greater areas of hard landscaping and buildings envisaged by the plan. This is equally true of developments where sustainable drainage systems pass water more effectively into the ground but which by nature may increase the level of the water table.

The Settlement Profiles – which still lump the entire Guildford Urban Area together as a single Settlement of wards, communities, amenities, convenience stores, differing levels of service provision (as witnessed by the Indices of Multiple Deprivation (2015) for each Lower Super Output Area, and as demonstrated by the Society in Annex 6 of our 2014 response) – do not adequately cover areas of local flooding, and could not highlight pockets of surface water stress, for example around Guildford Cathedral where run off affects local households in Ridgmount even before the allocated 100 homes are built there.

It is not clear that the Flood Risk Topic Paper has taken full account of the Section 19 Flood Investigation Report (2015) - [https://www.surreycc.gov.uk/__data/assets/pdf_file/0018/71910/4-Guildford-Borough-S19-Report.pdf](https://www.surreycc.gov.uk/__data/assets/pdf_file/0018/71910/4-Guildford-Borough-S19-Report.pdf) - that highlights some of the risks, and it is by no means clear that a detailed assessment has been made of the local hydrology and the impact of the various development proposals.

Full account needs to be made of the existing and modelled instances in local communities of fluvial flooding, surface water flooding, groundwater flooding, sewer flooding and any other sources of flooding (including the fragility of water supply pipework).

In the town centre, there are pinch points that lead to an unplanned for build-up of water, for which major strategic planning will be required both upstream and downstream. Upstream there should be some water management infrastructure
– probably at both Shalford and at Shalford Meadows. In town there needs to be better water retention and water capacity management, and it is our contention this can only realistically be achieved as part of a master-planned regeneration of the riverside and town centre.

[Map]

In the above diagram, the width restrictions are illustrated by a dark blue circle, whereas those with height and width restrictions are in lighter blue. North is to the right of the map.

The Topic Paper does not provide any solutions to flooding, and does not really inform policy in the Local Plan.

The image below is taken from: https://flood-warning-information.service.gov.uk/long-term-floodrisk/map and allows a quick view of flood risk, including, in this instance, surface water flood risk in Guildford town centre.

[Map]

It will be important to increase the catchment upstream but there is not a lot of upstream in Guildford Borough. It seems Waverley has completed its flood plan, and that it does not increase catchment to benefit Guildford. It seems, anecdotally at least, that this is substantially due to a lack of cooperation by Guildford Borough Council.

There is also a need to address the water catchment increase beyond Waverley and in tributaries such as the Tillingbourne. This, and consequent impact on developable sites, are absent from the Topic Paper and the Plan. We understand that Guildford’s flood plan is still in development, and that it has 16 options including upstream catchment.

As there is so much missing from the plan itself and Topic Paper, we are at a loss to understand if the plan is anywhere close to being sound in terms of flood risk management. This is a shame because there is considerably more detail in the Key Evidence documents that have not been carried forward into this strategic planning document.

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

Attached documents:

**Comment ID:** pslp171/1772  **Respondent:** 8561377 / The Guildford Society (Julian Lyon)  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy S1

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

**Answer (if comment is on questions 1-7 of the questionnaire): ()**

Presumption in favour of sustainable development

m)Amendment to 4.1.1 is broadly acceptable, but makes the plan a little less predictable in its delivery and in its development promotion and protection.

n)We are unfamiliar with the proposed suggested wording at 4.1.2a which could, as referred to above at (m), lead to unpredictable outcomes, there being no measure of ‘gains’ against which to assess projects.

o)Paragraph 4.14 seems to be an attempt to determine that no development proposals in Guildford Borough should be subject to national policy under NPPF, as the entire Borough falls within the exceptions listed: veiw Map.
HOUSING TYPE, TENURE AND MIX – TOPIC PAPER (2017)

We broadly agree the background to this paper (excepting any analysis in the SHMA). The section on student accommodation needs to be read in the knowledge that there are various further education colleges and universities in the town, not all of which have campuses in which students do and can live. The SHMA miscalculates inward migration as a result of a failure to properly understand the student population and the processes for registering and deregistering with GPs which acts as a proxy for census data.

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

Attached documents:

Comment ID: pslp171/1768  Respondent: 8561377 / The Guildford Society (Julian Lyon)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy S2

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

Answer (if comment is on questions 1-7 of the questionnaire): ()

p) Whilst not strictly an amendment, Paragraph 4.1.6 looks out of place in a plan that does not include any substantial town centre allocations.

a. The Local Plan suggests 1,151 homes for an area of the town centre where the Guildford Vision Group has identified scope for 3,787 homes. The Local Plan allocates some sites, but is missing others. The almost complete absence of detail puts at risk the entire Local Plan.

q) The Guildford Society welcomes, on the one hand as it is a Green Belt site, the removal of the site at Flexford and Normandy from the plan; on the other hand, however, we are mystified as to why it is more appropriate to include development in the Green Belt at, say, Send, whilst removing a Green Belt site which includes land (deleted Policy A47) of which a substantial portion is within 500m of Wanborough Station, which would place it second only to Guildford Town Centre in the sequential test in Policy E2(Note that this station is not included in newly provided Appendix A1). This suggests that the Council sees sites accessing the already-congested A3 as superior for development to a site meeting its needs for available land.

r) We note at 4.1.9 that North Street is now included as a Strategic Site.

s) In Policy S2 we note the deletion of the jobs forecast, the reduction in proposed office space from 47,200 to 43,700 sqm (GVG’s town centre plan envisages 51,000 sqm of new offices and civic space, although it does propose to demolish some office areas to achieve this). We note there is a proposed reduction in industrial land allocation by at least a Hectare.

t) In Policy S2 – Annual Housing Target, we note the increased back-loading of housing provision and the explanation for this. We do not see a connection between the Infrastructure Delivery Plan and the propensity to deliver housing in this ‘contingent’ plan (see (a) above). This is surely an omission in such a contingent plan, where there should be a detailed timescale for the provision of infrastructure, against which a timeline for housing delivery should be mapped out.

u) From the housing numbers, we can see these rising from 450pa to 850pa over the fifteen-year period 2019 to 2034, totalling 9,810 homes. The total stated target for the plan period is 12,426 homes. Mathematically, this leaves 2,616 homes to be delivered in the four years from 2015 to 2018 inclusive – an average of 653 homes per year. From the 2015-2016 Monitoring Report, completions in recent years (including 2015, where there was a shortfall of 265 homes) were:

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<thead>
<tr>
<th>Year</th>
<th>Completions (net)</th>
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246
07/08  478  
08/09  130  
09/10  227  
10/11  190  
11/12  262  
12/13  234  
13/14  137  
14/15  242  
15/16  388  
16/17  297  

[2016/17 Information from Housing Topic.]

Paper Please see the table in our review of the Topic Paper – Housing Delivery (2017)

v) Paragraph 4.1.9a notes that ‘strategic greenfield sites...[are] dependent upon the delivery of necessary infrastructure expected to occur towards the end of the plan period’ (the emphasis is ours).

w) There is no such requirement cited in the plan for town centre infrastructure, and Table 1 (Paragraph 4.1.12 has been deleted so we cannot see where the Council anticipate its development will actually occur.) Please see our comments with regard to the serious shortcomings of the SHMA and the Objective Assessment of Need.

y) Paragraph 4.1.9b says that the Council is demonstrating a rolling five-year supply but the deletion of Table 1 does nothing much to demonstrate explicit supply throughout the plan. It is, therefore, far from clear where the crucial evidence is for the rolling five year supply in the short term. If not a clearly-produced table such as has been deleted, there should be at least a clear diagram showing a broad-brush picture of how the housing target will be delivered over time.

z) At 4.1.11 the plan points to further details of sites key to delivering the strategy, and yet these policies do not include timetables that would then give confidence of the delivery of both homes and infrastructure (together with economic, environmental and social gains – Paragraph 4.1.2a) in accordance with the Annual Housing Target.

aa) Every document in the Key Evidence box has been amended and the Housing Needs Assessment deleted.

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

Attached documents:

Comment ID:  psp17q/510  Respondent:  8561377 / The Guildford Society (Julian Lyon) Agent:

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

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
The Guildford Society has reviewed the thousands of pages of the Evidence Base and, to the best of its ability and, with limited (voluntary) resources, has considered the content and context of each.

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

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

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

**Attached documents:**

### Comment ID: pslp17q/511  Respondent: 8561377 / The Guildford Society (Julian Lyon)  Agent:

**Document: Proposed Submission Local Plan: strategy and sites 2017 / Question 2: Legal Compliance**

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

Answer (if comment is on questions 1-7 of the questionnaire): ()

We have not engaged any legal advisors and, as such, are not in a position to determine that legality of the plan. We are concerned about the nature of gamble being undertaken to make all or most development ‘contingent’ upon infrastructure, much of which is beyond the power and control of the Council to bring forward. We have commented on this at many of the individual policies, the evidence base and also in a section entitled ‘Issues and Topic Papers’

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

**Attached documents:**

### Comment ID: pslp17q/512  Respondent: 8561377 / The Guildford Society (Julian Lyon)  Agent:

**Document: Proposed Submission Local Plan: strategy and sites 2017 / Question 3: Soundness**

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

Answer (if comment is on questions 1-7 of the questionnaire): ()
We have genuine and serious concerns about the soundness of a plan that fails to deal proactively and comprehensively with the town centre – a critical part of the regional infrastructure for Guildford and surrounding boroughs. We have commented on this in our response to Policy E7 among others and also in our section entitled ‘Issues and Topic papers’.

The housing target numbers are, we believe, mathematically flawed (even after the SHMA which we do not agree with). The tabulated calculation of housing from 2019 to 2034 leaves a 2015-2018 target inclusive of 653 homes per year. Our five-year housing supply falls well short of these numbers. We have commented on this in our response to the Policy S2, the Housing Policies and also in relation to the Housing Delivery Topic Paper (June 2017)

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

Attached documents:

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<th>Comment ID: pslp17q/513</th>
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There is no doubt in our minds that Guildford Borough Council has attempted to co-operate with numerous agencies and neighbouring boroughs. There is relatively little evidence (including in the Duty to Cooperate Topic Paper (2017)) to suggest there has been much tangible or useful response, which is deeply disappointing when the plan depends so much on external organisations.

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

Attached documents:

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Spatial vision

1) Chapter 3 includes the Spatial Vision.

a. The 40% affordable housing target is unchanged. So is the viability report (2014)– somewhat outdated and written before the change in Appendix C of most infrastructure from ‘Developer Contribution’ to ‘Developer Funded’ which suggests it is achievable. There is insufficient strength in the policy and no definitive test for assessing developments for affordable
housing, and The Society remains very concerned that the actual proportion that will be delivered will be substantially lower.

b. The Spatial Vision spells out the housing target of 12,426 homes over the nineteen-year currency of the proposed plan, at an average of 654 homes per year. The Guildford Residents Associations (GRA) will contest the need for so many homes and we have seen their analysis and believe it to be substantially more robust than that of GL Hearn in their SHMA – not least because the basis of calculation and underlying assumptions of GL Hearn (in the original SHMA and the recently 2017 update) have not been available to the community despite several attempts to obtain it by FoI requests and EIR. We, therefore, support the analysis commissioned by GRA and reject the target proposed in this Regulation 19 draft submission local plan.

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

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

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

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

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

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

Attached documents:
I would like to place on record my comments and concerns regarding the New Local Plan.

Over 60% of the proposed new houses are to be built in the Metropolitan Green Belt. In my view this represents a massive incursion into the Green Belt within the borough which is completely contrary to its whole concept. It was of course established by law to be the lungs of London and to prevent urban sprawl. It should be open and permanent and not subject to inappropriate development except in very special circumstances. I understand that Government advice is quite clear that housing need alone is not an adequate ground for building in the Green Belt. I therefore object to this proposed invasion of the Green Belt.

I also object to the proposed removal of East and West Horsley from the Green Belt. One result of this would no doubt be to make back garden development easier. This would lead to a creeping urbanisation of the two villages from within which would eventually destroy or severely harm their existing semi-rural nature. This characteristic is one reason why many residents chose to live here in the first place. No exceptional circumstances have been put forward to justify the insetting and the adjustment of the settlement boundaries.

It seems to me that West Horsley has been singled out for special attention and I object to the proposals for our village. The main development site proposals (all in the Green Belt and outside the existing settlement boundary) if agreed and implemented would add up to 385 new dwellings in the village, an increase of 35% on the current number. The resulting housing density would be drastically higher than the current level and would fundamentally alter the character of the village for the worse. Policy D4 stated that proposals for new development within an inset village will have particular regard to the distinctive settlement pattern of the village and the important relationship between the built environment and the surrounding landscape. What is being proposed for West Horsley, a small semi-rural village with 43 listed buildings seems to me to be quite contrary to this policy. It would be completely overwhelmed by development on the proposed scale and its existing character significantly damaged. There were a very large number of objections to similar proposals in the 2014 daft plan and these appear to have been almost completely ignored in drawing up the latest proposals.

Another key issue here is that the local infrastructure is already under considerable strain. 385 new dwellings could mean an increase in village population of over 1000 people and one has to ask where the extra children would go to school or where any of them would obtain medical care. The primary school is full and the medical centre struggles to cope with existing demand. The draft plan does contain a proposal to expand the medical centre in East Horsley, but only within a 5 to 15 year time scale. This could be long after the new houses have been built.

Local public transport is very limited and the residents of these new dwellings would be heavily dependent on the use of private cars. The local roads are already in places in distinctly poor condition. One example is East Lane which carries a considerable volume of both through, school and local traffic and Northcote Road which leads to the Raleigh primary school. I have reported the badly broken surface of East Lane to SCC Highways, but little so far seems to have been done to improve matters. I also regularly have to report large potholes in Northcote Road (which do usually get patched up, but open up again within months). I question whether the local road network could realistically cope with the increased traffic levels.

Some of the new inhabitants would no doubt want to commute towards or into London by rail. It is doubtful whether the existing service could accommodate many more commuters, as trains in the rush hours are already very crowded. In addition the car park at Horsley station is close to full on weekdays. Furthermore car parking for the Station Parade shops is quite often full or close to capacity.

I was surprised and dismayed to note that the proposed 2000 dwelling development of the Wisley Airfield site has been included in the draft plan. This has of course already been refused planning permission by the Borough Council. Many of the transport infrastructure factors in the Horsleys mentioned above would be considerably exacerbated if this were to go ahead. Inevitably the numbers using Horsley Station would increase and traffic levels would rise still further as the inhabitants and those providing services to them drove to and from the new settlement through the two villages. I therefore wish to object to the inclusion of the Wisley Airfield in the draft plan.

Site A38 (Land to the west of West Horsley) is designated for 135 new houses. This would load both East Lane and Long Reach with considerably more traffic than at present. As mentioned above East Lane is already a busy road in poor surface condition in places. Long Reach is a narrow unclassified road with some sharp blind bends towards its northern end and is...
not well suited to significantly to increased traffic volumes. Almost every Saturday in the season there are a large number of cars parked on the verge by those using Horsley Football Club grounds and Tom’s Field. This reduces it to a single lane.

The map for this site shows its eastern boundary as the end of the back gardens of the houses on the western side of Northcote Road. It needs to be noted that Bens Wood, which I understand is likely to be proposed as a SANG, extends to the south along the back of some of these houses. Permissive access is available to Bens Wood from all properties backing onto it and this is a valuable local feature. This part of the Wood would be destroyed and access lost to the rest if the entire site were to be built up. Bens Wood is also an important wildlife habitat as well as being an asset to the village and the development of Site A38 would inevitably have an adverse impact on this natural environment. I therefore object specifically to the inclusion of this site in the draft plan.

In conclusion I readily accept that the borough needs more housing, but I fell very strongly that this should be provided in a far more sensitive, measured, balanced and sustainable way than proposed in the draft plan.

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

Attached documents:

Comment ID: PSLPA16/3159  Respondent: 8562081 / C Scarlett  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North

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

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the removal of West Horsley from the Green Belt as do the National Trust, West Horsley Parish Council and Horsley Countryside Preservation Society. This seems to ignore the NPPF stipulations that the planning system should fulfil a role which contributes to the protection and enhancement of our natural environment and that all available urban resources should used before any development of the Green Belt is considered. The Surrey Hills AONB should also wash over the village.

The proposed increase in housing of 35% above current levels is completely out of line with developments in other villages and especially in Guildford Town. This inflated number of new houses apparently arises from a Strategic Housing Market Assessment that was generated by a consultant’s mathematical model. The need for more houses in West Horsley should be limited to providing small dwellings for first time buyers and the elderly who wish to downsize, not the 385 new houses proposed.

The infrastructure in the Horsleys is already overloaded; the local schools are full, medical facilities are stretched, roads and trains are overcrowded, roads are badly maintained, car parks are frequently full, and drainage is inadequate.

I object to the proposed development of a large estate of 135 houses on the land designated A38 at Manor Farm West Horsley (site reference 15) to be located between East Lane, Long Reach and Northcote Road. This last named road is not mentioned in the address of site reference 15, but should be. This development would not respect the current character and density of housing in the village. 135 houses would involve at least 270 more cars using the narrow lanes in the area and commuters to and from the A3 would use Long Reach which is quiet and rural with right angled bends at the northern end in Ockham village. Although the site is designated Flood Zone 1 (low risk) there were large amounts of standing water present last winter in spite of the presence of many deciduous trees which take up water.
The amount of new broadleaf woodland created in England has fallen to the lowest level in at least 45 years according to the Forestry Commission and Woodland Trust. Any loss of woodland is highly undesirable given its ability to absorb carbon.

I have lived in properties adjoining the land at Manor Farm for 44 years and our garden and a number of others on the western side of Northcote Road back directly on to Bens Wood, which is a nature reserve and a bespoke SANG. The end of our rear gardens is the current settlement boundary and its relocation and the proposed development would destroy the rural nature of this part of the village. We enjoy direct access to the all weather permissive footpaths in the Wood, which would be lost if the southern extension is taken by development as shown in the site map.

The presence of the Bens Wood nature reserve and its pond has improved the environment and the amount and variety of wildlife species has increased greatly. There are now far more animals and especially birds including migrants, woodpeckers, owls, buzzards and red kites which give interest and pleasure to local residents who walk in the area. The noise and disturbance caused by large scale building works nearby will frighten away this wildlife from the whole of the wood.

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

Attached documents:

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The amendments made in the latest draft unfortunately do nothing to allay my concerns and I must therefore maintain my objections. The proposed scale of new building still does not in my view represent sustainable development for the Horsleys and would irretrievably change the semi rural nature of the villages. I also have little confidence in Surrey County Council’s ability or willingness to provide a suitable road system – I refer particularly to East Lane West Horsley whose surface is badly damaged in several places and which would have to carry a considerably increased volume of traffic if the proposed developments were to go ahead.

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

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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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I OBJECT TO THE PLANS OUTLINES IN POLICY A25 This massive development, coupled with POLICY A43, would transform the rural nature of the villages of Send and Ripley to a sprawling suburb of Guildford. Our Green Belt lost forever!

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

Attached documents:

Comment ID: PSLPS16/2892  Respondent: 8562145 / Mr Christopher Last  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

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

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT TO THE PLANS OUTLINED IN POLICY A43 on the grounds that this area is Green Belt and is therefore protected from development. It is a wildlife habitat. What does The Council propose to do about this? The brownfield industrial site at Burnt Common is large enough for the 7,000 sq. m. suggested for further development. If the Council builds on this area, the small, beautiful country villages of Ripley and Send will become suburbs of Guildford in no time at all and their uniqueness and beauty will be lost forever. Please don't touch our Green Belt! This why we moved to this area, because it is unspoilt! I also object to the plan for 400 new homes, on the grounds that there is insufficient infrastructure to maintain this level of development, viz: health centres, schools etc. I also strongly object to the manner in which this plan was put forward at the last moment, without consultation.

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

Attached documents:

Comment ID: PSLPS16/2891  Respondent: 8562145 / Mr Christopher Last  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A44

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

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT TO THE PLANS OUTLINED IN POLICY A44 on the grounds that this area borders a country lane, one track in places, in a beautiful, rural position. There is a beautiful cemetery adjacent, a place for peaceful reflection and quietude. The ethos of this area will be destroyed by the addition of 2 traveller sites and a further 40 homes

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

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<tr>
<td>I object to the local plan as I consider it is unacceptable as it will have a bad effect on traffic and the living conditions of local residents.</td>
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<td>I object as I do not consider the removal of green belt areas is legal.</td>
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I object to the proposed plan as I consider it is not sound.

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

Attached documents:

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Comment ID: PSLPA16/1521  Respondent: 8562273 / The Clandon Society (Christopher Dean)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

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

Answer (if comment is on questions 1-7 of the questionnaire): ( )

2. The housing needs assessment is flawed in various respects and overstates housing need. In addition since it was produced, the referendum Brexit decision has almost certainly reduced future housing need and rendered the previous assessment seriously out of date. As a result any assessment of Green Belt sites which took place to consider whether “exceptional circumstances” existed to outweigh the harm to the Green Belt was based on false premises and should be reconsidered.

3. The Council was entitled to consider constraints before determining the housing number. We believe that as well as being entitled to do this the Council was required to give proper consideration to constraints. The scarcity of sites outside the Green Belt as well as infrastructure (most notably roads) considerations all represented constraints which should have been taken into account in determining the final housing number. Accordingly in this regard our objection to the allocation of Green Belt sites is twofold. First we believe constraints should have been applied. Secondly we believe the Council did not properly consider constraints and that their decision making process was flawed and thus subject to being set aside by the Inspector.

4. Having properly applied constraints if there is a need to develop in the Green Belt then specific Green Belt sites should not be included in the Plan unless “exceptional circumstances” for development are proven in relation to that specific site, as stipulated repeatedly in the NPPF. The Green Belt should trump short-term considerations such as perceived housing need, as case law has established. There needs to be a specific balancing exercise conducted on each Green Belt site weighing the harm to the Green Belt against the very special circumstances which are argued in favour of development at that particular site. There is no evidence this has been done. Instead the council have appeared to say that having chosen a housing needs figure and decided it cannot be met without building on Green Belt then there is no need for any further consideration and any convenient Green Belt site can be allocated for building at will.

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

Attached documents:

Comment ID: PSLPS16/2808  Respondent: 8562273 / The Clandon Society (Christopher Dean)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A25
### POLICY A25 - Gosden Hill Farm

We object to Policy A25 Gosden Hill Farm.

1. The Green Belt at this point serves the important function of separating the parish of West Clandon from the edge of urban Guildford. Development here will cause the two to coalesce, defeating one of the objectives of the Green Belt. If this development proceeds we believe the narrow strip of Green Belt remaining between Guildford and the houses along The Street in West Clandon (owned by the same developer as Gosden Hill Farm) will come under enormous pressure.

1. It will represent an undesirable ribbon development along the A3. It will be highly visible from the A3 when approaching Guildford and will, in conjunction with A43a at Garlick's Arch give the appearance of almost continuous development from Send through to Guildford.

1. The Plan does not put forward any evidence that exceptional circumstances exist to justify removing this site from the Green Belt.

1. The development will overburden the local road network and increase congestion on the A247 through the centre of West Clandon. This is already very heavily used whilst being unsuitable for designation as an A road. In places it is too narrow for two lorries to pass causing them to mount the pavement (see also below).

1. We object most strongly to the proposal for a link road to bring traffic from the Gosden Hill development to the proposed 4 way junction at Burnt Common. This has the potential to generate large volumes of traffic (including commercial vehicles) on the A247 through West Clandon—a road which is already under traffic stress (see also below) and which Surrey County Council say cannot be improved.

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

### Attached documents:

**Comment ID:** PSLPS16/2809  **Respondent:** 8562273 / The Clandon Society (Christopher Dean)  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

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

**Answer (if comment is on questions 1-7 of the questionnaire): ()**

### POLICY A43 AND A43a – Garlick’s Arch

We object to Policy A43 and A43a on Garlick’s Arch.

This site had been previously considered and rejected before the previous draft of the Plan. The site was then inserted in this draft only hours before its publication without any consultation. We have seen no evidence that exceptional
circumstances exist to justify removing this site from the Green Belt or that this important issue has been addressed. The Green Belt and Countryside study did not even consider this site.

This is a cavalier approach to public engagement by the Council.

1. The site is not a sustainable site being far from any infrastructure facilities and transport links. The bus service is infrequent and future residents will rely almost entirely on cars for journeys. Similarly any employees at the employment areas will almost undoubtedly arrive and leave by car.

1. The site is susceptible to flooding and development will cause harm to the ancient woodland on and by the site.

1. The Green Belt at this point serves the important function of separating West Clandon from Send. Building here will cause the two to coalesce defeating one of the objectives of the Green Belt.

1. The Council appears to view the development as an enabling site to obtain land and developer funding for slip roads on/off the A3. This is not an exceptional circumstance to justify taking Green Belt land. The slip road land if needed could be safeguarded in the Plan and acquired by compulsory purchase when required. Lack of current funding for the slip road is not a justification for allowing the development of this site. If the slip road is genuinely needed then government funding will be available for it. (One of the reasons for turning down the so called enabling development proposal intended to fund the rebuilding of the Howard of Effingham school was that the redevelopment of the school was not essential. As and when it became essential Government funding would become available. Accordingly enabling development was not necessary. The same principle applies here.)

1. The A247 running south past this site through the centre of West Clandon is already very heavily used whilst being unsuitable for designation as an A road. In places it is too narrow for two lorries to pass causing them to mount the pavement- often at speed. It has narrow bends with poor sight lines, a primary school and a hump-backed bridge concealing the entrance road to the station for southward traffic. In addition, there are no continuous footpaths which forces pedestrians to cross and re-cross the road. Development at Garlick’s Arch will only exacerbate the problem and make the road even more congested and unsafe for pedestrians.

1. Taken together with the Gosden Hill site, there will be a ribbon of development along the A3 in contrast to the current “soft” edge approach to Guildford.

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

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/6180</th>
<th>Respondent: 8562273 / The Clandon Society (Christopher Dean)</th>
<th>Agent:</th>
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</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3</td>
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</table>

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

Answer (if comment is on questions 1-7 of the questionnaire): ()
POLICY D3 - Historic environment

We object to this policy as it is very weak and we do not think it is clear enough in its support for the conservation of the historic environment. It provides for development which will “enhance” heritage assets. Taken together with the current Council policy of “sweating assets” we fear this policy leaves plenty of room for abuse.

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

Attached documents:

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POLICY D4 - Development in urban areas and inset villages

We object to this policy:

1. The policy should place much greater emphasis on residential development in the existing urban centres. In this way housing needs can be met without resorting to large developments in the Green Belt. There are urban areas in need of regeneration but these are ignored in favour of Green Belt development.
2. The policy should not be applied to the villages which should remain in the Green Belt. Unrestricted application of this policy to the villages intended to be inset will change their characters radically and for the worse. The development it encourages will increase traffic and congestion disproportionately and is not sustainable.

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

Attached documents:

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Comment ID: PSLPP16/6181  Respondent: 8562273 / The Clandon Society (Christopher Dean)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D4

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

Answer (if comment is on questions 1-7 of the questionnaire): ()

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Comment ID: PSLPP16/6176  Respondent: 8562273 / The Clandon Society (Christopher Dean)  Agent:

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

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

Answer (if comment is on questions 1-7 of the questionnaire): ()
POLICY E1 - Meeting employment needs

We object to this policy.

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

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

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

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

Attached documents:

Comment ID: PSLPP16/6177  Respondent: 8562273 / The Clandon Society (Christopher Dean)  Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

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

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY E2 - Location for new employment floorspace

We object to this policy. It would be more sensible to confine new office and research and development floor space to the urban Guildford area. We also oppose the policy of expanding the Research Park onto Blackwell Farm. No exceptional circumstances, as defined under the NPPF, have been advanced to justify incursion into this permanent and high-quality area of Green Belt.

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

Attached documents:

Comment ID: PSLPP16/6178  Respondent: 8562273 / The Clandon Society (Christopher Dean)  Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E6
**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

Answer (if comment is on questions 1-7 of the questionnaire): ()

**POLICY E6 - The leisure and visitor experience**

We object to this policy. The policy should acknowledge that much tourism depends on the undeveloped nature of Green Belt areas surrounding Guildford. Accordingly, the policy should recognize that in many rural areas new and enhanced visitor facilities may be unnecessary and counterproductive, particularly away from existing buildings and development. For example the attraction of Newlands Corner is its undeveloped nature. Significant development of visitor facilities there is likely to diminish rather than increase its attractions. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment. Heritage sites and the Green Belt are particularly vulnerable to harm.

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

Attached documents:

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**Comment ID:** PSLPP16/6179  **Respondent:** 8562273 / The Clandon Society (Christopher Dean)  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E7

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

Answer (if comment is on questions 1-7 of the questionnaire): ()

**POLICY E7 Guildford Town Centre**

We object to this policy.

1. The policy "vision" describes protecting the Guildford’s unique setting and historical character and sets out some of the ways this will be done. However none of this is included in the formal Policy wording in the blue box. We suspect the Vision wording is effectively of little or any force. These principles should be explicit in the statement of policy.

2. There should be a much greater focus on residential use of the town centre where many people would like to live and where the necessary amenities and infrastructure exist. The policy misses the opportunity to propose forward looking sustainable residential development in, for example the Walnut Tree Close /Woodbridge Meadows area, where very significant numbers of new homes could be provided. Such town centre sites could meet much of the housing need over the Plan period without harming the countryside.

3. There is an urgent need for a strategy to focus on brownfield redevelopment before considering development outside the existing urban area.

4. The policy does not address any of the major issues raised by the Council’s own Town Centre Master Plan, the Guildford Vision Group’s proposal for new river and rail crossings or plans for the redevelopment of Guildford Station, all of which are already the subject of public discussion.

5. The policy also fails to provide guidance on design requirements, as required by the NPPF.

6. The policy and surrounding text concentrates too much on shopping without regard to its nature which risks a proliferation of dull high-street chain stores. The policy should seek to enhance Guildford’s character and encourage a wider variety of small shops including locally owned businesses and shops of use to consumers. Above all, the retail development proposals must not damage the viability of the High Street.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**POLICY H1 – Homes for all**

We object to this policy.

The housing mix is based on out-of-date, pre-Brexit projections and on assumptions set out in a flawed SHMA that has not been scrutinized or evaluated. Numbers aside, all the policy in the blue box says is that the Council will encourage building over the Plan period. It fails to set rules on important issues such as constraints and density and is not specific enough to provide a practical framework for planning decisions.

A much higher proportion of Surrey University students should be housed in university accommodation. The University has proved to be recalcitrant in providing accommodation in spite of outstanding Planning permissions. The policy does not do enough to rectify this.

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

Attached documents:

**POLICY H2 – Affordable homes**

We object to this policy on the grounds that it should be more firm and explicit on “unviability” in paragraph 4.2.40. The possibility of avoiding or reducing the affordable housing obligation through use of unviability arguments is likely to inflate land values and lead to appeals.
In particular a scheme is only unviable if the value of developing the land (including some allowance for development risk and a normal level of profit) falls below the sale value of the land for alternative non-premium uses such as agriculture. The price paid for the land is not relevant. It will become clear that developments are unviable when developers start selling land for alternative non-development uses.

Guildford's popularity and location in the Green Belt, with the Surrey Hills, close to others towns and within the London Commuter belt mean that demand is virtually unlimited and no amount of affordable housing will meet it. The real need is for social or “council” housing but that will not be provided by current developer-led models.

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

Attached documents:

**Comment ID:** PSLPP16/6171  **Respondent:** 8562273 / The Clandon Society (Christopher Dean)  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy H3

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

**Answer (if comment is on questions 1-7 of the questionnaire): ()**

**POLICY H3 – Rural Exception Homes**

We object to this policy for a number of reasons:

1. The wording of the policy is far too wide and drives a coach and horses though all other aspects of planning policy. As drafted the Planning authority could be obliged to grant permission for inappropriate and unsuitable developments.

1. The wording provides no ability to balance the desirability of the development against other considerations including harm to the Green Belt or the AONB. (If the housing would meet identified need and adjoins a settlement under this policy wording permission would have to be granted even in the most sensitive AONB location, even if more suitable locations were available.) The policy should include the need for a balancing exercise including consideration whether more suitable locations exist.

1. The policy wording should not allow market housing. The ability to include market housing is likely to inflate land values, leading to a self-perpetuating need to include market housing. It may lead to spurious developer led proposals which will be difficult to resist.

1. The policy wording should define small, either in land size or number of units. We are concerned that if small is left undefined the policy could be used to justify significant developments. In the context of the Plan a development of 150 homes might be argued as small. (If Wisley at 2,500 homes is a big development then 500 homes might be a medium development and 150 could be small.)

1. The policy wording should be restricted to adjoining sites or define the concept of being "closely related". In particular, we believe adding the concept of “safe and easy walking distance” extends the potential radius within which sites will be argued to be “closely related”. Many people would regard a mile or so as an easy walking distance and school children are expected to walk further than that before being eligible for free school travel.
1. The wording of the policy itself does not require the local connection requirement for tenants to be secured in perpetuity - only the affordability must be secured in perpetuity. The supporting text includes this point, but it is not part of the policy itself and may carry little weight at appeal.

1. The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfulfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove “exceptional circumstances.” The size and location of sites should be better defined and it should be clear market housing cannot be included.

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

Attached documents:

Comment ID: PSLPP16/6182  Respondent: 8562273 / The Clandon Society (Christopher Dean)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

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

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY I1 - Infrastructure and delivery

We object to this policy as it is inappropriate and inadequate and fails to respond to the challenges raised by the proposed significant Green belt developments. The borough’s infrastructure is already heavily strained. However the Plan’s determination to build large housing estates across the Guildford countryside significantly increases the need for infrastructure investment without securing the means for its provision. Placing housing in the established urban areas would reduce the need for enhanced infrastructure as would a more realistic housing number.

The policy wording says nothing about roads and traffic. The Council’s methodology for assessing traffic congestion - averaging it over periods of several hours and ignoring the effects of junctions - simply hides the problem, which will get worse as development proceeds. The schemes referred to in this policy will not solve existing congestion and the local road network has not been given sufficient consideration. Some proposed development locations would require highway schemes that are unlikely ever to happen.

Adequate infrastructure provision is a pre-condition of sustainable development. But in this Plan it is an afterthought buried away in Policy I1. By prioritizing greenfield over urban, brownfield regeneration, the Plan creates insurmountable (and unnecessary) obstacles for itself. Common sense suggests a local Plan should first assess the borough’s infrastructure capacity for sustainable development, and then tailor development accordingly. This Plan, however, assumes infrastructure will follow on the heels of housebuilding as if by magic. Implementation is critically dependent on providers outside the Council’s control and CIL income. Instead of recognizing this as a key constraint, the Plan is based on hope. It is also highly likely that developers faced with the imposition of large infrastructure requirements will go to court to invoke the NPPF provision that prevents authorities from imposing conditions that make a development non-viable.

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

Attached documents:

Comment ID: PSLPP16/6184  Respondent: 8562273 / The Clandon Society (Christopher Dean)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY I2 - Supporting the Department of Transport’s “Road Investment Strategy”

We object to this policy as it is too vague and optimistic. Significant improvements to the road infrastructure are like to be many years away even if they ever happen. The draft Plan, however, commits to building massive housing estates in the countryside before any of these road improvements are in place. This is inappropriate and will lead to massive traffic disruption during the construction phase and will add permanently to an already congested network.

Road infrastructure represents a major constraint that should have been applied to the OAN at a much earlier stage in the Plan process and not left as an unresolved difficulty in the draft Plan.

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

Attached documents:

Comment ID: PSLPP16/6172  Respondent: 8562273 / The Clandon Society (Christopher Dean)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P1

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

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY P1 – Surrey Hills Area of Outstanding Natural Beauty

We object to this policy as we are concerned it weakens existing protection when it should strengthen it. It is dependent on the Surrey Hills Management Plan. This welcomes housing development. Even major (undefined) development in the AONB would be permitted if exceptional (undefined) circumstances could be demonstrated. The policy should be tightened up.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6175  Respondent: 8562273 / The Clandon Society (Christopher Dean)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
POLICY P2 – Green Belt

We object to this policy.

1. It does not sufficiently safeguard the Green Belt even though Green Belt constitutes 89% of the borough and should be the cornerstone of all local Planning policy. The Green Belt is not the Council’s to give away and once it is gone it is gone forever. Sacrificing areas of the Green Belt to a developer influenced growth agenda is a betrayal of future generations and does not constitute sustainable development. Green Belt was last taken in the 2003 Plan and now it is again proposed to move the boundaries.

1. The Green Belt should be protected in perpetuity, but Policy P2 seeks to justify excessive development in supposedly protected areas. This is in breach of party manifesto commitments and contrary to previous responses to public consultation. It is disreputable to argue, as the Council does, that the Plan would involve the loss of “only” 1.6% of the borough’s Green Belt. Leaving aside the reliability of that statistic, the NPPF does not set an “acceptable” percentage. The fact remains that the Plan proposes that 65% of the housing plus industrial development be built on land to be taken out of the Green Belt.

1. Paragraph 4.3.16 is seriously deficient in simply stating that the Council considers that exceptional circumstances exist to justify amendment of Green Belt boundaries. The exceptional circumstances are not identified. It is clear from national guidance that unmet housing need is not on its own an exceptional circumstance. Even to the extent that exceptional circumstances exist, these have to be balanced against the harm to the Green Belt in the specific sites proposed to be taken out of the Green Belt. This balancing exercise appears not to have been done.

1. The Countryside Study was a simplistic exercise based on the erroneous principle that ranking Green Belt land would identify candidates for development. The Council has not carried out the balancing exercise needed to determine whether specific exceptional circumstances justified removal of specific areas of land from the Green Belt. This exercise should bear in mind that housing need in itself is not an exceptional circumstance and nor is the Council’s growth aspiration. An important consideration is that more housing need could be met on urban sites than is currently Planned. The Plan has fallen into the developers’ hands and developers prefer building on undeveloped land rather than brown field sites.

1. We object to the “insetting” of 14 villages from the Green Belt. Contrary to assertions made in the Plan process many of these villages do contribute to the openness of the Green Belt (a term which neither the Plan nor the NPPF defines) and there is no need to inset them. We also object to the wholesale extensions to the settlement boundaries in many villages to allow for infilling and that infilling is also proposed outside the settlement boundaries of 11 further villages. In effect, each village will become a nucleus for further development. The NPPF’s other 4 tests of Green Belt status, including the prevention of urban sprawl, are ignored. Effectively, this policy makes all villages within the Green Belt vulnerable to large blocks of new development.

1. To “inset” two-thirds of the borough’s rural villages on the grounds that they no longer contribute to the purposes of the Green Belt is extreme and inherently implausible, given the borough’s location on the edge of Metropolitan London. We cannot see how such extensive areas fail to contribute to the purposes of the Green Belt under the NPPF but this could quickly be the case if the proposed “insetting” and boundary extensions go ahead. This policy is wildly disproportionate in terms of any foreseeable development need and has caused intense opposition from residents. It flies in the face of NPPF paragraph 17’s aim of “empowering local people to shape their surroundings” and other NPPF provisions.

1. Paragraph 4.3.17 states that “the general extent of the Green Belt has been retained.” We believe this should be deleted as an untruth.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

SITES - POLICIES A1 TO A57-sites in the Green Belt

We object to each of the proposals to remove sites in this list from the Green Belt on the following grounds:

1. The identification and allocation of sites in this Plan is made without regard to Green Belt, infrastructure or other constraints. The Plan now proposes even more housing in the Green Belt than at the Section 18 consultation. The Plan says that “allocating these sites does not grant Planning permission for development.” However, each of the sites will be removed from the Green Belt and will be available in principle for development and non-Green Belt uses. The inclusion of these sites without detailed site by site justification shows contempt for the thousands of detailed comments the Council has received about individual sites ever since the Issues and Options consultation in 2013.

POLICIES

It is our understanding that only the text in blue constitutes “policy”. All the remaining text is not. If the accompanying text does not have the force of policy when planning decisions have to be made then a number of the policies (i.e. the text in blue) are so vague and general that they commit the Council to very little and provide little guidance for planning decisions. It is certainly not possible in many cases to read across from the non-policy wording to the policy itself.

POLICY S1 – Presumption in favour of sustainable development

We object to this policy. The NPPF states that the presumption in favour of sustainable development “should be seen as a golden thread running through both Plan-making and decision-taking.” The policy calls for “development that secures the economic, social and environmental conditions in the area”.

As the first policy in the Plan, Policy S1 ought to set a clear framework. Instead there is no definition of “sustainable development” and no principles for balancing economic growth, social justice and environmental protection in practice to local Planning decisions are given. However, apparently, all excursions into the Green Belt constitute “sustainable development”. It is clear that economic growth has trumped the other considerations in breach of the NPPF’s requirements.
Policy S1 should include a commitment to protect the Green Belt from inappropriate development and to uphold Green Belt boundaries and protections as required by the NPPF. This would set one clear boundary to Planning decisions. The Plan and the Council have treated the Green Belt as a developable land bank rather than as a constraint to development.

The commitment to approve Planning applications “wherever possible” and “without delay” seems to fly in the face of the NPPF presumption in favour of sustainable development and becomes a presumption in favour of any development at all. It also seems at odds with public statements from the Leader of the Council to the effect that including a site in the Plan does not mean that permission will be given for development.

The policy ignores the 12 Core Planning Principles set out in NPPF paragraph 17.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/6167  Respondent: 8562273 / The Clandon Society (Christopher Dean)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY S2 – Borough Wide Strategy

We object to Policy S2 on a number of grounds.

1. Almost every element of the Plan is predicated on the OAN adopted as the housing number. We believe this number to have been seriously overstated before the referendum but it is utterly without foundation now.

1. It is unreasonable to embark on the most extensive transformation of the borough on the basis of an unclear housing target. The scale of the development proposed increases the onus for it to be seen to be sound. The first line of the policy states that it will make provision for 13,860 dwellings or 693 p.a. over the period 2013-2033. The number given in Table 1 is 13652 for the 2018-2033 period or 910 p.a. and this is said to be an overprovision to demonstrate that the “target” can be met. The numbers given in the policy as targets for each of the years 2018-2033 add to 10,395 or 693 p.a. and this is said to be an overprovision to demonstrate that the “target” can be met. The numbers given in the policy as targets for each of the years 2018-2033 add to 10,395 or 693 p.a. and this is said to be a shortfall against the provision stated in the first line of the policy, or perhaps 2,200 allowing for those that will be built in the period 2013-2017. There are references in the evidence base documents to the possible need to make up shortfalls in Woking’s provision and the “Sustainability Assessment” carried out for the Council came up with a preferred figure of 15,860 houses. This is very confusing.

1. The Council has said that the housing number and the OAN are identical because the OAN is “deliverable” and is by definition objective and cannot be contradicted. The OAN is only deliverable because of the Council’s cavalier approach to the Green Belt in contravention of the NPPF, ministerial statements and local and national Conservative Party manifesto commitments. The Plan also states that infrastructure or other constraints may in due course affect deliverability. It is also unlikely that the number of houses can be built at the rate proposed. In recent years, housing starts have on average been less than half the proposed rate. This is not because developers do not have the land or cannot get Planning permission. Constraints in the supply chain and maintaining profit levels have been more important.
1. The Plan in general and this policy in particular do not address the point that Guildford exists as part of London's commuter belt. In this area the demand for housing is, in practical terms, unlimited. The increase in the supply of housing in Guildford will simply result in a shift of population into the area. “Affordability” is not a fixed sum but is dependent on market prices. The Plan will not reduce prices or increase affordability except at the margins.

1. This policy does not take proper account of the constraints to development which exist, principally posed by the Green Belt and by infrastructure limitations. We believe the Council is under a duty to properly consider applying these constraints and that this has not happened. This approach differs from the other boroughs in Surrey. The Plan is based on the assumption that “growth is good”. More consumption, more congestion, more Green Belt being taken-this is not a sustainable strategy.

1. The development of 13,860 homes in the Plan period with 65% in the Green Belt does not constitute sustainable development. It will have a permanently detrimental impact on the Borough in general and on West Clandon, Ripley and Send in particular. The developments at Garlick’s Arch and Gosden Hill Farm will put severe strain on the road infrastructure in and around West Clandon which will be unable to cope. The proposed A3 slip roads at Burnt Common will make matters much worse. The edge of urban Guildford will be moved much closer to West Clandon. It will be built on Green Belt land which was to safeguard the countryside from encroachment and check the sprawl of large built up areas.

1. The Plan is out of balance in proposing 65% of housing on the Green Belt and 36% in the three wards of Lovelace, Send and Clandon and Horsley. These are rural areas whose identities will be greatly and detrimentally changed by these proposals.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: SQLP16/992</th>
<th>Respondent: 8562273 / The Clandon Society (Christopher Dean)</th>
<th>Agent:</th>
</tr>
</thead>
</table>

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

RESPONSES TO 2016 GUILDFORD PROPOSED SUBMISSION LOCAL PLAN STRATEGY AND SITES

The Clandon Society is the residents’ association of East and West Clandon. We have serious concerns about many elements of the draft Plan.

24A. Question 1: Evidence Base. We do not agree that the evidence used for the Proposed Submission Local Plan Strategy and Sites is adequate, up-to-date and relevant.

- The evidence base documents are self-evidently not up-to-date in that they take no account of the radically changed environment and outlook following the referendum. This is hardly the fault of the Council but is nevertheless a serious flaw.
- The Transport Assessment was published at the same time as the Plan leaving little time for study and analysis. The projections contained appear to be quite inadequate in that 1) they average congestion over 3hr time bands thus materially reducing the impact of congestion and 2) they do not model junctions.
- The “Assessment” shows that congestion will worsen significantly over the period of the Plan even if all the proposed infrastructure is built.
- The SHMA attempts to justify an OAN based on a very aggressive desire for growth in the borough. No case is made that such growth is sustainable. The assumptions and estimates are not transparent and have not been adequately scrutinized by Councillors so that people have to take on trust the work of a consultant. In any case events have overtaken the SHMA.
- The number and complexity of the documents in the evidence base make reading, understanding, analysis and assimilation extremely difficult.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: SQLP16/993</th>
<th>Respondent: 8562273 / The Clandon Society (Christopher Dean)</th>
<th>Agent:</th>
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<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 2: Legal compliance</td>
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</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

24B. Question 2: Legal Compliance. This is surely a matter for qualified people. We are quite unable to judge whether the Proposed Submission Local Plan as a whole is legally compliant. Doubtless the Inspector and the legal representatives of parties to the hearing will decide this.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: SQLP16/994</th>
<th>Respondent: 8562273 / The Clandon Society (Christopher Dean)</th>
<th>Agent:</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

24C. Question 3: Soundness. We do not agree that the Plan is sound for the following reasons:

- “Only sites that propose sustainable solutions have been included in the Plan and the Plan rejects any schemes that would have a detrimental effect on the green belt.” Summer 2016 edition of "About Guildford" (published by the Council) on page 5. This is demonstrably untrue and appears designed to bias the consultation process.
- The housing OAN figure has been calculated by a process which is not transparent. It has not been properly examined by Councillors before being adopted.
• The OAN has been adopted as the housing number without the application of any constraints to take account of Guildford's circumstances, including in particular the Green Belt, AONB and road infrastructure. National policy permits such constraints to be applied and it is inappropriate not to consider the need to do this.
• The draft Plan does not accord with the NPPF policies on protecting the Green Belt. Exceptional circumstances need to be shown to justify removing areas from the Green Belt and this has not been done. The housing need number is not justification in itself according to published ministerial statements. Having properly calculated an OAN, constraints should be applied to it to reflect the Green Belt, AONB and infrastructure. Each proposed Green Belt site then needs to be justified on its own merits. The benefits of the proposed development need to be identified together with the harm to the Green Belt. Only if there are exceptional circumstances and following a proper balancing exercise demonstrating that these exceptional circumstances outweigh the harm to the Green Belt can the proposal proceed. The draft Plan does not demonstrate that this has been done. The housing number has been used as a blanket justification for all Green Belt sites - which amount to 65% of the proposed housing number.

• Whatever the justification for the assumptions made in calculating the OAN, those assumptions are now almost certainly incorrect following the referendum.
• The housing number is at least twice the achieved rate of building in the Borough over the last few years. There is no evidence in the Plan to show that this rate is achievable and sustainable.
• Much of the infrastructure required to support the level of development proposed is outside the Council’s control. The Infrastructure Plan is long on possibilities and aspirations and very short on commitments. The infrastructure requirements placed on developers are supposed to be in place before development commences. This is utterly unrealistic and indicates a lack of knowledge of developer’s business models which depend on positive cash flow. It seems very clear that at best, infrastructure provision will seriously lag development and leave higher levels of congestion than now. This will reduce the quality of life for residents through congestion and disruption.
• The 40-45% requirement for affordable homes together with infrastructure such as railway stations, park and ride facilities, schools and roads is highly likely to be challenged on a site by site basis by developers using the NPPF provision that Councils cannot impose conditions which make development non-viable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. Gosden Hill is located entirely within the Green Belt. No exceptional circumstances have been demonstrated for building on this site and therefore development here does not meet paragraphs 87-89 of the NPPF. Furthermore, Gosden Hill performs all five functions of the green belt.
2. If this development proceeds, it leaves a narrow strip of Green Belt remaining between Guildford and West Clandon. The same developer who is promoting Gosden Hill has several times tried to develop this land for housing. The current policy on treating green belt land as a developable resource means that it is only a matter of time before the village is joined up with the urban area.
3. The development will be highly visible from the A3 when approaching Guildford.
4. Together with the developments at Garlick’s Arch and Burnt Common there will be an almost uninterrupted ribbon of development along the A3 extending 5 miles from the centre of Guildford.
5. The development of this site will cause massive congestion in surrounding roads. It will generate many thousands of vehicle movements onto the A3 which is stationary every day during rush hours. The linking of the A3100, B2215 and A247 would channel large amounts of traffic onto the narrow, winding road through West Clandon and Send.
6. The proposal for a link road to bring traffic from the Gosden Hill development to a 4 way junction at Burnt Common has the potential to generate large volumes of traffic (including commercial vehicles) on the A247 through West Clandon and Send - a road which is already under traffic stress.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/3426   Respondent: 8562273 / The Clandon Society (Christopher Dean)   Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The Wisley development of a new village / town with at least 2000 houses, 4-entry form secondary school and employment land will generate large amounts of additional traffic onto the A3. If the slip roads at the A3/A247 junction to relieve the impact of this development on Ripley do get built, traffic on the A247 will increase dramatically. There are no plans to alleviate the effect of this development on the A247.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/3424   Respondent: 8562273 / The Clandon Society (Christopher Dean)   Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A58
This previous allocation for B1c, B2 and B8 development was removed from the 2014 draft due to all the objections made previously. The Plan calls for a minimum of 7000sq. m (previously in the 2016 Plan a maximum figure) but will take 9.26 hectares out of the green belt. There is no proper justification given for taking the additional land.

1. The evidence base does not support this scale of additional industrial space and the justification for placing it in the green belt is not made out. The 2017 Employment Land Need Assessment shows a demand for about 4 hectares for industrial land for the whole borough not a huge over allocation of 9.26 hectares at Burnt Common in the green belt.

2. If the quality of some existing industrial provision is not adequate this should cause re-development of it not a large encroachment into the green belt.

3. The reference to waste management facilities mentioned at paragraph 4.4.23a lacks enough detail for proper consultation and should not be so casually included for this site.

1. The A247 through West Clandon and Send is likely to experience large volumes of additional traffic including heavy vehicles generated by the proposed light industry, storage, distribution and waste management activities at Burnt Common. There is also the likelihood of commercial vehicle traffic between Slyfield and Burnt Common particularly when the Clay Lane access is built which will impact the same road.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Residents are being asked to accept very large amounts of development with little or no detail being provided on measures which would relieve existing congestion and limit future problems. Much is made of the need for new infrastructure to support developments and for this to be in place as needed (listed in App. C to the Plan). Even if this happens the Plan admits …”we forecast that there will also be an absolute increase in overall traffic volumes” and also that congestion at junctions will increase (but this is not modelled so we don’t know by how much or where).

The cumulative effects of the developments in the north east of Guildford are certain to have a devastating impact on the A247 through West Clandon (and of course on Send) and it is hard to see how any of the infrastructure proposals in the Plan (App. C) will do anything to mitigate this impact. GBC has little or no control over the plans of Surrey County Council as the local highways authority and it is well known that they have no money available.

The Plan now calls for nearly all the proposed infrastructure to be funded by developers (see C). We question how realistic it is to expect developers not only to pay for all the infrastructure but also to have it in place in a timely fashion. The Plan says that planning permission will be refused if timely provision of infrastructure cannot be secured. Such refusals will
almost certainly be settled in the courts. Developers’ business models are based on building and selling houses to create the cash required to provide infrastructure. People will be living on the sites well before infrastructure is complete.

If development were to be refused the land would still have been removed from the green belt and its future rendered uncertain.

All of these developments will draw very large amounts of additional traffic to the A247 through the village and there is no reference to this in the Plan. It would be naïve to think that the employment sites and schools will serve only the developments themselves. Apart from the normal movements of residents to and from the new sites there will be considerable additional traffic on the A247 generated by:

- children from elsewhere being delivered to Gosden Hill schools and collected
- the employees of the offices and industrial sites getting to work and returning home
- the vehicle movements generated by distribution and storage activities
- traffic from Wisley wishing to travel south and returning
- traffic from Gosden Hill wishing to travel south and returning
- traffic from Slyfield wishing to travel south and returning
- private and commercial traffic originating in the south and accessing Gosden Hill, Burnt Common or the A3 and returning (including traffic from Dunsfold)
- SCC’s business plan for Newlands Corner

We point out that although the A247 is classified as an A road it has none of the characteristics and ideally should be downgraded. The road is a well-known problem and a number of domestic planning applications have been turned down on highways objections. It is quite unsatisfactory to even consider putting more traffic on a road that:

- is less than 2 vehicles wide in places
- does not have continuous footpaths
- has several very sharp bends
- has a hump-backed bridge with poor sight lines
- has many properties with very poor exit sight lines
- has a very difficult and dangerous junction with the station access road
- has a dangerous junction with the southbound A3 on-slip road
- is largely unlit
- has a primary school
- is already very congested at times

In summary, the A247 is quite unsuited to coping with additional traffic and it is very clear that the developments proposed in the 2017 Local Plan will increase the amount of traffic on this road over and above that in the 2016 draft to which residents strongly objected. There is nothing in the Infrastructure Schedule which addresses this issue. Indeed several of the infrastructure proposals will themselves lead to significant increases in traffic on the A247.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
The Plan states: “4.3.16 National planning policy requires that Green Belt boundaries are only amended in exceptional circumstances and that this must be undertaken as part of the Local Plan process. We consider that exceptional circumstances exist to justify the amendment of Green Belt boundaries in order to facilitate the development that is needed and promote sustainable patterns of development.”

1. The Plan fails to demonstrate that exceptional circumstances have been identified for each site that is to be taken from the green belt. The scoring system used to classify pieces of green belt was deeply flawed and assumed that because the housing number could not be accommodated on brownfield or previously developed land in the green belt, it is therefore legitimate to move the boundaries. The Plan implies that it is legitimate to have a blanket change to green belt boundaries to meet the housing number. That is not in accord with the NPPF or ministerial statements.

2. The Plan claims that in fact more housing could be delivered than the OAN which implies that excess land is being taken from the green belt. Doubtless some of Woking B.C’s shortfall will be built in Guildford.

3. The green belt appears to be functioning as a resource to be developed whenever the borough claims it is short of development land.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp17q/305  Respondent: 8562273 / The Clandon Society (Christopher Dean)  Agent:


Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (No)

The Local Plan is not sound.

The NPPF states para 155: “Early and meaningful engagement and collaboration with neighbourhoods, local organisations and businesses is essential. A wide section of the community should be proactively engaged, so that Local Plans, as far as possible, reflect a collective vision and a set of agreed priorities for the sustainable development of the area, including those contained in any neighbourhood plans that have been made.”

The changes in this latest version of the Guildford Local Plan show little or no evidence of a collective vision. Despite the many thousands of responses to previous versions of the Plan which overwhelmingly rejected building on Green Belt land, this latest version has as much, if not more, building on the Green Belt and will bring increasing traffic congestion, pressure on other infrastructure, noise and pollution and a reduction in the quality of life of residents.

There cannot be a collective vision about critical matters on which there is no detail available—e.g. any future plans for alleviating congestion on the A3 between the M25 and the town. There is little or no recognition of the cumulative impacts of the concentration of development in the north east of the town centre.

The Plan does not consider the implications of Surrey County Council’s business plan for Newlands Corner to attract 100,000 more visitors a year. A significant proportion of these can be expected to use the A247.

The Plan does not consider the implications for the A247 of the large number of developments which have the potential to generate traffic on it:
- slip roads to the A3 off the A247
- Wisley
- Garlick’s Arch
- Gosden Hill
- Slyfield
- Burnt Common
- 4-way junction near Send/Burnt Common
- diverting traffic from the south to go around and not through Guildford

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I OBJECT to the removal of Send from the Green Belt because the village and its countryside provides a necessary buffer between Woking and Guildford.

I OBJECT to the building on the Green Belt at Send at Garlick’s Arch, Clockbarn Nurseries and Send Hill because it is not justified by any special circumstances and the fact that Green Belt is meant to be permanent and not continually eroded.

I OBJECT to the exaggerated “housing need” figure of 13,860 which is far too high and results in the completely unnecessary development of the Green Belt. The way students, economic need and affordability are calculated inflates the housing need.

I OBJECT to all proposals to build on the Green Belt at Send and elsewhere in the borough because all the development that is really needed can be accommodated in Guildford’s urban brownfield areas much closer to existing transport hubs.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/7292  
Respondent: 8562561 / Mrs C Sheard  
Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A42

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to building 45 houses at Clockbarn because of inadequate access and traffic volume. Tannery Lane is far too narrow and bendy to take any more traffic. The junction with Send Road is already very hazardous for vehicles emerging into the main road. Planning permission has already been given for 64 houses at the Tannery and the marina will generate heavy traffic too. The road cannot take any more.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/7291  
Respondent: 8562561 / Mrs C Sheard  
Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I OBJECT to the development at Garlick’s Arch for 400 houses because it was sprung on the village at the last moment with only 2 weeks’ notice and without any prior consultation and is not required in terms of housing need either for the village or the borough.

I OBJECT to the proposed industrial development of 7,000 sq m at Garlick’s Arch because it is simply not required since the latest Employment Land Needs Assessment 2015 (ELNA) shows a reduction of 80% in required employment floor space from the previous draft plan. If there is a need for 7,000 sq m of industrial space it should be at Slyfield where there is a 40ha site available.

I OBJECT to the development at Garlick’s Arch because the site has a particular conservation sensitivity since it is covered in ancient woodland. Trees which existed in the 16th century would be endangered. The site is also subject to flooding.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/7290   Respondent: 8562561 / Mrs C Sheard   Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the proposed new interchange onto the A3 at Burnt Common because it would be disastrous for Send and the (A247) would be gridlocked all day.

I OBJECT to the proposed new interchange onto the A3 at Burnt Common because the Transport Evidence is incomplete and unreliable and shows there will be congestion because Send would be used as a cut through to the A3/M25.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/7293   Respondent: 8562561 / Mrs C Sheard   Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A44

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I OBJECT to the development of 40 houses at Send Hill due to its high quality Green Belt amenity within an area of beautiful countryside which would be spoilt. The subsoil of the existing site contains documented unsafe land fill waste which is currently vented. The proposal to include 2 Travellers Pitches is completely inappropriate due to the narrow width single track country road providing insufficient access to the site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/16302  Respondent: 8562561 / Mrs C Sheard  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the fact that infrastructure requirements have not been properly considered and are inadequate to deal with proposed housing levels. Roads, doctors and schools will be unable to cope.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/16301  Respondent: 8562561 / Mrs C Sheard  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the large proposed development at of 2,000 houses at Wisley Airfield, 2,000 houses at Gosden Hill and 1,850 houses at Blackwell Farm because it will destroy large areas of Green Belt and agricultural land and produce congestion on the A3 and surrounding roads including Send.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/16303  Respondent: 8562561 / Mrs C Sheard  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the fact that 70% of the proposed 13,860 houses are targeted at the Green Belt strung along the A3 which will destroy the open amenity of the borough and produce gridlock on the A3 and surrounding roads including the A247 which are all already at 100% capacity.

I OBJECT to the complete failure of GBC to identify sufficient brownfield sites within the urban area which should be targeted first for development before the open countryside and the Green Belt and the failure to include the Town Centre Masterplan 2015 within the plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
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<th>Comment ID: SQLP16/1809</th>
<th>Respondent: 8562561 / Mrs C Sheard</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to all the proposed sites in Send because they were not included in the previous consultation in 2014. Unlike the rest of the borough Send has not been properly consulted and all its sites have been changed substantially

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPA16/2158</th>
<th>Respondent: 8563169 / Send Parish Council (Debbie Hurdle)</th>
<th>Agent:</th>
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<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Send</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
OBJECTION: The following are comments from Send Parish Council about the proposed Local Plan 2016:

Insetting of the Green Belt behind Heath Drive and Send Road and in the vicinity of St Bedes Junior School Send Hill

Taking the villages out of the Green Belt leads to windfall sites which could mean Send Village could have even more developments than are currently set out in the proposed plan.

Much of this land forms part of the Wey Navigation Corridor which should be protected. This land in turn provides habitation for a great deal of wildlife - foxes, bats, birds etc. It provides a beautiful green backdrop to walkers on the tow path and for distant views from Old Woking and Pyrford.

The statement on page 116 4.6.39 states that “The River Wey Navigation is owned and managed by the National Trust (NT) and is a highly valued asset of borough wide significance, both as an important element of our borough’s biodiversity and as a very significant public space. The NT has compiled a set of guidelines for what it considers important characteristics of the river, and how this should be managed.

These include the importance of the river as a ‘visually important open corridor’ and ‘an important leisure asset’ as well as a Conservation Area.

Insetting land at St Bedes Junior School, Send Hill will go against what was stated in a recent Planning Permission granted which stated when the St Bedes School was demolished the land would be returned to Green field. Removing the Green Belt status would present this land to developers.

Removing the Send Lakes from the SNCI designation

This means that there is the potential for these lakes not to be so well tended and the risk of flooding in the area to rise. At present a dedicated team tend the lakes, which is a joy for all the villagers to appreciate. It is an area that is a magnet for wildlife.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents: fish lakes.jpg (20 KB) wey navi.png (350 KB)
As stated many times previously, this narrow lane does not lend itself to accommodating more traffic. It should also be noted that planning permission for 63 apartments is already granted at the Tannery under reference 14/P/00575 and 00576 as amended. An additional 45 houses on Clockbarn Nursery would increase the number of dwellings in Tannery Lane by nearly 400%.

The junction with Send Road (A247) is busy and has poor sight lines. In the other direction it enters Papercourt Lane which is even narrower. The land currently floods, despite the recent improvements to the road drainage from digging out ditches. A planning application for a large Marina in the same lane was recently granted and the spoil from this development was to be placed on this land. These actions will only exacerbate this flooding problem for everyone in the lane, and for properties in Send Road and Wharf Lane.

Clockbarn Nursery is designated as agricultural land within the Green Belt. The fact that it has been allowed to deteriorate should not be a passport to changing its status. It is a nesting habitat for bats which are a protected species.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents: [3.JPG](31 KB)
be placed on this land. These actions will only exacerbate this flooding problem for everyone in the lane, and for properties in Send Road and Wharf Lane.

Clockbarn Nursery is designated as agricultural land within the Green Belt. The fact that it has been allowed to deteriorate should not be a passport to changing its status. It is a nesting habitat for bats which are a protected species.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents: a44.png (120 KB)

Comment ID: PSLPS16/7692  Respondent: 8563169 / Send Parish Council (Debbie Hurdle)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

This would involve loss of one of the very few remaining areas of woodland in the vicinity. Ancient woodland is irreplaceable. Much of the woodland was planted hundreds of years ago, in fact many of the oaks show great age.

400 Houses is an outrageous number for any small village to accommodate. It would virtually raise the number of residences in the villages by 25%. The implications for traffic are dramatic. Every day Portsmouth Road is stacked back from the M25 to the Send Road traffic lights from 8.00am to about 9.15am and then the flow is reversed in the evening. There is serious concern about air pollution from the cars that sit in the roads with engines running. The access to the Portsmouth road is poor from the proposed development. It is very near to the Burnt Common Lane junction.

The addition of the industrial buildings so close to housing is undesirable and perfectly good sites are available at Slyfield Industrial area. There are also electric pylons on this land which must be addressed in the event of development.

This Garlick’s Arch site abuts the East Clandon Stream. The stream frequently floods onto the Portsmouth Road and the A3. Furthermore, with so many buildings being added the run off the land onto the stream will be aggravated. We understand that the site is built on London Clay. This means that every time there is the potential for the stream to rise, the land floods. (see attached photograph) In addition the trees that are being removed will also exacerbate the problem. The copse is home to and regular visiting place for deer, foxes, owls, bats, rabbits, hares not to mention having a carpet of bluebells in spring.

Much of the Garlick’s Arch area is used for country pursuits in varying ways. The large field abutting Burnt Common Lane is still farmed which is rare in the borough. Pheasants are raised in this and the adjoining wooded area. There is a Clay pigeon shooting syndicate which use the land to the end of Kiln Lane. Dog walkers are regular users of the lanes and surrounding fields.

We understand from the Guildford Lead Councillor for Infrastructure, Matt Furniss, that the 400 houses proposed is the pay back required by the landowner for the land gift being offered for the four way junction to the A3. We are of the opinion that the payment is disproportionate to the benefit for our Village.

The infrastructure needs to be in place before the site is considered for development because the pressure on the current roads is too great. Parking in the village is already stretched. There is no bus service at all to the Villages Medical Centre which is already oversubscribed.
The large field mentioned in this application was subject to a planning application for 25 houses on the Oatlands side site a couple of years ago but was turned down but yet here it is again with a suggestion of 400 houses this time.

In a more recent planning application for the land at Oldlands Field Yard which is adjacent to this current development, permission was refused by Guildford Borough Council and the following two extracts are from the letter of refusal. Surely the same reasons would apply to the land now proposed for 400 houses and an industrial development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
- burnt.jpg (100 KB)
- garliks.jpg (99 KB)
- garlick2.png (1.4 MB)

Comment ID: PSLPS16/4282  Respondent: 8563169 / Send Parish Council (Debbie Hurdle)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

A 43a The proposed Northbound and Southbound slip roads

The proposed slip roads do have some merits, offering the residents of Send and West Clandon quicker access. However, this would come at a very high price in terms of noise and upheaval for neighbours adjacent to the slip roads in Burnt Common Lane and Wood lands.

Another difficulty with this development is that the access to the northbound slip road would run over Manorial land which is at the site. It is apparently owned by the Lord of the Manor or his heirs. The proposed slip road also runs up land that is currently farmed.

The A247 and other feeder roads in the area are already heavily congested at peaks periods. The proposed slip roads to and from the A3 at Burnt Common interchange would make this congestion even heavier. The villages of Send, West Clandon and Ripley already carry very heavy traffic morning and even ing with vehicles going or returning from the A3 and M25. The A247 Clandon Road and the Street in West Clandon are very narrow in places as are many of the lanes and feeder roads around the area as a whole.

In Send Road adjacent to the junction with Tannery Lane and Sandy Lane is the Send Recreation Ground. This recreational area was Gold Rated by Guildford Borough Council and is one of only about ten in the Borough. It is used by children from the Village and surrounding areas, youth sports teams and personal trainers throughout the week. Increased housing and industry will bring further vehicles and increased pollution to this vulnerable area. Parking in the area is always a problem. In addition to this the local school is advocating children should be walking to school wherever possible. The pavements are very poor and narrow in places. Any increase in traffic would aggravate this problem and the physical danger to children.

In the event of this re-organised junction being included and planned the Parish Council would insist that Potters Lane junction must be closed as it causes many accidents with its poor placement so close to the exit at Burnt Common. There is currently no northbound slip road from Potters Lane and traffic on the A3 is travelling at high speeds which make entry from this point very dangerous.
This is the house called Oatlands, Burnt Common Lane which was refused planning permission for 25 houses about three years ago. It is now proposed to build 400 houses in the vicinity.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
- [8.JPG (40 KB)]
- [7.JPG (19 KB)]

**Comment ID:** PSLPS16/7693  **Respondent:** 8563169 / Send Parish Council (Debbie Hurdle)  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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This is the house called Oatlands, Burnt Common Lane which was refused planning permission for 25 houses about three years ago. It is now proposed to build 400 houses in the vicinity.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**
A 44 Land west of Winds Ridge and Send Hill

The land in question is in the Green Belt and outside the current settlement boundary. This land was previously used as a gravel pit and then infilled and it is still monitored judging by the various manhole covers on the land.

The exit from this land onto Send Hill is very narrow and not suitable for the access for a small estate. This might also be described as backland development. The distant views from Potters Lane which are beautiful would be totally altered. Some of this land is farmed and, or grazed.

The site is unsuitable for a traveller site as it is away from the Village centre and approximately one mile from the shops and the nearest bus stops. The road Send Hill at the entrance to this site is 2.3 metres wide, very narrow and additionally unsuitable for long vehicles and on the opposite side of this narrow road is the multi-denominational Send Cemetery. It is a quiet area and an additional 40 houses and two traveller pitches would be detrimental to the surroundings.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
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The site is unsuitable for a traveller site as it is away from the Village centre and approximately one mile from the shops and the nearest bus stops. The road Send Hill at the entrance to this site is 2.3 metres wide, very narrow and additionally unsuitable for long vehicles and on the opposite side of this narrow road is the multi-denominational Send Cemetery. It is a quiet area and an additional 40 houses and two traveller pitches would be detrimental to the surroundings.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9162  Respondent: 8563169 / Send Parish Council (Debbie Hurdle)  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Insetting of the Green Belt behind Heath Drive and Send Road and in the vicinity of St Bedes Junior School Send Hill

Taking the villages out of the Green Belt leads to windfall sites which could mean Send Village could have even more developments than are currently set out in the proposed plan.

Much of this land forms part of the Wey Navigation Corridor which should be protected. This land in turn provides habitation for a great deal of wildlife - foxes, bats, birds etc. It provides a beautiful green backdrop to walkers on the tow path and for distant views from Old Woking and Pyrford.

The statement on page 1 16 4.6.39 states that "The River Wey Navigation is owned and managed by the National Trust (NT) and is a highly valued asset of borough wide significance, both as an important element of our borough's biodiversity and as a very significant public space. The NT has compiled a set of guidelines for what it considers important characteristics of the river, and how this should be managed.

These include the importance of the river as a 'visually important open corridor' and 'an important leisure asset' as well as a Conservation Area.

Insetting land at St Bedes Junior School, Send Hill will go against what was stated in a recent Planning Permission granted which stated when the St Bedes School was demolished the land would be returned to Green field. Removing the Green Belt status would present this land to developers.

Removing the Send Lakes from the SNCI designation
This means that there is the potential for these lakes not to be so well tended and the risk of flooding in the area to rise. At present a dedicated team tend the lakes, which is a joy for all the villagers to appreciate. It is an area that is a magnet for wild life.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents: 2.JPG (21 KB) 1.JPG (42 KB)
would exert on the village’s infrastructure and the flooding concerns of the site. Other information, such as with the marina application, emphasised other aspects, such as the importance of the area to flora and fauna, such as bats. Further information on these concerns can be seen in greater detail in Send Parish Council’s representations made in July 2016.

6.03 The 2017 draft Local Plan once again includes a residential allocation on the site of Clockbarn Nurseries. However, despite the site not changing in size, this allocation has been altered to increase the allocation from 45 new homes to 60 new homes. It is not clear on what basis the plan has deemed an increase to be acceptable.

6.04 Send Parish Council view this increase in the proposed number of homes on the Clockbarn site to be unacceptable. The stretch of Tannery Lane that connects the site to the Send village is narrow and it is difficult for vehicles to pass, especially large commercial vehicles that would be involved in the construction process. Short term parking along this stretch further limits accessibility to this site. Pedestrian infrastructure would be required in order to create a safe environment that pedestrians can use. Furthermore, the consented Marina scheme on the adjacent land and any proposed intensification of Send Business Centre (see also 5.07 – 5.13 above) would significantly increase vehicular flow along Tannery Lane, past the Clockbarn Nursery site. The increase in the number of proposed homes from 45 to 60 would simply exacerbate this problem, making the issues of accessibility and pedestrian safety even more acute.

6.05 The parish council are also concerned that the cumulative, strategic picture regarding transport and the impact on Send Road is not clear enough in the current plan.

6.06 Changes sought to make the Local Plan sound:

• Remove Allocation A42.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/3207  Respondent: 8563169 / Send Parish Council (Debbie Hurdle)  Agent: Tibbalds Planning and Urban Design (Richard Crutchley)

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The parish council made objections to the site at Garlick’s Arch in 2016, and the objection to the residential element is maintained.

The changes introduce a provision for travelling showpeople into this allocation. Policy H1 provides the strategic policy for the provision of plots for travelling showpeople and seeks to secure such plots where provision is being made for 500 homes or more. Garlick’s Arch is proposed for only 400 homes, and the parish council therefore question the suitability of the site to accommodate such plots. Whilst there is no detail of how these sites might be accessed, neither Burnt Common Lane nor Kiln Lane are suitable for the sort of vehicles that might be expected at such plots.

The changes to policy H1, sub-section (6), remove reference to the impact upon the visual amenity of such provisions. The parish council would wish this wording to remain. Whilst the site allocation text introduces reference to visual amenity in para (7) of policy A43, this is not felt to be equivalent to the wording lost from H1.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
5. Employment Land Allocations in Send, Send Marsh, and Burnt Common.

5.01 Send Parish Council object to the following proposals related to employment designations and allocations included within the 2017 draft Guildford Local Plan:

- Send Business Centre – designation changed from “Locally Significant Employment Site” to “Strategic Employment Site”.
- Site A58 – Land around Burnt Common warehouse – “Strategic Employment Site” providing a minimum of 7,000sqm employment floorspace.

The reasons for objections are set out below.

Send Business Centre – changed designation

5.02 As discussed in Section 4, the 2014 draft version of the Guildford Local Plan proposed to inset the Send Business Centre and the adjacent employment land, Site Allocation 67, from the Green Belt. The employment land proposed at Site Allocation 67 would have effectively extended the existing Business Centre by approximately 1.4ha. However, despite this proposed enlargement, in the 2014 draft Local Plan Policy 13 did not include Send Business Centre in the list of new Strategic Employment Sites.

5.03 The 2015 Employment Land Needs Assessment [ELNA], prepared as part of the evidence base for 2016 draft Guildford Local Plan, includes Send Business Centre in its list of Non-Strategic Employment Sites. The 2015 ELNA states that Send Business Centre has “indirect” strategic road access, “poor” access to amenities and facilities, and “very poor” access to public transport [see Table 4.2 of the 2015 ELNA]. The report also states that there is no identified potential for intensification and/or additional floorspace. It is clear from this assessment that Send Business Centre is not an appropriate site for the development of further employment land.

5.04 In the 2016 draft version of the Local Plan, employment land Site Allocation 67 was removed, as was the proposal to inset Send Business Centre from the Green Belt. As discussed in Section 4.04 of this document, the reason for this was the allocation’s location in high sensitivity Green Belt. The removal of Send Business Centre’s proposed extension and insetting from the Green Belt reflected the findings of the 2015 ELNA, which correctly identified the shortcomings of the site with regard to further employment land development. In line with this, Policy E1 of the 2016 draft Local Plan included Send Business Centre in its list of Locally Significant Employment Sites.

5.05 The 2017 ELNA was prepared as part of the evidence base to the 2017 draft Guildford Local Plan and now includes the Send Business Centre in its list of Strategic Employment Sites. The 2017 ELNA states that Send Business Centre has
“indirect” strategic road access, “good” access to amenities and facilities, and “good” access to public transport [see Table 4.1 of the 2017 ELNA]. The report also states that there is potential for intensification and/or additional floorspace to be provided.

5.06 Send Parish Council contest that the findings of the 2017 ELNA are completely unfounded and mark a significant departure from the findings of the 2015 ELNA published just two years previously.

5.07 Firstly, Tannery Lane, which forms the main access point to the Business Centre from Send village, is a rural single-track road with only irregular passing places for vehicles and as such is not appropriate for significant use by commercial vehicles. It provides no street lighting or infrastructure for pedestrians or cyclists and, as is correctly stated in the 2015 ELNA, constitutes poor access to the local amenities available in Send village. There have been no significant alterations to this road since the publication of the ELNA and, thus, it is unclear why the classification of access to amenities from Send Business Centre has changed from “poor” to “good” within two years. It is the opinion of Send Parish Council that a single-track country lane with no street lighting and no pedestrian or cycling infrastructure does not constitute the “good” access to amenities stated in the 2017 ELNA. In fact, it represents an unsafe environment for non-car users wishing to make use of local amenities and an inappropriate environment for a significant increase in vehicular traffic due to the characteristics of the road. As an access route for a Strategic Employment Site, Tannery Lane is fundamentally inappropriate, and as such the findings of the report need to be re-examined with relation to Send Business Centre.

5.08 In light of the changed designations at Send Business Centre, and the increase in housing numbers at Clockbarn Nursery, we would also suggest that the 2016 Strategic Flood Risk Assessment is revisited to include Send Business Centre in order to consider the impact of development on Tannery Lane’s flooding issues. The susceptibility of the area to groundwater flooding was clearly set out in the environmental statement [Volume 8, Water, prepared by Johns Associates.] submitted with the marina application.

5.09 Secondly, as correctly stated in the 2015 ELNA, access to public transport provision at Send Business Centre is very poor. The closest bus stop, which has only hourly bus services to Guildford and Woking, is located in Send village centre and is accessed by a ten-minute walk along the aforementioned Tannery Lane, lacking pedestrian infrastructure, cycle infrastructure, or street lighting. For the 2017 ELNA to refer to this situation as constituting “good” access to public transport does not make logical sense. It represents an unsafe environment for non-car users and, as such, would put increased traffic pressures on Tannery Lane. Send Parish Council calls on the findings of the report related to Send Business Centre to be re-examined.

5.10 Finally, the 2015 ELNA states that there is no potential for intensification and/or additional floor space at the Send Business Centre. This reflects the constrained nature of the site in light of its setting within high sensitivity Green Belt. In the 2017 ELNA, it is stated that there is potential at Send Business Centre for intensification and/or additional floor space. The report does not give an indication as to why this stance has altered in the two years that passed between the 2015 ELNA and the 2017 ELNA, nor how potential intensification and/or additional floorspace would be catered for at the Centre. It does not explain why such growth could not be accommodated in more appropriate locations.

5.11 There are no explanations readily available in the 2017 ELNA which seek to justify why Send Business Centre is proposed to be enlarged and re-classified as a Strategic Employment Site, nor why the classification of its access to public transport and local amenities have been upgraded so significantly when no improvements or alterations have occurred with regard to these matters between 2015 and 2017. Send Parish Council believe that these changes are unfounded in available facts and represent a questionable approach to assessing the Borough’s current and future stock of employment land.

5.12 Policy E1 of the 2017 draft Local Plan includes Send Business Centre within its list of Office (B1a) and Research & Development (B1b) Strategic Employment Sites. No explanations for this change of designation are included in the Local Plan document itself. The Employment Topic Paper, prepared as part of the evidence base for the 2017 draft Local Plan, identifies the 1.4ha Tannery House site adjacent to the Send Business Centre. It states, “Although it [the Tannery House site] remains in high sensitivity Green Belt the unique nature of the site and the existing infrastructure in place means it is considered appropriate for development” [paragraph 4.43 of the Employment Topic Paper]. The TopicPaper goes on to state that significant investment, which has already been secured, will help create an estimated 400 new direct and indirect jobs [paragraph 4.47]. In addition to this in states that “longer term there is potential for significant expansion of 6-7,000sqm on the land adjacent [paragraph 4.49], although it is unclear where this expansion would occur.
5.13 Send Parish Council deem this change of Send Business Centre’s designation and its proposed enlargement wholly inappropriate and unjustifiable. Send Business Centre is located in high sensitivity Green Belt unsuitable for significant development and accessed via infrastructure that is simply unsuitable for supporting the proposed changes at the Centre.

5.14 The Employment Topic Paper states that funding in the Send Business Centre could create an estimated 400 new direct and indirect jobs. Assuming that at the very least 300 of these are direct jobs, this would mean 300 additional employees accessing the Centre. Given the inadequacy of the public transport offer, the likely means of accessing the site is by private car (even if we assume that some employment could be generated locally). The existing car park at the Centre is insufficient for such demand. The single-track Tannery Lane appears unable to deal with such an increase in traffic stress that these movements would bring, without factoring in any additional commercial vehicles visiting the centre. As discussed above, access to local amenities and local public transport provision is similarly inappropriate, with no street lighting provided on Tannery Lane and no pedestrian and cycling infrastructure. Furthermore, the Topic Paper states that there is potential for a significant expansion of 6-7,000sqm of employment space on the land adjacent to the Centre, yet it is unclear whether the jobs created from this floorspace is included within the aforementioned 300+ jobs. If not, then this would mean even greater stress on infrastructure that seems simply unable to cope.

5.15 Changes sought to make the Local Plan sound:

- Remove the proposal to change the designation of Send Business Centre from Locally Significant Employment Site to Strategic Employment Site;
- Remove the proposal to enlarge Send Business Centre by insetting Centre and adjacent land from Green Belt

5.16 The 2014 draft version of the Local Plan included Site Allocation 74, which proposed employment-led mixed-use development on the land around Burnt Common warehouse. This allocation was subsequently removed from the 2016 draft version of the Local Plan, with proposed housing and employment development relocated to the newly created Site Allocation 43 – Garlick’s Arch. This allocation proposed 400 new homes and up to 7,000sqm of commercial (B1c/B2/B8) uses (our emphasis). During the consultation process for the 2016 draft Local Plan, Send Parish made representations against this proposal, which was inappropriate for the site.

5.17 The draft 2017 Local Plan removes the allocation for commercial development from Garlick’s Arch and relocates it back to the land around the Burnt Common warehouse site. Policy E1 includes the land around Burnt Common warehouse within its list of proposed Strategic Employment Sites, while Policy A58 outlines the allocation for the site for a “minimum of 7,000sqm of either or a mix of light industrial (B1c), general industrial (B2), and storage and distribution (B8) with a potential for further industrial floorspace to meet future borough needs” (our emphasis). No residential element is included in this site allocation.

5.18 Send Parish Council does not object to the principal of employment land development on this site. Indeed, in representations made to the draft 2016 version of the Local Plan, Send Parish Council proposed that Guildford Borough Council re-instate the previous allocation for industrial development on Land around Burnt Common Warehouse. However, Policy A58 does not provide an appropriate limit to the scale of industrial development to take place on this site. The previous allocation for employment land at Garlick’s Arch stated that up to 7,000sqm of employment floorspace would be created. No such maximum exists within Policy A58, with at least 7,000sqm of employment land proposed on Land around Burnt Common Warehouse. Send Parish Council deem this approach unacceptable as it opens the door to a significant intensification of employment uses on the site which would not be suitable for the site.

5.19 Proposed changes to make the Local Plan sound:

- Provide an upper limit for the amount of employment floorspace to be created within Policy A58 – Land around Burnt Common warehouse.

Summary of Employment Land Provision within Send

5.20 Send is a village of approximately 2,300 people, while Send Marsh/Burnt Common has a population of approximately 1,900. In the May 2014 Settlement Hierarchy Document prepared by Guildford Borough Council as part of the evidence
base for the 2014 draft Local Plan, Send, Send Marsh/Burnt Common are considered to be large villages. Chapter 4 of this
document recognises that Send Marsh/Burnt Common is only identified as a large village due to its proximity to Send’s
services. Send itself has modest public and commercial amenities, with few additional amenities provided in Send Marsh/
Burnt Common. Both villages have limited access to public transport – served only by hourly bus services which pass
through the villages en route between Woking and Guildford – but have good links to the strategic road network.

5.21 The draft Local Plan proposes the creation of two Strategic Employment Sites in the Send Parish. On Send’s current
designated Employment Sites, there exists 7,800sqm of employment floorspace. The creation of two Strategic Employment
Sites in the Send Parish would increase the employment floorspace within designated employment sites within the Parish to
at least 21,000sqm should only the minimum 7,000sqm be provided at Burnt Common. This figure is likely to rise should
further employment land be developed at Burnt Common.

5.22 While Send Parish Council recognises the importance of developing a strong rural economy, this significant increase
in employment land within the Parish is unsustainable and uncalled for. Send Parish does not have the requisite amenities,
facilities, and infrastructure to support two Strategic Employment Sites within its boundaries.

5.23 Changes sought to make the Local Plan sound:

- Maintain existing designation of Send Business Centre as Locally Significantly Employment Site.
- Provide an upper limit for the amount of employment floorspace to be created within Policy A58 – Land around
  Burnt Common warehouse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/1488  Respondent: 8563169 / Send Parish Council (Debbie Hurdle)  Agent: Tibbalds Planning
and Urban Design (Richard Crutchley)

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally
Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. Introduction

1.01 Tibbalds Planning and Urban Design is the appointed planning consultant acting on behalf of Send Parish Council.
These representations relate to the June/July 2017 consultation of the Proposed Submission version of the Local Plan:
Strategy and Sites document, which is open for consultation until Monday 24 July 2017. Representations made by the
Parish Council to the Local Plan consultation which took place in 2016 are assumed to remain valid.

1.02 This statement challenges the level of proposed housing provision in the parish, and focuses specifically on draft
housing, employment and transport allocations in Send, Send Marsh and Burnt Common. It sets out objections to the
following issues, designations, and allocations:

- Send Business Centre – inset from the Green Belt;
- Send Business Centre – designation changed from “Locally Significant Employment Site” to “Strategic
  Employment Site”;
- Site A58 – Land around Burnt Common warehouse – “Strategic Employment Site” providing a minimum of
  7,000sqm employment floorspace;
2. Proposed Allocations for Housing Provision

2.01 During the previous consultation in 2016, Send Parish Council set out that it considered the proposed level of housing provision to be unsound due to the number of allocated homes being significantly greater than the identified need. Table 1 of Policy S2 set out the planned delivery of housing between 2018 and 2033. Sufficient allocations were made to deliver 13,652 homes in this period; an average of 910 dwellings per annum (dpa), or 131% of the requirement identified in the SHMA. Paragraph 4.1.12 of the Proposed Submission Local Plan (2016) acknowledged that the number of homes set out in table 1 is greater than the number of homes required by policy S2 and that this is deliberate in order to build in flexibility. This, however, was well beyond the objectively assessed need of 693 dpa or 10,395 dwellings over the course of the plan period.

2.02 Send Parish were concerned that this resulted in the allocation of sites that were not suitable for development.

2.03 The proposed modifications rely on updated information in respect of housing need in the form of an addendum to the West Surrey SHMA. This has resulted in a reduced requirement; the objectively assessed need has fallen to 654 dpa. As a result, the proposed modifications remove some allocations and reduce the capacity of others. Whilst flexibility remains in the sites listed in the Site Allocations section of the plan, this appears to be at a more acceptable level of 9%.

2.04 However, Send parish specifically has not seen any reduction in the demands made upon it to deliver the housing needs of the borough and, in fact, the number of dwellings proposed in the plan has increased. Send parish also sees changes in respect of employment provision, and consequential changes to the green belt. These matters are dealt with in sections 4, 5 and 6 below. Distribution of housing 2.05 Send Parish Council also made comments during the 2016 consultation regarding the distribution of housing with reference to the 2014 Settlement Hierarchy document. There is no further evidence presented in respect of the Settlement Hierarchy in this consultation. Equally, nothing has materially changed in the settlements of Send and Send Marsh / Burnt Common that would warrant an update and, therefore, these comments remain relevant.

Distribution of housing

2.05 Send Parish Council also made comments during the 2016 consultation regarding the distribution of housing with reference to the 2014 Settlement Hierarchy document. There is no further evidence presented in respect of the Settlement Hierarchy in this consultation. Equally, nothing has materially changed in the settlements of Send and Send Marsh / Burnt Common that would warrant an update and, therefore, these comments remain relevant.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
4. Green Belt Boundary

4.01 Send Parish Council object to the following alteration to the Green Belt boundary:
• The insetting of the Send Business Centre and adjacent field from the Green Belt.

The reasons for the objection are set out below.

4.02 The 2014 draft version of the Guildford Local Plan proposed to inset the Send Business Centre from the Green Belt. This proposed insetting of the Business Centre from the Green Belt was included at this time on the basis that it formed a logical extension to the two site allocations located on Tannery Lane. These allocations were as follows:

• Site Allocation 67 – Tannery House and land adjacent to Tannery Lane – B1 employment uses;
• Site Allocation 75 – Land at Tannery Lane, Send (including Clockbarn Nurseries) – C3 uses, 215 homes.

The proposed Site Allocation 67 would have enabled an extension to the adjacent Send Business Centre. During consultation on the 2014 draft Local Plan, Send Parish Council made representations in respect of Allocation 75.

4.03 After consulting on the Local Plan in July 2014, the Council drafted an updated version of the Local Plan. This draft version was submitted for consultation in Summer 2016. In this version of the Guildford Local Plan, the proposal to inset Send Business Centre was removed and the Green Belt washed over the site.

4.04 The Tannery Lane allocation (Site Allocation 67) was removed due to its location within high sensitivity Green Belt. The allocation at Send Business Centre was also removed [see paragraph 4.38 of GBC Topic Paper: Green Belt & Countryside for further details]. In addition to this, residential Site Allocation 75 was also removed from the draft Local Plan, replaced by Site A42. Site A42 allocated 45 homes on the site of Clockbarn Nurseries, a much smaller site than had previously formed Site Allocation 75.

4.05 Despite these reasons for removing the proposal to inset Send Business Centre from the Green Belt, the 2017 draft version of the Guildford Local Plan once again proposes to inset the site from the Green Belt. The area proposed to be inset from the Green Belt is significantly larger than the existing extent of Send Business Centre. In addition to the existing site of Send Business Centre, the area to be inset also includes the Business Centre car park and the adjacent undeveloped site previous proposed in the draft 2014 Local Plan as employment land Site Allocation 67.

4.06 Send Parish Council feel that the proposed insetting of Send Business Centre from the Green Belt is unjustified. Firstly, it is unreasonable to expect that the high sensitivity of the Green Belt in this location has altered since the Tannery House site allocation was removed from the 2016 draft local plan for this very reason. In addition to this, the River Wey Navigation Corridor, which sits adjacent to the Business Centre, is designated as a Conservation Area. The openness of this conservation area, and the setting of the River Wey within the Green Belt is an important feature of this high sensitivity Green Belt. Nothing has changed in the last year to the nature of either the Green Belt or the River Wey Navigation, thus it is not immediately clear why Guildford Borough Council have overlooked the ‘high sensitivity’ Green Belt designation in order to inset Send Business Centre and the adjoining land from the Green Belt.

4.07 Secondly, the Green Belt and Countryside Topic paper published as part of the evidence base for 2017 draft version of Guildford Local Plan states that the “unique nature of [Send Business Centre] and the existing infrastructure in place means it is considered appropriate for development”.

4.08 However, Send Business Centre is a small collection of buildings which enjoys a rural setting alongside the River Wey. It has consistently been regarded as contributing to the openness of the green belt by virtue of the designation washing over it. The existing infrastructure in place at Send Business Centre represents that typical of a Green Belt setting, namely single track roads with passing places and no pedestrian or cycling infrastructure. This does not constitute infrastructure ready to support an area inset from the Green Belt that, following removal from the Green Belt designation, will not be subject to the same restrictions as are currently in place.

4.09 No evidence is provided in the literature accompanying the 2017 draft local plan that justifies removing the Send Business Centre and adjacent land from its Green Belt designation. The Parish Council considers removing this area from the Green Belt an unsustainable precedent and could pave the way for significant inappropriate development in a rural area of high sensitivity Green Belt.
4.10 The proposed insetting of Send Business Centre and adjacent land is directly linked to the proposed change of designation of the Business Centre from “Locally Significant Employment Site” to “Strategic Employment Site”. Send Parish Council’s representations regarding this change of designation are laid out in Section 5.

4.11 Changes sought to make the Local Plan sound

• Remove proposals to inset Send Business Centre and adjacent land from the Green Belt. Restore the green belt wash over Send Business Centre.

8. Summary of Proposed Changes and Conclusions

8.01 In summary, Send Parish consider the following changes to be necessary to make the Proposed Submission Local Plan sound:

• Remove proposals to inset Send Business Centre and adjacent land from the Green Belt.
• Remove the proposal to change the designation of Send Business Centre from Locally Significant Employment Site to Strategic Employment Site;
• Remove the proposal to enlarge Send Business Centre by insetting Centre and adjacent land from Green Belt.
• Provide an upper limit for the amount of employment floorspace to be created within Policy A58 – Land around Burnt Common warehouse.
• Maintain existing designation of Send Business Centre as Locally Significantly Employment Site.
• Remove Allocation A42.
• Reconsider the suitability of the Garlick’s Arch site for travelling showpeople given the site allocates a number of homes that is below the policy threshold.

8.02 Send Parish Council are pleased to have the opportunity to respond to the draft Local Plan and request that they are informed of any future consultation events.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

4.11 Changes sought to make the Local Plan sound

• Remove proposals to inset Send Business Centre and adjacent land from the Green Belt.

8. Summary of Proposed Changes and Conclusions

8.01 In summary, Send Parish consider the following changes to be necessary to make the Proposed Submission Local Plan sound:

Remove proposals to inset Send Business Centre and adjacent land from the Green Belt.
Remove the proposal to change the designation of Send Business Centre from Locally Significant Employment Site to Strategic Employment Site;
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Provide an upper limit for the amount of employment floorspace to be created within Policy A58 – Land around Burnt Common warehouse.
Maintain existing designation of Send Business Centre as Locally Significantly Employment Site.
Remove Allocation A42.
Reconsider the suitability of the Garlick’s Arch site for travelling showpeople given the site allocates a number of homes that is below the policy threshold.

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICIES I1, I2 & I3

These three policies cover Infrastructure & Delivery, Supporting the Department of Transport’s ‘Road Investment Strategy’ and Sustainable Transport for new developments. Whilst WHPC supports the general policy statements as presented in each case, it is the detailed infrastructure proposals for Guildford Borough or lack of for the Horsleys, which are the real issue.

WHPC believes there are serious deficiencies and shortcomings in the infrastructure of Guildford Borough as it is today. The aggressive house building policy advanced by GBC in the Proposed Submission Draft Local Plan will substantially exacerbate many, if not all, problem areas.

WHPC puts forward the following specific comments regarding infrastructure in West Horsley today:

• Thames Water has sent very clear advice in 2014 to stating that their current facilities, i.e. pipelines to the Ripley North Treatment Works and the Treatment Works, are unlikely to have the capacity to cope with one or possibly all the developments proposed for West and East Horsley. A 2 to 3 year lead-in period Thames Water say will be necessary to expand capacity following the granting of planning permission for a development Site.
• Roads across the parish are in poor condition with many potholes. Many roads are unable to sustain their current levels of traffic, particularly the increasing levels of HGV traffic along the B2039.
• Principal through roads traversing West Horsley are narrow and winding, have a series of pinch points, have sections without any pavements and are generally unlit. As a senior SCC councillor remarked at a recent public meeting in the village hall: “West Horsley has lanes, not roads.” West Horsley’s ‘lanes’ are totally unsuitable for high volumes of traffic.
• Many of the drains are blocked or otherwise in extremely poor condition, giving rise to frequent surface water flooding when it rains. The southern edge of the Horsleys Area lies on the ‘spring line’ at the foot of the North Downs and is recognised in the GBC Infrastructure Delivery document as a Surface Water Flooding Hot Spot, viz:

Surface Water Flooding Hot Spots Map â€“ Horsleys (extracted from GBC Infrastructure Delivery document page 22)

• The pavements are in poor condition. As well as being narrow, they are often uneven and/or cracked making it difficult, for example, for people with pushchairs or prams or disabled persons in wheelchairs.
• There are insufficient school spaces for the number of local children needing them, with the result that children are allocated to schools a significant distance away such as Dorking or Woking
• The Medical Centre in East Horsley is already at capacity in terms of its number of patients.

It is recognised that, as stated in the Proposed Submission Local Plan, the maintenance of adequate infrastructure and its expansion to meet growing needs is the responsibility of the relevant infrastructure provider. This is often not GBC itself but rather, for example, Surrey County Council or utility companies.

In respect of West Horsley, there are only four proposals mentioned in Appendix C:

LRN 22 - East Horsley and West Horsley traffic management and environmental improvement scheme. It is not clear what is proposed here, and its timing and funding have to be considered uncertain. It is stated that funding will, at least in part, come from developer contribution. However, it is not at all clear what development is likely to give rise to such a contribution, but it certainly implies that funding could only come if there were a development; and
HSC 5 - Expansion of East Horsley Medical Centre to provide additional capacity and services for future population in years 5 – 15 of the plan.

SANG 8 – Strategic Alternative Natural Green Space, Long Reach Farm, West Horsley. Years 1-5. Delivered by Landowner at cost of £7,573,822 from Developer contributions. NOTE: Long Reach Farm does not appear on any map. WHPC Comment: SANG 8 would result, if granted permission, in the loss of open agricultural land in the Metropolitan Green Belt. The land contributes greatly to the openness of the Green Belt.

SANG 9 – Bespoke Strategic Alternative Natural Green Space, Ben’s Wood, West Horsley. Years 1-5. Delivery by Developer with Developer contributions.

There are no proposals in respect of all the existing problems with for example drainage, roads, pavements and schools.

Furthermore, it is inevitable that the proposed developments in West Horsley itself and nearby, in East Horsley and the proposals for Wisley, will put enormous strain on the existing infrastructure. There are no proposals at all to cater for this.

Although an expansion of the Medical centre is proposed in the Infrastructure Schedule, this is not until years 5 – 15 of the Plan. Given that it is already at capacity, WHPC submits this needs to be done much earlier.

Local primary schooling is also a very pertinent issue. There are 11 housing development sites identified in the LAA for West and East Horsley which, if taken together, would result in the building of 593 new houses in the two parishes that today are served by a single primary school - The Raleigh, in West Horsley. Planning guidance suggests that this number of new homes will require the provision of around 150 additional primary school places to accommodate such an increase in population. Today there is no spare capacity at The Raleigh, yet no proposals are made in the Proposed Submission Draft Local Plan to provide for any more school places in the Horsleys.

WHPC submits that the failure to address the inadequacies of the existing infrastructure, never mind GBC’s proposed growth in housing, is a serious deficiency in the Proposed Submission Draft Local Plan. The Plan is therefore UNSOUND.

WHPC OBJECTS to the lack of detailed infrastructure proposals to not only cater for development in West and East Horsley but also throughout the Borough. As drafted the proposals do not meet the stated objective of providing infrastructure to support the proposed developments.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents: WHPC Draft Local Plan response July 2016.pdf (2.2 MB)
2. the extension of current village Settlement Areas to encompass Sites A37, A38, A39, A40 and A41 and additional areas of land for which no ‘exceptional circumstances’ are advanced to justify their being removed from the Green Belt;

3. the scale and density of new housing proposed on the 4 parish based development Sites and Site A 39 adjacent to the parish boundary with East Horsley Parish;

4. the Objectively Assessed Number (OAN) proposed by the West Surrey SHMA of 693 new homes per annum (13,860 total for the Plan Period) which represents a 25% increase in the housing stock of the Borough. [NOTE: An independent Review of the OAN in the West Surrey SHMA by N McDonald (Appendix 1) concludes that there are significant errors in the West Surrey SHMA adopted by Guildford Borough, without scrutiny, and the OAN should be 510 homes per annum not 693]. Another review of the West Surrey SHMA prepared by Guildford Borough Clandon & Horsley Ward Councillor David Reeve, totally independently of the Neil McDonald Review, found similar errors to those reported on by Mr McDonald;

5. West Horsley’s proposed share of Guildford’s growth which equates to a 35% increase on the current housing stock of 1120 homes. Such proposed growth for the village is grossly disproportionate and unsustainable;

6. the total absence of detailed and deliverable infrastructure proposals to support the proposed local developments. The existing infrastructure is overloaded and insufficient for the needs of today’s village population, let alone the proposed developments set out in the Local Plan. Thames Water in particular has indicated a lack of capacity to absorb just one, never mind all, of the housing developments proposed for West and East Horsley.

Like many of the Borough’s rural villages, WHPC has noted in Policy P2 the opening sentence, “We will continue to protect the Metropolitan Green Belt ... against inappropriate development”. The Parish Council and the village it represents, fully support this policy. Regrettably however the proposed delivery of some 65% of the OAN unconstrained housing need on Green Belt land, coupled with the proposed insetting of villages from the Green Belt, flagrantly ignores this most important part of the Policy. No Exceptional Circumstances are advanced for ignoring the requirements of the National Planning Policy Framework (NPPF) by the Borough to justify the removal of current Green Belt land to meet GBC’s questionable growth targets.

Part 2 of this Submission is A Planning Assessment Report on Sites A37, A38, A40 and A41 in West Horsley and Site A39 adjacent to the boundary with West Horsley, prepared by ADN Planning Ltd, the Parish Council’s appointed consultant. The Conclusions at Para 4.9 state:

In conclusion, all of the Sites allocated for development within West Horsley have been singularly and cumulatively, found to be inappropriate for development. The basis of the Settlement Hierarchy, in which West Horsley has been placed, has to be seriously questioned, and the adverse impact of each site upon the village on an economic, social and environmental scale, as demonstrated in this statement, provides a compelling case demonstrating that they would not deliver sustainable forms of development, nor would their inclusion be justified as exceptional circumstances for them to be removed from the Green Belt. It is therefore recommended that Guildford Borough Council remove all five sites from their Local Plan and re-assess their proposals to extend the Green Belt boundary within the village as potential future sites for future residential development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:  

- WHPC Draft Local Plan response July 2016.pdf (2.2 MB)  
- GRA Report FINAL.pdf (1.6 MB)
Guildford Open Space, Sport and Recreation Assessment 2016 – 2033

General Comments:
Informative, clear aims and objectives.
Will help inform West Horsley’s emerging Neighbourhood Plan.
It is right to reference the old Planning Policy Guidance (PPG 17), as there is no clear replacement for this.
Methodology clear and well referenced – a transparent document.
How will you monitor the implementation of the policies? Is this going to be the remit of Parish Council’s or will this be the planning officers at GBC?
This is especially important as each Ward has been identified as having some form of typology deficiency which will be exacerbated should the scale of development proposed in the new draft Local Plan go ahead.

2.0 Methodology
The report states that it is based on a thorough understanding of local needs as detailed in the Community and Stakeholder Consultation.
However, I would query how representative the local need data is. If Guildford Borough has a population of 141,009 (mid ONS figures), then why was the online survey only sent to 3000 households as this is just over 2% of the Guildford population and is probably therefore too small a sample to produce justifiable evidence?
It transpires that only 411 surveys were actually completed by residents. Although it is mentioned that the survey was sent on a random basis, it would be helpful to see the results broken down by Ward, to ensure fair representation of the people who actually use the facilities, as well as a cross section of age and frequency of use.

3.0 Strategic Context
There are many references to the EU, especially when it comes to protecting Biodiversity, and adherence to many EU policies.
How will this be affected now that we are no longer a member of the EU?
Biodiversity 2020: A Strategy for England’s wildlife and Ecosystem services – how will the measures that are put in place be monitored? This is of particular concern as there is reliance on developers to deliver specific targets within their planning applications that protect our wildlife and green spaces. How will this be enforced?

3.3. Local Context – reference to the new Local Plan.
It is stated that a Local Plan Development Management Document will be produced to support the new Local Plan, if adopted. What would be the non-strategic, development management policies that are mentioned? Will you be working with Parish Councils and Neighbourhood Planning teams to identify these?

4.0 Local Needs Assessment
It is noted, and encouraging that the themes of need are consistent between GBC and Parish Councils regarding provision and deficit of Open Spaces.

5.0 Audit of Existing Open Space Assets
I note that there is no inclusion of Local Green Spaces. My understanding from our conversation is that this has not been included because LGS is a planning designation, and that LGSs will be designated through Development Management Policies which are to follow at some point.

6.0 The Development of Standards

6.2 Allotments

Although I don’t have figures to back this up, I feel that I must point out that West Horsley would be different in this area because of our thriving Grace and Flavour Community Gardens and Allotments. I believe this is reflected in the detailed analysis of need and deficit there we clearly do not have a deficit.

6.3 Amenity Green Space

Why have GBC reduced the Fields in Trust recommended standard of 0.6ha/1000 population of amenity space, to 0.4 hectares per 1000? I can see that the average current level of provision exceeds the recommendation, but that will not be consistent across the Borough.

We need to ensure that it does not become less, especially with the scale of development proposed for West Horsley and the East of the Borough in general, where these figures would be far from correct should the new draft Local Plan be adopted.

FIT do recommend that local circumstances are considered, but what are the circumstances that necessitate a reduction for Guildford Borough? Is this simply based on the fact that we have more of what we need already? But then how do we protect what we have, and ensure that there is more consistency of provision across the Borough? Food for thought…

The design requirements are good – how will they be enforced with developers? This applies to all typologies.

7.0 Applying Local Standards

It is recognised in the study that there is an under supply of the majority of typologies across the majority or Wards.

This is based on the ONS data for 2011. What will the picture look like for the East of the Borough in particular in five, ten, and fifteen years’ time, should the housing development recommended in the new draft Local Plan be accepted?

I do not see any reference to this, but believe that if there is already an under supply across the Borough, then this will become much greater with another 13,860 homes delivered by 2033. Surely these projections need to be factored into this report?

Although it states that Natural green Space is in sufficient supply across all wards, again what will this picture look like if you factor in all the development proposed?

8.0 Strategic Options, Policy and Management recommendations

It is noted that the issues are highlighted within this section, but not how they would be addressed going forward.

The Open Space Policy recommendations for the four key areas (protecting open space, enhancing open space, re-locating/re-designing open space, and new provision of open space) are detailed within the document and I would be interested to know when and how these proposed policies are likely to be adopted. There is no time frame within the document that I have found to confirm the next stages, and these would be helpful.

It would be interesting to note planned future engagement with Neighbourhood Planning teams across the Parishes, as this could be key to delivering the policies proposed.

Finally, although I pointed this out when we met, I do need to check that the maps in the Assessment of sites for Amenity Value produced by ethos have been corrected, as follows:
Page 47 – the land identified is in West Horsley, not East Horsley as written on the map.

This also applies to page 48 Weston Lea, also in West Horsley, not East, pages 53/55/56 Waterloo Farm, again in West Horsley, not East, and page 54 Manor Farm in West Horsley, not East.

I am sure the misnaming is a genuine mistake, and not reflective of GBC’s possible future vision to merge the two villages through the new draft Local Plan!

I hope that these comments are helpful, and I will await to see what happens next in terms of policy adoption. If there is further consultation planned, and the opportunity for Neighbourhood Plan Groups to be involved, then I hope you will add West Horsley to your consultation group.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
WHPC OBJECTS to the Proposed Submission Draft Local Plan: strategies and sites June 2016

West Horsley Parish Council (WHPC) has reviewed the Proposed Submission Draft Local Plan: strategies and sites, published by Guildford Borough Council (GBC) for a 6 weeks public consultation to 18th July.

WHPC requests that the objections and comments contained in this Submission are put to the Inspector appointed by the Secretary of State to review the Guildford Borough Submission Draft Local Plan: strategies and sites following this Regulation 19 Consultation. The Parish Council will appoint and retain a representative to speak on its behalf at the Examination in Public on the following issues:

1. Proposals for new Green Belt boundaries and the ‘insetting’ of villages from the Green Belt.
2. The use of an unconstrained OAN figure of 693 homes per annum throughout the Plan Period
3. The unsustainable characteristics of proposed development sites A37, A38, A39, A40 and A41.
4. The unsoundness of the Local Plan.

Part 1 of this Report sets out the Parish Council’s comments and objections to the proposed Policies.

Part 2 presents the Planning Assessment Relating to Sites A37, A38, A39, A40 and A41 prepared by the Parish Council’s planning consultant ADN Planning Ltd. WHPC endorses the Planning assessment conclusion that all five sites should be removed from the Draft Local Plan. The proposals to bring in new Green Belt boundaries within the village must be withdrawn as no ‘Exceptional or very special circumstances’ have been presented by the Borough to justify their removal from the Green Belt.

The Appendix section includes 3 other documents referred to within this Submission.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:  WHPC Draft Local Plan response July 2016.pdf (2.2 MB)
In brief: Development sites A37 to A41 have been determined unsustainable. Thus there is no justification for the proposed new boundaries of which many are not defensible.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/4279  Respondent: 8563201 / West Horsley Parish Council (Sam Pinder)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

SITES POLICIES (referenced A1 to A67)

The proposed West Horsley development sites A37 to A41 are reviewed in Part 2: Planning Assessment Relating to Sites A37, A38, A39, A40 and A41 prepared by ADN Planning Ltd, the Parish Council’s appointed consultant.

CONCLUSIONS

West Horsley is a rural village with some 1120 homes and just under 3,000 residents, whose Parish Council and residents do not share the same vision for the future of the Borough, as put forward in the Draft Local Plan by Guildford Council.

GBC’s desire to pursue a ‘Forced Growth’ policy results in highly aggressive, poorly justified and questionable targets being set for economic growth and housing development in the Borough. The excessive targets – particularly the proposed 25% increase in housing stock – will add to the current heavy strain on overloaded infrastructure in the already over-stretched county of Surrey.

Guildford is a constrained borough by the reality of having 89% of its land classified as permanent Green Belt and an out-of-date road network already suffering over capacity at peak times.

The Proposed Submission Draft Local Plan, if approved, particularly in respect of the excessive housing growth proposed (more than any other Surrey Borough by a considerable margin) will have a permanently damaging impact on the Metropolitan Green Belt across the Borough, particularly on the eastern side where West and East Horsley are located. The test of “exceptional circumstances” that might justify allocating Green Belt land, thereby creating new Green Belt boundaries, for development in a Local Plan has not been rigorously and transparently applied at a strategic level. In reviewing the proposals to put forward new Green Belt boundaries and locate new development on unsustainable sites, it appears to this Parish Council, Guildford Borough decided, at some point, not to be guided by and observe the National Planning Policy Framework. Local Plan Policy P2 which starts with, “We will continue to protect the Metropolitan Green Belt... against inappropriate development” does not fool any of the parishes in the Borough.

Additionally the Sustainability Appraisal does not seem to fit with the concept of Sustainable Development as written in the National Planning Policy Framework, to the extent that it is questioned whether it complies with those requirements.

WHPC submits that it is quite achievable for realistically prepared and identified development needs to be accommodated in Guildford’s urban areas and villages. The NPPF Plan Making - Local Plans paras 150 to 157, sets out clear advice on objectives and procedures a Local Authority should adopt. WHPC was not asked by Guildford Borough to take part in “Early and meaningful engagement and collaboration with neighbourhoods, local organisations... is essential” (NPPF 155).
WHPC believes no parish council was invited to engage in early essential collaboration - a serious flaw for a Borough with 23 Parish Councils.

West Horsley totally rejects the housing proposals to add 385 more dwellings to the village housing stock (a grossly disproportionate 35% growth) on unsustainable sites in the first 5 years of the Plan Period.

WHPC is concerned that GBC have, without proper scrutiny, adopted an inflated OAN of 13,860 homes as a housing target for the Plan Period without any application of constraints as required by the National Planning Policy Framework and National Planning Policy Guidance. The Parish Council subscribed, with other parish and residents organisations, to funding A Review of the West Surrey SHMA as it relates to the Objectively Assessed Housing Needs of Guildford", June 2016 prepared by Neil McDonald. This Review, included in Appendix 1, found significant errors in the OAN West Surrey SHMA, the effect of which, if accepted as correct, would lower the OAN to 510 homes per year from the 693 homes per year adopted, without constraint, by Guildford Borough. The findings of Neil McDonald’s thorough and substantive Review, if correct, mean the Proposed Submission Draft Local Plan 2016 is UNSOUND.

West Horsley Parish Council on behalf of all its residents calls upon Guildford Borough Council to:

1. have the West Surrey SHMA completely checked either by a joint working party comprising Neil McDonald (for parishes and residents groups), 4 Borough Councillors (one from each political group), under the chairmanship of a retired judge or similar independent professional or by an appointed independent expert who is accepted by all the interested parties.
2. review and re-assess its growth and housing policy objectives rather than force through the Council a Local Plan which unequivocally does not have the support of the majority of residents in Guildford Borough.
3. remove all five West Horsley Sites A37 to A41 from the Proposed Submission Draft Local Plan and re-assess proposals to create new Green Belt boundaries, the effect of which would remove the village from being ‘washed over’ by the Metropolitan Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

- WHPC Draft Local Plan response July 2016.pdf (2.2 MB)
- WHPC Draft Local Plan response letter July 2016.pdf (240 KB)
- GRA Report FINAL.pdf (1.6 MB)

Comment ID: PSLPS16/7915  Respondent: 8563201 / West Horsley Parish Council (Sam Pinder)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Land at Wisley Airfield (Site A35)

Report page: 14

WHPC view: Objects Strongly

In brief: Inappropriate development in the Green Belt. Refer to Planning Officer’s Committee Report on application 15/P/00012 for reasons for Planning Committee’s Unanimous refusal.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
**Attached documents:**

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<th>Respondent: 8563201 / West Horsley Parish Council (Sam Pinder)</th>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

**Sites Policies A37 to A41**

**Report page:** 18

**WHPC view:** Objects strongly

**In brief:** All the West Horsley Sites are unsustainable, as demonstrated in the Planning Assessment Report (Appendix 2) when evaluated against NPPF Policies

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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Answer (if comment is on questions 1-7 of the questionnaire): ()

**Sites Policies A37 to A41**

**Report page:** 18

**WHPC view:** Objects strongly

**In brief:** All the West Horsley Sites are unsustainable, as demonstrated in the Planning Assessment Report (Appendix 2) when evaluated against NPPF Policies

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Sites Policies A37 to A41

In brief: All the West Horsley Sites are unsustainable, as demonstrated in the Planning Assessment Report (Appendix 2) when evaluated against NPPF Policies

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Sites Policies A37 to A41

Report page: 18

WHPC view: Objects strongly

In brief: All the West Horsley Sites are unsustainable, as demonstrated in the Planning Assessment Report (Appendix 2) when evaluated against NPPF Policies

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

D1 – Making better places

Report page: 15

WHPC view: Supports

In brief: Only for sites adjoining or closely related to a defined rural settlement

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Comment ID: PSLPP16/17473  Respondent: 8563201 / West Horsley Parish Council (Sam Pinder)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY D1: Making better places

WHPC supports this policy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents: WHPC Draft Local Plan response July 2016.pdf (2.2 MB)

Comment ID: PSLPP16/17434  Respondent: 8563201 / West Horsley Parish Council (Sam Pinder)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

D2 – Sustainable design, construction and energy

Report page: 15

WHPC view: Supports

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

**POLICY D2: Sustainable design, construction & energy**

WHPC supports this policy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:  [WHPC Draft Local Plan response July 2016.pdf](#) (2.2 MB)

**Comment ID:** PSLPP16/17435  **Respondent:** 8563201 / West Horsley Parish Council (Sam Pinder)  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

**D3 – Historic environment**

Report page: 15

**WHPC view:** Supports

**In brief:** West Horsley’s range of heritage assets make an important contribution to the look / feel of the village and its character.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** PSLPP16/17482  **Respondent:** 8563201 / West Horsley Parish Council (Sam Pinder)  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
POLICY D3: Historic environment

West Horsley contains a wide range of heritage assets which make an important contribution to the look and feel of the village and its character. WHPC fully supports this policy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents: WHPC Draft Local Plan response July 2016.pdf (2.2 MB)

Comment ID: PSLPP16/17436   Respondent: 8563201 / West Horsley Parish Council (Sam Pinder)   Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

D4 – Development in urban areas and inset villages

Report page: 15

WHPC view: Objects

In brief: If the term ‘inset villages’ is deleted from the Policy, it would be supported.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17481   Respondent: 8563201 / West Horsley Parish Council (Sam Pinder)   Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY D4: Development in urban areas and inset villages

WHPC Objects to this policy as it includes the term ‘inset villages’. If that term is deleted from the Policy title and other text, the Policy would be supported.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents: WHPC Draft Local Plan response July 2016.pdf (2.2 MB)
### E1 – Meeting employment needs

**Report page:** 15

**WHPC view:** Supports

**In brief:** Proposed new office and industrial land area are located on western side of Borough, remote from West Horsley

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

**Policy E1: Sustainable employment**

WHPC supports the general policy statements made in this policy. However sustainability is not served by the location of the new office space and industrial land area proposed being on the opposite side of the Borough to West Horsley, giving rise to more to / from work car journeys for residents of the proposed new housing developments in the village. This does not fit with sustainable development as set out in NPPF para 7.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

**Comment ID:** PSLPP16/17438  **Respondent:** 8563201 / West Horsley Parish Council (Sam Pinder)  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ()**
**E2 – Locations of new employment floorspace**

Report page: 15

WHPC view: Neutral

In brief: East Horsley Parish Council comments re Effingham Junction station noted

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** PSLPP16/17484  **Respondent:** 8563201 / West Horsley Parish Council (Sam Pinder)  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

**POLICY E2: Location for new employment floorspace**

Under this policy, areas within 500 metres of a "public transport interchange" play a key role.

Proposals for new office and research and development floor-space are to be directed to firstly Guildford town centre and then to areas within 500 metres of a public transport interchange (PTI).

East Horsley has two railway stations, Horsley Station and Effingham Junction Station, but currently the Draft Local Plan only proposes that Horsley Station should have PTI status.

WHPC is neutral on this Policy but notes that East Horsley Parish Council has submitted detailed comments on this policy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents: [WHPC Draft Local Plan response July 2016.pdf](#) (2.2 MB)

**Comment ID:** PSLPP16/17439  **Respondent:** 8563201 / West Horsley Parish Council (Sam Pinder)  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
Answer (if comment is on questions 1-7 of the questionnaire): ()

**E3 – Maintaining employment capacity ...**

Report page: 15

WHPC view: No comments

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPP16/17485  **Respondent:** 8563201 / West Horsley Parish Council (Sam Pinder)  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

**POLICY E3: Maintaining employment capacity and improving employment floor-space**

WHPC is supportive of this policy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents: [WHPC Draft Local Plan response July 2016.pdf](#) (2.2 MB)

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**Comment ID:** PSLPP16/17440  **Respondent:** 8563201 / West Horsley Parish Council (Sam Pinder)  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
E4 – Surrey Research Park

Report page: 15

WHPC view: No comments

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/17486</th>
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POLICY E4: Surrey Research Park

WHPC has no comments on this policy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents: WHPC Draft Local Plan response July 2016.pdf (2.2 MB)

<table>
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<tr>
<th>Comment ID: PSLPP16/17441</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E5</td>
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E5 – Rural Economy

Report page: 15

WHPC view: Supports

In brief: Cumulative effects of rural economic development need to be monitored / controlled to ensure no harm to openness of Green Belt

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
**Policy E5: Rural Economy**

WHPC supports this policy, though the cumulative effects of rural economic development need to be monitored and controlled to ensure there is no harm to the openness of the Green Belt.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents: [WHPC Draft Local Plan response July 2016.pdf](#) (2.2 MB)

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**Policy E6: The Leisure and visitor experience**

**Report page:** 15

**WHPC view:** Supports

**In brief:** Well-loved historic Green Belt village visited by walkers, cyclists and visitors to Surrey Hills

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

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**Comment ID:** PSLPP16/17488  **Respondent:** 8563201 / West Horsley Parish Council (Sam Pinder)  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E6

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**Comment ID:** PSLPP16/17442  **Respondent:** 8563201 / West Horsley Parish Council (Sam Pinder)  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E6

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**Comment ID:** PSLPP16/17487  **Respondent:** 8563201 / West Horsley Parish Council (Sam Pinder)  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E5

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**Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E6**

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

**POLICY E6: The leisure and visitor experience**

West Horsley is a rural and historic village with over 40 Listed Buildings. The village is located between the railway stations of Horsley to the east and West Clandon to the west.

West Horsley is a jewel and gateway for the many visitors to the Surrey Hills Area of Outstanding Natural Beauty, through its network of footpaths, bridleways and lanes leading to the upland areas in the south of the Parish, where The Sheepleas (an SSSI) and Woodcote hamlet, once frequently visited by Beatrix Potter, are located.

The southern part of the village has two well-used historic inns, which host walking and cycling groups plus occasional classic car and motorcycle rallies.

Following Guildford Boroughâ€™s approval in Spring 2016, West Horsley Place (Grade 1 Listed) and its magnificent estate is to be home to a prestigious Opera House development (lauded by the Head of Surrey County Council); it is even more desirable to preserve the rural character of the village and maintain its openness in the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents: [WHPC Draft Local Plan response July 2016.pdf](#) (2.2 MB)

<table>
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<tr>
<th>Comment ID: PSLPP16/17443</th>
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**Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E7**

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

**E7 – Guildford town centre**

Report page: 16

WHPC view: No comments

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
POLICY E7: Guildford Town Centre

WHPC has no comments on this policy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents: [WHPC Draft Local Plan response July 2016.pdf](#) (2.2 MB)

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E8 - District and Local Centres

Report page: 16

WHPC view: Neutral with comment

In brief: The 2 Horsley Centres have no room for expansion and are already overloaded in terms of parking cars

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
**POLICY E8: District centres and POLICY E9: Local centres**

WHPC notes EHPC supports these 2 policies, which include the designation of Station Parade, East Horsley, as a District Centre and the designation of Bishopsmead Parade, East Horsley as a rural Centre under the draft Local Plan. It is observed that there is virtually no room for expansion of the mix of retail units, post offices / newsagents, estate agency, charity shops, restaurants and café facilities at each location. Parking of cars becomes more and more difficult each week and is likely to become near impossible if even a proportion of the proposed housing is built.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents: [WHPC Draft Local Plan response July 2016.pdf](#) (2.2 MB)

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/17423</th>
<th>Respondent: 8563201 / West Horsley Parish Council (Sam Pinder)</th>
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<td><strong>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1</strong></td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

**H1 – Homes for All**

Report page: 9

WHPC view: Supports

In brief: Achievability is queried

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/17451</th>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

**POLICY H1: Homes for all**

WHPC supports the general policy statements made in this policy, which mainly repeat NPPF polices. Our primary concerns, as set out above, are with the scale of new housing being proposed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
H2 – Affordable Homes

Report page: 9

WHPC view: Objects

In brief: Fails the test of sustainability and should be radically revised.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

POLICY H2: Affordable Homes

WHPC Objects to Policy H2

WHPC supports the general principle that developers should be required to contribute part of their development profit towards the cost of social housing in the borough. However, this ‘one-size-fits-all’ policy is seriously flawed and likely to prove highly inefficient, if not unworkable, in the longer term. Readers of this submission should note that the average 2016 market price for a 3 bedroom semi-detached house in West Horsley is £581,031 well above the average price of £432,580 for a semi-detached house price in Guildford. The 2016 average price for flats in Guildford is £282,070.

In this policy GBC sets out no strategy to recognise and deal with the differences in affordable housing need and price across the borough. In West Horsley, there is some demand for affordable housing but other factors, e.g. transport to
workplace considerations, lack of transport and shopping facilities, are key influencers for persons on low incomes. A Summary of the West Horsley Housing Needs Survey May 2014 is included in Appendix 2.

Under Policy H2, 40% of all but the smallest development sites in West Horsley will be required to have affordable housing built upon them, irrespective of whether there is actually demand for more affordable housing in the parish. Moreover, the affordable housing targets proposed in the Proposed Submission Local Plan indicate that the biggest component of affordable housing (40%) should be built as 1-bed dwellings despite the fact that GBC’s own studies show that the strongest affordable demand in the borough is actually for 2 to 3 bed dwellings.

As a result of this flawed affordable housing policy, a significant volume of social housing is likely to be built in places where it is not needed and offered to tenants who do not want to live there, nor have jobs near that location.

Policy H2 thereby fails the test of sustainability and should be radically revised. If not, the outcome will be serious inefficiency in the provision of social housing in the borough.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:** [WHPC Draft Local Plan response July 2016.pdf](attachment:WHPC%20Draft%20Local%20Plan%20response%20July%202016.pdf) (2.2 MB)

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**Comment ID:** PSLPP16/17425  **Respondent:** 8563201 / West Horsley Parish Council (Sam Pinder)  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy H3

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ( )**

**H3 – Rural Exception Homes**

**Report page:** 9

**WHPC view:** Supports

**In brief:** Only for sites adjoining or closely related to a defined rural settlement

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/17455  **Respondent:** 8563201 / West Horsley Parish Council (Sam Pinder)  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy H3

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ( )**
Policy H3 Rural Exception Homes

WHPC supports this policy but only for sites adjoining or closely related to a defined rural settlement.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents: WHPC Draft Local Plan response July 2016.pdf (2.2 MB)

Comment ID: PSLPP16/17445  Respondent: 8563201 / West Horsley Parish Council (Sam Pinder)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I1 – Infrastructure and delivery

Report page: 16

WHPC view: Objects strongly

In brief: No detailed Infrastructure proposals for the Horsleys are presented, even in response to Thames Water’s statement that their current facilities would not have the capacity to cope

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17496  Respondent: 8563201 / West Horsley Parish Council (Sam Pinder)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICIES I1, I2 & I3

These three policies cover Infrastructure & Delivery, Supporting the Department of Transport’s ‘Road Investment Strategy’ and Sustainable Transport for new developments. Whilst WHPC supports the general policy statements as presented in each case, it is the detailed infrastructure proposals for Guildford Borough or lack of for the Horsleys, which are the real issue.
WHPC believes there are serious deficiencies and shortcomings in the infrastructure of Guildford Borough as it is today. The aggressive house building policy advanced by GBC in the Proposed Submission Draft Local Plan will substantially exacerbate many, if not all, problem areas.

WHPC puts forward the following specific comments regarding infrastructure in West Horsley today:

- Thames Water has sent very clear advice in 2014 to stating that their current facilities, i.e. pipelines to the Ripley North Treatment Works and the Treatment Works, are unlikely to have the capacity to cope with one or possibly all the developments proposed for West and East Horsley. A 2 to 3 year lead-in period Thames Water say will be necessary to expand capacity following the granting of planning permission for a development Site.
- Roads across the parish are in poor condition with many potholes. Many roads are unable to sustain their current levels of traffic, particularly the increasing levels of HGV traffic along the B2039.
- Principal through roads traversing West Horsley are narrow and winding, have a series of pinch points, have sections without any pavements and are generally unlit. As a senior SCC councillor remarked at a recent public meeting in the village hall: “West Horsley has lanes, not roads.” West Horsley’s ‘lanes’ are totally unsuitable for high volumes of traffic.
- Many of the drains are blocked or otherwise in extremely poor condition, giving rise to frequent surface water flooding when it rains. The southern edge of the Horsleys Area lies on the ‘spring line’ at the foot of the North Downs and is recognised in the GBC Infrastructure Delivery document as a Surface Water Flooding Hot Spot, viz:

  Surface Water Flooding Hot Spots Map â€“ Horsleys (extracted from GBC Infrastructure Delivery document page 22)

  - The pavements are in poor condition. As well as being narrow, they are often uneven and/or cracked making it difficult, for example, for people with pushchairs or prams or disabled persons in wheelchairs.
  - There are insufficient school spaces for the number of local children needing them, with the result that children are allocated to schools a significant distance away such as Dorking or Woking.
  - The Medical Centre in East Horsley is already at capacity in terms of its number of patients.

It is recognised that, as stated in the Proposed Submission Local Plan, the maintenance of adequate infrastructure and its expansion to meet growing needs is the responsibility of the relevant infrastructure provider. This is often not GBC itself but rather, for example, Surrey County Council or utility companies.

In respect of West Horsley, there are only four proposals mentioned in Appendix C:

LRN 22 - East Horsley and West Horsley traffic management and environmental improvement scheme. It is not clear what is proposed here, and its timing and funding have to be considered uncertain. It is stated that funding will, at least in part, come from developer contribution. However, it is not at all clear what development is likely to give rise to such a contribution, but it certainly implies that funding could only come if there were a development; and

HSC 5 - Expansion of East Horsley Medical Centre to provide additional capacity and services for future population in years 5 – 15 of the plan.

SANG 8 – Strategic Alternative Natural Green Space, Long Reach Farm, West Horsley. Years 1-5. Delivered by Landowner at cost of £7,573,822 from Developer contributions. NOTE: Long Reach Farm does not appear on any map. WHPC Comment: SANG 8 would result, if granted permission, in the loss of open agricultural land in the Metropolitan Green Belt. The land contributes greatly to the openness of the Green Belt.

SANG 9 – Bespoke Strategic Alternative Natural Green Space, Ben’s Wood, West Horsley. Years 1-5. Delivery by Developer with Developer contributions.

There are no proposals in respect of all the existing problems with for example drainage, roads, pavements and schools.

Furthermore, it is inevitable that the proposed developments in West Horsley itself and nearby, in East Horsley and the proposals for Wisley, will put enormous strain on the existing infrastructure. There are no proposals at all to cater for this.
Although an expansion of the Medical centre is proposed in the Infrastructure Schedule, this is not until years 5 – 15 of the Plan. Given that it is already at capacity, WHPC submits this needs to be done much earlier.

Local primary schooling is also a very pertinent issue. There are 11 housing development sites identified in the LAA for West and East Horsley which, if taken together, would result in the building of 593 new houses in the two parishes that today are served by a single primary school - The Raleigh, in West Horsley. Planning guidance suggests that this number of new homes will require the provision of around 150 additional primary school places to accommodate such an increase in population. Today there is no spare capacity at The Raleigh, yet no proposals are made in the Proposed Submission Draft Local Plan to provide for any more school places in the Horsleys.

WHPC submits that the failure to address the inadequacies of the existing infrastructure, never mind GBC’s proposed growth in housing, is a serious deficiency in the Proposed Submission Draft Local Plan. The Plan is therefore UNSOUND.

WHPC OBJECTS to the lack of detailed infrastructure proposals to not only cater for development in West and East Horsley but also throughout the Borough. As drafted the proposals do not meet the stated objective of providing infrastructure to support the proposed developments.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents: WHPC Draft Local Plan response July 2016.pdf (2.2 MB)

Comment ID: PSLPP16/17497  Respondent: 8563201 / West Horsley Parish Council (Sam Pinder)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICIES I1, I2 & I3

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WHPC believes there are serious deficiencies and shortcomings in the infrastructure of Guildford Borough as it is today. The aggressive house building policy advanced by GBC in the Proposed Submission Draft Local Plan will substantially exacerbate many, if not all, problem areas.

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- SANG 8 – Strategic Alternative Natural Green Space, Long Reach Farm, West Horsley. Years 1-5. Delivered by Landowner at cost of £7,573,822 from Developer contributions. NOTE: Long Reach Farm does not appear on any map. WHPC Comment: SANG 8 would result, if granted permission, in the loss of open agricultural land in the Metropolitan Green Belt. The land contributes greatly to the openness of the Green Belt.

- SANG 9 – Bespoke Strategic Alternative Natural Green Space, Ben’s Wood, West Horsley. Years 1-5. Delivery by Developer with Developer contributions.

There are no proposals in respect of all the existing problems with for example drainage, roads, pavements and schools.

Furthermore, it is inevitable that the proposed developments in West Horsley itself and nearby, in East Horsley and the proposals for Wisley, will put enormous strain on the existing infrastructure. There are no proposals at all to cater for this.

Although an expansion of the Medical centre is proposed in the Infrastructure Schedule, this is not until years 5 – 15 of the Plan. Given that it is already at capacity, WHPC submits this needs to be done much earlier.

Local primary schooling is also a very pertinent issue. There are 11 housing development sites identified in the LAA for West and East Horsley which, if taken together, would result in the building of 593 new houses in the two parishes that today are served by a single primary school - The Raleigh, in West Horsley. Planning guidance suggests that this number of new homes will require the provision of around 150 additional primary school places to accommodate such an increase in population. Today there is no spare capacity at The Raleigh, yet no proposals are made in the Proposed Submission Draft Local Plan to provide for any more school places in the Horsleys.

WHPC submits that the failure to address the inadequacies of the existing infrastructure, never mind GBC’s proposed growth in housing, is a serious deficiency in the Proposed Submission Draft Local Plan. The Plan is therefore UNSOUND.
WHPC OBJECTS to the lack of detailed infrastructure proposals to not only cater for development in West and East Horsley but also throughout the Borough. As drafted the proposals do not meet the stated objective of providing infrastructure to support the proposed developments.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?


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I2 – Supporting Dept. of Transport’s “Road Investment Strategy”

Report page: 16

WHPC view: Neutral

In brief: The new development proposals throughout the Borough, if allowed, will overload roads and lanes. Surrey CC Highways will need to invest £ millions. Not just a Dept. of Transport issue.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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I3 – Sustainable transport for new developments

Report page: 18

WHPC view: Neutral

In brief: Practicality and enforceability is questioned. Policy wording is weak, e.g. We will expect … should be replaced by We will require...
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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POLICY I4 Green and blue infrastructure

WHPC supports this policy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents: "WHPC Draft Local Plan response July 2016.pdf" (2.2 MB)

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Answer (if comment is on questions 1-7 of the questionnaire): ()

P1 – Surrey Hills Area of Outstanding Natural Beauty (AONB)

Report Page: 10

WHPC view: Supports

In brief: Protecting this area should be given the highest priority

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17459  Respondent: 8563201 / West Horsley Parish Council (Sam Pinder)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY P1: Surrey Hills Area of Outstanding Natural Beauty (AONB)

The Surrey Hills AONB is one of the great treasures of Guildford Borough and WHPC believe that protecting this area should be given the highest priority.

WHPC supports Policy P1.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents: WHPC Draft Local Plan response July 2016.pdf (2.2 MB)

Comment ID: PSLPP16/17427  Respondent: 8563201 / West Horsley Parish Council (Sam Pinder)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
In brief: WHPC fully supports GBC’s policy statement of protecting the Green Belt from inappropriate development but objects to GBC proposals to build 65% of the proposed new dwellings on Green Belt land.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

In brief: New planning designation introduced titled ‘the identified boundary of the village’. Does not fit with Policy P2 for preventing inappropriate development

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Proposal to ‘inset’ West Horsley by introducing new Green Belt boundaries to enable the village to be removed from the Metropolitan Green Belt

Report page: 10

WHPC view: Objects Strongly

In brief: No Exceptional circumstances presented to justify changing / adding to Green Belt boundaries. Proposal does not meet NPPF Policies. West Horsley South in High Sensitivity Green Belt (land parcel D6). Inconsistent land parcel sensitivity in Borough wide classifications. P2 Policy wording does not mention ‘insetting’ of several villages

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17465  Respondent: 8563201 / West Horsley Parish Council (Sam Pinder)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )

POLICY P2: Green Belt

Policy P2 states that: We will continue to protect the Metropolitan Green Belt … against inappropriate development”

WHPC only supports this opening statement.

Regrettably, despite such forthright words, GBC appears to be in breach of this policy itself, through the housing policies set down in the Draft Local Plan. Analysis of the breakdown included under Sites (p122), reveals that around 65% of the developments, some 8,202 dwellings, are proposed to be built on land currently within the Metropolitan Green Belt (see pie charts above). These inappropriate development proposals flagrantly ignore the opening statement of Policy P2 as well as the stipulations set out in NPPF paras 83 to 87. No ‘exceptional circumstances’ are advanced to justify the introduction of new Green Belt boundaries to enable the land at the many locations in the Borough to be used for building homes on.

Under NPPF policy, a Local Authority may impose constraints on the delivery of new dwellings, e.g. through the need to protect the Metropolitan Green Belt or the protection of the Surrey Hills Area of Outstanding Natural Beauty (NPPF protection comparable to that of a national park) or for other reasons such as lack of necessary infrastructure. Notwithstanding that proposed Green Belt areas to be built on, account for a significant percentage (over 6%) of the land area of the Borough, GBC has stated on several occasions to full Council Meetings that “no constraints will be applied to the OAN” to reduce the need to deliver dwellings on Green Belt land through the Plan Period.

WHPC, like other parish councils, finds this approach inexplicable, irresponsible and unsound.

WHPC objects to GBC’s proposed imposition of new Green Belt boundaries and the extensions to current village Settlement Areas boundaries proposed under this policy. These are responded to in sections (a) “insetting” and (b) “Settlement Areas extensions” below. The two sections are mutually interdependent in terms of NPPF policies.

Paragraph 4.3.13: Proposal to inset West Horsley from the Green Belt
Response: WHPC strongly Objects to the proposal to inset West Horsley from the Green Belt and requires this proposal to be removed from the Local Plan

Policy P2 proposes that West Horsley should be inset from the Green Belt, instead of being ‘washed over’ as it is today. Currently development is permitted within the Settlement Area, although it is still Green Belt with particular planning policies being applicable.

West Horsley is set in a rural location and the village has the look and feel of a rural village. Its Green Belt status has been a key factor in preserving that character. Moreover, being ‘washed over’ by the Green Belt has not been a serious constraint on development within the village. Today West Horsley is a picturesque and lively rural community, which has and continues to experience incremental growth, despite the continuing lack of sufficient infrastructure. The parish of West Horsley’s open, semi-rural character makes an important contribution to the openness of the Green Belt in this part of the borough. This is a specific and differentiating characteristic of West Horsley over its neighbour, East Horsley, which the Council and its consultant Pegasus Planning has failed to recognise.

The assessment of sensitivity in the context of the five purposes of Green Belt set out in GBC’s Green Belt and Countryside Study is flawed. The land parcels used to assess sensitivity are ill considered and mask significant variations in function and character of different areas within each land parcel. As a consequence, the conclusions drawn are subjective and inconsistent and do not provide a robust basis from which objective decisions can be made. The inconsistent conclusions about the extent to which different land parcels can be seen in the Green Belt Purposes Schedule and Green Belt Sensitivity Map (ref Vol. III Appendix 1 and Appendix 2). To be specific: land parcels are scored against four of the criteria laid out in NPPF para 80 and then categorised by their resulting land parcel score as follows: 3/4 = High Sensitivity, 2 = Medium Sensitivity and 1 = Low Sensitivity Green Belt. Based on their Green Belt sensitivity grading villages were then targeted for ‘insetting.’ The selection or targeting of villages to be ‘inset’ and those not to be ‘inset’ when scrutinised against their land parcel score and grading is demonstrably very inconsistent. For example:

West Clandon: no insetting proposed for south of railway line - Land parcels D1, D2 High Sensitivity, score 4 Settlement north of railway / west of main road - Land parcel C4, High Sensitivity, score 3 (similar to West Horsley South).

Housing area, north of railway / east of main road. Land parcel C4 Medium Sensitivity, score 2 with no enlargement of the Settlement Area or insetting proposed, despite being close to a railway station on Guildford to London line.


East Horsley: Land Parcels D6, D7 High Sensitivity score 3. Insetting proposed.

West Horsley: the whole village, both to the north (Land Parcel C14) and the south (Land Parcel D6) of the railway line that divides the village, passes the test for remaining ‘washed over’ as the village makes an important contribution to the openness of the Green Belt. (see also 2.13, 2.14 and 3.0 Sites Critique - Planning Assessment - Appendix 2). Inside the northern Settlement Area there is an average housing density of 9.9 dwellings per hectare (dph).

Woodlands and large residential gardens make a vital contribution towards biodiversity, provide wildlife corridors, and furnish those open spaces which are vital to the character of the Green Belt. Visit the village of West Horsley and appreciate how the Green Belt has preserved the rural character and openness of the village.

The case put forward in the Local Plan Evidence Base proposing the insetting of the villages of West and East Horsley, both predominantly located in High Sensitivity Green Belt Land Parcels is inconsistent, weak and non-compliant with NPPF policies. No Exceptional Circumstances are demonstrated.
Paragraph 4.3.16 and Proposals Map: Settlement Areas extensions in West Horsley

GBC are proposing to make a number of changes to the Current Settlement boundaries of West Horsley and so expand the Settlement Area, as set out within the Green Belt & Countryside Study prepared by GBC’s consultants, Pegasus Planning.

WHPC Objects to the Settlement Areas extensions changes proposed. Each is dealt with below:

1. There is a proposal to move the West Horsley settlement boundary westwards from behind the houses on the west side of Northcote Road to Long Reach, to include all the dwellings in East Lane, Greta Bank, Woodside, Farleys Close and the east side of Long Reach. The new northern boundary of this extended settlement area would be a post & rail fence with hedge, the southern edge of Ben’s Wood, both of which are NOT highly defensible Green Belt boundaries. Under NPPF rules Green Belt boundaries should only be changed in ‘exceptional circumstances’. The non-sustainability of site A38 and its importance to the openness of the Green Belt is reviewed in detail in the ADN Planning Assessment Report submitted in Part 2. Overall therefore, the proposal to extend the current Settlement Area westwards cites no ‘exceptional circumstances’ and is an invalid proposal.

2. There is a proposal to move the East Horsley settlement boundary westwards from behind the houses on the west side of Ockham Road North to the Western boundary of Lollesworth Wood, to create site A39. This proposal removes over 5 hectares of agricultural fields from the Green Belt. The present boundary line is clearly defined by a deep and well-maintained drainage ditch which is classified by the Environment Agency as a ‘main river line’ and therefore represents a highly defensible Green Belt boundary. Moving this boundary west to the edge of woodland in no way improves its defensibility. Under NPPF rules Green Belt boundaries should only be changed in ‘exceptional circumstances’. The proposal cannot be considered as an exceptional circumstance and the only reason for this change is to bring a large agricultural field within the settlement area to provide more housing land. However, under NPPF rules this is not a sufficient justification for changing a Green Belt boundary.

3. There is a proposal to move the West Horsley settlement boundary northwards and westwards to take in the existing houses on the west side of Ockham Road North, houses on Green Lane and the private Close off Green Lane (sometimes referred to as ‘Bungalow Road’) to the proposed western boundary of site A40. This proposal removes over 8 hectares of paddock, garden land (Oakland ‘Farm’) and an established line of mature trees along the eastern edge of the Oakland Farm land from the Green Belt. The present boundary line on the southern edge of Site A40 is the hard northern edge of housing along Nightingale Avenue. The proposed western boundary on the edge of woodland and around the Camping & Caravanning site’s lake does not improve its defensibility. Under NPPF rules Green Belt boundaries should only be changed in ‘exceptional circumstances’. The proposal cannot be considered as an ‘exceptional circumstance’ and the only reason for this change is to bring the field within the settlement area to provide more housing land. Under NPPF rules this is not sufficient justification for changing a Green Belt boundary.

4. A further proposal is for the addition of Green Belt land on the south side of East Lane and to the east of Lollesworth Lane to the West Horsley settlement area to enable Site A41 to be created. The proposed eastern boundary along the western edge of a former tree nursery (sic: now woodland) and hedging to an area of grazing land is not defensible and lacks permanence. The southern edge of this proposed piece of settlement area goes beyond the indicated Site A41 to woodland adjacent to the northern edge of the railway line. An existing paddock between A41 and the woodland would result from the proposal and be potential land for infill development. Under NPPF rules Green Belt boundaries should only be changed in ‘exceptional circumstances’. The proposal cannot be considered as an ‘exceptional circumstance’ and the only reason for this change is to bring the field within the settlement area to provide more housing land. Therefore under NPPF rules there is not sufficient justification for changing a Green Belt boundary.

5. The existing West Horsley South Settlement Area (where no major PDAs are proposed) is wholly within High Sensitivity Green Belt Land Parcel D6, with a number of extensions proposed along its eastern and western boundaries. The largest extension proposed to this South Settlement Area is at the south-east corner, where Cranmore School and its grounds plus woodland on the west side of Little Cranmore Lane would be taken into the Settlement Area. WHPC submits that extension of the existing South Settlement Area at all the various locations, is purely being proposed in order to add land for potential inappropriate infill development. No justification is provided for these Settlement Area extension proposals and under NPPF rules ‘exceptional circumstances’ need to be advanced to justify Green Belt boundary changes. Further, most of the
new boundaries proposed have poor or nil defensibility. Therefore under NPPF rules there is not sufficient justification for the proposed enlargement of the Settlement Area.

In the Green Belt & Countryside Study and accompanying Topic Paper, GBC attempts to justify its rationale for making changes in settlement boundaries in order to meet unfulfilled housing need in the Borough. Green Belt rules, however, are clear that unfulfilled housing need is not “an exceptional circumstance”.

The NPPF is clear that all changes to or movement of settlement boundaries must be justified by ‘exceptional circumstances’. GBC have offered only a generic justification in their Topic Paper of meeting unfulfilled housing need. No case by case justification has been provided. Thus WHPC believes strongly the settlement boundary changes referred to above (plus many others) are invalid without individual detailed justification.

**Paragraph 4.3.17: Proposal to remove Wisley Airfield from the Green Belt**

WHPC OBJECTS to the proposal to remove Wisley Airfield from the Green Belt. The only justification for this proposed change is unfulfilled housing need which is not considered an exceptional circumstance. Without wishing to extend this letter, WHPC unequivocally supports the views of East Horsley Parish Council re Wisley Airfield, set down in their letter of 4th July 2016 to Planning Policy GBC (copy attached).

**POLICY P2: Limited In-filling**

Response: WHPC Objects to this Policy

A new planning designation has been introduced called ‘the identified boundary of the village’.

Though not applying to West Horsley, nevertheless WHPC finds it difficult to reconcile Policy P2’s opening statement that “We will continue to protect the Metropolitan Green Belt” with any further reduction in effective Green Belt status. Where this policy is proposed to be applied (e.g. East Horsley south of A246) it represents a de facto extension of the Settlement Boundary and a substantial reduction in the operational effectiveness of the Green Belt.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents: [WHPC Draft Local Plan response July 2016.pdf](WHPC Draft Local Plan response July 2016.pdf) (2.2 MB)

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**Comment ID:** PSLPP16/17430  **Respondent:** 8563201 / West Horsley Parish Council (Sam Pinder)  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

**P3 - Countryside**

Report page: 14

WHPC view: No objections

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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POLICY P4: Flooding Risk

WHPC supports this policy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents: WHPC Draft Local Plan response July 2016.pdf (2.2 MB)

Comment ID: PSLPP16/17432  Respondent: 8563201 / West Horsley Parish Council (Sam Pinder)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

P5 – Thames Basin Heath Special Protection Areas

Report page: 14

WHPC view: Supports

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17468  Respondent: 8563201 / West Horsley Parish Council (Sam Pinder)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY P5: Thames Basin Heath Special Protection Areas

WHPC supports this policy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents: WHPC Draft Local Plan response July 2016.pdf (2.2 MB)

Comment ID: PSLPP16/17421  Respondent: 8563201 / West Horsley Parish Council (Sam Pinder)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1
**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

Answer (if comment is on questions 1-7 of the questionnaire): ()

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**S1 – Presumption in favour of sustainable development**

Report Page: 6

**WHPC view:** Objects Strongly

**In brief:** The Policy wording is flagrantly open, unenforceable and ignores the requirements of NPPF paras 7, 8, 10 and 17 in particular.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/17449  **Respondent:** 8563201 / West Horsley Parish Council (Sam Pinder)  **Agent:**

| Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1 |
| Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( ) |
| Answer (if comment is on questions 1-7 of the questionnaire): () |

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**Policy S1: Presumption in favour of sustainable development**

**Response:** WHPC Objects to this policy

**Key reasons:**

1. The presence and strategic importance of the Metropolitan Green Belt forming 89% of the Borough area, is not mentioned, though WHPC considers that this is the single most important sustainable development issue that Guildford faces in preventing urban sprawl from surrounding towns in Surrey and from Greater London. Protecting Green Belt is mentioned as one of the 12 Core Planning Principles (refer NPPF 17)
2. Policy S1 states “When considering development proposals we will take a positive approach that reflects the presumption in favour of sustainable development contained in the National Planning Policy Framework. We will work pro-actively with applicants jointly to find solutions that mean that proposals can be approved wherever possible, and to secure development that improves the economic, social and environmental conditions in the area”.

Planning applications that accord with the policies in this Local Plan (and, where relevant, with policies in adopted neighbourhood plans) will be approved without delay, unless material considerations indicate otherwise.

The policy wording is non-compliant with NPPF 10 which states that "plans and decisions need to take local circumstances into account so that they respond to the different opportunities for achieving sustainable development in different areas". Further it does not fit with NPPF 14 which notes that specific policies within the
framework may require development to be restricted, and in this context, decision taking should not imply development proposals should be approved in all circumstances.

3. Non-compliance with NPPF 17 which sets out 12 core planning principles to underpin both plan-making and decision-taking. The wording of Policy S1 disregards a number of the 12 principles. All of these principles have equal weight and importance and the Proposed Submission Draft Local Plan 2016 must reflect such in its wording.

4. The Policy wording is flagrantly open and unenforceable where the last paragraph states, “Where there are no policies relevant to the application or they are out of date at the time of making the decision then the Council will grant permission unless material considerations indicate otherwise.” In addition the presumption in favour of all applications, as stated in this policy, totally overlooks the NPPF requirement for constraints which should be agreed and implemented as part of the Local Plan process. Most, if not all, development in the AONB should be severely restricted, and the Metropolitan Green Belt must remain a substantial constraint to development.

5. NPPF 7 states that there are three dimensions to sustainable development (i) an economic role (ii) a social role and (iii) an environmental role and at NPPF 8, “These roles should not be undertaken in isolation, because they are mutually dependent.” The Monitoring Indicators section to Policies S1 and S2 does not acknowledge that all three dimensions to sustainable development need to be applied to have a correct and acceptable monitoring procedure.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents: WHPC Draft Local Plan response July 2016.pdf (2.2 MB)
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

**Policy S2: Borough Wide Strategy**

Response: WHPC Objects to the borough housing targets set out in Policy S2.

The policy sets out an objective of adding 13,860 new homes to Guildford Borough over the 2013-2033 period of the Proposed Submission Local Plan, equating to an annual build of 693 new homes per annum (NOTE: the tabulated Annual Housing Target list in the Policy totals only 10,495 homes).

WHPC has serious concerns about the enormous scale of this building programme, which represents a net increase of 25% in the housing stock of Guildford Borough, a remarkable rate of increase for a borough in the English Home Counties. The growth rate differs substantially from that projected by the Office of National Statistics (ONS) which projects a population increase of some 15% for Guildford Borough over the same period.

WHPC has analysed the Land Availability Assessment (LAA) February 2016, and has identified a disproportionate bias in the location of homes proposed for Guildford's Green Belt villages. The results of the analysis are summarised in the histogram and pie charts below. The data for these charts is drawn from all the development sites detailed in the LAA and/or the Sites table in the Draft Local Plan.

The histogram shows the grossly disproportionate 35% growth proposed for West Horsley, compared to other parts of the Borough.

The two Pie Charts show by location the number of homes that will be built in the first 5 years of the Plan period and then over the full fifteen year period. The number of dwellings proposed for development on Green Belt land at 8,202 is extremely high (65% of the total no of homes set out on DLP pages 123 to 126), with 45% of these proposed dwellings to be built east of Guildford.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents: WHPC Draft Local Plan response July 2016.pdf (2.2 MB)

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<table>
<thead>
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<tr>
<td>2016</td>
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<tr>
<td>2017</td>
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</tr>
</tbody>
</table>

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Comment ID: pslp171/2356   Respondent: 8563201 / West Horsley Parish Council (Sam Pinder)   Agent:
D4 – Development in urban areas and inset villages

Objects If the term ‘inset villages’ is deleted from the Policy, it would be supported.

Supports Policy retitled ‘Character and Design of new Development’ and the whole Policy rewritten. The term ‘Inset villages’ does not now appear.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: pslp171/2346</th>
<th>Respondent: 8563201 / West Horsley Parish Council (Sam Pinder)</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy E1</td>
<td></td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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</thead>
<tbody>
<tr>
<td>E1 – Meeting employment needs</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Supports Neutral</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Proposed new office and industrial land area are located on western side of Borough, remote from West Horsley East Horsley Parish Council comments re Effingham Junction station noted</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Supports Contrary to national trends, too much potential development land within the town centre is being allocated for retail or commercial development rather than housing. High added value businesses are welcome in the borough, but much of the employment land is designated for retail or low added value employment floorspace, which only exacerbates the current issue of lack of low cost housing.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Attached documents:

Comment ID: pslp171/2349  Respondent: 8563201 / West Horsley Parish Council (Sam Pinder)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy E5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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<th>2017 WHPC comment in brief</th>
</tr>
</thead>
<tbody>
<tr>
<td>E5 – Rural Economy</td>
<td>Supports</td>
<td>Cumulative effects of rural economic development need to be monitored / controlled to ensure no harm to openness of Green Belt</td>
<td>Supports in principle</td>
<td>Strong controls on new development in any rural area of the Borough. The recently published (without any Consultation with Parishes) Rural Economy Strategy suggests that new enterprise requiring new facilities will be waved through without consideration any possible harm that may result.</td>
</tr>
</tbody>
</table>

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/2337  Respondent: 8563201 / West Horsley Parish Council (Sam Pinder)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
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</tr>
</thead>
<tbody>
<tr>
<td>H1 – Homes for All</td>
<td>Supports Achievability is queried</td>
<td>SUPPORTS Policy wording extensively reworded</td>
<td>Achievability still queried. The paragraphs on Density in Policy H1 have been deleted. To ensure developments make optimal use of space a policy to cover minimum and maximum densities is required</td>
<td></td>
</tr>
</tbody>
</table>

### What changes (2016)/further amendments (2017) do you suggest should be made to the document?

### Attached documents:

**Comment ID:** pslp171/2357  **Respondent:** 8563201 / West Horsley Parish Council (Sam Pinder)  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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</table>
| I1 – Infrastructure and delivery | Objects strongly | No detailed Infrastructure proposals for the Horsleys are presented, even in response to Thames Waters statement that their current facilities would not have the capacity to cope | Objects | Policy now ID1

Though requirements in the policy statement have been extended and will give, it is thought, better control, WHPC still does not see any detailed infrastructure proposals for the West Horsley housing developments planned to be built by 2024. No approach has been made to WHPC to discuss / identify what will be required.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

**Comment ID:** pslp171/2359  **Respondent:** 8563201 / West Horsley Parish Council (Sam Pinder)  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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<tbody>
<tr>
<td>13 – Sustainable transport for new developments</td>
<td>Neutral</td>
<td>Practicality and enforceability is questioned. Policy wording is weak, e.g. <em>We will expect ...</em> should be replaced by <em>We will require...</em></td>
<td>Support in principle</td>
<td>Now Policy ID3</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td>Policy extensively rewritten and strengthened. The key will be to get formal commitment before planning approval from the developer, housebuilding company or applicant to all that is considered necessary by the parish where the Site is and GBC as Planning Authority</td>
</tr>
</tbody>
</table>

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** pslp171/2340  **Respondent:** 8563201 / West Horsley Parish Council (Sam Pinder)  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy P1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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</tr>
</thead>
<tbody>
<tr>
<td>P1 – Surrey Hills Area of Outstanding Natural Beauty (AONB) and Area of Great Landscape Value</td>
<td>Supports</td>
<td>Protecting this area should be given the highest priority</td>
<td>Objects to the weakening of the policy controls</td>
<td>Policy statement extensively reworded. and as a result, is weaker in its protection of the Surrey Hills AONB and AGLV land. Previously all proposals were considered against the 5 key tests – now development in the AONB seems to be more acceptable. This is weaker, not stronger, and is contrary to the weight of protection given to AONB in the NPPF</td>
</tr>
</tbody>
</table>

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** pslp171/2341  **Respondent:** 8563201 / West Horsley Parish Council (Sam Pinder)  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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<tbody>
<tr>
<td>P2 – Green Belt</td>
<td>Objects strongly</td>
<td>WHPC fully supports GBC’s policy statement of protecting the Green Belt from inappropriate development but objects to GBC proposals to build 65% of the proposed new dwellings on Green Belt land.</td>
<td>Objects strongly. Opening statement in Policy at (1) is supported</td>
<td>Exceptional circumstances must be demonstrated to develop in the Greenbelt, yet despite the weight of public and parish council opinion against weakening of this policy, Over 70% of new housing development will be in the countryside, of which, 65% is proposed in Greenbelt. By definition, this is not an exception and no attempt is made to demonstrate exceptional circumstances, in line with the requirements of the NPPF. The <strong>insetting of villages and extension of current Settlement Area boundaries is opposed</strong></td>
</tr>
</tbody>
</table>
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** pslp171/2342  **Respondent:** 8563201 / West Horsley Parish Council (Sam Pinder)  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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<tbody>
<tr>
<td>P2 – Limited in-filling</td>
<td>Objects</td>
<td>New planning designation introduced titled ‘the identified boundary of the village’. Does not fit with Policy P2 for preventing inappropriate development</td>
<td>Objects</td>
<td>Limited infilling policy within extended Settlement Boundaries will be opposed</td>
</tr>
</tbody>
</table>

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** pslp171/2335  **Respondent:** 8563201 / West Horsley Parish Council (Sam Pinder)  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
1. Introduction

The Parish Council OBJECTS to the Proposed Submission Draft Local Plan: strategies and sites June 2017

West Horsley Parish Council (WHPC) has reviewed the Proposed Submission Draft Local Plan: strategies and sites, published by Guildford Borough Council (GBC) for a 6 week public consultation to 24th July.

The Parish Council’s primary objections are to

(i) proposals for new Green Belt boundaries within the existing area of Metropolitan Green Belt and the ‘insetting’ of several villages from the Green Belt, including West Horsley and East Horsley.

(ii) the use of an unconstrained OAN figure of 654 homes per annum throughout the Plan Period.

(ii) the unsustainable characteristics of proposed development sites A37, A38, A39, A40.

The Proposed Submission Local Plan 2017 pack of consultation documents contains no proposals for provision of infrastructure for the proposed development Sites in West and East Horsley

(iv) the unsoundness of the Local Plan in many of its proposed policies and the flawed evidence base upon which policies are being promoted.

WHPC requires that the objections and comments contained in both this and our 17th July 2016 Submission are submitted to the Planning Inspector appointed by the Secretary of State to review the Guildford Borough Submission Draft Local Plan: strategies and sites following this Regulation 19 Consultation. The Parish Council will appoint and retain a representative or representatives to speak on its behalf at the Examination in Public of the Submission Local Plan.

The Parish Council also reserves its right to join with other parish councils to put forward their objections and case against many aspects of the Submission Local Plan at the Examination in Public when held by the Planning Inspector.

This submission focuses on changes made to the Regulation 19 Proposed Submission Draft Local Plan 2016. In the case of Sites A37-40, changes are minimal, thus ignoring the high volume of serious objections submitted by the majority of residents of the Horsleys to those Site proposals. The Removal of Site A41 from the Plan is welcomed.

The Proposed Submission Draft Plan Policies put greater emphasis on the need for adequate facilities and infrastructure to underpin development. However, this is not reflected in any new wording or proposals for the Horsley sites, thus leaving local objections unaddressed. This failure to address objective responses by residents and the Parish Council, curtails the plan’s usefulness as a sensible and respected planning tool at a site level and further adds to its lack of credibility with residents. The Plan fails to mention most of the known sustainability issues and infrastructure constraints affecting the Horsley sites, including public transport, traffic, road safety, shops, parking, schooling, medical facilities, sewage and flooding/surface drainage.

Section 2 sets out the Parish Council’s comments on and objections to the revisions to proposed Plan Policies. These are set down in tabular form alongside WHPC’s 2016 Consultation comments.

Section 3 focuses on the widespread criticism and concern expressed, not just by many West Horsley residents, but by the thousands of objectors to the proposed Local Plan at every Consultation since 2013. The dominant theme of objections since 2013 remains one of too many homes being proposed for building in the Green Belt.

The number of new homes has been promoted by the West Surrey SHMA and Objectively Assessed Number (OAN) prepared under a contract awarded by Guildford Borough Council to G L Hearn. GBC’s refusal, in response to many requests (Foi and other) to release details of the methodology and assumptions used by G L Hearn, on alleged commercial confidentiality grounds has been blatantly obstructive, falling far short of the requirements of NPPF Plan Making paras 155 and 157 in particular.

Along with a number of other parish councils, WHPC decided in 2016 to contribute financial assistance to Guildford Residents Association (GRA) to enable the appointment of Neil McDonald to undertake a critical review of the West
Surrey SHMA and the OAN recommended by G L Hearn. Neil McDonald’s 2016 Review Report which uncovered errors in GL Hearn’s work, has been followed in May-June 2017 by a further Review of Hearn’s 2017 Addendum to the West Surrey SHMA.

McDonald’s Review of this Addendum to the West Surrey SHMA has revealed serious issues with Hearn’s data interpretation, resulting in an OAN that is too high. **MOST SIGNIFICANTLY the Office for National Statistics endorses Neil McDonald’s findings.**

Neil McDonald’s Review of the Addendum to the West Surrey SHMA is reproduced in entirety (with GRA permission) in Section 3.

[see attached document]

2. Parish Council comments on Sites, Amended Policies and Strategies

a) West Horsley Sites A37, A38, A40 and A41 and East Horsley Site A39

**Lack of infrastructure / poor sustainability**

WHPC and its appointed Planning Consultant put forward their reasoning in the Parish Council’s Submission Report on the 2016 Consultation, that the selection of these Sites in Green Belt locations without ‘exceptional circumstances’ having been proven, fails to satisfy the requirements of NPPF chapter 9.

Further, the sustainability of all the Sites was seriously questioned and found wanting, particularly in terms of the distance of each from Horsley station, shops, schools, medical centre, library and other services. The absence of a regular daily bus service through those parts of West Horsley that contain the Sites, was identified as a further factor that will generate considerable car use by residents of the proposed new homes on Sites A38, A39 and A40.

Referring to Table C of the AECOM Sustainability Appraisal SA Report Update June 2017, the Parish Council takes issue with a number of the Site Appraisal performance criteria, e.g. the distance from a Site to a Railway Station being measured on a straight-line basis. This is a nonsense for Sites A38 and A40, i.e. unless crows are going to buy / reside in the dwellings and fly to the station!

For Site A38 the distance to a Secondary School is categorised ‘Orange’ (less than 2km) yet A38 is further from a secondary school than Sites A39 and A40, both of which are categorised ‘red’(more than 2km),

The Land Availability Assessment 2016 review of each of Sites A38, A39 and A40 includes the following statement (or similar) on Utilities:

**Utilities**

In response to the consultation on the draft Local Plan (2014), Thames Water advised that current wastewater network in this area is unlikely to be able to support the demand anticipated from this development. Drainage infrastructure is likely to be required to ensure sufficient capacity is brought forward ahead of the development. In the first instance, a drainage strategy would be required from the developer to determine the exact impact on the infrastructure and the significance of the infrastructure to support the development. Thames Water will work the planned housing into their investment programme only once a site has planning permission.

Wastewater treatment provision will therefore be a delivery restraint for the proposed dwellings on this Site. WHPC met with Thames Water in May 2017 who confirmed that there were capacity issues at Ripley Sewage Treatment Works.

As a further and timely reminder of the lack of facilities in West Horsley (North and South), Appendix XII Greenbelt & Countryside Study Settlement Hierarchy is reproduced on the next page as a Summary Table with **the Settlements shown in ranking order**, rather than as the somewhat confusing alphabetical listing in the original Evidence document. Villages proposed for insetting from the Green Belt are highlighted in light red. West Horsley is ranked well down at 17th but regardless of that position was targeted (note: not selected) to receive more new dwellings than any other village, before the sustainability of each site and the cumulative impact on East and West Horsley had been properly, if ever, considered.

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Though two sites have been dropped from West Horsley since the initial Local Plan Consultations were started in 2013, the Parish Council, along with many of the village’s residents, has a strong belief that a proper evaluation of sustainability has been fudged, simply to allow the remaining West Horsley Sites into the Submission Local Plan in a desperate attempt to producing a Plan that is able to deliver a sufficient number of homes in the first 5 years, i.e. 2019 to 2024.

Local Plan first 5 years Housing Supply - comment

With the very obvious lack of infrastructure in West Horsley, recognised by the Parish Council and residents but seemingly not or simply ignored by GBC’s Local Plan Team, the deliverability of all 255 homes planned for Sites A38 and A40, as stated in 2017 LAA Addendum by 2024 in the Plan Period’s first 5 years is seriously questioned. Why? The housebuilders who hold the option on both Sites will adopt a steady building development programme which involves the release of new homes in Phases that match the house build rate to what the market can take, without depressing the prices of the various house types that will be offered. The new homes will not be cheap and that includes so-called affordable units which will be priced at 80% of the local market average. West Horsley Parish Council will be surprised if each site releases more than 15 units per annum for sale. Thus an 8 -9 years long building programme is highly likely, if realistic housebuilding market criteria are applied to Sites A38 and A40.

Access to and beneficial use of the Green Belt, NPPF para 81

Collectively, the three sites in West Horsley North fail to meet NPPF paragraph 81’s encouragement of providing access to and beneficial use of the Green Belt and its amenity and recreation value. This has been an outstanding success story in the Horsleys. Assets, to name just a few, include a dense public footpath network visited and used by many walkers from Greater London, parish parks, sports fields, a caravanning & campsite of international standard, Britain’s newest rural opera theatre ‘Theatre in the Woods’ and the now, since the Local Plan process commenced, popular Olympics cycle route. These examples of positive planning stem from a Local Plan that protects the Green Belt, maintains its openness and beauty and avoids urbanisation and traffic congestion. Sites A38 to 40 are aggressively hostile to openness and the character of the area, with a density of new housing that is completely inappropriate, being greater than anywhere in the locality at present.

Proposed housing delivery trajectory 2019 to 2034 - illustrated

The housing delivery figures set out in LAA Addendum 2017 (page 8) have been plotted as two pie-charts, shown on the next page, the key purpose of which is to illustrate very openly the very large percentage of housing proposed for Sites in the Green Belt. No exceptional circumstances or reasoned justification is put forward by Guildford Borough on a Site by Site basis.

A Histogram follows the pie-charts illustrating the housing figures from the 2016 and 2017 Consultation Local Plans for (i) the Guildford town and urban Area (ii) Ash & Tongham (iii) the Eastern Rural area and (iv) the western rural area. The histogram illustrates how the Rural Areas are disproportionately targeted for new homes, all of which are proposed on Green Belt Sites without any justification being put forward.

Land Availability Assessment Addendum 2017 - Corrections

i) Site A37 and its entry in the LAA Addendum 2017 is incorrect. The Bell & Colvill planning approval is for 9 homes, not 6 as listed.

ii) It is not understood how in the Housing Trajectory – Sites with provision and phasing table on page 8, on the 3rd line Outstanding capacity (Commenced) figures are filled in for the years for years 11 to 15 of the Plan Period.

[see table on attached document]

East Horsley District and Local Centres – Station Parade and Bishopsmead

Station Parade and Bishopsmead are explicitly identified as being suitable for “main town centre uses” which include amongst other uses “cinemas, drive-through restaurants, night clubs, casinos and bingo halls”. Clearly such uses are unsuitable and must be excluded from the proposed Local Plan by statements in Policies E8 and E9
b) Amended Plan Policies and Strategies

WHPC has chosen to tabulate its position on the 2017 Consultation alongside what it stated in its Executive Summary in the 2016 Submission Report -

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<tr>
<td>S1 – Presumption in favour of sustainable development</td>
<td>Objects strongly</td>
<td>Policy wording is flagrantly open, unenforceable and ignores the requirements of NPPF paras 7, 8, 10 and 17 in particular.</td>
<td>OBJECTS</td>
<td>2016 comment remains</td>
</tr>
<tr>
<td>S2 – <strong>Borough Wide Strategy</strong> Planning for the Borough – Spatial development strategy</td>
<td>Objects strongly</td>
<td>WHPC objects to the borough housing targets of 25% increase in houses (against an ONS growth projection of 15%). Proposals is a 35% increase in village housing stock</td>
<td>OBJECTS</td>
<td>Policy redrafted and drop in housing provision to 12,426 homes for Plan Period 2015-2034. The housing target proposed, of 12,466 is based on assumptions that have not been made public and includes flaws that have not been corrected in the modified SHMA (verified by professional analyst Neil MacDonald of NMSS who concluded that an annual housing figure of 400 per year would meet Guildford's overall need). The phased approach (more homes built towards the end of the plan period) is appropriate in order to permit necessary infrastructure</td>
</tr>
</tbody>
</table>
All the West Horsley Sites are unsustainable, as demonstrated in the Planning Assessment Report (Appendix 2) when evaluated against NPPF Policies.

Objects strongly 2016 comments still apply

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:  WHPC Consultation Submission Final July 2017.pdf (2.2 MB)

Comment ID: PSLPA16/4191  Respondent: 8563233 / Shere Parish Council (Joy Millett)  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Gomshall

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The term ‘Identified Boundary of the Village’ is misleading, as it fails to clarify the significance for infill development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/4192  Respondent: 8563233 / Shere Parish Council (Joy Millett)  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Holmbury St Mary

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The term ‘Identified Boundary of the Village’ is misleading, as it fails to clarify the significance for infill development.

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Comment ID: PSLPA16/4193  Respondent: 8563233 / Shere Parish Council (Joy Millett)  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Peaslake
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The term ‘Identified Boundary of the Village’ is misleading, as it fails to clarify the significance for infill development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/4189  Respondent: 8563233 / Shere Parish Council (Joy Millett)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Shere

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

General Comment – the term ‘Identified Boundary of the Village’ is misleading, as it fails to clarify the significance for infill development.

We note that the National Planning Policy Framework (NPPF) states:

“89. A local planning authority should regard the construction of new buildings as inappropriate in Green Belt. Exceptions to this are:

...... limited infilling in villages, ....”

We consider that the NPPF is referring only to villages where development could take place that can be described as infilling, and thus the existing level of development must be of relatively high density. We also consider that any local policies must stay within the limitations of the NPPF by only allowing new development in Green Belt villages (under this provision) that is limited infilling. Local policies cannot, under this provision in the NPPF, designate areas that are not inherently appropriate for infilling.

We consider that the boundaries drawn up for this local policy in the Draft Local plan include areas that are not appropriate for limited infilling, and that the designation of them as within a village settlement will open them up for development pressure beyond that which can reasonably be seen as limited infilling.

We consider that in designating land as being within villages when that land is not inherently appropriate for infilling, the Local Plan is going beyond that which is allowed by the NPPF and is therefore unsound.

We also feel that in defining the designated areas with the term “Identified Boundary for Village” the Local Plan is misleading as it appears simply to describe the limits of the villages whereas the requirement for designation is for those parts of the village that are inherently appropriate for infill development.

We also note that the National Planning Policy Framework (NPPF) states:
“89. A local planning authority should regard the construction of new buildings as inappropriate in Green Belt. Exceptions to this are:

….. and limited affordable housing for local community needs under policies set out in the Local Plan; ....”

We consider that affordable housing that has been built under the NPPF and its predecessors on rural exception sites should not be considered as appropriate for infilling and thus not included within the “Identified Boundary for Village”. This inclusion also seems contrary to the intent of the NPPF and, as it risks generating distrust of the process of creating affordable housing, undermines the effective working of the NPPF. In this respect the Local Plan is again unsound.

In the light of this we have enumerated all the changes in boundaries compared to the Settlement Areas in the 2003 Local Plan and indicated which are inappropriate in terms of our objections defined above. Please see attached comments on specific proposed changes to the Settlement Areas within Shere Parish’s wards.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
- Proposed changes to the Settlement Areas with comments (2).docx (28 KB)
- SPC response prop sub LP strat sites 16 (2).docx (28 KB)
SITE ALLOCATION A39. In terms of centrality to East Horsley's shops, medical centre and railway station this is a prime EH site for development. Indeed it is - or could be made - so central that arguably it would be an ideal site for the new primary school that the Horsleys will need if housing is developed on the scale proposed. In that case the Raleigh would be completely inadequate in scale and on far too small a site. The site behind Ockham Road North could be used to build a new much larger primary school right next to the Raleigh's existing grossly under used Playing Field. The over crowded old Raleigh School site could be used for housing.

Any development on this site, whether housing or school, will have to solve the flooding problem. Much of the site is in the flood plain, There is already regular flooding of the western ends of the gardens on Ockham Road North that abut this site and regular severe flooding of Ockham Road North itself near the railway bridge. According to Surrey Councillor John Furrey (Cabinet Member for Highways and Flooding) the problem is that "drainage networks have never been mapped" and "the system is old and owned by many different agencies". These problems will need to be solved before either a large estate or a school can be built on this site.

One other site problem is the poor sight lines for traffic attempting to leave this field and join Ockham Road North. The local Speed Watch regularly records vehicles traveling north under the railway bridge at speeds in excess of 50 miles an hour. As the one footpath on this part of ORN runs alongside the new site and is much used by children going to the Raleigh and Glenesk schools there will also need to be controls on the traffic coming out of site A39.

As implied by the number of houses proposed (100) this could be a good location for housing aimed at elderly people and those only able to afford "low cost housing". A development like "Frenchlands Hatch" (on Ockham Road South) would be particularly appropriate.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/5660  Respondent: 8563489 / Mr Christopher J Norman  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Allocation A35 - for the phased development of a new settlement of up to 2100 dwellings

We object to the draft Local Plan for the following key reasons:

1. I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.

2. We object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt. This land has been farmed for many years and is good quality farmland.

3. We object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans.
4. We object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC). The local infrastructure simply cannot support additional traffic and required facilities.

5. We object to the threat the Local Plan poses to the historic rural village of Ockham and the blight on properties there. The plan calls for a village of 159 residences (with narrow lanes, no streetlights, very few pavements and many listed houses) to be subsumed into a 2,000+ dwelling development, with urban-style buildings up to five storeys high and a population density higher than most London boroughs.

6. We object to the detrimental impact on transport, local roads and road safety, and specifically object to:
   a. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars
   b. The increased volume of car traffic. A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads
   c. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements
   d. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them)
   e. The increase in the already severe congestion on the Strategic Road Network of the A3 and M25. A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest
   f. The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity. There is no parking elsewhere near the stations

7. We object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).

8. We object to the fact that air quality concerns have not been taken seriously – air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.

9. We object to the fact that the proposed plan does not meet the needs and desires of local communities, as evidenced through the Ockham Parish Plan. The top two responses as to why local residents enjoy life in Ockham are (1) access to the countryside and clean air and (2) the peace and quiet afforded by wide open spaces. Over 90% wish to see both the historic features of the village maintained and the village’s green spaces, including the FWA/TFM, protected.

10. We object to the continued inclusion of a site (the former Wisley Airfield, now known as Three Farm Meadows) – where the planning application has already been unanimously rejected by GBC’s Planning Committee.

After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd’s (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter. Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.
I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp172/1576  Respondent: 8563713 / P-Fava.Consulting (Mr Peter Fava)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A58

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to Policy A58 at Burnt Common because the impact on the small surrounding roads will add to already overstretched roads in the area. There have been no appreciable improvements to the local infrastructure in the last forty years. Roads are gridlocked every time there is a problem at the M25 Junction 10. In one recent week that was on three days. This is damaging businesses locally.

Send Road is at maximum capacity every rush hour. The road through West Clandon cannot take two lorries passing each other without one having to mount the pavement. The narrowest part of The Street is close to a junior school. There is no chance of widening these roads without having to purchase local private property.

The 2017 Employment Land Need Assessment shows a reduction in demand to 3.9 hectares for industrial land for the whole borough, not a huge over allocation of 10 hectares in the Green Belt in Send.

It is quite clear that the whole basis of your plan for the Send area is politically motivated as neither of our councilors are Conservatives. This is totally unacceptable and has been noted by the electorate locally.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp171/411  Respondent: 8563713 / P-Fava.Consulting (Mr Peter Fava)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to the proposal to inset Send Business Park from Green Belt because it is effectively an old non-conforming user in an area of outstanding countryside adjacent to the National Trust’s Wey Navigation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/7455  Respondent: 8563777 / Michael Brown  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The infrastructure is already overloaded, local schools are full and the waiting times to see a doctor getting longer.

The impact on the parking at the local shops is going to be no one will be able to park with an extra 1000 plus cars on the local roads.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/18656  Respondent: 8563777 / Michael Brown  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The roads are looking like a third world country as it is, potholes everywhere

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/7456  Respondent: 8563777 / Michael Brown  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4
The drainage is very poor around the East and West Horsley area, the area frequently floods.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/5040  Respondent: 8564001 / Judith Cowan  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/1451  Respondent: 8564961 / Mr Daniel Palmer  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
1. Removal from Green Belt of homes in Guildford Road, Northern end of Glaziers Lane, Flexford, Walden Cottages & Palm House Nurseries traveller site

I object to this as placing these homes outside of the Green Belt could enable development within these areas at much higher density and will give greater success for planning applications.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/3398  Respondent: 8565089 / D Tucknott  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A22

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I am writing to object to the proposed redevelopment plans north of Keens Lane for 140 new houses and the additional 14,000 new homes in and around Guildford.

1. The proposed area north of Keens Lane is Green Belt and should not be built on in accordance with Surrey County Councils guide lines.
2. Exits to Keens Lane are via Worplesdon Road or Aldershot Road currently with both junctions at a stand still during the rush hour.
3. Keens lane is not wide enough to carry additional traffic and cannot be widened because of Chittys Common at one end and existing housing the other end.
4. Additional housing and traffic etc would have detrimental effect on the wildlife and tranquillity of Chittys Common.

I believe that it is the Councils plan to build 14,00 new homes in and around Guildford. The CURRENT infrastructure is insufficient to handle the existing level of housing yet alone more houses.

The existing road system cannot cope with the current level of daily traffic in and around Guildford with so many “A” roads converging on the already inadequate Guildford Town centre one-way system It would take a new major ring road to overcome this problem. What plans are in place to support the additional traffic that any development will bring?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/7491  Respondent: 8565089 / D Tucknott  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I do not see any proposed plans to improve the infrastructure.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/136  Respondent: 8565153 / Mr David Gianotti  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

- I object to the lack of immediate provision for new schools; and
- I object to the lack of immediate provision for doctors surgeries.

Please see sense and stop this now!

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/135  Respondent: 8565153 / Mr David Gianotti  Agent:
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<td>- I object to site A43 Garlicks Arch;</td>
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<td>- I object to any &quot;in-setting&quot; of any villages from the green belt;</td>
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I am disgusted that such a proposal should be put forward when the existing local infrastructure (i.e. roads, water supply, doctors, schools and hospitals) is already struggling to cope.

When I moved to Ripley some 17 years ago I came because I wanted to live in a pretty, green and quite environment, please tell me who I should look in the eye an ask why would you want to take this away and destroy our "green and pleasant land"?......

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

- I object to all erosion of the green belt;

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
- I object to the disproportionate amount of development in our area of the Borough;
- I object to the last minute inclusion of new sites;

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/177  Respondent: 8565153 / Mr David Gianotti  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

So specifically:
- I object to a document that is over 1800 pages long and not user friendly;

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/2695  Respondent: 8565185 / Mr Dave Robins  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT TO the late inclusion of site A43 Garlicks Arch. This has been slipped in at the very last moment without proper consultation. The added 400 houses will cause overcrowding of our schools and doctors surgery. Our Villages Medical Centre is already over subscribed and difficult to get doctors appointments. Another 800 minimum people would completely swamp this facility. The 7000 sq mtrs of industrial area would also increase the amount of Commercial Vehicles in the area using the local roads. We hardly need industrial buildings, as past developments have stood empty for years.

I OBJECT TO site A43A the on and off ramp at Clandon/Burnt Common. This will cause complete chaos in the area, as all roads leading to the junction are country roads leading from Clandon, Ripley and Send. At present it only takes an incident at Wisley/Junction 10 of the M25 and our villages are swamped with traffic. This junction will make the whole situation worse as the local roads are so narrow and are unable to be widened to suit increased traffic flow. The Send Road only leads to similar narrow roads in Old Woking and Hoebridge areas, which are also unable to be widened.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** PSLPS16/2703  **Respondent:** 8565185 / Mr Dave Robins  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A45

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT TO site A45 The Talbot. This is overdevelopment in a conservation area. Overdevelopment in Ripley will completely spoil the feel of a village which will then be lost forever.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** PSLPS16/2702  **Respondent:** 8565185 / Mr Dave Robins  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A57

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT TO site A57 The Paddocks – 4 Traveller Pitches. [Response has been redacted due to statements being considered defamatory, derogatory, inflammatory or offensive in nature]

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** PSLPP16/5991  **Respondent:** 8565185 / Mr Dave Robins  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy ID2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
The proposed widening of the M25 will only increase the amount of vehicles being drawn to junction 10 on the A3. The proposed building developments will only worsen the current situation.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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I OBJECT TO all erosion of the Green Belt. Once we use this for building it will be lost forever. There are plenty of Brown Field sites to be built on first before using the Green Belt. The Green Belt is a buffer between Woking and Guildford.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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I OBJECT TO any “in-setting” (i.e. removal) of any villages from the GREEN BELT.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT TO the Local Plan as the development proposed is not sustainable

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5988  Respondent: 8565185 / Mr Dave Robins  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT TO the disproportionate amount of development on the A3 between Burpham and the M25 at Wisley. With 2000 houses at Wisley Airfield, 2200 homes at Gosden Hill Farm and 400 houses at Garlick’s Farm Send. This will make an urban sprawl in this part of Surrey and will completely change the environment for all the residents and who live here as well as increased air pollution from all the additional vehicles. There is a lack of evidence for the alleged housing need numbers.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/967  Respondent: 8565185 / Mr Dave Robins  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 2: Legal compliance

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to the last minute inclusion of new sites in the Local Plan with not enough time for a proper consultation period.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Evidence on infrastructure

The draft Local Plan seems to have again been assembled with insufficient proposals or research on the infrastructure needed to accompany proposals for housing development. There must be proper infrastructure planning for transport, educational, medical, energy, water and communications services before additional housing is contemplated. It does not seem to be understood that, for instance, bus transport is wanting and there are few facilities in the borough for any transport to rural parts except by car. There is no guarantee that the A3 will be improved in the way suggested.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Evidence on infrastructure

The draft Local Plan seems to have again been assembled with insufficient proposals or research on the infrastructure needed to accompany proposals for housing development. There must be proper infrastructure planning for transport, educational, medical, energy, water and communications services before additional housing is contemplated. It does not seem to be understood that, for instance, bus transport is wanting and there are few facilities in the borough for any transport to rural parts except by car. There is no guarantee that the A3 will be improved in the way suggested.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Housing Target

Setting a housing target for Guildford Borough is a vital function for the Local Plan. The Trust is reluctant to get involved in the method of reaching a figure for an adjoining borough but, given what is at stake locally, considers that it has an obligation to comment and object to the figure put forward.

Paragraph 158 of the NPPF 158 provides that "Each local planning authority should ensure that the Local Plan is based on adequate, up-to-date and relevant evidence". The starting point for that is a Strategic Housing Market Assessment (SHMA).
The SHMA does not take into account any of the constraints to development such as Green Belt, AONB, woodland, heathland, protection of flora and fauna etc. in determining an “Objectively Assessed Needs” (OAN) figure for the Local Plan. It is for the local authority to take these constraints into consideration and apply them to what is provided in the SHMA.

There has been nationwide concern, especially from local residents and community groups, even about the figures emerging from the SHMA process. In many instances the figures are considered to be inflated or otherwise inaccurate. Such inflation can occur in the hands of consultants who are inclined to favour developers. Guildford Borough Council have used G.L.Hearn as consultants and that company’s website shows that their work for developers could provide motive for bias. Local authorities can succumb to those in the planning industry acting on behalf of developers who advocate that the “presumption in favour of sustainable development” means that growth must be looked for across the board and in doing so have less regard to where there should be constraints. If local authorities overlook proper scrutiny it can also be because that development can generate income from Community Infrastructure Levy, taxes and bonuses.

For the purpose of a Local Plan it is necessary to have underlying data that is used to back up propositions. In the case of the West Surrey Housing Market Area (SHMA) for Guildford, Woking and Waverley, and prepared by G L Hearn, requests for that have met with resistance. Incredibly Guildford appear to have told the Information Commissioner that consultants have refused to give it the formulae and assumptions in the model because of ‘intellectual property’ in the model used. The Trust understands that in consequence neither the administrators nor councillors at Guildford Borough Council have had an opportunity of scrutinising vital basic information. This makes it all the more important that Inspectors test SHMAs and OANs against properly provided methodology.

The Trust understands that the process toward determining targets for future housing numbers starts with the Office for National Statistics (ONS) projection of the likely local population change for the borough due to natural change (births, deaths), net internal migration within the UK and finally net international migration.

The Trust understands that based on natural change and net internal migration recent ONS data projected that the borough population to 2031 would shrink and that it would increase only on projected net international migration based upon the abnormally high increase in the number of foreign students attending the University of Surrey (as was experienced in recent years). The ONS themselves state that this latter figure is less reliable and anyway stress that before its projections are turned into predictions their basic statistics should be reviewed in detail, with changes made based on whatever factors are deemed important in that review.

G L Hearn have assessed the housing need for Guildford at 693 dwellings per year, (13,860 overall) for the next 15 years (the result bring to add 25 per cent to the stock of dwellings in the borough with increased pressure on existing infrastructure. It is based predominantly on international migration, itself based on an increase in students. Even if desirable this is implausible particularly in a post-Referendum climate with further education being more expensive in the UK compared with other countries, evidence this week of students no longer wishing to study in the UK and a trend to distance learning. This issue should also be considered in the type of housing required. If based on any realistic forecast the University, with unused planning permissions for student accommodation on campus, should take responsibility to enable this factor to be removed from the equation for projected household numbers. This would free up affordable housing for local people, particularly the young. In any event, a separate detailed assessment should be made of the need for and type of student housing required.

This aspect of the SHMA reveals that the basis for it is severely flawed.

There is also a need in looking at housing targets to distinguish between need and demand. The latter could be limitless as in Guildford house prices and therefore demand are dictated and dominated by London house prices. The outward movement of population from metropolitan London is incapable of being satiated and was an important reason for the creation of the Green Belt.

In looking at the OAN there would appear to be insufficient evidence of the residences that Guildford town can accommodate (windfalls, reuse of empty housing, switch from office accommodation and use of student accommodation). A substantially lower number would remove the need to build on Green Belt or open countryside, and instantly meet the single biggest public objection to the plan as a whole.
Additional observations

The Trust makes the following general observations on the draft Local Plan.

Policy S1 should go in full through the principles for sustainable development in the NPPF in full including the 12 Core Planning Principles set out in paragraph 17.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPA16/4400  **Respondent:** 8565217 / Cobham Conservation and Heritage Trust (David Bellchamber)

**Agent:**

**Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North**

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Sites in East and West Horsley

There is considerable concern locally that Effingham, the Horsleys, Ripley, Wisley and the Ockham and Hatchford areas are protected from unwarranted development. But the changes to settlements that would have most effect on the Cobham area in terms of increased traffic and call for amenities, if the draft Local Plan were implemented, would be the Horsleys. Implementing proposals for Sites A36-41 would destroy the nature of the villages that make up the Horsleys. The new building suggested for these villages is excessive and disproportionate relative to the rest of the borough. It has to be asked why it is suggested that the Green Belt is sacrificed here where the protection of the Metropolitan Green Belt is highly relevant when on the other side of the borough in the Ash and Tongham areas the draft Local Plan looks to expand the Green Belt.

The reclassification of East Horsely to a Rural District Centre would allow less desirable uses such as factory outlets, warehouses, clubs etc. to be the subject of applications for planning permission. Development in these villages should not be other than from small windfall sites.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPS16/8060  **Respondent:** 8565217 / Cobham Conservation and Heritage Trust (David Bellchamber)

**Agent:**

**Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35**

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Objections to the Guildford Borough Council Draft Local Plan (June 2016) and in particular to inclusion in the plan of Site Allocation A35 - the former Wisley Airfield - for a new settlement with 2,000 dwellings,

The Trust writes to object to aspects of the draft Local Plan.

The Trust has approximately 1,100 members, some from within the Borough of Guildford including Ockham. Most of that membership that resides in the Cobham area uses the resources of the Borough of Guildford, including the villages and the countryside for recreational purposes. The Trust submitted objections to applications relating to the Former Wisley Airfield site numbered 13/P/02165, 14/P/01664 and 15/P/00012, all of which were refused. It also filed comments on the draft Local Plan submitted for consultation in 2014, when it objected to the inclusion of the former Wisley Airfield site for consideration for development. That draft was subsequently withdrawn and the Trust is concerned that the large number of objections to that may not be replicated here because of the frequency that these have had to be made in the planning process.

While, therefore, the majority of our members may not live in the Borough of Guildford they have a greater interest in much of what goes into the Guildford Local Plan for their local area than those living on the far side of the borough.

The draft Local Plan now submitted for consultation has many of the flaws that were in the previous draft. In this response the Trust has felt that it should lead on and give most attention to the Plan’s approach to the Green Belt and inclusion of the former Wisley Airfield site (Policy A35).

The site of the former Wisley Airfield

The Trust does in particular object to the inclusion in the draft Local Plan of Policy A35 relating to the site of the former Wisley Airfield and surrounding area and involving 2000 dwellings, and other building. It is said that the evidence for need for this is in the SHMA being used.

The size of the development that might be achieved at the site actually makes it unsustainable.

The Trust points to the South East Regional Plan not being revoked as to preventing new residential development close to the Thames Basin SPA, part of which lies just north of the site.

This is a much loved open area by those living in the south of Elmbridge that is Hatchford, Downside, Cobham and Stoke D’Abernon. The proposal for 2000 dwellings is not sustainable for many reasons. The site is in some beautiful countryside that would be devastated by the development. It is too close to the SPA and would result in the destruction of the Site of Nature Conservation Interest (SNCI). Proposals for this housing resulted in the unanimous refusal of application no.15/P/00012 which showed that it would have been delivered by apartment blocks up to 5 storeys, alien to the area and with a density higher than most London boroughs. Openness and important views would be marred from a number of directions including that from Painshill Park Landscape Gardens

The proposals for 2000 dwellings with other buildings, involving the introduction of some 5,000 new residents, are not sustainable for many reasons. To place them in context as to the increase in population, it would result in an increase of the equivalent of 50% of the population of nearby Cobham, having a significant adverse effect on the infrastructure of the southern part of the Borough of Elmbridge as well as the northern part of the Borough of Guildford. There would be significant wider effects on strategic infrastructure not only in Guildford but also Elmbridge, Mole Valley, Woking and further afield.

A settlement here would create, on presently open country, a line of building that would start to merge settlements to become the urban sprawl that the Green Belt exists to prevent.

Green Belt
The site is entirely in the Green Belt. It was not contemplated for development for the existing Guildford Borough Council Local Plan 2003 or the South East Regional Plan. The Green Belt was established by and is protected by Acts of Parliament.

The starting point for consideration of taking any site out of the Green Belt is Paragraph 83 of the NPPF which confirmed that Green Belt boundaries can only be altered in exceptional circumstances through the preparation of the Local Plan. The only exceptional circumstance suggested in the draft Local Plan is the pressure to build more dwellings and that arises from flawed housing target figures. The proposed development would clearly impact negatively on the openness of the Green Belt and would be considered inappropriate development within the Green Belt under paragraph 87 of the NPPF. Inappropriate development is by definition harmful to the Green Belt and should not be approved except in very special circumstances. Under paragraph 89 those very special circumstances will not exist unless the potential harm to the Green Belt, is clearly outweighed by other considerations. The proposals for development at the site clearly fail at these hurdles.

There have been assurances by the government that unmet housing need, even if provable, is unlikely to outweigh the harm to the Green Belt and constitute exceptional circumstance (Ministerial Statement on the 17 January 2014 and letter from Brandon Lewis mentioned above).

There has been a tendency to portray this site as if it were a previously developed brownfield site (including emphasis on the remnant of the old runway) and it is worth noting that the runway and hardstanding are but a small part of the site. If the hard-core that is the runway were not to be removed for whatever reason such as viability, in due course, like the remains of many such sites in other parts of the country or the world, the runway would eventually disintegrate and return to agricultural land or nature, as was promised when it was requisitioned during the last world war. The vast majority of the site is good quality agricultural land recently advertised by the owners as Grade 3 and being arable land that has been farmed for many years.

**Wildlife**

The Trust is very concerned about protecting, and indeed expanding, Special Protection Areas (SPAs) and Sites of Special Scientific interest (SSSIs). The Trust supports the position of Natural England and the Campaign to Protect Rural England (CPRE) that studies show the need for the Green Belt to be protected as an integral component of England’s ecological network and the additional views of the RSPB as to protection of biodiversity. While there may be scope for a developer to suggest Suitable Alternative Natural Green Spaces (SANGs) in an area, it is impractical to find any sufficient such sites in the borough or adjoining boroughs that are not already protected in some way. Already agricultural or wooded land should not be used as recreation land in order to justify building on other green spaces nearby.

In the application no. 15/P/00012 the applicants sought to include an onsite SANG in supposed mitigation. That was illogical as it would create an additional multi space car park and would only have increased visitor numbers to the nearby SPA rather than draw them away.

The introduction of residences would mean the import into an ecologically sensitive area not only of humans, and increase in their footfall, but also of pets. Studies of the effect of dogs and cats in particular have shown just what a devastating effect this would have on wildlife. There is no answer to the effect of the introduction of humans and of pets would have on wildlife and wildlife corridors and damage to habitats of the protected and endangered rare species in contravention of the EU Birds Directives and Habitats Regulations.

**Local Roads and transport**

Looking at how the proposal to have a settlement of 2000 at the site would impact on transport, there would still need to be reliance on vehicles for work and other needs and for delivery. It would be impossible to provide enough jobs for residents in the area of the development which would result in a substantial increase of traffic on the local road network. This suggested site for development is far removed from local stations and has no existing access to public transport. It is unrealistic to assume that residents will not rely on the private car and reliance on private car or buses cannot meet requirements for a low carbon, sustainable economy. It is impossible to provide safe walking and cycling routes to the nearest station particularly in winter as the surrounding lanes are narrow and unlit. Further, public transport would itself be limited by the weight restrictions imposed on surrounding roads which are narrow and unsuitable for Public Service Vehicles.
In application no. 15/P/00012 the applicants incredibly suggested that stations are within easy cycle distance. Due to the absence of cycling paths and the lack of footpaths (and the space to provide them) the assertion that the development would result in a meaningful shift to cycling and walking is unbelievable. The increased traffic would add danger to cyclists and pedestrians (including those increasingly using local roads for recreational purposes).

Given how main roads (and in particular the M25 and A3) become jammed at various times, adding to the number of motorists, development in this rural area would result in the use of more local roads as rat runs. The Trust would be particularly concerned for the additional traffic on the very narrow and winding Ockham Lane and Plough Lane locally.

Cobham is the closest shopping centre to the proposed development. It already serves many from the areas of Ockham, the Horsleys and Effingham with traffic along Horsley Road and Downside Road, Ockham Lane and Plough Lane. Cobham is only 4.5 miles from the proposed development whether one used Old Lane, Horsley Road and Downside Road or the A3 and the A245 - Guildford is by comparison 7.5 miles from the proposed development. The village could not cope with the additional traffic and car parking involved in serving an additional 5,000 residents at the site and would experience a significant increase in traffic from the development. Cobham would experience increased stationary traffic at junctions. Traffic congestion has an impact on health and Cobham High Street is an Air Quality Management Area arising in part from the proximity of the A3 and M25 and there are identifiable health problems already arising from this. To add to the traffic here would exacerbate that.

One of the stations that in application no. 15/P/00012 the applicants claimed would adequately service the increased population (much of which is likely to commute) is Cobham & Stoke D’Abernon (the local rail stations of Effingham and Horsley could not cope). The route to that station is either by way of Downside Road or by way of the A3 and A245. Additional pressure would be placed on parking at this station and overcrowding at peak hours would increase, quite apart from the impact of vehicles using local roads for the purpose of getting there. In the refused planning application there had been a suggestion that Cobham & Stoke D’Abernon Station could be used. That or use of stations further north at Weybridge or Walton would increase congestion and pollution on local roads in Elmbridge.

In that application the Trust supported Elmbridge Borough Council’s objections on the grounds that the development would have a significant impact on the highway network.

There would be an increase in the already severe congestion on the Strategic Road Network of the A3 and M25 and the junction of those as well as local roads. The current planning application by RHS Wisley would already have significantly added to visitor traffic.

**Air quality**

There would be an increase of around 5,000 residents at the proposed development site with possibly an additional 4,000 vehicles. The air quality surrounding the site of the suggested development already causes concern, for instance levels of NO2 already exceed the EU limit due in part to the proximity of the M25, the A3 and Cobham Services on the M25. Additional traffic would worsen the situation, affecting the health of all current and future residents in the area.

**Summary of objections to this site**

Objection is supported by the unanimous rejection of application no 15/P/00012 by the Planning Committee at Guildford Borough Council on 8th April 2016 on the recommendation of Planning Officers. The Planning Report identified the serious concerns now being highlighted.

The only exceptional circumstance that might be advanced, with all other matters were discounted, is housing need. Insofar as that may rely on evidence tendered for that it does not bear any extensive examination and the government has anyway made it clear that housing need alone is not sufficient.

There would be a loss of Green Belt and countryside used for leisure purposes and an immense effect on biodiversity. The development would affect not only the surrounding natural land but add to the danger of losing rare species that need protection.
The land is close to the M25 and A3 junction and would increase the number of vehicles using these busy roads on a daily basis, cause further extensive use of inadequate local roads and cause further pollution. Surrey is very poorly served by public transport and any new residents would be reliant on private transport.

A new settlement here would absorb the hamlet of Ockham. The area serves a vital role in preventing urban sprawl from London and a development would create an urban corridor stretching from London to Guildford. There is no realistic account taken of general organic growth and other proposed developments and impact on traffic and infrastructure.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/17903  Respondent: 8565217 / Cobham Conservation and Heritage Trust (David Bellchamber)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Affordable homes and homes for those on low income and the young

Market prices in the South-East mean that homes designated as affordable are just not that. That makes it even more important that developers are given no leeway from the requirements to provide a proportion of a development to be built as such. In this area there is no excuse to plead viability as a reason not to comply with guidelines. The Trust is keen that in the North Surrey area Local Plans should be formulated in a way that will provide accommodation for local people, to the young and those on low pay and that a good stock of starter homes and social housing are made available.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17902  Respondent: 8565217 / Cobham Conservation and Heritage Trust (David Bellchamber)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Urban Development

The Trust supports higher density development in the urban area where there is existing infrastructure, although that should of course avoid over intensification. Guidelines should avoid spoiling the environment and causing congestion but much can embrace fresh thinking on urban life including pedestrianisation, cycling lanes, home zones and underground parking.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp172/4103  Respondent: 8565217 / Cobham Conservation and Heritage Trust (David Bellchamber)

Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Objections to the Guildford Borough Council Draft Local Plan (June 2016) and in particular to inclusion in the plan of Site Allocation A35 - the former Wisley Airfield - for a new settlement with 2,000 dwellings.

The Trust writes to object to aspects of the draft Local Plan.

The Trust has approximately 1,100 members, some from within the Borough of Guildford including Ockham. Most of that membership that resides in the Cobham area uses the resources of the Borough of Guildford, including the villages and the countryside for recreational purposes. The Trust submitted objections to applications relating to the Former Wisley Airfield site numbered 13/P/02165, 14/P/01664 and 15/P/00012, all of which were refused. It also filed comments on the draft Local Plan submitted for consultation in 2014, when it objected to the inclusion of the former Wisley Airfield site for consideration for development. That draft was subsequently withdrawn and the Trust is concerned that the large number of objections to that may not be replicated here because of the frequency that these have had to be made in the planning process.

While, therefore, the majority of our members may not live in the Borough of Guildford they have a greater interest in much of what goes into the Guildford Local Plan for their local area than those living on the far side of the borough.

The draft Local Plan now submitted for consultation has many of the flaws that were in the previous draft. In this response the Trust has felt that it should lead on and give most attention to the Plan’s approach to the Green Belt and inclusion of the former Wisley Airfield site (Policy A35).

Green Belt - POLICY P2

The Metropolitan Green Belt covers 89% of the borough. Its existence and retention should be one of the fundamental bases of the Local Plan. Policy P2 does not have any proper assessment of the Green Belt’s value. Building on the Green Belt means a loss of agricultural production, open space, biodiversity, natural heritage, rural views, rural leisure amenities (with benefits to public health and wellbeing as aimed for in paragraph 81 of the National Planning Policy Framework (NPPF)), water catchment and flood control. It also means an increase in air pollution by loss of carbon and particulates being captured by vegetation.

There is insufficient commitment in the draft Local Plan to the permanence of the Green Belt. Surrey County Council have voted unanimously to protect the Green Belt. The draft Local Plan suggests that the Metropolitan Green Belt would be
defended but then goes on to propose extensive changes to the Green Belt. The pressure for such proposals comes primarily from flawed housing figures as outlined below and fails to take account of how much more difficult it is to deliver infrastructure to support development outside urban areas. The draft Local Plan looks to impose development where wider consultation could have resulted in acceptance of limited development by communities if it were genuinely for the benefit of local people. The Trust believes there should be more emphasis on the aims of the NPPF and in particular the aim in paragraph 17 of “empowering local people to shape their surroundings”.

With an increase of 13,860 new dwellings suggested during the duration of the Plan, only 2,800 are in urban areas. Urban planning in a number of London boroughs and other authorities provides a good model for urban revival, and in particular in bringing brownfield sites back into play, but many of the planning advances from those areas have not been sufficiently taken into account in the draft Local Plan. The number of homes planned in the urban area is too low – there is a need for regeneration in some areas, but this is ignored and instead the plan concentrates on building homes on green field sites, which does not meet the needs for housing within the town.

The insets of two thirds of the borough’s rural villages appears to involve the straightening boundary lines rather than considering how the nature of the Green Belt protects countryside. The proposals extend the power of developers out of all proportion to genuine local needs. In any event until such time that the evidence is robust enough to be considered sound, no consideration should be given to changing boundaries of the Green Belt. It should continue to wash over settlements close to Cobham such as the Horsleys, Effingham and Ripley.

It is also noteworthy that the South East Regional Plan, as challenged in 2009, had suggested that development on Green Belt land was to be between West Clandon and Burpham. While not advocating any extensive building on Green Belt land, that area was at least closer to the infrastructure that Guildford town offers than development sites now suggested on Green Belt land.

Research available shows that there should be no need to build on the Green Belt. The Green Belt has saved precious countryside from urban sprawl, saved village life and conserved wildlife. Once any part of it is destroyed it is lost for ever and letting any part go in other than in very exceptional circumstances, risks opening the floodgates for further encroachment. It is owed to succeeding generations to preserve it. There is no justification to build on the Green Belt until all alternatives in the more sustainable urban areas have been used. Insofar as there is a demand for new housing there are brownfield and other sites in and around urban and semi-urban Guildford that must be looked at and used first.

The Trust considers that all Green Belt development sites should be removed from the plan until “exceptional circumstances” for development are proven, as stipulated repeatedly in the NPPF. The Trust makes further points on the Green Belt in dealing with the inclusion of the Former Wisley Airfield as a development site but, in summary, the Local Plan should commit more to uphold Green Belt boundaries and protections.

In the context of considering any alteration of Green Belt boundaries the Trust has had sight of a letter dated 7th June 2016 from Brandon Lewis the Minister of State for Housing and Planning to MPs which states “We have been repeatedly clear that demand for housing alone will not change Green Belt boundaries”.

**The site of the former Wisley Airfield**

The Trust does in particular object to the inclusion in the draft Local Plan of Policy A35 relating to the site of the former Wisley Airfield and surrounding area and involving 2000 dwellings, and other building. It is said that the evidence for need for this is in the SHMA being used.

The size of the development that might be achieved at the site actually makes it unsustainable.

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The proposals for 2000 dwellings with other buildings, involving the introduction of some 5,000 new residents, are not sustainable for many reasons. To place them in context as to the increase in population, it would result in an increase of the equivalent of 50% of the population of nearby Cobham, having a significant adverse effect on the infrastructure of the southern part of the Borough of Elmbridge as well as the northern part of the Borough of Guildford. There would be significant wider effects on strategic infrastructure not only in Guildford but also Elmbridge, Mole Valley, Woking and further afield.

A settlement here would create, on presently open country, a line of building that would start to merge settlements to become the urban sprawl that the Green Belt exists to prevent.

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There have been assurances by the government that unmet housing need, even if provable, is unlikely to outweigh the harm to the Green Belt and constitute exceptional circumstance (Ministerial Statement on the 17 January 2014 and letter from Brandon Lewis mentioned above).

There has been a tendency to portray this site as if it were a previously developed brownfield site (including emphasis on the remnant of the old runway) and it is worth noting that the runway and hardstanding are but a small part of the site. If the hard-core that is the runway were not to be removed for whatever reason such as viability, in due course, like the remains of many such sites in other parts of the country or the world, the runway would eventually disintegrate and return to agricultural land or nature, as was promised when it was requisitioned during the last world war. The vast majority of the site is good quality agricultural land recently advertised by the owners as Grade 3 and being arable land that has been farmed for many years.

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The introduction of residences would mean the import into an ecologically sensitive area not only of humans, and increase in their footfall, but also of pets. Studies of the effect of dogs and cats in particular have shown just what a devastating effect this would have on wildlife. There is no answer to the effect of the introduction of humans and of pets would have on wildlife and wildlife corridors and damage to habitats of the protected and endangered rare species in contravention of the EU Birds Directives and Habitats Regulations.

Local Roads and transport

Looking at how the proposal to have a settlement of 2000 at the site would impact on transport, there would still need to be reliance on vehicles for work and other needs and for delivery. It would be impossible to provide enough jobs for residents in the area of the development which would result in a substantial increase of traffic on the local road network. This suggested site for development is far removed from local stations and has no existing access to public transport. It is unrealistic to assume that residents will not rely on the private car and reliance on private car or buses cannot meet requirements for a low carbon, sustainable economy. It is impossible to provide safe walking and cycling routes to the nearest station particularly in winter as the surrounding lanes are narrow and unlit. Further, public transport would itself be limited by the weight restrictions imposed on surrounding roads which are narrow and unsuitable for Public Service Vehicles.

In application no. 15/P/00012 the applicants incredibly suggested that stations are within easy cycle distance. Due to the absence of cycling paths and the lack of footpaths (and the space to provide them) the assertion that the development would result in a meaningful shift to cycling and walking is unbelievable. The increased traffic would add danger to cyclists and pedestrians (including those increasingly using local roads for recreational purposes).

Given how main roads (and in particular the M25 and A3) become jammed at various times, adding to the number of motorists, development in this rural area would result in the use of more local roads as rat runs. The Trust would be particularly concerned for the additional traffic on the very narrow and winding Ockham Lane and Plough Lane locally.

Cobham is the closest shopping centre to the proposed development. It already serves many from the areas of Ockham, the Horsleys and Effingham with traffic along Horsley Road and Downside Road, Ockham Lane and Plough Lane. Cobham is only 4.5 miles from the proposed development whether one used Old Lane, Horsley Road and Downside Road or the A3 and the A245 - Guildford is by comparison 7.5 miles from the proposed development. The village could not cope with the additional traffic and car parking involved in serving an additional 5,000 residents at the site and would experience a significant increase in traffic from the development. Cobham would experience increased stationary traffic at junctions. Traffic congestion has an impact on health and Cobham High Street is an Air Quality Management Area arising in part from the proximity of the A3 and M25 and there are identifiable health problems already arising from this. To add to the traffic here would exacerbate that.

One of the stations that in application no. 15/P/00012 the applicants claimed would adequately service the increased population (much of which is likely to commute) is Cobham & Stoke D’Abernon (the local rail stations of Effingham and Horsley could not cope). The route to that station is either by way of Downside Road or by way of the A3 and A245. Additional pressure would be placed on parking at this station and overcrowding at peak hours would increase, quite apart from the impact of vehicles using local roads for the purpose of getting there. In the refused planning application there had been a suggestion that Cobham & Stoke D’Abernon Station could be used. That or use of stations further north at Weybridge or Walton would increase congestion and pollution on local roads in Elmbridge.

In that application the Trust supported Elmbridge Borough Council’s objections on the grounds that the development would have a significant impact on the highway network.

There would be an increase in the already severe congestion on the Strategic Road Network of the A3 and M25 and the junction of those as well as local roads. The current planning application by RHS Wisley would already have significantly added to visitor traffic.
Air quality

There would be an increase of around 5,000 residents at the proposed development site with possibly an additional 4,000 vehicles. The air quality surrounding the site of the suggested development already causes concern, for instance levels of NO2 already exceed the EU limit due in part to the proximity of the M25, the A3 and Cobham Services on the M25. Additional traffic would worsen the situation, affecting the health of all current and future residents in the area.

Summary of objections to this site

Objection is supported by the unanimous rejection of application no 15/P/00012 by the Planning Committee at Guildford Borough Council on 8th April 2016 on the recommendation of Planning Officers. The Planning Report identified the serious concerns now being highlighted.

The only exceptional circumstance that might be advanced, with all other matters were discounted, is housing need. Insofar as that may rely on evidence tendered for that it does not bear any extensive examination and the government has anyway made it clear that housing need alone is not sufficient.

There would be a loss of Green Belt and countryside used for leisure purposes and an immense effect on biodiversity. The development would affect not only the surrounding natural land but add to the danger of losing rare species that need protection.

The land is close to the M25 and A3 junction and would increase the number of vehicles using these busy roads on a daily basis, cause further extensive use of inadequate local roads and cause further pollution. Surrey is very poorly served by public transport and any new residents would be reliant on private transport.

A new settlement here would absorb the hamlet of Ockham. The area serves a vital role in preventing urban sprawl from London and a development would create an urban corridor stretching from London to Guildford. There is no realistic account taken of general organic growth and other proposed developments and impact on traffic and infrastructure.

Sites in East and West Horsley

There is considerable concern locally that Effingham, the Horsleys, Ripley, Wisley and the Ockham and Hatchford areas are protected from unwarranted development. But the changes to settlements that would have most effect on the Cobham area in terms of increased traffic and call for amenities, if the draft Local Plan were implemented, would be the Horsleys. Implementing proposals for Sites A36-41 would destroy the nature of the villages that make up the Horsleys. The new building suggested for these villages is excessive and disproportionate relative to the rest of the borough. It has to be asked why it is suggested that the Green Belt is sacrificed here where the protection of the Metropolitan Green Belt is highly relevant when on the other side of the borough in the Ash and Tongham areas the draft Local Plan looks to expand the Green Belt.

The reclassification of East Horsely to a Rural District Centre would allow less desirable uses such as factory outlets, warehouses, clubs etc. to be the subject of applications for planning permission. Development in these villages should not be other than from small windfall sites

Housing Target

Setting a housing target for Guildford Borough is a vital function for the Local Plan. The Trust is reluctant to get involved in the method of reaching a figure for an adjoining borough but, given what is at stake locally, considers that it has an obligation to comment and object to the figure put forward.

Paragraph 158 of the NPPF 158 provides that "Each local planning authority should ensure that the Local Plan is based on adequate, up-to-date and relevant evidence”. The starting point for that is a Strategic Housing Market Assessment (SHMA).
The SHMA does not take into account any of the constraints to development such as Green Belt, AONB, woodland, heathland, protection of flora and fauna etc. in determining an “Objectively Assessed Needs” (OAN) figure for the Local Plan. It is for the local authority to take these constraints into consideration and apply them to what is provided in the SHMA.

There has been nationwide concern, especially from local residents and community groups, even about the figures emerging from the SHMA process. In many instances the figures are considered to be inflated or otherwise inaccurate. Such inflation can occur in the hands of consultants who are inclined to favour developers. Guildford Borough Council have used G.L.Hearn as consultants and that company’s website shows that their work for developers could provide motive for bias. Local authorities can succumb to those in the planning industry acting on behalf of developers who advocate that the “presumption in favour of sustainable development” means that growth must be looked for across the board and in doing so have less regard to where there should be constraints. If local authorities overlook proper scrutiny it can also be because that development can generate income from Community Infrastructure Levy, taxes and bonuses.

For the purpose of a Local Plan it is necessary to have underlying data that is used to back up propositions. In the case of the West Surrey Housing Market Area (SHMA) for Guildford, Woking and Waverley, and prepared by G L Hearn, requests for that have met with resistance. Incredibly Guildford appear to have told the Information Commissioner that consultants have refused to give it the formulae and assumptions in the model because of ‘intellectual property’ in the model used. The Trust understands that in consequence neither the administrators nor councillors at Guildford Borough Council have had an opportunity of scrutinising vital basic information. This makes it all the more important that Inspectors test SHMAs and OANs against properly provided methodology.

The Trust understands that the process toward determining targets for future housing numbers starts with the Office for National Statistics (ONS) projection of the likely local population change for the borough due to natural change (births, deaths), net internal migration within the UK and finally net international migration.

The Trust understands that based on natural change and net internal migration recent ONS data projected that the borough population to 2031 would shrink and that it would increase only on projected net international migration based upon the abnormally high increase in the number of foreign students attending the University of Surrey (as was experienced in recent years). The ONS themselves state that this latter figure is less reliable and anyway stress that before its projections are turned into predictions their basic statistics should be reviewed in detail, with changes made based on whatever factors are deemed important in that review.

G L Hearn have assessed the housing need for Guildford at 693 dwellings per year, (13,860 overall) for the next 15 years (the result bring to add 25 per cent to the stock of dwellings in the borough with increased pressure on existing infrastructure. It is based predominantly on international migration, itself based on an increase in students. Even if desirable this is implausible particularly in a post-Referendum climate with further education being more expensive in the UK compared with other countries, evidence this week of students no longer wishing to study in the UK and a trend to distance learning. This issue should also be considered in the type of housing required. If based on any realistic forecast the University, with unused planning permissions for student accommodation on campus, should take responsibility to enable this factor to be removed from the equation for projected household numbers. This would free up affordable housing for local people, particularly the young. In any event, a separate detailed assessment should be made of the need for and type of student housing required.

This aspect of the SHMA reveals that the basis for it is severely flawed.

There is also a need in looking at housing targets to distinguish between need and demand. The latter could be limitless as in Guildford house prices and therefore demand are dictated and dominated by London house prices. The outward movement of population from metropolitan London is incapable of being satiated and was an important reason for the creation of the Green Belt.

In looking at the OAN there would appear to be insufficient evidence of the residences that Guildford town can accommodate (windfalls, reuse of empty housing, switch from office accommodation and use of student accommodation). A substantially lower number would remove the need to build on Green Belt or open countryside, and instantly meet the single biggest public objection to the plan as a whole.
Additional observations

The Trust makes the following general observations on the draft Local Plan.

Policy S1 should go in full through the principles for sustainable development in the NPPF in full including the 12 Core Planning Principles set out in paragraph 17.

Evidence on infrastructure

The draft Local Plan seems to have again been assembled with insufficient proposals or research on the infrastructure needed to accompany proposals for housing development. There must be proper infrastructure planning for transport, educational, medical, energy, water and communications services before additional housing is contemplated. It does not seem to be understood that, for instance, bus transport is wanting and there are few facilities in the borough for any transport to rural parts except by car. There is no guarantee that the A3 will be improved in the way suggested.

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The Trust supports higher density development in the urban area where there is existing infrastructure, although that should of course avoid over intensification. Guidelines should avoid spoiling the environment and causing congestion but much can embrace fresh thinking on urban life including pedestrianisation, cycling lanes, home zones and underground parking.

Affordable homes and homes for those on low income and the young

Market prices in the South-East mean that homes designated as affordable are just not that. That makes it even more important that developers are given no leeway from the requirements to provide a proportion of a development to be built as such. In this area there is no excuse to plead viability as a reason not to comply with guidelines. The Trust is keen that in the North Surrey area Local Plans should be formulated in a way that will provide accommodation for local people, to the young and those on low pay and that a good stock of starter homes and social housing are made available.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/5201  Respondent: 8565217 / Cobham Conservation and Heritage Trust (David Bellchamber)
Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Looking at how the proposal to have a settlement of 2000 at the site would impact on transport, there would still need to be reliance on vehicles for work and other needs and for delivery. It would be impossible to provide enough jobs for residents in the area of the development which would result in a substantial increase of traffic on the local road network. This suggested site for development is far removed from local stations and has no existing access to public transport. It is unrealistic to assume that residents will not rely on the private car and reliance on private car or buses cannot meet
requirements for a low carbon, sustainable economy. It is impossible to provide safe walking and cycling routes to the nearest station particularly in winter as the surrounding lanes are narrow and unlit. Further, public transport would itself be limited by the weight restrictions imposed on surrounding roads which are narrow and unsuitable for Public Service Vehicles.

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<td>Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy H1</td>
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**Housing Target**

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Lack of road and rail capacity

We object to this scale of growth when there is already insufficient road and railway capacity in Guildford. Locally, one effect of this level of growth (together with that in Waverley) will be to place an undue burden on the single-track lanes in the Tyting area, which is designated as an Area of Outstanding Natural Beauty. Additional traffic will be very unwelcome and change the character of the AONB.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
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<tr>
<th>Comment ID:</th>
<th>PSLPP16/16071</th>
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<th>8565601 / Tyting Society (David Thorp)</th>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Some 40 hectares of the Tyting farmland is proposed as a potential location for a SANG. In principle the Tyting Society is prepared to accept this proposal subject to a number of considerations.

- Maximising the agricultural use
  For over ten years the local community has been interested in securing the long-term future of the Tyting farmland in agricultural use. The most promising development over this long period has been the tenancy with Surrey Wildlife Trust who has successfully begun to restore this land since 2014. We therefore wish to encourage GBC to enter into an agreement for SWT to run the farm for a long period. We believe a way forward can be agreed whereby the grazing and conservation objective can be best met and be a good fit with SWT’s mission.

- Minimising footpath disruption
  From the initial plans seen to date, there are concerns regarding the extent and location of the paths in the farm and the proposed footpath accesses from White Lane and Halfpenny Lane. Both households adjacent to the path off White Lane are concerned about intrusion. The only mandatory element from Natural England is the circular route and so we support steps to minimise the interaction of cattle and free roaming dogs through a reduction is planned footpaths.

- Handling traffic and car parking
  Car parking for the SANG and additional traffic on White Lane and Halfpenny Lane are important safety and environmental issues. We are pleased to understand that no additional car park is being proposed to that currently enjoyed by walkers in the Tyting area.

- Management of SANG monies
  The Tyting Society cares about the future management of the SANG designated land as the farmland is central to
the whole Tyting area. We are keen to find a mechanism with GBC for the management and use of SANG funds involving the local community on a regular basis.
We look forward to working with Guildford Borough Council to implement the proposed Tyting Farm SANG.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/18647  Respondent: 8565601 / Tyting Society (David Thorp)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The Tyting Society is a Residents Association (RA) representing 88 local households. It is a member of the Guildford Residents Association (GRA), which represents 26 RAs and 4 Parish Councils. The Tyting Society endorses the response and objections that the GRA is providing to this current consultation.
The Tyting Society is also a member of CPRE. We support CPRE’s objections to the high level of housing building and that the constraints such as Green Belt and lack of adequate infrastructure have not been taken into account.
We have two specific objections to the draft Local Plan

Level of House building

We object to the average annual target of 693 houses planned to be built over the period until 2033. The evidence for this is not soundly based lacking transparency and credibility. There are also significant infrastructure constraints that need to be recognised today and not at some ill defined moment in the future.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/846  Respondent: 8565601 / Tyting Society (David Thorp)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Traffic implications for the Tyting area

The lanes of the Surrey Hills are only suited to carrying a low level of traffic, often being narrow single track roads, as is the case for Halfpenny Lane and White Lane/Guildford Lane in the Tyting area.

The combination of the scale of growth proposed in this 2017 plan and a reduction of capacity in the town centre (as indicated by the plans for the Sustainable Movement Corridor and the Town Centre Regeneration Strategy) threatens to lead to much more peak hour traffic on minor roads around the town as drivers find alternatives routes.

This potential impact on the lanes should be avoided and the character of the lanes protected.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/845  Respondent: 8565601 / Tyting Society (David Thorp)  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Excessive Level of House building

We object to the average annual target of 654 houses planned to be built over the period until 2034. The evidence in the Guildford Addendum Report (March 2017) is not soundly based. This high number is modelled from the demographic needs within the Borough representing some 85% of the overall projected increase.

The new evidence from GRA’s independent expert shows there is an over estimate of population growth of about 40%. The GBC proposal will result in needless loss of Green Belt and increased congestion.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/4475  Respondent: 8565729 / David Ogilvie Design (David Ogilvie)  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
This iteration of the Draft Guildford Local Plan is an improvement on the previous draft however it still has serious flaws.

It does not provide for the pedestrianisation of Guildford from the station to the High Street.

It does not satisfactorily address the gyratory traffic congestion, traffic accidents and air pollution. Preferred Scenario 2 of the Allies and Morrison plan will reduce traffic capacity by over 30% in the town centre thus reducing accessibility and the commercial success of the town with little environmental gain.

The hypothetical reliance on the idea of the sustainable movement corridor is seriously misplaced. The narrow approach roads the Guildford cannot accommodate dedicated bus lanes and the route is such that it will be unlikely to serve more than 20% of the Guildford catchment area. There has been no research or evidence of the likely demand for this service or comparison with other routes or the effect on the existing bus services or the detrimental effect it will have on other traffic flows that will be vital to Guildford proper functioning. The £90 million budgeted for this chimera will be a waste of money.

There has been no fully comprehensive origin and destination study of traffic into and out of Guildford that should form the basis for traffic infrastructure requirements.

The proposal that I made to Guildford Borough Council over 4 years ago for a bridge over the river and railway from York Road to link to Madrid Road and Guildford Park Road together with a tunnel under Bright Hill to link York Road to Millbrook has not been properly investigated.

There has been no comprehensive plan for the future of the town centre.

There has been no proposal to comprehensively plan the Walnut Tree Close area to maximise its’ residential potential.

The housing requirement figure is excessive and more than double the historic increase in housing in Guildford and is unsustainable bearing in mind the current traffic congestion.

The A3 is already seriously congested particularly at the Dennis/Cathedral junctions due to the function of this section of the A3 trunk road as a local road. Proposals to repeat this error with a new all directions junction near the Clandon Road Junction will perpetuate this folly and make the A3 congestion a real handicap to Guildford’s successful functioning.

I attach some plans and ideas that would help give Guildford town centre a better quality environment and give some relief to traffic congestion.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:  
- doc20130601095923 A3 relief junction.pdf (601 KB)
- doc20141002113237 proposed bus routes.pdf (411 KB)
- Guildford T C masterplan.pdf (2.0 MB)

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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Send</td>
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I have been studying the outline proposals by Guildford Borough Council for the Send area. With reference to the proposals in principle, I OBJECT to the constant change of plans which have been published over past months, both in fundamental terms as well as in detail. As an example, I have seen no earlier reference to the Garlick's Arch site, which at this late stage has become a major feature.

I OBJECT to the inevitable large increase in road traffic which would pass through Send, which is already overloaded on a daily basis. Send Road would inevitably become the main link route between Woking and the A3 trunk road.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/1801  Respondent: 8566049 / Mr David W Lazenby  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A42

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the proposal to build 45 houses at Clockbarn Nursery. This would be additional to housing development at the Tannery, and the major scheme for further marina space in the area. The local roads are wholly inadequate for the totality of all this.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/1798  Respondent: 8566049 / Mr David W Lazenby  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the proposals for housing and semi-industrial buildings at the Garlick's Arch site, which is for a large number of houses which would generate heavy overload of the local social infrastructure.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I OBJECT to the housing and travellers' sites proposed for Winds Ridge / Send Hill area. This would be a prominent intrusion in the existing pleasant landscape. It would generate more traffic to the Send Hill / Send Road junction, which would prove to be unmanageable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3864  Respondent: 8566049 / Mr David W Lazenby  Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

I OBJECT to the proposal to take Send out of the Green Belt, which is outrageous in these times. Send is currently the major buffer between Guildford and Woking. It fulfils the precise intentions of the Green Belt concept, and its status should be maintained as such.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/3590  Respondent: 8566049 / Mr David W Lazenby  Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A42

I OBJECT to Policy A 42, for an Increase in number of houses in Tannery Lane. No proper reasons are offered for this large increase which would aggravate the road traffic congestion, and overload local services.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<td>I OBJECT to Policy A 43, for an absurd increase in housing provision at Garlick’s Arch, now proposed to be for 400 houses, including 6 travellers’ sites. No justification has been provided for this huge increase. It would swamp the local roads and public services. The main road through Send, being the main route from Woking to the South is already overloaded with queues of up to 1 mile at morning and evening peaks.</td>
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<td>I OBJECT to Policy A 58, for development at Burnt Common which was deleted from the 2014 draft plan, but is now re-inserted with no justification. There is capacity at the existing Slyfield site. The road traffic effects at Burnt Common would be immense, and the existing conditions are already overloaded.</td>
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<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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I further object to the proposal for this development in the Horsleys and to the proposal to build 2000 houses, with shops and churches, at Ockham on the former Wisley Airfield because the infrastructure is insufficient to cope with these developments and there appears to be neither the scope, the money nor the plans to develop the necessary sewage removal and treatment, the schools, doctors’ surgeries, roads and car parking. Horsley roads are narrow, unlit, often without pavements, never more than one lane in each direction, and some roads are actually single track lanes with and without passing places. The foul water sewers are old and unmapped and will need considerable investment for improvement and enlargement to cope with the proposed scale of development. There is no provision for this investment.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/4320  Respondent: 8566145 / Mrs Diana Brighton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E8

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to Station Parade East Horsley being designated a District Centre because this misunderstands the facilities provided here. For example, the grocery stores do not have the full range of groceries and vegetables that the usual household will require. I have to travel to Ripley for a green grocer’s, shop at Sainsbury’s and also have to go to Guildford for the many items that are not available in the Horsleys eg paint and hardware, clothes and shoes, dress fabrics and knitting wools.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/4319  Respondent: 8566145 / Mrs Diana Brighton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Objections to the Guildford Local Plan

I object to the proposal to remove the Horsleys from the Green Belt. The government clearly re-stated the principal that Green Belt should not be sacrificed for development. Guildford Borough Council has not demonstrated any valid reason for removing the Horsleys from the Green Belt.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4321  Respondent: 8566145 / Mrs Diana Brighton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the large number of houses proposed for the Horsleys. Guildford Borough Council has not demonstrated the need for an extra 35% in West Horsley which is greater than any other area in the borough. The surveys undertaken by the parish council have not demonstrated either the need or the desire for an expansion of West Horsley.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/1628  Respondent: 8566145 / Mrs Diana Brighton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the Guildford Local Plan 2017 in particular to the plans to build on the Wisley Airfield and fields.

The site is a valued part of the Green Belt and it is therefore not legally available for development.

In addition:

I consider the site is not suitable or sustainable as a residential area because it is dangerous to walk or cycle from the site to the local train station. This is due to the lack of street lights and pavements along this narrow road which is regularly used by large and heavy vehicles causing all other traffic to pull into the verge.

Proposals for new road access to the station for cars and for cycle paths will undermine the rural identity of the surrounding area which is characterised by its unlit, pavementless, narrow country roads through fields and small villages.

I understand that a bus service is proposed but the narrowness of the road and the lack of anywhere safe for passengers to catch or alight from the bus makes this an unrealistic proposition.
The site is adjacent to the A3 road which carries very heavy traffic. The air pollution level is already very high and will become even higher if this planning application is allowed. Inevitably the levels will be greater than the levels currently allowed and thus in breach of the law. The pollution will be increased even further if residents have to use their cars to reach the station where there is already insufficient parking.

Within the time frame proposed for development of this site the access for construction traffic will heavily impact the surrounding roads which are not suitable for sustained use by heavy vehicles and will cause unacceptable disruption to the lives of local residents.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
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<tr>
<th>Comment ID: PSLPS16/8272</th>
<th>Respondent: 8566497 / Derek Horne &amp; Associates Ltd (Derek Horne)</th>
<th>Agent:</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A12</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY A12, SITE 174

The Council is underestimating the importance of short stay car parking which is essential if Guildford Town Centre is to prosper, befitting its status as the Country Town in Surrey and resist the competition posed by online shopping. Retailing is the principal function of Guildford and it needs to be protected. Bright Hill car park is ideally located to serve the shops in Upper High Street which will otherwise suffer.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<tr>
<th>Comment ID: PSLPS16/8273</th>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

A35, WISLEY AIRFIELD

Wisley Airfield has been vacant for decades. All the buildings associated with its previous function have been removed. The runway is not visible from beyond its boundaries. It is located some considerable distance from any meaningful settlement within the wholly inadequate infrastructure for a development of this scale and is served by narrow winding country roads with no footpaths. It is not served by public transport. It, therefore, constitutes a wholly unsustainable
development in an unsustainable location. A recent outline planning application for its development was refused unanimously by the Council’s Planning Committee.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/8274  Respondent: 8566497 / Derek Horne & Associates Ltd (Derek Horne)  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A36

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

A36, RAMADA HOTEL

This Green Belt site is located outside the Defined Settlement Boundary of East Horsley and proposes a density of development that is out of keeping with the character of the surrounding area. As a gateway site to the village along the A246, the proposals would be harmful to the character of the area. Moreover, vehicular access is not ideal given its proximity to two sharp bends on the A246.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/8275  Respondent: 8566497 / Derek Horne & Associates Ltd (Derek Horne)  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A38

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

A38, Land to the west of West Horsley

This site is located outside of the Defined Boundaries of this Green Belt settlement in a location that is remote from shops and public transport. It is in a wholly unsustainable location.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/8276  Respondent: 8566497 / Derek Horne & Associates Ltd (Derek Horne)  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A41
A41, Land adjacent to South of West Horsley

This is a rural Green Belt site unrelated to any significant development and remote from shops and public transport. It is an unsustainable site on which unsustainable development is proposed contrary to government advice as set out in the National Planning Policy Framework. If such a scale of development is necessary, which is disputed, there are several much better sites in the area that should be considered.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/8277  Respondent: 8566497 / Derek Horne & Associates Ltd (Derek Horne)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

A43, Land at Garlick’s Arch

This is a rural Green Belt site unrelated to any significant development and remote from shops and public transport. It is an unsustainable site on which unsustainable development is proposed contrary to government advice as set out in the National Planning Policy Framework. If such a scale of development is necessary, which is disputed, there are several much better sites in the area that should be considered.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/269  Respondent: 8566497 / Derek Horne & Associates Ltd (Derek Horne)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (No)
Too many rural and Green Belt sites are proposed within settlements and, in many cases, outside settlements with inadequate infrastructure, including public transport. Such sites constitute unsustainable development contrary to government advice as set out in the National Planning policy Framework. The redevelopment of Town Centre car parks for residential use will irreparably damage Guildford's function as the principal shopping centre in Surrey.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/272  Respondent: 8566497 / Derek Horne & Associates Ltd (Derek Horne)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 7: Any other comments?

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (Yes)

PLEASE SEE ATTACHED.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents: GUILDFORD BOROUGH COUNCIL.Submissions.docx (17 KB)

Comment ID: PSLPP16/7773  Respondent: 8566529 / Derek Corden  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I confirm that I act on behalf of the tenants of No. 4 Kernel Court, Walnut Tree Close, Alifabs Design & Construction Limited and Aluminium Building Products Limited and am instructed by them to submit comments in respect of The Local Plan.

Background

The site is presently in industrial/warehouse use and under Policy A13 on Page 153, the allocation is for 100 homes.

Para 2.8: Under paragraph 2.8 of the draft Local Plan, it is pointed out that the number of jobs in the Borough continues to grow and that new employment land is required to sustain such growth. Employment land is categorised as Bla & Blb (in effect offices) and then Blc, B2 & B8 which is, in effect, industrial and warehousing.

Notwithstanding the acknowledgement that new employment land is required, The Local Plan does not provide sufficient Blc, B2 & B8 to meet the employment needs, with a mere 4.7 - 5.3 hectares being allocated over the plan period. This
would account for a new supply of approximately 1,500 sq m per annum, which does not comply with Policy E1 in which it is stated that "we will support the retention, creation and development of small local businesses by encouraging a range of types and sizes of new premises, including incubator units, managed workspace and serviced office accommodation."

The opening paragraph of Policy E1 states that the purpose of the Policy is to "ensure an adequate supply of land is available for employment purposes".

Firstly, the allocation fails to support existing businesses, but secondly fails to make provision for employment for the new population which will arrive with the additional houses that are to be built. Thirdly it is proposed to remove this and other sites from employment use without adequate replacements. We believe that that Borough Council has a duty to provide sufficient land for Blc, and it has failed to do so.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** PSLPP16/7776  **Respondent:** 8566529 / Derek Corden  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

Page 20 sets out a vision and ambition and in particular, proposes an extension to The Surrey Research Park of approximately 11 hectares, to comprise 35,000 sq m of business premises.

The Property & Transport side of the Guildford Business Forum considers the University and The Surrey Research Park to be tremendous assets to the town and their expansion should be encouraged. However, the University is not an organisation that is prepared to build speculatively and therefore, reacts to a relatively small number of organisations who are able to plan, say two years ahead. This represents only a fraction of the market place for new occupiers, the vast majority of whom rely on premises being available in a three-six month period.

In the existing 2003 Local Plan, the Borough Council allocated their own property holdings at the Slyfield Industrial Estate as the new land supply. Once again, the land was placed in the hands of an organisation who would not build speculatively and therefore, did little to assist in providing expansion facilities for existing companies, let alone new ones. We believe that you cannot put all your eggs in one basket and this is, therefore, a flawed policy.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** PSLPP16/7783  **Respondent:** 8566529 / Derek Corden  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
Answer (if comment is on questions 1-7 of the questionnaire): ()

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Policy E2 states that ‘proposals for new office and research and development [Use Class B1(a) and B1 (b)] floor space will be directed first to Guildford town centre, then sequentially to -

- Locations within 500 metres of a public transport interchange
- Office and research and development strategic employment .............”

Under Policy E1 an average of 5 hectares is being provided over the plan period for B1c, B2 & B8 amounting to approximately 1,486 sq m per annum. We consider this allocation to be totally insufficient to cater for existing businesses, let alone an expanded workforce and a balanced economy.

Furthermore, this document proposes losing existing B1c, B2 & B8 sites and the allocation is not adequate for their replacement, let alone expansion of the economy or catering for the needs of local businesses.

Under the section headed "B Class Uses" and in particular strategic employment sites, there are sites that are missing from here that are of major significance. For example, whilst you have identified the Guildford Business Park, you have not included nearly 16,000 sq m of offices known as G2000 and G3000 where Regus and Avaya are.

Under the heading "Industrial (Blc, B2 & BB) Strategic Employment Sites" you have noted The Guildway on the Portsmouth. This, in fact, is an office site not industrial. Within the same Policy, there is a heading "Locally Significant Employment Sites". Specific sites are mentioned at 32 Chertsey Street and 1-7 Stoke Road, Andrews House, College Road, College House, Stoke House, Leapale House and Bell Court and 65 Woodbridge Road. However, all of these sites are located within the proposed town centre boundary and therefore, surely should fall under the definition of Strategic Employment Sites in the Guildford Town Centre Employment Core.

Another site described as a locally significant employment site is The Courtyard at Wisley. It would be surprising if this totalled more than 1,000 sq m, but significantly the Plan seeks to remove a site several times larger at Broadford Park, Shalford. This provides an unusual mix of light industrial and office accommodation, which is not typically provided elsewhere in the Borough and therefore, represents a scare resource. We wonder why this is being taken away from employment use. We believe that it falls within the definition set out in 4.4.7.

Under the section "Monitoring Indicators", the source for monitoring is Planning Applications and Appeals. However, these are simply pieces of paper and not buildings within which people can obtain jobs. The Monitoring Indicators should, therefore, be buildings constructed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
We believe that this is a highly restrictive policy with sequential tests originally being designed more for retail purposes than office. If you were to apply this policy to sites which have already been developed within the Borough, the vast majority of supply would not exist today. Guildford Borough Council created an SPD for Woodbridge Meadows, which was predicated on this becoming an office location. It is not within 500m of a public transport interchange and therefore, it would fail a sequential test if there were a site closer into the town centre that could be developed. Walnut Tree Park, upon which consent has been given for redevelopment as offices, would also fail this test, as would the consent granted for a fifth building at the Guildford Business Park, as this falls second in the hierarchy of sequential testing. The policy will, therefore, stagnate development.

Again under Policy E2, there is a heading "All B Class development". Encouragement will be given to business units less than 50 sq m. In reality, this is a tiny amount of accommodation and unlikely to ever be built. Consideration should be given to increasing the size of this.

Page 68 - Reasons justification

Under Clause 4.4.22, the Employment Lands Needs Assessment, concludes that there was not enough capacity to accommodate all of their growth in the town centre and on existing strategic employment sites. However, this contradicts the concept of a sequential test where, if there was a site available to be developed in the town centre, nothing outside that could be built.

Para 4.4.23 also contradicts the restrictive policy behind the sequential test, given that there is a desire to ensure that buildings are available. Whilst development in the most sustainable locations is a laudable target, we do not live in a perfect world where this can be created and flexibility within the Local Plan is an important factor.

Monitoring Indicators

Under the monitoring indicator for Bl©, B2 & BS, the target is to have 100% of permitted development on industrial strategic employment sites. This is too restrictive. Under the section for small business units, the target simply states "percentage of B Class development proposals incorporating units of less than 50 sq m". This is not actually a target as a target has to be a proposed figure.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
D2 use, and sui generis uses. To have to market a building for potentially over 2 years to create say 10 jobs, when say 50 jobs could be created tomorrow by an alternative use in the above categories, would seem not only ludicrous but also render the Borough uncompetitive and fail to provide opportunities for not only the existing residents in the Borough, but also those in the new houses that are to be developed during the planned period.

Land is being taken away from employment uses without adequate provision for their replacement and the Borough is putting all its eggs in one basket with its allocation of land at the Research Park.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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This states that GBC would maintain employment capacity and improve employment floor space. As stated above, this is not catered for in the B1c, B2 & B8 categories. Policy E3 strengthens retention of employment land, but the loss of Kernel Court to residential flies in the face of this new Policy. This is notwithstanding that the Policy against loss of employment land is undertaken on a sequential test; i.e. those closest to the town are protected most. Kernel Court is on the border with the town centre and close to the major transport interchange of the railway station.

There has been no attempt to market the site for employment purposes, nor to offer the premises to the tenant who wishes to remain.

The site is in a sustainable position allowing the employer to recruit staff using public transport.

I trust that the above comments will be taken into account when considering changes to The Local Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Para 4.4.25 states that the Policy "seeks to protect floor space to accommodate existing and future demand". This is contrary to many of the proposals to take employment sites away in the town centre and examples such as Broadford Park at Shalford.

Within Policy E3, any change of use on a strategic employment site has to be backed up by marketing "for a continuous period of least two years". This effectively is discretionary by virtue of the words "at least". The Borough Council are, therefore, in total control, whether this is 3, 4 or indeed 5 years or indeed even more. We suggest that the words "at least" should be removed.

In relation to locally significant employment sites, the same comments apply, where there is a requirement for at least 18 months and in relation to general floor space again the words "at least" should be removed.

The penultimate paragraph in the greyed out section of Policy E3, reference is made to "once the period of comprehensive and active marketing is achieved, any other suitable employment use should be considered before change of use to residential or other use will be permitted".

We are advised by Guildford Borough Council that the definition of employment use is specific and limited to B1(a), B1(b), B1(c), B2 & B8. In reality, therefore, there are no other suitable employment uses.

However, this is an area in which we have highlighted a serious practical concern over the Local Plan. In reality, there are multiple Planning Applications each year for sui generis uses which, by definition, fall outside the definition of employment land and examples of which include all of the car showrooms located on the Slyfield Industrial Estate. A warehousing building on the Slyfield Industrial Estate would need at least 2 years’ marketing, could be 3, could be 4, could be 5 and could be 10, depending on an individual Planning Officer’s view. There is no specific allocation for sui generis uses in the Local Plan and yet they typically come from employment land and typically employ large numbers of people. Their loss from their technical use of employment land to the sui generis use, does not, in our view, create issues. The buildings are likely to be capable of re-use for alternative employment uses in the future and this requires to be dealt with under the Local Plan.

Similarly, the Borough has always accepted the importance of the leisure industry. There are numerous buildings which are dedicated to health and fitness and entertainment, which have come from previous employment uses. Examples of these include the Borough Council’s own building in Midleton Road, which is now a trampolining centre, the Rock Climb on Cobbett Park on the Slyfield Industrial Estate, the gymnastics facility at Pew Corner on the Portsmouth Road and various private fitness gyms and pilates premises in the town centre. In a world where obesity is described as a huge problem, these facilities should be actively encouraged and specific provision made for a change of use from employment land. Other examples include The Guildford School of Acting and PPA (Performance Preparation Academy), both of whom employ large numbers of people and the provision of which is regarded as good for the Borough.

Further examples would include medical uses, which we have seen on the Research Park and which surely must be an increasingly important part of the UK’s future. There is no specific allocation of land for these uses and they will occur on an ad hoc basis, but will need to be derived from employment land. Again, large numbers of people are employed in such facilities and they have to be regarded as good for the town. Why, therefore, is the Local Plan lacking in consideration of such matters?

There seems to be a desire for Guildford to aim for higher added value jobs. On paper, this is fine, but you do not have the tools within this Local Plan to facilitate that.

Within the Guildford Business Forum, we believe that the UK following the vote to leave the European Union must be flexible and adaptable and buildings and land should not remain empty whilst owners seek tenants that may not exist when demand for other uses that will employ people does exist. How can this possibly be in the interests of the Borough and critically, the residents within this Borough? The use categories do not reflect fully the world we live in and do not have the flexibility to cater for not only today’s real world uses, but also future uses.

Para 4.4.27

In relation to evidence of active marketing, there is a requirement to offer premises at a competitive rate and a reasonable market rate. Who is to decide what is competitive and what is a reasonable market rate? The Borough should also bear in
mind that owners of buildings will very often have mortgages where the lender's view and the Borough's view may be at odds.

There is also a requirement to demonstrate that there has been flexibility in space offered, including dividing up larger areas of floor space where this is possible and making alternative layouts. If you take Guildford Borough Council's own building at Midleton Road, which was let to a non employment use by the Borough, this would have required them to divide this space up, to let off offices separately at the front of the building. The Policy goes even further advising that Guildford Borough Council in that above example should have looked at alternative marketing strategies, including management of the space by specialist third party providers. The suggestion behind this, therefore, is that if a 20,000 sq ft building could attract demand from a 1,000 sq ft tenant, then the land owner would be expected to make that space available on competitive terms and potentially prejudice the rest of the building. This is draconian as a policy.

Given how restrictive and demanding this Policy is, it should be very carefully considered in terms of implications.

Policy 4.4.31 advises that "employment floor space would be protected and the release of existing sites would be managed". The word managed has huge implications. Firstly, please advise how the Borough intends to manage the release of sites, as this implies a controlled process and also it advises that the Borough Council will ensure, by this management, that there is sufficient supply to accommodate existing and future demand. We do not believe that the Borough Council has the ability to do this and would wish to understand what their proposals are.

Para 4.4.32 advises that "there is no specific guidance on an appropriate period for marketing.....".

The Policy on the previous page no. 70 does give specific guidance on the appropriate period of marketing and we feel that this clause is, therefore, contradictory.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/7775</th>
<th>Respondent: 8566529 / Derek Corden Agent:</th>
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<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

It was noted during the meeting that policies in the draft Local Plan are predicated upon confirmation by Highways England that the M25 will be widened between Junctions 10 and 16; the A3 M25 Junction 10 will be improved and the congestion associated with the Guildford by-pass will be resolved. Whilst the Borough Council cannot be blamed, the fact that Highways England are unable to confirm this at the present time, or indeed under any short-term timetable, we feel leaves the Borough in a very uncertain environment and those parties relying on the policies somewhat in no man's land.

We believe that a clear statement is required to understand whether the policies in the existing 2003 Local Plan will apply under such circumstances or whether the new policies proposed in this document will apply.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
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<th>Comment ID: PSLPP16/7781</th>
<th>Respondent: 8566529 / Derek Corden Agent:</th>
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This policy specifically relates to land previously developed and under Para B there is the need for a sequential test. Whilst this may be a Government requirement, it is nonsense if the existing buildings on the site flood already. There should be total encouragement to redevelop such sites, almost above all others, to ensure that those buildings are taken out of flooding, given that there is inevitably betterment. To put obstacles in the way of betterment can make no sense whatsoever and will prejudice the ability to create a vibrant town centre which already has a paucity of land for development.

It has also been pointed out by this Group that there are no proposals in this Local Plan to seek to create additional flooding capacity upstream of the town centre in order to either reduce or completely eradicated town centre flooding. We have suggested lowering the Shalford Flood Plain to protect the town and wish to understand if this is a suggestion that has been fully explored. If it has we wish to understand the reasons why it has not been implemented.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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I wish to object most strongly to the proposed change to the Shalford Green Belt and Settlement Boundary contained within the new version of the Guildford local plan.

These changes, to which over 700 residents signed a petition objecting to the proposed settlement boundary change last year, will destroy the open character of our village. The fields provide a wonderful setting for the local community facilities, the tennis club, the bowls green and the village halls. The elevation of the land, some 32 feet above King’s Road, if built upon would tower over these community facilities and the surrounding area.

Access to the proposed site is via Chinthurst Lane, an already a very heavily congested country lane, where parking is currently unrestricted. During the daytime there is nose to tail parking from King’s Road along to Ashcroft and access along the lane is at best difficult, and at worst, a fatal accident waiting to happen.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (No)

Your plan was prepared before the Brexit referendum which must affect your assumptions.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/524  Respondent: 8567105 / David Calow  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (No)

It is not clear if the housing actions achieve the housing objectives. There should be a table showing housing mix and total unmet housing need today and at, say, 5 year intervals for the life of the plan so that the outcomes can be compared with the objectives.

There are no apparent quantified objectives for why the plan creates 69,800m2 of employment space and 3,200 jobs rather than any other number. Is the plan to create opportunities for local people or to encourage more people to move to or commute to Guildford? Will development concentrate on high salary employment and if so in what proportion?

The assessment of the soundness of the infrastructure plans appears to rely on a model. It is not clear how the model has been validated. Looking at plans for Flexford, for example, it is hard to see how extra road traffic could be accommodated even with improvements. A better rail service would help but access to the area is already difficult and dangerous at peak periods.

The plan hopes development can be kept in line with infrastructure improvements but it takes longer to improve infrastructure than to permit development. It is not clear how this objective can be achieved.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/525  Respondent: 8567105 / David Calow  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 7: Any other comments?
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (Yes)

There is a suggestion of a road tunnel for through traffic. The entrance and exit points are not known, the route and full cost are not clear. It is not certain who would pay and how much risk indecision might bring. In principle, however, a road tunnel would reduce costs for everyone trying to get past Guildford and make it easier for Guildford to develop and should be supported.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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17. I OBJECT to the proposed Infrastructure Schedule (Appendix C)

The Infrastructure Schedule sets out the key infrastructure requirements on which the delivery of the plan depends. For each of the Key Allocated Sites in the borough it identifies infrastructure projects that are required, except for Garlick’s Arch (A43) which is not mentioned. It is clear that the Plan takes no account of the infrastructure required for this site and is therefore not fit for purpose.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/953  Respondent: 8568193 / Miss Edwina Attwood  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
18. I OBJECT to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)

The Plan’s proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the borough, it is over double the previous figure of 322 used in previous plans. The SHMA report methodology I believe is inaccurate; inflating the needs of the borough by distorting student numbers. It is based on commercially confidential modelling assumptions that cannot be checked or reviewed. There is no transparency to this evidence base and it is therefore impossible to assess its accuracy. **This is not democratic and is not appropriate for consultation of the Plan.**

The National Planning Policy Framework allows the overall housing target to be reduced to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/1450  Respondent: 8568193 / Miss Edwina Attwood  Agent:

**Document:**  Proposed Submission Local Plan: strategy and sites 2016 / Policy A25

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

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1. **I OBJECT** to Gosden Hill development being in the Local Plan. The land in Gosden Hill does exactly what the Greenbelt was designed to achieve. It provides a green buffer between the Guildford Urban Area and West Clandon, gives Burpham a defined green boundary and breathing space and it hides Guildford town from visitors until they pass the off-slip to Burpham.

No exceptional circumstances have been demonstrated for building on this site and therefore it does not comply with paragraphs 87-89 of the NPPF. It stops the sprawl of Guildford town, assists in safeguarding the countryside from encroachment and assists in urban regeneration by encouraging the recycling of derelict and other urban land: all requirements of the NPPF.

The scale of Gosden Hill is out of proportion to West Clandon. It would have four times the amount of housing plus shops, offices/factories, GP surgery, schools. Development on this scale would blight a historic village with a history going back to the doomsday book and beyond.

Gosden Hill is the most obvious location for the north end of an A3 tunnel. It has rising ground and is situated just before the urban area. If it is built on, it will be very difficult to construct a tunnel.

The development will generate in the region of 6,000 vehicles which will pour on to the A3 which is stationary every day during rush hours. The linking of the A3100, B2215 and A247 would channel thousands of cars through the narrow,
winding road through West Clandon, a road where large lorries mount the pavement every day and through Send and Ripley which are also severely constrained.

The volume of traffic will greatly increase air pollution which is particularly critical given the proposal to build two schools.

Currently, a two way junction at the site would require vehicles wanting to go north on the A3 to go through Burpham which is grid-locked every day.

Burpham’s sewers are at capacity. Sewage would have to be pumped to Slyfield for processing, a project of enormous cost.

There is inadequate fresh water in Guildford and current supplies could not meet the needs of a development of this size.

Electricity supply is also inadequate and would require a big infrastructure development.

The railway station was rejected by Guildford Borough Council in 1984 because it feared Gosden Hill would become a dormitory estate for London.

The wording of the Local Plan with regard to Gosden Hill is so loose that the developer could virtually do whatever it wants.

The remaining agricultural land between Gosden Hill and West Clandon is so small that it is highly likely to be uneconomic and therefore a prime candidate for further development which would roll the Guildford Urban Area over West Clandon towards East Clandon and Wisley.

If the Strategic Sites are developed, the north of Guildford will deliver 36%, 5,036 houses towards the total of around 14,000. The infrastructures of the existing villages and the A3 will be overwhelmed by the scale of development.

A new on-slip at Burpham would only be 1.8km from the on-slip at Burnt Common which is against Highway England’s requirement of 2km.

Development of the A3 at best will not start until after 2020 and the building of a tunnel, which is only an “aspiration” in the Local Plan is likely to be many years after. In the meantime given that developers build houses to provide cash-flow for infrastructure, Gosden Hill will have a crippling effect on villages like West Clandon and the A3.

Gosden Hill already has surface water problems. Merrow Stream crosses the site. No hydrological survey has been carried out to assess the implications. Electricity pylons run through the centre of Gosden Hill which have health and safety issues.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
15.1 OBJECT to the inclusion of the land at Garlick’s Arch, Send Marsh/Burnt Common and Ripley (A43)

Garlick’s Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8). There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).

The Plan states the preference is to making the best use of previously developed land. Yet at the 11th hour a perfectly acceptable brown field site at Burnt Common, capable of accommodating approximately 100 houses, was removed from the Plan and replaced with the Garlick’s Arch site. There was no proper consultation in relation to the inclusion of this site.

Why was a brownfield site removed and replaced with a Greenfield site?

There is no evidence that Section 18 of the Planning and Compulsory Purchase Act 2004, which requires local planning authorities to produce a Statement of Community Involvement, has been complied with for this site. This only came to light for local residents following a Council meeting on 11th May 2016.

Guildford Borough Council’s own Green Belt & Countryside Report does not address Garlick’s Arch at all, so there is no evidence base to support the inclusion of this site.

National Planning Policy promotes sustainable developments, with sustainable transport. With ever reducing bus services in the area and no train station within reasonable walking distance it is impossible for any development on this site to offer a sustainable transport solution. Development on this site is wholly inappropriate (Policy I3).

The stream, which runs through the site, is identified as having a high risk of flooding by the Environment Agency. There are other sites that do not flood that can be developed and therefore this site should be removed from the Plan (Policy P4).

This site is bordered by Ancient Woodland and within it a number of trees are protected by Tree Preservation Orders (Policy D3).

The site has an abundance of wildlife, some of which are protected. It is home to many types of owls and bats, with the woods having cuckoos and woodpeckers. In addition there are regular sightings of badgers, deer and red kites.

Development of the site will result in the loss of habitat. No wildlife report has been conducted on the site. (Policy I4)

It is clear that with this site being added at the 11th hours no infrastructure planning has been undertaken. The Infrastructure Schedule makes no provision for any infrastructure improvements for this site. How will the local services such as schools and doctors cope, many of which are already at capacity? (Policy I1)

Furthermore, several electricity pylon runs through the site, which will have the potential to be a health hazard for any residents.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
16.I OBJECT to the inclusion of the land for new on/off ramps at Burnt Common (A43a)

The addition of north facing ramps to the A3 at Burnt Common would be a disaster for local communities. There is no requirement for local traffic to access the A3 to the north, but the addition will draw in a huge amount of ‘through’ traffic. The route from London/M25 to Woking or would now be through Burnt Common and Send. Equally traffic from the east of Guildford (Merrow etc) and the A25 will now go through West Clandon and Burnt Common. This will cause immense damage to those areas on small roads which cannot be improved.

This Plan does not address the needs of local communities or the Borough in this regard. There has again been no Section 18 consultation on this.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3164  Respondent: 8568193 / Miss Edwina Attwood  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

8.I OBJECT to the damage to the historic environment as a result of the scale of the proposed development (Policy D3)

8 OBJECT to the local plan based on the impact it will have on the special countryside of the borough.

The proposed development at Garlick’s Arch (A43) will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3161  Respondent: 8568193 / Miss Edwina Attwood  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
5.1 OBJECT to the sustainable employment policy (Policy E1)

If developed, the new employment site at Garlick’s Arch, Send Marsh/Burnt Common (A43), would be treated as a Strategic Employment Site.

The proposed development of up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8) at Garlick’s Arch (A43) is in the scheme of industrial development relatively small. Just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m. The Garlick’s Arch site which is in the Green Belt should not be developed as a Strategic Employment Site when there is a suitable alternative brownfield site very close by, which is far more sustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3162  Respondent: 8568193 / Miss Edwina Attwood  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

6.1 OBJECT to the location for new employment floor space at Garlick’s Arch – Site A43 (Policy E2)

Proposals for new industrial, warehousing and storage (use Class B1c, B2 and B8) floor space will be directed to the Industrial Strategic Employment Sites.

There is no need for the new employment floor space to be located at Garlick’s Arch, when just to the south, at Burnt Common, there is existing industrial development, with surplus land that could accommodate further development of 7,000 sq m.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3163  Respondent: 8568193 / Miss Edwina Attwood  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
7.I OBJECT to the loss of rural employment (Policy E5)

Policy E5 supports the retention and development of local services and community facilities in our inset and identified villages. Yet the development at Garlick’s Arch (A43) would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises. The Plan does not promote rural employment; rather it will result in the loss of existing local rural businesses.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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1. POLICY E6 - The leisure and visitor experience

I OBJECT Tourism and visitors do not depend on new visitor “attractions” and could actually be damaged by them, as compellingly argued in the current debate over Newlands Corner. In this policy, the presumption in favour of development runs the risk of becoming an excuse for “overdevelopment”. Heritage sites and the Green Belt are particularly vulnerable.

Guildford has many “leisure and visitor attractions” already. The case for creating more is not made and no examples are given. Instead, the plan’s explicit priorities should be:

1. To protect the borough’s prime leisure and tourism asset, its countryside, from inappropriate development. This is all the more valuable because of its accessibility from London, the rest of Britain and the Continent, in that order. Rural residents are its custodians and require no Council interference. Economically, the most valuable forms of tourism, such as walking and cycling, require no new development. In the overcrowded South-East of England, lack of development is a leisure and tourism asset, not a liability.

2. To help make Guildford’s river landscape less off-putting and support town-break packages for high-value tourists. To achieve this, the policy needs to define what leverage, if any, Council planners have to influence normal tourism market mechanisms.

3. To help private providers market local tourism. This need not involve extra spending. The Council could, for instance, help co-ordinate ready-made, local tourism packages under a distinctive brand at an all-in price. An “English town break” (including B&B accommodation, a walking tour of Guildford, a pub lunch in the Surrey Hills, a visit to Wisley Gardens and a National Trust property and a SouthWest Trains travel card for a day out in London) would be highly attractive to many European visitors who currently by-pass Guildford to go to Bath, Oxford or Cambridge instead.

4. To rule out the redevelopment of scarce rural hotel sites (e.g. Thatchers, East Horsley, earmarked for 40 new houses under Site A37 of the plan yet just a short walk from the new opera house).

I trust the objections made above are fully considered and that the Plan is amended accordingly.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
1. I OBJECT (POLICY H1 – Homes for all) Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan period. It fails to set rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions.

The housing mix is based on out-of-date, pre-Brexit projections and on assumptions set out in a flawed SHMA that has not been scrutinised or evaluated.

I support higher density development in the urban area, without resorting to dehumanising, high-rise buildings that developers commonly claim are necessary for financial viability. Much of Guildford town could usefully be regenerated with 4-5 storey blocks with landscaping and underground parking, as often seen on the Continent and, recently, in London.

Student accommodation should be provided for 100% of new students and more than 60% of existing students, which would free up ideal family accommodation in the urban area. Other university cities (e.g. Oxford) insist on higher percentages than those proposed in the plan. In my view, the Council’s timidity is a case of “regulatory capture” by Surrey University, which has failed to use its existing planning permissions (dating from 2004) to accommodate 3,000 students or to improve the efficient development of its campus (e.g. by building on its extensive and under-used surface car parks). If all students were accommodated in this way, 2,000 homes would be freed up in town and there would be no need to build on the Hog’s Back.

Guildford Borough already has a higher proportion of traveller sites than most comparable boroughs. Over-provision is inappropriate given other constraints.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

1. POLICY H3 – Rural Exception Homes

I OBJECT This is a Trojan horse policy. It says that homes can be built anywhere near a settlement of any form (including agricultural land and the AONB). These homes are meant for people with a village connection, but they could be for anyone on the Guildford borough housing list. To make the housing viable, or to improve the “mix” this can include “market” housing (i.e. normal commercial development which in Guildford usually means large executive homes). This policy means building anywhere, and ignoring all historic planning restrictions.
The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove “exceptional circumstances.”

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** PSLPP16/3165 **Respondent:** 8568193 / Miss Edwina Attwood **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

9.1 OBJECT due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1)

Our villages already suffer from severe congestion for much of the day, for example the Newark Road & Rose Lane junction in the centre of Ripley. The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on local roads.

Many of the country lanes around the villages of Ripley, Send and Clandon are narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition.

I OBJECT to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces.

Many of the affected villages, West Clandon included, already suffer from traffic congestion. Development around these villages will result in more traffic and more parking problems.

With some 5000 houses being proposed close to the village of Ripley, the roads serving the village will become even more congested. Cycling has become ever popular, particularly at weekends with hundreds of cyclists passing through the villages on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road accidents involving cyclists as a result of development proposed under the local plan.

The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the road becoming ever more dangerous for pedestrians.

The council has a statutory obligation to protect the public and the additional traffic flows will bring added pollution and risk to injury of the public. In the case of West Clandon the Street often only has a narrow footpath on one side of the road making it very dangerous, especially when vehicles mount the pavements, as they often need to.

10.1 OBJECT to the lack of proper infrastructure planning for sites (Policy I1)

Policy I1 requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.
Despite the Garlick’s Arch site (A43) being significant for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents will see their quality of life significantly deteriorate.

Many of the utilities in the Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers. No plans to improve these services should mean no development of the Garlick’s Arch site.

Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send, will have their services stretched and overwhelmed. Many of these services are already at capacity and suffering from funding cuts or freezes. Any further development without funding will place further stress upon existing health services.

Police services are seeing funding reduced. The development of the proposed 13,860 homes during the plan period will stretch the police services further and is not sustainable.

There is no provision for the increased capacity of Guildford hospital, where is this assessed and remedied?.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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11.1 OBJECT due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2)

There is no certainty that either the A3 or M25 in the borough will be improved to increase capacity and reduce congestion during the Plan period. Highways England has no plans to even examine improving the A3 before 2020. I worry that development of the large residential sites identified at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), will take place before any improvements are made to the trunk road network. The A3 & M25 are already at capacity during peak hours and any development prior to improvement of these roads will only make the situation worse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
12.1 OBJECT to poor air quality concerns (Policy I3)

Paragraph 4.6.27 of the Plan states that “Development must also mitigate its traffic impacts, including its environmental impacts and impacts on amenity and health.” The significant level of development being proposed, particularly in the north east of the borough will lead to considerable further congestion, despite any attempts to mitigate this through travel plans. This will be particularly acute in built up residential areas and will only lead to greater levels of air pollution, which will have a detrimental effect on local residents and their health and can result in early death.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/3158  Respondent: 8568193 / Miss Edwina Attwood  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

3.1 OBJECT to not protecting the Green Belt (Policy P2)

I OBJECT to the proposals to remove the villages of Ripley, Send and Clandon from the Green Belt, together with sites of Wisley Airfield (A35) and Garlick’s Arch (A43). National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these villages (as mere housing need does not constitute a ‘special circumstance’) and the land to be taken from the Green Belt. Once taken the green belt is lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl and neighbouring villages merging into each other. The significant development in these villages will result in the character of these villages being lost and the countryside encroached. GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site.

Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/3160  Respondent: 8568193 / Miss Edwina Attwood  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
4.I OBJECT to development in areas which are at risk of flooding (Policy P4)

National Planning Policy states that Local Plans should take account of climate change over the longer term, including factors such as flood risk. It goes on to say that new development should be planned to avoid increased vulnerability to the range of impacts arising from climate change.

The Plan states that in accordance with national planning practice guidance, the Level 1 SFRA has been used to guide development towards areas at the lowest risk of flooding and identify areas unsuitable for development. However, the document concludes that land outside of the area of flood risk is not capable of accommodating all of the borough’s identified development needs. A Level 2 SFRA has therefore also been produced and will help the Council apply the exceptions test (as described in the NPPG) as necessary to development proposals in areas at risk of flooding.

The site at Garlick’s Arch (A43) is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. I am aware that this site often floods during winter months and the flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Objections to Guildford Borough Proposed Submission Local Plan (June 2016)

1.I OBJECT in the strongest possible terms to the Guildford Borough Proposed Submission Local Plan (June 2016). This Plan is unsustainable, unworkable and, in many provisions, unnecessary.

I set out below my objections to specific policies and matters within the Plan.

1.1 OBJECT to the Local Plan as the development proposed will not be sustainable (Policy S1)

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a lasting detrimental impact on existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will not be able to cope with the proposed level of development. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are just unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick’s
Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3157  Respondent: 8568193 / Miss Edwina Attwood  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

2.1 OBJECT to the Borough Wide Strategy (Policy S2)

1. The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

2. The Housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.

3. The Housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any commonsense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guildford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of
the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/4527  Respondent: 8568193 / Miss Edwina Attwood  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A25

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to the changed policy A25 Gosden Hill for the development of 1700 homes which is still far too much.
2. There is no need for housing on this site because the local plan housing target is incorrect and inflated and ignores constraints.
3. Gosden Hill is located entirely within the Green Belt. No exceptional circumstances have been demonstrated for building on this site and therefore development here does not meet paragraphs 87-89 of the NPPF. Furthermore, Gosden Hill performs all five functions of green belt,
4. The site has no provision for foul or surface water sewerage and adjoining sewerage is at capacity
5. The Green Belt at this point serves the important function of separating West Clandon from the edge of urban Guildford. Development here will cause the two to coalesce defeating one of the objectives of the Green Belt. If this development proceeds I believe the narrow strip of Green Belt remaining between Guildford and Clandon at this point will be too narrow and will come under further pressure. It will represent an undesirable ribbon development along the A3. It will be highly visible from the A3 when approaching Guildford and will, in conjunction with A43a at Garlick's Arch give the appearance of almost continuous development from Send through to Guildford.
6. The development of this site cannot be sustainable and will cause massive congestion onto surrounding roads. The development will generate in the region of 6,000 vehicles which will exit straight on to the A3 which is stationary every day during rush hours. The linking of the A3100, B2215 and A247 would channel thousands of cars through the narrow, winding road through West Clandon.
7. I object to the proposal for a link road to bring traffic from the Gosden Hill development to the proposed 4 way junction at Burnt Common. This has the potential to generate large volumes of traffic (including commercial vehicles) on the A247 through Send and West Clandon - a road which is already under traffic stress (see below).
8. The volume of traffic will greatly increase air pollution which is particularly critical given the proposal to build two schools.
9. A new on-slip at Burpham would only be 1.8km from the on-slip at Burnt Common which is against Highway England’s requirement of 2km.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/4528  Respondent: 8568193 / Miss Edwina Attwood  Agent:
1. I object to the changed policy A43 Garlick’s Arch for 400 homes and 6 travelling show people pitches
2. It ignores all the thousands of previous objections made by local people
3. There is no proven demand for travelling show people plots in this location
4. There is no need for putting houses on this site because the local plan housing target is incorrect and inflated and ignores constraints.
5. The allocation of 28.9 ha is an excessive land grab into the Green Belt. If we take a normal density of 30 homes per ha and it is at the end of the day proven that there is a need for 400 homes in this location the land requirement is 13 ha not 28.9 ha which is more than double. This replicates a similar over land grab at Burnt Common where the factor is 7 times the land required.
6. This confirms the worrying impression that GBC have a pre-determined policy of building on the Green Belt at every opportunity. The arithmetic does not stack up. One would have thought that they would as custodians of the green belt be intent on conserving it rather than exploiting it.
7. The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.
8. Garlick’s Arch (A43) is in an unsustainable location. It does not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. The site is unsuitable due to lack of access to sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be dependent on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.
9. The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.
10. I object to the proposal to remove Garlick’s Arch from the Green Belt. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for this land to be taken from the Green Belt. Once taken the green belt is lost forever. There is a real danger that the loss of this Green Belt will result in urban sprawl and the neighbouring villages merging into one another. The significant development in West Clandon, Send and Ripley will result in the character of these villages being lost and the countryside encroached.
11. I object to the development at Garlick’s Arch because of flood risk. The site at Garlick’s Arch is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. Knowing the area well I am aware that this site often floods during the winter months and the flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.
12. I object to the loss of rural employment on the site. The development at Garlick’s Arch would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises.
13. I object to the potential loss of Ancient Woodland on the site. The proposed development at Garlick’s Arch will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees that existed in the year 1600.
14. I object due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1). Our villages are already suffering from severe congestion for much of the day, for example the Newark Road and Rose Lane junction in the centre of Ripley and the A247 through West Clandon.
The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.

15. Furthermore, many of the country lanes around the villages of West Clandon, East Clandon, Ripley, and Send are narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition. I object to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces.

16. Many of the affected villages, such as West Clandon, East Clandon, Send, and Ripley, already suffer from parking problems. Further development around these villages will only result in more traffic and more parking problems.

17. With some 5000 houses being proposed close to the villages of West Clandon, East Clandon, Send, and Ripley, the roads serving the village will become even more congested. Cycling has become a popular pastime, particularly at weekends hundreds of cyclists past through the village on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road accidents involving cyclists as a result of the development proposed under the local plan.

18. The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the roads becoming ever more dangerous for pedestrians.

19. I object to the lack of proper infrastructure planning for sites (Policy I1). Policy I1 requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.

20. Despite the Garlick’s Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents’ in the locality will see their quality of life significantly deteriorate in many ways.

21. Many of the utilities in the West Clandon, East Clandon, Burpham, Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers. No plans to improve these services should mean no development of the Garlick’s Arch site.

22. Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are already at capacity and suffering from funding cuts or freezes. Any further development without funding will place further stress upon existing health services.

23. I object due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2). There is no certainty that either the A3 or M25 in the borough will be improved to increase capacity and reduce congestion during the Plan period. Highways England has no plans to even examine improving the A3 before 2020. I have considerable concerns that development of the large residential sites identified at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), will take place before any improvements are made to the trunk road network. The A3 & M25 are already at capacity during peak hours and any development prior to improvement of these roads will only make the situations worse.

24. I object to poor air quality concerns (Policy I3). Paragraph 4.6.27 of the Plan states that “Development must also mitigate its traffic impacts, including its environmental impacts and impacts on amenity and health.” The significant level of development being proposed, particularly in the north east of the borough will lead to considerable further congestion, despite any attempts to mitigate this through travel plans. This will be particularly acute in built up residential areas and will only lead to greater levels of air pollution, which will have a detrimental effect on local residents and their health.

25. I object to the inclusion of the land at Garlick’s Arch, Send Marsh/Burnt Common and Ripley (A43). Garlick’s Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8). There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).

26. It is clear that with this site being added at the eleventh hour and no infrastructure planning has been undertaken. The Infrastructure Schedule makes no provision for any infrastructure improvements for this site. How will the local services such as schools and doctors cope, many of which are already at capacity? (Policy I1)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<th>Respondent: 8568193 / Miss Edwina Attwood</th>
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<td>The Plan now states: “the presumption in favour of sustainable development will not automatically apply to policies relating to sites protected under the Birds and Habitats Directives and/or designated as Sites of Special Scientific Interest (SSSIs), land designated as Green Belt, Local Green Space, the Surrey Hills Area of Outstanding Natural Beauty, designated heritage assets and locations identified as at risk of flooding.”</td>
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<td>Gosden Hill and Blackwell Farm (both currently in the green belt) are called “urban extensions” surely a euphemism for urban sprawl? Garlick’s Arch and Burnt Common developments take land from the green belt to extend Ripley/Send. One of the important specific purposes of the green belt is to prevent urban sprawl.</td>
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<td>Policy A43</td>
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<td>This is green belt. It is not suitable for industrial development, the A247 cannot handle the present traffic load let alone an increase in the number of larger forms of transport. The local infrastructure and services cannot handle another 400 homes, the schools, doctors, and all other services are already overloaded in this area. Please think again as this area is not suitable for this plan</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? (No), is Sound? (No), is Legally Compliant? (No)

Answer (if comment is on questions 1-7 of the questionnaire): ()

This is green belt. It is not suitable for industrial development. The A247 cannot handle the present traffic load let alone an increase in the number of larger forms of transport. The local infrastructure and services cannot handle another 400 homes, the schools, doctors and all other services are already overloaded in this area. Please think again as this area is not suitable for this plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** PSLPS16/267  **Respondent:** 8568673 / Enid Morgan  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy 43A

The amount of land needed for this totally unnecessary plan is huge. We already have adequate access to the A3 southbound and northbound.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** PSLPS16/124  **Respondent:** 8568673 / Enid Morgan  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A44

Do you consider this section of the document; complies with the Duty to Cooperate? (No), is Sound? (No), is Legally Compliant? (No)

Answer (if comment is on questions 1-7 of the questionnaire): ()
This is green belt land and suggest you concentrate on re-using brown field sites in the area, such as the whole of the Wisley airfield site. The road of Send Hill is far too narrow and is congested to the point of being impassable during school morning and afternoon traffic periods to the point of already being a “no go” area to the existing residents during those times. Why does the Council persist in these lines of thought when obvious brown field sites should be used more readily and legally, without the need for pointless consultation when brown field sites are available to such an extent as they are in this area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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I object to the above Policies A42, A43,A58 and Green Belt Policy 2 at paragraph 4.3.15 since I consider any encroachment on Green Belt areas is morally and environmentally wrong - given the Brown Field Sites available in the area (including, for example, most of the vast Wisley Airfield site).

Local Plan 2017 is a clear failure of the proper planning process which was the basis of all the tens of thousands of objections to it in its previous guise of Local Plan 2016. However, local Plan 2017 has ignored all those earlier objections and proceeded with even worse schemes, bearing in mind the clearly inadequate surrounding social infrastructure and road links.

Please desist from wasting tax payers' money on such pointless anti-social planning exercise and listen to the wishes of those tax payers in the future.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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1. **Evidence. I OBJECT** Data presented by GBC is suspect and estimates of required housing is exaggerated. I object to excessive development in green belt for housing that may not be needed and the effect on infrastructure of this development. If the council needs to provide 'affordable homes' this will need to be high density on possibly brown field sites to have a chance of being 'affordable'.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

| 1. **Policy A 43.30 Land at Garlick's Arch:** I object This is A NEW INCLUSION and whilst I see some merit in improving A3 access the effect on Send and the A 247, which cannot be sufficiently improved, would be likely to create 'gridlock' This doesn't seem to have been thought through! Garlick's Arch is again a massive incursion into the green belt to which I object. This seems to have replaced the Burnt Common site which would have had less impact on the area and I understand is classified as a brown field site. |
| Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( ) |
| Answer (if comment is on questions 1-7 of the questionnaire): () |

| 1. **Policy A44.1.9 Land to the west of Winds Ridge and Send Hill.** |
| This site was not included in the draft and has not been consulted on previously. I object as this is part of the green belt and part of open countryside. In past years substantial land fill has taken place and it is still vented. Access is by narrow lanes which cannot cope with extra traffic generated. I believe part of this site or adjacent land is already owned by a Traveller family, which if site were developed far more than 2 traveller pitches would appear. 40 Homes, if needed, would be better provided on the burnt common site which seems to have disappeared from the latest version of the plan. |
| Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( ) |
| Answer (if comment is on questions 1-7 of the questionnaire): () |

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<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy P2</td>
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<td><strong>Policy P2. Send should retain its green belt. I object</strong> to plans to remove areas from green belt status. In particular land behind the school including playing fields. With the middle school combining with the first school it would seem likely that the middle school site would be under pressure for redevelopment, which does not seem to appear in the plan. Any development here would exacerbate the traffic congestion in Send Hill and Send Road.</td>
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<td><strong>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</strong></td>
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<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
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<td><strong>5 GBC have not followed correct process.</strong> There are significant changes in the sites suggested including slipping in new sites by the 'back door' The proposals for the housing requirements have gone up and down in recent years and it is not acceptable to try to use regulation 19 rather than the full consultation to which I <strong>object.</strong></td>
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<td><strong>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</strong></td>
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<td><strong>Answer (if comment is on questions 1-7 of the questionnaire): ()</strong></td>
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</table>
As a resident in both West and then East Horsley for many years I wish to record my Strong OBJECTIONS to the current Plan for the area as a whole and my Villages in particular.

My main reasons are as follows :-

1) The vast increase in houses proposed, of various types. bears no relationship to the very modest needs of this virtually rural area

2) The proposal to adjust the Green Belt area, attacks the original grand concept in its development as a “breathing space” for London.

3) The Horsleys have an important heritage status and lie within the Surrey Area of Outstanding Natural Beauty.

4) The Villages already suffer from the overload of their Schools, Shops, Doctors Surgeries, Roads and Parking. It is ALWAYS the case that such vital facilities are the very last to be increased within Housing Developments of the scale proposed.

Any change to aspects such as these would affect the everyday life of current and potential new members to an unacceptable degree, in my view.

Please give my opinion consideration in your proposed study of Plan

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
• Woking Borough Council will be concerned if there are any unmitigated traffic implications of the development proposals in the Guildford Local Plan that would have adverse impacts in the Borough. The development of some of the strategic sites identified in the Local Plan such as the Former Wisley Airfield would potentially have significant traffic implications in Woking if the impacts are not addressed. The implications of developing the proposals in the Plan on the road network such as the A3 corridor would be severe if appropriate mitigation is not identified and delivered as part of developing the sites. Appendix C of the Local Plan sets out the transport infrastructure projects identified to support the delivery of the Plan. This includes a number of projects to improve the A3 corridor and other road networks with indicative costings and funding sources. Woking Borough Council is aware that Highways England is still in the process of testing various options for A3 corridor improvements. The outcome of this work is not yet known. It is expected that the outcome of the work will be reflected in the Local Plan and if necessary used to refine the projects set out in Appendix C. Any adverse impacts should be appropriately addressed to ensure the sustainable delivery of the Local Plan without exacerbating the existing traffic conditions in Woking.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/1923  Respondent: 8569857 / Woking Borough Council (Ernest Amoako)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

• The Local Plan should be supported by adequate infrastructure, in particular, educational facilities. This is necessary to avoid any additional pressure on existing infrastructure in Woking Borough. Appendix C sets out the education facilities identified to support the Local Plan. However, unlike the early years and primary school provision, the provision of secondary schools has no delivery timetable and who is likely to deliver. It is clear from the evidence that to deliver the housing requirement, the education infrastructure in Appendix C will be necessary. Consequently, it will be helpful if indicative dates for their provision are provided and are aligned to when development are likely to come forward.

• On a minor point, the Local Plan would be further enhanced if it includes a section on how it will be implemented and the conditions for its review.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/8114  Respondent: 8569857 / Woking Borough Council (Ernest Amoako)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
The protection of the Thames Basin Heaths Special Protection Area (SPA) is a strategic issue of significant interest to all the local authorities with SPAs within their boundaries. A Joint Strategic Partnership Board has been set up to ensure that a strategic approach is taken for its protection. In accordance with the relevant legislative guidance, it will be helpful if the policy is drafted to avoid harm to the SPA rather than its current focus on mitigating identified adverse impacts. In this regard, an indication in Policy P5 of whether Guildford Borough Council has identified sufficient SANGs land to meet its development needs would be helpful.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Overall, it is acknowledged that the Guildford Local Plan has made a significant attempt to identify sufficient land to meet the full objectively assessed housing need for the Borough for the entire plan period. In particular, the Plan makes provision for the delivery of 13,860 new homes between 2013 and 2033. This is equivalent to 693 new homes a year. In additional, the Plan identifies land to deliver about 1,984 new homes as a buffer to ensure early provision, flexibility of delivery and the deliverability of the housing requirement. This will make a significant contribution to housing provision in the Housing Market Area, and is commended. However, the Council would like to make the following detailed comments:

- Paragraph 47 of the National Planning Policy Framework (NPPF) emphasises that local authorities should use their evidence base to ensure that their Local Plans meets the full objectively assessed needs for market and affordable housing in the housing market area. Paragraph 179 goes on to say that joint working should enable local planning authorities to work together to meet development requirements which cannot wholly be met within their own areas. The Council is aware of the information that Guildford Borough Council has provided to demonstrate that the unmet need from Woking cannot be met in Guildford. Once this evidence is agreed at the Examination, the Council is willing to cooperate with Guildford and Waverley Borough Councils to find ways of how the unmet need in the Housing Market Area can be addressed. It is recognised that discussions have already started between the three authorities on this particular issue and it is envisaged that this will continue. The three authorities should also monitor housing delivery against their housing requirements to see whether any measures will be necessary to facilitate housing delivery.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Overall, it is acknowledged that the Guildford Local Plan has made a significant attempt to identify sufficient land to meet the full objectively assessed housing need for the Borough for the entire plan period. In particular, the Plan makes provision for the delivery of 13,860 new homes between 2013 and 2033. This is equivalent to 693 new homes a year. In additional, the Plan identifies land to deliver about 1,984 new homes as a buffer to ensure early provision, flexibility of delivery and the deliverability of the housing requirement. This will make a significant contribution to housing provision in the Housing Market Area, and is commended. However, the Council would like to make the following detailed comments:

- Paragraph 47 of the National Planning Policy Framework (NPPF) emphasises that local authorities should use their evidence base to ensure that their Local Plans meets the full objectively assessed needs for market and affordable housing in the housing market area. Paragraph 179 goes on to say that joint working should enable local planning authorities to work together to meet development requirements which cannot wholly be met within their own areas. The Council is aware of the information that Guildford Borough Council has provided to demonstrate that the unmet need from Woking cannot be met in Guildford. Once this evidence is agreed at the Examination, the Council is willing to cooperate with Guildford and Waverley Borough Councils to find ways of how the unmet need in the Housing Market Area can be addressed. It is recognised that discussions have already started between the three authorities on this particular issue and it is envisaged that this will continue. The three authorities should also monitor housing delivery against their housing requirements to see whether any measures will be necessary to facilitate housing delivery.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Thank you for giving Woking Borough Council the opportunity to comment on the Guildford Borough Proposed Submission Local Plan: Strategy and Sites. Woking, Guildford and Waverley Borough Councils are in the same Housing Market Area and Functional Economic Market Area and as such have common strategic cross boundary issues of interest to be considered as part of the plan making process. Under the Duty to Cooperate, Woking Borough Council has already worked in partnership with Guildford Borough Council to scope the common strategic issues of interest, including housing, transport and infrastructure provision, and in particular, the traffic implications of your plan in Woking. Officers from both authorities have signed a Memorandum of Understanding to work together to address both current and future strategic cross boundary issues. So far, the partnership working between the two authorities is positive and purposeful. It is important to highlight that Woking Borough Council is also in the process of preparing two Development Plan Documents, and the Duty to Cooperate discussions have been and should continue to be a two way dialogue between the two authorities to the mutual benefit of our respective Plans.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp173/682  Respondent: 8569857 / Woking Borough Council (Ernest Amoako)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Appendix C: Infrastructure Schedule

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The Local Plan should be supported by adequate infrastructure, in particular, educational facilities. This is necessary to avoid any additional pressure on existing infrastructure in Woking Borough. Appendix C sets out the education facilities identified to support the Local Plan. Guildford Borough Council should make sure that the list of infrastructure is adequate to mitigate development impacts across the borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/1427  Respondent: 8569857 / Woking Borough Council (Ernest Amoako)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Woking Borough Council will be concerned if there are any unmitigated traffic implications of the development proposals in the Guildford Local Plan that would have adverse impacts in the Borough. The development of some of the strategic sites identified in the Local Plan such as the Former Wisley Airfield would potentially have significant traffic implications in Woking if the impacts are not addressed. The implications of developing the proposals in the Plan on the road network such as the A3 corridor would be severe if appropriate mitigation is not identified and delivered as part of developing the sites. Appendix C of the Local Plan sets out the transport infrastructure projects identified to support the delivery of the Plan. This includes a number of projects to improve the A3 corridor and other road networks with indicative costings and funding sources. Woking Borough Council is aware that Highways England is still in the process of testing various options for A3 corridor improvements. The outcome of this work is not yet known. It is expected that the outcome of the work will be reflected in the Local Plan and if necessary used to refine the projects set out in Appendix C. Any adverse impacts should be appropriately addressed to ensure the sustainable delivery of the Local Plan without exacerbating the existing traffic conditions in Woking.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/1428  Respondent: 8569857 / Woking Borough Council (Ernest Amoako)  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy P5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The protection of the Thames Basin Heaths Special Protection Area (SPA) is a strategic issue of significant interest to all the local authorities with SPAs within their boundaries. A Joint Strategic Partnership Board has been set up to ensure that a strategic approach is taken for its protection. In accordance with the relevant legislative guidance, it will be helpful if the policy is drafted to avoid harm to the SPA rather than its current focus on mitigating identified adverse impacts. In this regard, an indication in Policy P5 of whether Guildford Borough Council has identified sufficient SANGs land to meet its development needs would be helpful.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/1426  Respondent: 8569857 / Woking Borough Council (Ernest Amoako)  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Overall, it is acknowledged that the Guildford Local Plan has made significant attempt to identify sufficient land to meet the full objectively assessed housing need for the Borough for the entire plan period based on the addendum Strategic Housing Market assessment undertaken by your Council. In particular, the Plan makes provision for the delivery of 12,426 new homes between 2014 and 2034. It is noted that the original figure in the West Surrey SHMA is 13,860 new homes. This is equivalent to 654 new homes a year. In addition, the Plan identifies land as buffer to ensure early provision, flexibility of delivery and the deliverability of the housing requirement. This will make a significant contribution to housing provision in the Housing Market Area, and is commended.

However, the Council would like to make the following detailed comments:

- Paragraph 47 of the National Planning Policy Framework (NPPF) emphasises that local authorities should use their evidence base to ensure that their Local Plans meets the full objectively assessed needs for market and affordable housing in the housing market area. Paragraph 179 goes on to say that joint working should enable local planning authorities to work together to meet development requirements which cannot wholly be met within their own areas. It is therefore expected that Guildford Borough Council will use the Local Plan process to meet the unmet housing need arising from Woking Borough. The Council is aware of the information that Guildford Borough Council has provided to demonstrate that the unmet need from Woking cannot be met in Guildford. Once this evidence is agreed at the Examination, the Council is willing to cooperate with Guildford and Waverley Borough Councils to find ways of how the unmet need in the Housing Market Area can be addressed. Waverley Borough Council has just been through their Local Plan Examination and the unmet need from Woking was a key topic for discussion. It is recognised that discussions have already started between the three authorities on this particular issue and it is envisaged that this will continue. The three authorities should also monitor housing delivery against their housing requirements to see whether any measures will be necessary to facilitate housing delivery.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp17q/268  Respondent: 8569857 / Woking Borough Council (Ernest Amoako)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Question 4: Duty to cooperate

Do you consider this section of the document: complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Thank you for giving Woking Borough Council the opportunity to comment on the Guildford Borough Proposed Submission Local Plan: Strategy and Sites. Woking, Guildford and Waverley Borough Councils are in the same Housing Market Area and Functional Economic Market Area and as such have common strategic cross boundary issues of interest to be considered as part of the plan making process. Under the Duty to Cooperate, Woking Borough Council has already worked in partnership with Guildford Borough Council to scope the common strategic issues of interest, including housing, transport and infrastructure provision, and in particular, the traffic implications of your plan in Woking. Officers from both authorities have signed a Memorandum of Understanding to work together to address both current and future strategic cross boundary issues. So far, the partnership working between the two authorities is positive and purposeful. It is important to highlight that Woking Borough Council is also in the process of preparing its Site Allocations Development Plan Document, and the Duty to Cooperate discussions have been and should continue to be a two way dialogue between the two authorities to the mutual benefit of our respective Plans.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<td>Where is the definition for 'exceptional circumstances'?</td>
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<td>The definition for 'insetting' bears no resemblance to the way in which it is being implemented? In relation to this, perhaps there should be a definition for 'openness'</td>
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<td>Isn't there a problem with 'double speak' here, when language is being subject to a glossary in order to explain the alternative definitions that GBC and or planning dept's have given it? The biggest issue being the difference between the term objective and subjective, ie an OAN where no-one has the methodology behind it is not objective or transparent in anyone's eyes but some planners and GBC Cllrs (not all). The Greenbelt sensitivity map is subjective as are other assessments where the decisions resulting from criteria used are made on a site by site basis on someone's opinion (who themselves are not always representing independent companies).</td>
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<td>One of the criticisms of the Draft Plan was the complexity and difficulty in understanding the Plan and tracking changes.</td>
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<td>This gives an overview, but no detail at all. 'Improvements to X road' doesn't tell us what the improvements are, who will benefit, where in the road etc. The schedule is weak and advocates much of the funding to developers who are also expected to supply 40% affordable housing? the two do not tally. Far more details are needed and detailed maps as well as clear ideas of the benefits (assessed) these changes will bring.</td>
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<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Guildford Urban Area</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The maps have different ratios which can be rather misleading in terms of comparing one with another.

The map for Compton suggests that the dotted pink line is the boundary line for the village when in fact this is just the village settlement area. The wider village includes Priorsfield Road and The Avenue and Down Lane and parts of New Pond Road and the Hog's Back and Blackwell Farm, all of which are missing. Common land should ideally be marked up. Blackwell Farm is currently shown on a map called 'Guildford Urban' which of course does not exist and hence this could be misleading.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Policy A55

I object to the removal of land from Greenbelt for the provision of two traveler pitches on Puttenham Heath Road to 'enable delivery'. The area warrants Greenbelt status and should remain in Greenbelt. Removal is a big step towards the eventual development of permanent accommodation, which would result in loss of the two pitches. I understood that temporary approval for one was given due to the exceptional circumstances put forward by the traveller's solicitor at the hearing. On this basis there is absolutely no need to remove greenbelt status.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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I object to policy A26 Blackwell Farm There is no need for housing on this site because the local plan housing target is incorrect and inflated and ignores constraints. Blackwell Farm is located entirely within the green belt. No exceptional circumstances have been demonstrated for building on this site and therefore development here does not meet paragraphs 87-89 of the NPPF. Furthermore, Blackwell Farm performs all five functions of green belt, and fulfils purposes 1, 3 and 5 very strongly. Purpose 1 - “checking the unrestricted sprawl of large built-up areas”. There is huge pressure to develop on the western edge of Guildford; the University of Surrey has stated publicly that its key objective is to develop the whole of its landholdings, stretching west to Flexford Farm. This, combined with the indefensible boundary being proposed (a hedgerow rather than the existing belt of ancient woodland), will put more of the green belt and the Surrey Hills Area of Outstanding Natural Beauty (AONB) at risk of future development. Purpose 3 “assists in safeguarding the countryside from encroachment” - the proposed movement of the green belt boundary on the west of Guildford to allow for development of the University in 2004 resulted in the encroachment on countryside and the loss of working farmland (including some Grade 2) at Manor Farm. The proposed future change in the boundary would result in further encroachment and the loss of farmland including further Grade 2. The proposed road development with access road from the A31 would also effectively cut off farm access to the south of the development area leading to further urban influence on this countryside. The University’s stated key objective is to develop land, which includes Chalkpit and Wildfield farms leading to the risk of further boundary change and further encroachment in future years. Purpose 5 - “assists in urban regeneration by encouraging the recycling of derelict and other urban land” Whilst all green belt assists towards this purpose, the ownership of this land by the University of Surrey with its extensive landholdings within the urban boundary (including land it leases to the Hospital and Holiday Inn, the Surrey Research Park, Hazel Farm as well as two large campuses) means that the location of Blackwell Farm within the green belt plays an even greater and direct role in encouraging the more efficient usage of urban land. Stopping development on Blackwell Farm would result in the University of Surrey investing in, and regenerating, land in its ownership and delivering its commitments following the 2003 boundary review (including 270 homes for key workers, 3,125 student residences and releasing further accommodation at Hazel Farm). The University has 17 hectares of surface car parking that could be built over with offices and flats. This is a more sustainable option than building over open farmland (largely grade 2 and 3a) within the green belt. The Blackwell Farm development would result in harm to the Surrey Hills Area of Outstanding Natural Beauty (AONB), harm to an Area of Great Landscape Value (AGLV), and harm to the setting to the AONB. (Blackwell Farm forms the views into and out of the Hogs Back ridge). The NPPF is clear that AONBs should be afforded the highest level of protection in relation to landscape and scenic beauty. All development proposals within and adjacent to the AONB must conserve or enhance its special qualities. The NPPF also makes it clear that applications for major development in the AONB will be refused unless exceptional circumstances are demonstrated and the development is proven to be in the public’s interest. Guildford Borough Council has not shown that the proposed housing development or the extension of the Research Park, or the proposed link road from the A31 to Gill Avenue, is in the wider public interest. Indeed, the increased traffic through the already congested Egerton Road/Gill Avenue junction, which would result from the development, would impede emergency vehicles travelling to the Hospital and this would be very much against public interest. GBC’s Policy P1 states that, “The Surrey Hills Area of Outstanding Natural Beauty (AONB) will be conserved and enhanced to maximise its special landscape qualities and protect it from inappropriate development. All proposals will be considered against whether they conserve and/or enhance the setting and views of the AONB”. I question how the proposal to carve a new two-lane carriageway through the AONB fits this policy, or meets para 115 of the NPPF? Finally, nearly the whole site has been identified as a “candidate area” for AONB status in the Landscape Evaluation Study commissioned by Compton, Worplesdon and Wanborough parish councils. Therefore, the entire site should be treated as though it is within the AONB during this local planning process. The access to the proposed Blackwell Farm site will put additional peak hour pressure on two of Guildford’s worst congestion “hot spots”: the A31 (Hog’s Back) and the Tesco Roundabout on Gill Avenue. GBC’s proposal to create a new major route into Guildford from the west at, or close to, the Down Place private driveway, and to make this the main access to the planned Blackwell Farm development, does not appear to have been thought through. There are queues stretching back from the Farnham Road Bridge as far as the Down Place driveway entrance most weekday mornings and any traffic generated by the new development would not be able to clear the junction. In order to accommodate the volume of traffic using the new junction (generated by residents of the new housing estate, employees at the Surrey Research Park, Hospital and University, and visitors to the new school/supermarket), there would almost certainly need to be a roundabout (rather than the proposed traffic-light controlled junction) and GBC has ruled out a roundabout on grounds of landscape impact and traffic. The secondary access to the site at Gill Avenue also presents problems, and as GBC states in its Transport Assessment (14.9.5), changes planned for the Tesco roundabout will not mitigate against the increased level of traffic through the junction as a result of the Blackwell Farm development, and this in turn will impact on the Egerton Road/Gill Avenue junction, which serves the Royal Surrey County Hospital. I question whether it is responsible to allow a development that would impede
emergency access to an A&E department and a major incident unit. The traffic impact resulting from the development of Blackwell Farm on the strategic road network would not appear to be properly assessed but it would be alleviated in part (but not completely) by widening the A3. However, timing and funding for this work is unclear so there would be many years of traffic chaos before any widening took place (if indeed it does). More significantly, the widening of the A3 would create noise and environmental impact on the neighbouring residential areas of Onslow Village and Beechcroft Drive and a six-lane highway would cause greater severance between Guildford and Blackwell Farm and areas to the west. The NPPF states in Section 6 para 47 that local authorities should “identify a supply of specific, developable sites or broad locations for growth, for years 6-10 and, where possible, for years 11-15”. In a footnote to this, it further adds, “To be considered developable, sites should be in a suitable location for housing development and there should be a reasonable prospect that the site is available and could be viably developed at the point envisaged.” I consider that the proposed access arrangements to Blackwell Farm are wholly inadequate for a development of this scale and thus the site cannot be “viably developed”.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:  
- Independent Traffic report annex 3.pdf (2.5 MB)  
- Annex 1 - Hogs Back Natural Beauty Evaluation V2 24.05.16.pdf (5.9 MB)

Comment ID: PSLPS16/8293  
Respondent: 8570273 / Fiona Curtis  
Agent: Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the inclusion of Blackwell Farm in this Local Plan, for the following reasons:

- The southern slopes of the Hog's back are AONB and views in and out of that area should be protected and this is not possible if the development goes ahead.
- Blackwell Farm has recently been assessed by an independent expert as being of AONB quality and we anticipate that it will be included within the Surrey Hills AONB as part of the forthcoming boundary review.
- The South Downs is National Park and there has been a call for the North Downs to be considered in the same light. This would make Blackwell Farm a great asset to Guildford and a tourist attraction (particularly as it is home to one of the few Model Farms in the South East) and would fit in well with the rural ventures such as Greyfriars Vineyard, Mane Chance horse sanctuary and Watts Gallery, all of which are in close proximity.
- Blackwell Farm is very effective in fulfilling the functions of Green Belt.
- Blackwell Farm land which has been categorised as the best and most versatile (Grades 2 and 3a) and there is strong demand for local food production.
- More people objected to the inclusion of this strategic site than to any other strategic site, its inclusion is not supported.
- The 4-way access to the site on the A31 (Hog’s Back) is highly unlikely to be viable, and would harm to the AONB for miles (due to the need for lighting and its elevated position). The suggestion that rat running could be deterred through the use of automatic number plate is unrealistic. What about visitors and deliveries and changes of vehicle? Likewise, a barrier would cause chaos and possibly increase the volume of traffic wishing to use the A31. If no restrictions were put into place, the route will become a rat run, then there is nothing from stopping traffic on the A31 from using it if it is indicated as the shortest route. If the A3 were congested traffic could also come off at the Compton roundabout and take this route via Down Lane, which would add to congestion in this busy village and would negatively impact the tranquil lane, which is the home of Watts Gallery and Chapel.
- Maps, tables and results from assessments such as traffic impact all refer to the Blackwell Farm site as in “Guildford urban area” and refer to non-existent boundaries as if they are current. There is nothing urban about this area of countryside as the independent landscape assessment reveals.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2195  Respondent: 8570273 / Fiona Curtis  Agent: Fiona Curtis

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to Policy D1 Making better places

I would support this if this were about regeneration which is what it should be about. Instead GBC would like us to think that building 3 sites of approx 2000 homes and two of approx 1000 can be considered 'better places than the countryside they currently occupy? The only site of the 5 that I would support as a form of regeneration is Slyfield.

The monitoring indicator might be better served to take on board the number of objections based on poor design rather than appeals?

I am pleased to see a policy that acknowledges older people in Guildford but I am concerned about the blurring between urban and rural living and design. It is not appropriate to create better living spaces in town at the expense of villages whose character and quality of life is being eroded due to coalescence and traffic. Better places is not just about bricks and mortar, it must allow village life to remain just that and not become urbanised. The policy is one-sided and narrow, it does not take on board the many aspects of life that create 'better places', but instead concentrates on the appearance of buildings. I believe this is a good start but this policy needs developing.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2196  Respondent: 8570273 / Fiona Curtis  Agent: Fiona Curtis

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to Policy D2 Sustainable design, construction and energy Sustainability should be an overarching ambition, conditioning the whole local plan and running through it, as claimed in the NPPF, “like a golden thread”. It should be set out clearly in Policy S1, not buried away as a minor detail in Policy D2. This policy amounts to “greenwashing”, expounding aspirational environmental targets while ignoring the plan to build dormitory towns across the Green Belt that are environmentally and socially unsustainable. These settlements will bring vastly increased car use and will lead to unacceptable traffic congestion, overstretched social infrastructure, and more greenhouse gas emissions, noise and light pollution. This policy should not be just about saving energy but about preserving the borough’s stock of natural capital, especially the countryside, from attempts to rig the housing market. This policy’s emphasis on Combined Cooling Heating and Power and communal heating networks is difficult to understand, since no such networks are available locally.

I am unsure of how 4.5.27 will apply to strategic sites with mixed development without a pool? Surely by their very nature ie 1000 houses plus, they will use a lot of energy and create a lot of waste?

Future proofing some houses for independent living for elderly should also be built into new builds at the planning stage. Given the ageing population, this would appear to be a serious omission. Elderly relatives can be looked after by relatives if a percentage of smaller bespoke homes are built for this purpose. This might also free up much needed family homes. The introduction of technology to new homes such as telecare / medicine would also help future proof homes and as Surrey is a leader in faster broadband applications this should be viable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID:</th>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( No ), is Sound? ( No ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

This policy doesn't go far enough. I, therefore object to policy D3 Historic Environment.

This policy clashes with the strongly pro-development agenda of the rest of the plan and fails to address the contradiction. History is unamenable to improvement, so the policy should commit the Council firmly to protecting and preserving our heritage assets from development. Instead, the specific policy pledge to “support development” that might “enhance” heritage assets leaves wide scope for abuse in the form of destructive commercialization and financial leveraging of relevant sites. This policy is based on the false premise that Guildford’s heritage is inherently in decay. This is a developer’s charter – a short step away from the idea that the historic environment needs to pay its way to be preserved. The Council’s reviews of Guildford Museum and the Electric Theatre support this interpretation. Whatever the “reasoned justification”, the actual policy wording in the blue box leaves too many loopholes. Development close to historical assets is harmful and should be expressly prohibited. This policy fails to meet the requirements of NPPF paragraphs 126 and 131-133.

We are very lucky as we have several noted historians in Guildford who really do understand history and its relevance and importance and not just in terms of buildings or how to make money from it. They are however not listed or even consulted (according to them). Indeed, their opinions are often unwelcome which does not give me faith in the sincerity of this policy.
History is more than just buildings, it can apply to gardens and aspects that have influenced the changes in the town and villages. The area next to the fire station in Guildford has one of the biggest prehistoric finds of flint weaponry, yet few know about it. GBC was given the opportunity to purchase the home that Lewis Carroll stayed in but did not, this was a lost opportunity. Quarry Street is awash with offices, yet could be a unique historic quarter if it were conserved rather than exploited.

4.5.45 I disagree that GBC meets NPPF requirements. The Conservation dept. at GBC is so small (1 permanent member of staff and possibly a part-timer, I think), that it cannot work effectively. If GBC wishes to take this policy seriously it must put adequate resources in place to make it workable. I recently notified the department of a house that met Grade II listing requirements but was pointed to the English Heritage website and hence completed all the forms and site visits and justification, myself. The Rectory in Compton is now Grade II listed, but simply stating that you support such endeavors is not good enough. Resources must be in place to permit timely and adequate response and action.

4.5.42 There is a historic monument in the grounds of Blackwell Farm, this area is completely neglected and any visitor or walker would not even know it was there as it is covered in weeds and bushes. I have seen this for myself and if GBC had the resources to send someone out on a site visit they would have to concur. Blackwell Farm is also the site of a Historic Park and given its close proximity to Watts Gallery and Limnerslease and Greyfriars, the entire area could become an area of local and National importance but instead, the University wishes to build 1,800 houses on it? How does that comply with this policy?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2198  Respondent: 8570273 / Fiona Curtis  Agent: Fiona Curtis

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to policy D4 Development in urban areas and inset villages.

This policy that does not address the opportunity for building in the urban area. The plan envisages that 40% of homes built will be “affordable”, but this does not provide any accommodation for low-paid workers, for example, those on the minimum wage, who cannot afford to buy so-called “affordable” homes or pay an “affordable” rent. There is a need for some expansion in social housing, especially in urban areas, where there is a greater concentration of low-paid workers such as those employed in the retail, warehousing and distribution sectors (all of which this plan aspires to expand). The number of homes planned in the urban area is much too low. There is a glaring need for regeneration in many urban areas, particularly Guildford Town Centre but this is ignored in favour of building homes on greenfield sites instead. This will not address urban housing needs. It is also unsustainable, since building outside the town does disproportionate harm to road traffic, air quality and overstretched infrastructure. The plan envisages a large expansion of the retail sector, but this is hard to justify because the sector is in rapid and continuous decline.

In Compton conservation area one house is currently being built. Having experienced dust, noise, vibration, traffic lights, traffic congestion etc it is hard to see how building many more houses in other areas can avoid the same? Is policy D4
workable? Building houses is a noisy messy business or is this policy just paving the way to build the vast majority of houses on green fields?

Does planning in other areas including conservation areas have such protection? I agree that it should, but this level of protection should apply to all areas and not just in the town and inset villages.

Some areas may conduct their own landscape character assessment and this should be permissible.

Building is permitted in settlement areas in way of infill and this should be subject to the same level of protection.

Given the need for up to date design, I would say that anything written in 2004 is probably dated in terms of design (pink box)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/2187  Respondent: 8570273 / Fiona Curtis  Agent: Fiona Curtis

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to policy E1 sustainable employment

I note that there is a significant reduction of between 71% and 79% in the previous job target and resultant 79% reduction in employment space in response to the many objections lodged in 2014 against an unsubstantiated agenda for economic expansion in the last draft and based on new findings by Aecom in the latest ELNA 2015. I have concern as to the ill-informed clustering of all B classes in terms of the clarity of market evidence required to inform effective planning and a failure to provide a clear understanding of business needs required under Section 160 of the NPPF. I also note the dramatic reduction in assessed demand by two Employment Land Needs Assessment Reports carried out under the same terms of reference within a period of 2 years which calls into question the general reliability of the process of collection and interpretation of data in the overall forward planning process by GBC. I am concerned however that the research undertaken by Aecom is generally superficial and lacks sufficient detail and analysis between B1a, B1b, B1c, B2 and B8 use classes and that no reliable individual analysis has been undertaken of the widely different supply and demand dynamics of office, research and development, light industrial, general industrial and warehousing and distribution floor space. No proper analysis has been made of data held by GBC in respect of different B classes in terms of planning applications granted or evidence gathered by the economic development function at GBC and no robust assessment of local market demand apart from fairly brief references to freely available market research undertaken by commercial estate agents such as Lambert Smith Hampton covering a much wider area. GBC appear to fail to appreciate the fundamental rationale of the Use Classes Order as a planning tool in terms of useful property market research or forward planning. What we are left with is a fairly clumsy and poorly informed plan which clusters B classes without any appreciation of widely different employment impact and economic sustainability. E.g. B1 generates at least 5 times as much employment as B8. The lack of appreciation as to the opportunity for widely different uses being generated within B class clusters defeats the whole point of proper planning of employment uses and can significantly endanger previously good planning put forward in the previous 2003 plan. E.g. the creation of a research and development park linked to the University but now has the threat of being downgraded into a general business park (see below). Little regard has been given in the plan to the
economic reality of falling demand for B2 industrial space which is clustered with other B classes almost randomly throughout the plan. Little regard is given to the opportunity of B1b space as an opportunity for research and development which needs to be nurtured and preserved without the detrimental and confused clustering with other B classes both in terms of planning and promotion of a research hub. I note that the past trend of expansion of Office/R &D is 0.43% pa over the period from 2004 to 2012 derived from VOA analysis and that the calculated annual floor space demand is 0.7% over the plan period up to 2033. I support the concept of seeking increased investment in our local knowledge-based, high technology economy. This will provide well paid, creative jobs and generate the funding necessary to pay for the infrastructure and environment this sort of industry requires. We need to distinguish between wanting to increase the added value of the economy and physical expansion, especially given the scarcity of land in Guildford. Guildford is not the place for large space hungry businesses. So I should target high added value small and medium sized enterprises rather than the headquarters of larger corporations.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to Policy E3 maintaining employment capacity. I object to the ill-informed policy of resisting change of use from B1a to residential because it flies in the face of positive property market solutions for the regeneration of brownfield land. It is also contrary to current government policy which has recently been reaffirmed and permits a change of use from B1a (offices) to C3 (residential). I believe that the existing government policy which has recently been made permanent of allowing change of use from B1a to C3 is sound. Many office buildings reaching an age of more than 30/50 years become redundant in terms of energy compliance making them illegal to occupy for employment purposes and the cost of refurbishment makes them redundant and uneconomic. The reality of market demand is that the gross development value of refurbished residential space is in excess of the gross development value of refurbished old office space in many locations (this gross development value assessment is supported by the analysis by property consultants GVA in the supporting evidence within the Allies and Morrison Masterplan for Guildford dated 2015). To resist change from B1a to C3 is contrary to the concept of brownfield first for residential development schemes. To resist change from B1a to C3 in Strategic or Significant Employment Sites is contrary to the concept of integrated mixed use communities whereby the journey to work is minimised.

London has led the way with significant residential schemes being created from redundant office stock. A good example is the South Bank in London adjacent to Waterloo Station where in 2005 the Shell Centre has been converted into flats. Another early example is the 2000 scheme at Metro Central Heights at Elephant and Castle where the old Alexander Fleming House was converted to 435 flats by St George.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I hope the Surrey Research Park in Guildford remains focussed on a broad spectrum of scientific research including
computer science, bio-chemistry, design, space-science, eco-science, health science, software development, laser
technology, media-science, artificial intelligence, robotics and super-manufacturingMonitoring indicators should include
new start-ups and new patents createdFacilities should be provided whereby new small businesses can secure premises
under subsidised licence fee arrangements with no onerous rent or lease commitmentsI support the idea of a variety of sizes
of unit including some small units (between 15 – 80 sq m) bearing in mind one workstation is 10 sq mConsideration should
be given to the concept of shared “enterprise hubs” where individuals can take pay as you go workstations in shared spaces
similar to touch down business centres similar to the “enterprise village” conceptI object to the policy of any new extension
of the research park more than the existing 14% already provided for within the park or within the footprint of the parkThe
Surrey Research Park currently extends to 65,000 sq mThere is already granted consent to expand to a further 9,000 sq m
(14%) This space has been available for 10 years and is still to find a takerThe past trend of expansion of Office/R &D is
0.43% pa over the period from 2004 to 2012 based on ELNA 2015 derived from VoA analysisThe ELNA 2015 calculated
annual floor space demand is 0.7%The data point for our analysis is today in 2016 so we have 17 years to go to the end of
the plan period.The necessary growth in floor space over the plan period is therefore 17 years x 0.7 = 12% which is less
than the current expansion space of 14%.The research park is developed at a plot ratio of 25%. This could be increased to
50% within the same footprint of the existing park without damage to its amenity. The actual current land use for
development in the park is in fact only 12.5% because most buildings are 2-storey.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2191  Respondent: 8570273 / Fiona Curtis  Agent: Fiona Curtis
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally
Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to policy E5 Rural Economy. In my opinion, this policy should only apply to small-scale development in rural
areas which means development of less than 100 sq m (gross) which is in keeping with and the permanence and amenity of
the green belt.Use of rural areas for town centre uses without applying the sequential approach is against the principles of
localism that require local people to be consulted and heeded, not ignored. Villages need protecting in terms of both design
and scale and character.Previous commitments to improved high-speed broadband and mobile phone coverage have now
been diluted, despite general support. This disregards the responses from the 2014 public consultation.

The consultation process was not well publicized; many Parish Councils had no idea of this. The emphasis on voluntary
efforts and greater community efforts is far removed from reality for this 'solution' was presented for almost every aspect of
rural life from managing crime to looking after elderly to education and more besides. Villages by nature are usually small
and the percentage of the population who are able to do voluntary work is smaller still. The solution is therefore
unworkable. The results of the consultation were not publicized but were instead collated and summarized and bore no
resemblance to the submissions I had sight of.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2193  Respondent: 8570273 / Fiona Curtis  Agent: Fiona Curtis
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E6
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to policy E6 the leisure and visitor experience. I believe that the importance of a visitor attraction hub could be much better articulated. Guildford has great potential to become a “must see” destination for tourists and visitors. Surrounded by the natural beauty of the Surrey Hills, it is already distinguished as an historic county town. The historic part of the town should be exploited to the full creating a real sense of vibrancy and atmosphere. This should be linked to the attractions of the Museum, the Castle, the Wey and the historic High Street including its views of the Hogs Back.

The economic impact would create big advantages for both the leisure and the niche speciality retail sectors in the town. Given the local and wider catchment of the town Guildford should strive for high quality definition making it a great centre for people to live in and visit. Guildford the historic “Gateway to the Surrey Hills” has far more potential than Guildford just any other stereotypical centre found anywhere around London. Re-branding walks, such as a new “Pilgrims Trail” similar to the Patriots trail in Boston USA with marked yellow footsteps leading from the station to the River and up through the historic heart of the town. There is a need to make Guildford’s river landscape less off-putting and support town-break packages for high-value tourists. To achieve this, the policy needs to define what leverage, if any, Council planners have to influence normal tourism market mechanisms. There is a need to help private providers market local tourism. This need not involve extra spending. The Council could, for instance, help co-ordinate ready-made, local tourism packages under a distinctive brand at an all-in price. An “English town break” (including B&B accommodation, a walking tour of Guildford, a pub lunch in the Surrey Hills, a visit to RHS Wisley Gardens and a National Trust property and a SouthWest Trains travelcard for a day out in London) would be highly attractive to many European visitors who currently bypass Guildford to go to Bath, Oxford or Cambridge instead.

Norfolk relies heavily on its tourist trade and yet has preserved and enhanced its golden egg (landscape, views, quaintness, history) and this is why people visit. To enjoy the peace and quiet and unspoil vista, nature at its natural best. I would like to see more made of what we actually have (our rivers, canals, views, walks, history, wildlife) and less man-made intrusion.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2194  Respondent: 8570273 / Fiona Curtis  Agent: Fiona Curtis
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E7

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
The omission of the Town Centre Master Plan from the Local Plan invalidates much of the Plan, especially the impact on traffic. I understand that option 2 of the traffic re-routing exercise is favoured yet we have no details and this has not been included in the Highway Assessment. Whether option 1 or 2 are elected, there will be a knock-on impact to the suburbs and surrounding villages as reducing capacity whilst increasing footfall and traffic in a town that is already congested can do nothing but harm.

I do not consider that the target of 1,172 homes in the town centre takes account of the need and demand for housing or the opportunities that brownfield sites present for increasing the residential development in the core of the town which will in itself help to sustain the retail core by increased economic impact. What the town centre needs in terms of urban regeneration and to attain a thriving night time economy is more residential development. The Town Centre policy needs to maximise the potential for residential development on brownfield and include as an absolute minimum the 2,551 units proposed in by Allies and Morrison for the town centre included in the masterplan 2015. The reality is that the Town Centre and other areas of brownfield in the borough has the capacity to provide significantly more than this.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2074  Respondent: 8570273 / Fiona Curtis  Agent: Fiona Curtis

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to policy H1 Homes for all. Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan period. It fails to set any rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions. The housing mix is based on out-of-date, pre-Brexit projections and on assumptions set out in a flawed SHMA that has not been scrutinised or evaluated. I support higher density development but not high-rise development (ie over 10 floors) in the urban area close to transport hubs to facilitate modal shift e.g. 20 minutes’ walk of Guildford railway station. Student accommodation should provide for 100% of new students and more than 60% of existing students, which would free up ideal family accommodation in the urban area. Other university cities (e.g. Oxford) insist on higher percentages than those proposed in the plan. In my view, the Council’s timidity is a case of “regulatory capture” by Surrey University, which has failed to use its existing planning permissions (dating from 2004) to accommodate 3,000 students or to improve the efficient development of its campus (e.g. by building on its extensive and underused surface car parks). If all students were accommodated in this way, 2,000 homes would be freed up in town and there would be no need to build on the Hog’s Back. Surrey University has 17 ha of car parks that could provide all the student accommodation required above it, with parking beneath. Guildford borough already has a higher proportion of traveller sites than most comparable boroughs. Overprovision is inappropriate given other constraints.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to policy H2 Affordable homes. “Affordable” homes, under national definitions, means homes that are sold or rented at 80% of market value. Even if 70% of these are rented as proposed, the level of market prices in the South-East means (even post-Brexit) that these homes will remain well beyond most people’s means and that starter homes will not become available for local people. In addition, the viability clause (4.2.40) means that in practice the policy could be unenforceable. Private financial viability has no place in a public policy and should be removed. It is a get-out-of-jail-free card for developers that will sacrifice countryside for no local benefit. I question the assumptions that seem to underlie this policy: that people have a right (rather than a legitimate aspiration) to own a home; that they should be encouraged to live locally (contradicting the Government’s policy of encouraging labour mobility and development in poorer regions, where homes are cheaper anyway); that increasing local house-building will reduce overcrowding and congestion (rather than simply suck more people into the borough); and that it will stem the rise in house prices (even though 13,860 new homes will be a drop in the ocean, given that prices are determined by an infinite demand-pull from London, whose population is increasing by 100,000 a year, and by the currently low cost of capital for overseas and other buyers). The weak mechanisms proposed in the plan might influence the market in a more remote part of the UK, but not here. This policy’s version of “affordability” is just a smokescreen for pushing through more development generally. Building more homes in Guildford cannot increase real affordability given the overhang of the London market.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

I object to policy H3 Rural Exception Homes This is a type of Trojan horse policy. It says that homes can be built anywhere near a settlement of any form (including agricultural land and the AONB). These homes are meant for people with a village connection, but they could be for anyone on the Guildford borough housing list. To make the housing viable, or to improve the “mix”, this can include “market” housing – i.e. normal commercial development which in Guildford usually means expensive executive homes. This policy means building anywhere, and ignoring all historic planning restrictions. The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove “exceptional circumstances.”

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to policy I1 Infrastructure and delivery.

Most of the borough’s infrastructure is antiquated, congested and straining to accommodate even current needs and organic growth. Yet this plan’s commitment to building housing estates across the Guildford countryside will mean either major infrastructure investment that no-one is prepared to pay for or else a catastrophic and simultaneous collapse in transport, educational, medical, energy, water and communications services. The plan targets greenfield sites – requiring heavy infrastructure investment – in order to generate CIL income necessary to meet an infrastructure shortfall that is already serious. The current draft CIL scale also encourages development on greenfield sites rather than brownfield and will reduce or negate developer's obligation to sell a percentage of homes at 20% below market value. The policy wording says nothing about roads and traffic. The Council’s methodology for assessing infrastructure needs in this area is inadequate, identifying only the tip of an iceberg of existing congestion. Compton Village is already close to tipping point, yet it will see a significant increase in traffic volume, will be completely congested and yet no plans exist to mitigate the problem. The schemes referred to in this policy barely solve existing congestion and are inadequate when development takes place. The full impact on local road networks has not been fully considered. Some proposed development locations would require highway schemes that involve demolishing property and road-widening in residential areas to solve the resultant congestion. The A3 improvements are not guaranteed to take place but they are being used to justify removing large areas from the Green Belt before detailed traffic assessments have taken place. These detailed investigations are being deferred until the planning application stage and will be left to developers to prepare. If a site then proves to be unsustainable its Green Belt protection will have been lost for no reason and unsuitable development will take place by a more insidious process. Compton Village will actually incur increased traffic flow as a consequence of A3 widening according to the study, yet as was pointed out above, no solutions are in place to improve the situation. Adequate infrastructure provision is a pre-condition of sustainable development. But in this

Compton Village is already close to tipping point, yet it will see a significant increase in traffic volume, will be completely congested and yet no plans exist to mitigate the problem. The schemes referred to in this policy barely solve existing congestion and are inadequate when development takes place. The full impact on local road networks has not been fully considered. Some proposed development locations would require highway schemes that involve demolishing property and road-widening in residential areas to solve the resultant congestion. The A3 improvements are not guaranteed to take place but they are being used to justify removing large areas from the Green Belt before detailed traffic assessments have taken place. These detailed investigations are being deferred until the planning application stage and will be left to developers to prepare. If a site then proves to be unsustainable its Green Belt protection will have been lost for no reason and unsuitable development will take place by a more insidious process. Compton Village will actually incur increased traffic flow as a consequence of A3 widening according to the study, yet as was pointed out above, no solutions are in place to improve the situation. Adequate infrastructure provision is a pre-condition of sustainable development. But in this plan it is an afterthought buried away in Policy I1. By prioritising greenfield over urban, brownfield regeneration, the plan creates insurmountable (and unnecessary) obstacles for itself. Common sense suggests a local plan should first assess the borough’s infrastructure capacity for sustainable development, and then tailor development accordingly. This plan, however, assumes infrastructure will follow on the heels of housebuilding. It makes implementation critically dependent on providers outside the Council’s control and on the vagaries of CIL income. Instead of recognising this as a key issue, the plan makes too many assumptions, not least being the verbal promise that development will not take place without infrastructure preceding it. It is not clear how this will happen and is not in the Plan, as it should be, if it is achievable. The highways network is under stress at peak times in many parts of the borough. Queuing is the daily experience of drivers going to and from work. The local plan recognises the problems in para 2.14. Much of the road network is single-carriageway, and junctions act as constraints. The key evidence on future traffic conditions is provided in the Strategic Highway Assessment Report (SHAR) which summarises the results of the tests carried out by Surrey County Council at the request of GBC. Five scenarios were examined using SCC’s strategic traffic model. Scenario 1 contains all developments...
and planning permissions from 2009 to date. As such it corresponds to today’s circumstances, and describes the current unsatisfactory traffic conditions in peak periods. Scenario 5 represents the position at the end of the plan period, including all development and highways schemes in the local plan. The results of the analysis show that there will be widespread congestion in the morning peak hour across the network. The key strategic routes, the A3 through Guildford NE bound, and the M25 between Junctions 10 and 11, are shown to be at or over capacity. The summary network statistics presented in the SHAR, while useful, require some interpretation because the analysis of vehicle-hours is derived from link speeds only, and does not reflect junction delays and queues. The tables that show the ratio of flow to capacity and level of service are especially helpful to gaining an understanding of the conditions on the network in the forecast. Where the forecast traffic volume is above or close to capacity, flow becomes unstable and there is congestion. The SHA results provide evidence that, in 2031, congestion will be worse than it is today on much of the network. It is the case that the traffic modelling does not take into account the potential for increased use of other modes, but the trip rates used for developments already have built in the typical level of use of other modes, and services will be required to meet that need. It is also the case that the model does not allow for park and ride, which would improve matters in the town centre, as discussed below. In order to gain an insight into conditions across the network, it is necessary to combine information from several tables in the SHAR. Table 4.5 shows that the M25 and A3 will be at capacity in Scenario 5. The other roads that will have poor levels of service include those in Table 4.5 but also those in 4.12 (except the A3) and those in Tables 4.3 and 4.4 with levels of service E and F that will not be given some relief by improvement of the A3 in Scenario 5. Paras 4.10.3, 4 and 5 point out that there will be increased congestion. Given that the starting point is unsatisfactory, there can be no expectation that the schemes in the Infrastructure Development Plan will provide an overall improvement. There will be some local benefits, such as the Ash rail bridge for example, but in general conditions will be as bad and in many places, such as Compton Village, worse. So the statement in the SHAR para 4.2.5 that ‘the combined mitigation as reflected in Scenario 5 indicates that at the strategic level it accommodates the additional PSLP demand’ needs qualifying – ‘at the cost of a lot of queuing’ and makes no mention of the impact this will have on pollution, which is already a known problem at the A3 end of Compton. The cumulative effect of the additional traffic generated by the developments in the local plan will be to increase congestion, even with the proposed highway schemes in place. More detailed analysis of the junctions and queuing is required. So we question the conclusion that the developments would have “an acceptable impact on the capacity of the highway networks in terms of the policy test set in paragraph 32 of NPPF”. Appendix 3 of the Transport Topic Paper shows the phasing of housing development and transport infrastructure. The major scheme being considered for the A3 between the A31 and the A320 is scheduled for delivery in the period 2023/24 to 2027/28. The strategic developments at Blackwell Farm and Gosden Hill Farm are shown as being phased in from 2021/22 onwards. The Garlick’s Arch

By prioritising greenfield over urban, brownfield regeneration, the plan creates insurmountable (and unnecessary) obstacles for itself. Common sense suggests a local plan should first assess the borough’s infrastructure capacity for sustainable development, and then tailor development accordingly. This plan, however, assumes infrastructure will follow on the heels of housebuilding. It makes implementation critically dependent on providers outside the Council’s control and on the vagaries of CIL income. Instead of recognising this as a key issue, the plan makes too many assumptions, not least being the verbal promise that development will not take place without infrastructure preceding it. It is not clear how this will happen and is not in the Plan, as it should be, if it is achievable. The highways network is under stress at peak times in many parts of the borough. Queuing is the daily experience of drivers going to and from work. The local plan recognises the problems in para 2.14. Much of the road network is single-carriageway, and junctions act as constraints. The key evidence on future traffic conditions is provided in the Strategic Highway Assessment Report (SHAR) which summarises the results of the tests carried out by Surrey County Council at the request of GBC. Five scenarios were examined using SCC’s strategic traffic model. Scenario 1 contains all developments and planning permissions from 2009 to date. As such it corresponds to today’s circumstances, and describes the current unsatisfactory traffic conditions in peak periods. Scenario 5 represents the position at the end of the plan period, including all development and highways schemes in the local plan. The results of the analysis show that there will be widespread congestion in the morning peak hour across the network. The key strategic routes, the A3 through Guildford NE bound, and the M25 between Junctions 10 and 11, are shown to be at or over capacity. The summary network statistics presented in the SHAR, while useful, require some interpretation because the analysis of vehicle-hours is derived from link speeds only, and does not reflect junction delays and queues. The tables that show the ratio of flow to capacity and level of service are especially helpful to gaining an understanding of the conditions on the network in the forecast. Where the forecast traffic volume is above or close to capacity, flow becomes unstable and there is congestion. The SHA results provide evidence that, in 2031, congestion will be worse than it is today on much of the network. It is the case that the traffic modelling does not take into account the potential for increased use of other modes, but the trip rates used for developments already have built in the typical level of use of other modes, and services will be required to meet that need. It is also the case that the model does not allow for park and ride, which would improve matters in the town centre, as discussed below. In order to gain an insight into conditions across the network, it is necessary...
There is an aspiration expressed about opportunities for infrastructure refer to supporting sustainable development and delivering a balanced system. However, in para 2.15 there is an aspiration expressed about opportunities ‘to improve the performance of the road networks through transport infrastructure and service improvements’, which taken with the previous paragraph includes reducing congestion. The evidence so far shows that this will not happen. The mitigation proposed is not sufficient to overcome the problems that will be caused by the level of growth in the local plan. Congestion will worsen. The network will lack resilience and be vulnerable to disruption due to incidents. Minor roads will have to cope with a lot more traffic, for which they are unsuitable.

The local plan does not state an objective for congestion. The two strategic objectives that are included for infrastructure refer to supporting sustainable development and delivering a balanced system. However, in para 2.15 there is an aspiration expressed about opportunities ‘to improve the performance of the road networks through transport infrastructure and service improvements’, which taken with the previous paragraph includes reducing congestion. The evidence so far shows that this will not happen. The mitigation proposed is not sufficient to overcome the problems that will be caused by the level of growth in the local plan. Congestion will worsen. The network will lack resilience and be vulnerable to disruption due to incidents. Minor roads will have to cope with a lot more traffic, for which they are unsuitable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents: [Independent Traffic report annex 3.pdf](Independent Traffic report annex 3.pdf) (2.5 MB)
Do you consider this section of the document; complies with the Duty to Cooperate? (No), is Sound? (No), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to policy i2

Supporting the Department of Transport’s “Road Investment Strategy” This policy is too vague and unrealistically optimistic. Decisions by Highways England on improving the strategic road network (the M25 and A3) are still years off. The Council has suggested a very expensive tunnel under Guildford, but there is no evidence to show that this is a realistic option. Even if Highways England accepted this (which is highly unlikely in the post-Brexit public spending climate) it would not be built until the end of the plan period at the earliest. Other, less expensive A3 improvements, and changes to the Junction 10/Heathrow stretch of the M25, will also take years to agree and complete. The draft plan, however, commits to building massive housing estates in the countryside before any of these road improvements are in place. This is foolhardy. Surrey is the most congested county in England, with 683 people per square kilometre, compared with an English average of 413. This policy will lead to massive traffic disruption during the construction phase and will add permanently to an already congested network (about 3,000 private cars from the 2,100 new homes at Wisley Airfield alone). This is a major development constraint that should have been applied to the OAN to constrain the housing target.

Public bus services have been cut and housing is proposed outside the town with a hugely expensive sustainable corridor so that people can walk or cycle in. Why not save money and build the houses in the town where people want them? This policy is in some ways ageist as elderly and infirm and those with small children are unlikely to benefit from this proposal as Guildford is very hilly!

Much of the funding is from development which will limit if not negate the implementation of affordable housing, which was originally a key driver of the Plan?

The 3 schemes are insufficient to prevent severe congestion on our highways and this is using a traffic model that has probably underestimated the issue. Constraints must be applied to the development levels or development needs to be put where infrastructure already exists and improvements can be considered rather than new infrastructure?

If the tunnel is a genuine consideration then land needs to be safe guarded or the notion should be removed. the same applies to railway stations which have been mentioned to pave the way for sustainable development but Network Rail has not agreed to them, even in principle (lacking the duty to cooperate).

The infrastructure proposals lack sufficient detail.'Improvements' to x junction is inadequate. Details should outline exactly where and what the proposal is and what improvements will transpire?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to policy I4 green and blue infrastructure. This policy is confusing. It sits oddly with the plan’s onslaught on the Green Belt. The plan to build on large areas of countryside and to inset 15 villages will cancel out any benefits from extending the principle of enhancing biodiversity beyond Biodiversity Opportunity Areas. There is no mention of the value of wildlife gardening to biodiversity or the important role that larger gardens play in a village setting. Land designated as ‘open space’ appears to be protected whereas land that IS actually open space (ie Blackwell Farm, Wisley, Gosden Hill and Normandy strategic sites) is proposed for development? It would be useful to understand who will monitor this policy and how Independent will they be? Will biodiversity be their prime concern or will all concerns be secondary to development?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2179  Respondent: 8570273 / Fiona Curtis  Agent: Fiona Curtis

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to policy P1 Surrey Hills Area of Outstanding National Beauty This policy weakens existing protection when it should strengthen it. It is dependent on the Surrey Hills Management Plan. The latter welcomes housing development. Even major (undefined) development in the AONB would be permitted if exceptional (undefined) circumstances could be demonstrated. Much of my concern stems from the loose wording of the Policy, which in some places renders the policy ineffective, for example: “All proposals will be considered against whether they…” “All development proposals within and adjacent to the AONB will be expected to conserve or enhance its special qualities” Terms such as “considered” and “expected” are not strong enough in prohibiting development proposals that do not conserve and enhance the AONB, and it is likely that developers will be able to use this loose wording to their advantage.

Of particular concern is the paragraph 3, which begins: “Whilst the AONB designation does not preclude specific types of development in the Surrey Hills and proposals will be assessed on their individual merits…” This whole opening clause is unnecessary and almost invites development proposals. I believe that it should be deleted, and the sentence should, therefore begin: “There is a presumption against major development in the AONB in accordance with NPPF.” In addition to the weakness of the language, I am also concerned that the AONB criteria listed in the policy are not the most important ones in determining whether a planning application should be approved. Aside from the one outlined in the first bullet point (which relates to the AONB setting) none of these criteria is concerned with the key characteristics of AONB, ie landscape character, scenic beauty, important views, tranquility etc.

Whether or not a development supports the rural economy or provides public access are of far less national importance than preserving the quality of the landscape itself. I believe that the AONB Policy in the Draft Plan 2014 provided greater protection to the AONB, and would like to see the following sentences reinserted: “The national significance the AONB
will be afforded the highest level of protection and only proposals which can be sensitively amalgamated into the area and which complement and enhance the character of the AONB will be considered. “Proposals within the AGLV which would have a negative impact on views into and out of the AONB and which do not respect the setting, will not be acceptable.” In accordance with the most up to date Minerals and Waste Plan, safeguarding of applicable land within the AONB and/or AGLV may be necessary and deemed appropriate.

Finally,

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Respondent: 8570273 / Fiona Curtis</th>
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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents: [Annex 1 - Hogs Back Natural Beauty Evaluation V2 24.05.16.pdf](5.9 MB)
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to Policy P2 green belt

This policy states, “the general extent of the Green Belt has been retained.” This is a misleading statement. The policy wording is weak in support of the Metropolitan Green Belt even though the latter forms 89% of the borough and should be the cornerstone of all local planning policy. It is precious beyond the short-term demands of the present Government’s policy or a 15-year local plan. As noted under Policy S1 above, it is a solemn legacy to future generations – an asset and amenity that belongs as much to Londoners and the whole nation as to the people who live in it. Once gone it is gone forever. It is not the Council’s to give away. Policy P2 completely fails to appreciate the importance and permanence of the Metropolitan Green Belt and the fact that it has been around for a long time and it needs to be permanently protected. It was actually established in a local act of parliament in Guildford under the London Home Counties (Green Belt) Act 1938 and subsequently in the 1944 Greater London Plan to contain the outward sprawl of London. The boundaries of the Green Belt through Guildford Borough were later defined in the 1987 Local Plan, forming part of a 19-24km concentric belt around London. The Green Belt is intended to check the unrestricted sprawl of built up areas; to prevent neighbouring towns from merging into one another; to safeguard the countryside from encroachment; to preserve the setting and special character of historic towns; and to assist with urban regeneration by encouraging the recycling of derelict and other urban land. The principles of the Green Belt designation were outlined within Planning Policy Guidance 2: Green Belts (PPG2) and are found within the National Planning Policy Framework (NPPF). The Metropolitan Green Belt is an exemplar of good planning and the envy of planners throughout the world. Policy P2 omits any assessment of the Green Belt’s value. The Green Belt is not just empty space but is an inhabited, working environment that safeguards a certain stock of natural capital. Building on it involves high opportunity costs, including an irreversible loss of:

1. Agricultural production
2. Rural leisure and tourism amenities
3. Water catchment
4. Flood control
5. Biodiversity
6. Natural heritage
7. A carbon sink for air pollution
8. Room for public facilities such as parks and burial grounds
9. Profitable film locations (e.g. Shere)
10. Future economic potential such as mineral extraction (even fracking)
11. Natural beauty, landmarks, open space, rural views and sight lines
12. Benefits to public health and wellbeing, physical and psychological (as well expressed in the NPPF) As a matter of law and national and local policy, these assets should be protected in perpetuity, but Policy P2 seeks to justify excessive
development in supposedly protected areas. This is in breach of party manifesto commitments and contrary to previous responses to public consultations. It is quite incorrect to argue, as the Council

This is in breach of party manifesto commitments and contrary to previous responses to public consultations. It is quite incorrect to argue, as the Council do, that the plan would involve the loss of “only” 1.6% of the borough’s Green Belt. In reality the figure is nearer 7% when insetting, infilling and settlement boundary extensions are included. More importantly, there is no “acceptable” percentage (in the NPPF or anywhere else) of Green Belt that may be sold. I object to the “insetting” of 14 villages from the Green Belt. The NPPF’s other 4 tests of Green Belt status, including the prevention of urban sprawl, are ignored. Effectively, this policy makes all villages within the Green Belt vulnerable to large blocks of new development and seems almost hell bent on self-defeat. I believe this policy is based on a flawed Green Belt and Countryside Study that, according to one Conservative Councillor, was irregularly commissioned by Council officers without the authority of Councillors.

To “inset” two thirds of the borough’s rural villages on the grounds that they no longer contribute to the purposes of the Green Belt is extreme and inherently implausible, given the borough’s location on the edge of Metropolitan London. I cannot see how such extensive areas fail to contribute to the purposes of the Green Belt under the NPPF, although they would quickly destroy them if the proposed “insetting” and boundary extensions go ahead.

I object to the removal of over 400 hectares of Green Belt land in and around Blackwell Farm to facilitate further development of Surrey Research Park and for 1800 homes. Over 60 hectares were removed from Green Belt 12 years ago for the same developer (Surrey University) who has yet to fulfill their planning obligations. This valuable land has been squandered with over 17 acres of surface car parking and as one of the key features of Green belt is its 'permanence' this second request for yet more Green Belt land to be released in such a short space of time, with all the outstanding issues that remain makes this all the more objectionable.

Furthermore I object on grounds of the impact this development will have in terms of congestion on our highways, these issues have been highlighted under ‘infrastructure’.

Exceptional circumstances have not been demonstrated for the removal of Green belt land which in my view, makes this policy unsound.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2202  Respondent: 8570273 / Fiona Curtis  Agent: Fiona Curtis
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to ALL Green Belt sites allocated for development in the local plan. I object to the identification and allocation of sites in this plan without regard to Green Belt, infrastructure or other constraints. The plan says that “allocating these sites does not grant planning permission for development, however, it does identify the principle of development and uses.” This ignores the tens of thousands of detailed comments the Council has received about individual sites ever since the Issues and Options consultation in 2013. The plan has hardly changed since the Council received 20,000 objections to its first draft plan in 2014. All Green Belt sites should be removed from the plan until “exceptional circumstances” for development are proven, as stipulated repeatedly in the NPPF. The Green Belt should trump short-term considerations such as perceived housing need, as case law has established.

I object to the inclusion of Greenbelt sites where exceptional circumstances have not been given. Housing need alone has in case law, been overturned and the housing need is highly questionable. We question the soundness of 66% of almost 14,000 homes being proposed on Greenbelt land and whether any circumstances could warrant this.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Answer (if comment is on questions 1-7 of the questionnaire): ()**

I object to policy P3 Countryside (i.e. beyond the Green Belt) This is more protective – as a policy – than the proposals for the AONB and the Green Belt, so is anomalous. I am not in favour of building on this area, since urban, brownfield areas are sufficient to meet all reasonable housing targets. There is no need to build on any green fields if brownfield, previously developed land is used efficiently (without garden-grabbing). This policy refers to the countryside near Ash and Tongham (see paragraph 4.3.28). This area does not justify stronger policy protection than any other part of the borough. The fact that the current and previous Council Leaders represent it should not give it preferential status: “we will seek to limit any development in the countryside unless it can be demonstrated that it is necessary in that location”. Green Belt and AONB areas should by definition have higher levels of protection than non-Green Belt areas. It should also be noted that Ash and Tongham lie beyond Guildford far away from London and therefore make no contribution to controlling Metropolitan urban sprawl, that is presumably why Ash and Tongham are not in the Green Belt already. This policy, however, attaches higher priority to preventing the “coalescence between the Ash and Tongham urban area and Aldershot” than it does to the primary purpose of the Metropolitan Green Belt, which is to stop London sprawl. I agree to the prevention of coalescence but this should apply to all villages including East and West Horsley and Flexford and Normandy.

I would agree to additional Greenbelt if it is merited and if an area on the same stretch that actually warrants AONB status were not under threat of massive development (Blackwell Farm 1,800). The treatment of different areas lacks parity.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to policy P4

Flood risk and water source protection zonesUrban development on existing hardstanding would not create additional flood risk, especially where there is scope for improved flood resistance measures to be included in the design. Sites such as Woodbridge Meadows Industrial Estate and the Arriva bus depot, on the River Wey bank, are potential high-value brownfield sites that would not be available for housing if this policy is implemented. It is not the footprint of existing buildings that should limit future development, but the extent of existing hardstanding. Tarmac and concrete do not act as functional floodplain, and some land with hard standing close to the river, within the town centre and within easy walking distance of the railway station, provides an excellent opportunity for real urban regeneration that could protect the surrounding countryside.

I strongly believe that this policy should not be used as a convenient excuse not to build on the extensive area of brownfield sites between the station and Ladymead. Any new development in this area could easily be built on stilts with flood resistant ground floor parking in areas that are identified as high flood risk. This area has been built over successfully over the last 50 years. We do not need to stop now.

I do not support building directly on (as opposed to over) flood plain as the land is effectively a soak away, but intelligent architecture has been dealing with this problem for many decades in other parts of the UK and the globe.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2186  Respondent: 8570273 / Fiona Curtis  Agent: Fiona Curtis

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to policy P5 Thames Basin Heath Special Protection Areas

This policy is not robust enough. The mitigation (cash compensation) offered for development in the special protection area is so small as to be meaningless. SANG (Suitable Alternative Natural Greenspace) is not beneficial since the sites identified or targeted are already green space. This is just using agricultural or wooded land as recreation land in order to justify building on other green spaces nearby. There is no actual increase in open space or environmental protection; instead, it is a ploy designed to permit building on otherwise protected areas. SANG – in part used to prevent dogs and cats attacking nesting birds – must also ensure that it is not using land which is adjacent to the Special Protection Areas.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2072  Respondent: 8570273 / Fiona Curtis  Agent: Fiona Curtis

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( No )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to policy S1 as stated and the presumption in favour of sustainable development. The NPPF states that the presumption in favour of sustainable development “should be seen as a golden thread running through both plan-making and decision-taking.” Policy S1 ought to set a clear framework. No definition of “sustainable development” is given. The policy also fails to set out any principles for applying sustainable development in practice to local planning decisions, which often have serious long-term impacts. The promise “to secure development that secures the economic, social and environmental conditions in the area” omits to recognise that economic growth, social justice and environmental protection often conflict. It does not say how each element is to be weighted or conflicts resolved. As a practical guide to the tough choices Councillors will face, it is without value. Under this policy, any development will qualify as “sustainable”, thereby failing to apply the NPPF’s most important guideline. The most gaping hole in Policy S1 is the Green Belt. As an inter-generational covenant (enshrined in primary legislation) to protect green areas in perpetuity, the Green Belt is a living example of sustainable development in practice. It is the envy of the world. Policy S1 should commit to uphold Green Belt boundaries and protections, setting at least one clear boundary to planning decisions. The plan’s contempt for Green Belt constraints is amply demonstrated in later policies. The commitment to approve planning applications “wherever possible” and “without delay” reveals this draft plan’s pro-development bias. Countervailing references to sustainability are so vague that the NPPF presumption in favour of sustainable development becomes a presumption in favour of any development at all. This policy also ignores, as if they are inconvenient constraints, most of the 12 Core Planning Principles set out in NPPF paragraph 17.3.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2073  Respondent: 8570273 / Fiona Curtis  Agent: Fiona Curtis

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy S2
Do you consider this section of the document; complies with the Duty to Cooperate? (No), is Sound? (No), is Legally Compliant? (No)

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to policy S2 the Borough Wide Strategy and the commitment to build 13,860 homes based on the Strategic Housing Market Assessment (SHMA) 2015 prepared by GL Hearn. The OAN “objectively assessed need” figure in the SHMA of 693 homes a year is far too high! I am very surprised and concerned that GBC have adopted the OAN of 13,860 homes as the housing target without any application of constraints as required under the National Planning Policy Framework and the National Planning Policy Guidance. The scale of the housing number proposed, inevitably increases the onus for it to be seen to be sound. A substantially lower number, on the other hand, would remove the need to build on Green Belt or open countryside, and instantly meet the single biggest public objection to the plan as a whole. Other local planning authorities appear to take a more balanced view in their approach to planning. The Woking Core Strategy 2012 applies a constraint of 50% from the 594 new homes identified in their own SHMA. It should be noted that local evidence (Strategic Housing Market Assessment - SHMA) highlights a need for an additional 499 new affordable homes every year in the Borough and a total of 594 new homes every year when taking into account demand. Given the level of environmental constraints present in the Borough, it is considered that the provision of an average of 292 dwellings per annum represents a reasonable level of housing growth for Woking and is deliverable. "Historically GBC have correctly applied constraints on housing numbers to protect the Green Belt. The Surrey Structure Plan 1994 advocated a general slowing down in the rates of development “because of the environmental constraints which exist in the County, including Green Belt”. This slowing down was reflected in the requirement that Guildford Borough should accommodate a net increase of 3,800 dwellings between 1991 and 2006. This was a lower rate of development than in previous years. It is interesting to note that the Structure Plan at that time expected sufficient land to arise within the urban areas to accommodate this requirement. However it would appear that today GBC have effectively ignored the real potential of the urban area to provide for housing. At the same time GBC have adopted a radically different approach to the policy of the Council over the last 20/30 years and are now ignoring government policy in relation to the Green Belt. A detailed and comprehensive professional review of the SHMA dated June 2016 by NMSS an independent expert firm dealing with housing and demographics procured by Guildford Residents Association (GRA) has concluded that the OAN figure should be revised down from 693 homes per annum to 510 homes per annum. The 41 page report by NMSS which can be found on the GRA website entitled “A Review of the West Surrey SHMA as it relates to the Objectively Assessed Housing Needs of Guildford”.

It was a real community effort. It was paid for by over separate 20 Guildford Residents Associations and Local Parish Councils none of whom were convinced that the SHMA report procured and presented by GBC was accurate or transparent or accessible in a meaningful way. So they clubbed together and collected contributions from many hundreds of Guildford residents to try to find out the truth of the housing need figure presented in the Local Plan. The NMSS report includes detailed analysis and financial modelling and was prepared by Neil McDonald. He is an independent adviser and commentator on housing demographics. He works with local authorities and others on the estimation of housing need and related issues. He was a civil servant and policy adviser to Ministers for over 30 years, the last 10 advising on housing and planning issues within the Department of Communities and Local Government. His 7 years as a Director at DCLG included a posting as Director, Planning Policy and a period as Chief Executive of the National Housing and Planning Advice Unit. NMSS found that the SHMA used in the Local Plan incorrectly adds extra homes to its basic demographic projection to allow for improving affordability of housing, increased student numbers and economic growth. The report found that none of these additions were justified based on the evidence presented within the SHMA. The report concluded amongst other matters that: The affordability of housing in Guildford is no worse than in other Surrey districts and boosting supply beyond the demographic OAN would not result in a noticeable improvement in affordability but simply in more people moving to the area. There are reasons for believing that the SHMA’s estimate of the number of homes needed for students may be too high and that an adequate provision for students is already included in the demographic OAN. The report advises that the Council should commission a separate student housing need figure for Guildford given the distorting effect of students on our overall OAN. It envisages that, once this exercise is undertaken, improved accuracy means the overall OAN would be likely to reduce still further. The SHMA seeks to estimate the number of homes needed to support employment growth using employment rate assumptions that are inconsistent with the employment forecasts. This produces misleading results. An analysis of the Cambridge Econometrics and Oxford Economics forecasts using employment or economic activity rate assumptions consistent with the forecasts suggests that in neither case is there a need to provide more housing than suggested by the demographic analysis. Indeed, in both cases a smaller population growth (and hence fewer homes) could support the jobs growth that is forecast. A further independent report was procured in 2016.
by the Campaign for the Protection of Rural England CPRE from Richard Bate of Green Balance, an independent consultancy with expertise in demographic and housing matters to carry out a review of the GL Hearn SHMA. The report by Green Balance runs to 37 pages and its findings are that the OAN for homes in Guildford should be reduced from 693 per annum to 481 because:

1. the vacancy rate figures should be taken from local government annual records rather than from the 2011 Census. This would reduce vacancy rates to 2.9% in Guildford.
2. there should be no increase for affordability above basic demographic change.
3. there should be no increase for Student housing and it was considered unrealistic that the University should be allowed to exert such substantial pressure on the domestic housing market. 4. the use of employment-led forecasts should be abandoned using purely household projections instead which are more reliable as a form of prediction. Two completely independent expert reports are surprisingly consistent in their findings.
4. the use of employment-led forecasts should be abandoned using purely household projections instead which are more reliable as a form of prediction. Two completely independent expert reports are surprisingly consistent in their findings. In broad terms a figure of approximately 500 homes per annum would appear to be a correct estimate of OAN for Guildford. However, this is before constraints are applied to arrive at an acceptable housing target. The SHMA is based on pre-Brexit projections for economic and population growth, including migration. These now need to be revised downwards. It is unacceptable that demographic and economic model assumptions have been withheld by GBC and cannot be checked making the process unaccountable. The figure of 13,860 new homes is unsubstantiated. It has not been scrutinised by Councillors despite repeated requests for debate. The assumptions and calculations underlying the model are hidden, protected by a claim to intellectual property by commercial sub-contractor used in preparing the SHMA. Both the National Planning Policy Framework and National Planning Policy Guidance provide a clear policy direction that the overall housing target should be reduced by a variety of constraints to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors. I have corrected this omission below. Infrastructure policies should be planned at the same time as Local Plans but in this case they have effectively been left out and are not sufficiently developed. The Framework also makes clear that, once established, Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan. Unmet housing need (including for traveller sites) is unlikely to outweigh the harm to the Green Belt and other harm to constitute the “very special circumstances” justifying inappropriate development on a site within the Green Belt.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (No)

Key parts of the evidence are still missing, flawed or based on withheld assumptions. The Strategic Housing Market Assessment overstates need, the Green Belt and Countryside Study uses a flawed approach, and the Transport Assessment is too late and incomplete to be relied upon to inform the Plan.

The Plan excludes the Town Centre Master Plan, which plays a pivotal role and fails to address the results of infrastructure difficulties, or use these and Greenbelt to constrain the level of development.

The Employment Land Needs Assessment

I object

This document omits many important points that are to be addressed at a future stage. The information is, however, very relevant and necessary and without it the document is weak on evidence. The overview given does not assess the capacity of existing supply to accommodate future growth. The paper acknowledges that almost 9% of commercial premises are empty and this somewhat flies in the face of arguments to vastly increase the volume until the reasons are understood. Around 30% of businesses are considering leaving Guildford (congestion being cited as a reason). There are also issues with planning permissions being granted to convert office space to residential, whilst at the same time it is argued that more offices are needed? The contradictions appear to indicate that policies related to this need firming up and that the evidence is incomplete.

I disagree with 40% of land in the town centre being given over to retail as there is no evidence that Guildford will 'buck the national trend' in terms of declining high-street sales, as has been suggested by Cllr Furniss. Guildford urban area ranks no 1 in terms of being the most sustainable location in the borough and, as housing is a priority, there should be more than 1,172 residences in the town centre.

I object to Policy E4 (expansion of the Surrey Research Park into the Blackwell Farm) The existing Research Park has been built at a very low density (25% plot ratio), which is very low for an urban extension. The majority of existing buildings are 2 storeys giving a developed floor space plot ratio of only 12.5%.

The existing Research Park has acres of surface car parking, which provides it with the opportunity to markedly increase its density without infringing any Green Belt land nearby. Any density increase would be cost effective for the use of all existing infrastructure and would also have the potential to match the existing density of the neighbouring academic buildings on the university campus at Manor Park, which is five times higher.

Together with the existing expansion of 14% through existing consents and the opportunity to increase its density, the Research Park has ample capacity to expand to embrace new demand for B1b uses linked to the university, without utilising additional land.

Infrastructure

I object

The infrastructure schedule makes reference to' improvements' without saying what they are. It includes a junction at the Guildford end of the A31, and another junction at Tongham. No evidence or traffic modelling data is available to demonstrate whether these 'improvements' will indeed improve anything at all given the additional traffic that will be generated by the new developments included in the plan. The Highways Assessment indicates that, even with these
'improvements', the level of congestion on the A3, A31, the B3000 and A25 will leave these roads over capacity and congested.

Constraints should be applied to the housing need/number as a full application of the overinflated number will have a severe detrimental impact on our road network. Smaller housing estates may be more difficult financially, but they would have less impact on infrastructure and could be considered where infrastructure already exists. The borough has many acres of surface car parking which, if replaced by multi-storey versions, and combined with current Brownfield sites, would free up enough land to build housing where it is wanted and needed and not on valuable Green Belt. There would be no need to build high-rise style development in Guildford town, which we don't support, but we do believe that buildings of 6-10 storeys (with underground parking) would be in keeping in some urban areas (where they don’t impinge on important vistas). [Some existing buildings already reach 5-7 levels in height].

The traffic maps omit the area south of Guildford borough completely and the lack of detail about impact on the B3000, a strategic route, is highly questionable, particularly as there are no solutions in place to deal with the impact. I am particularly concerned that, after the main highways routes of M25, A25, and the A320, the B3000 will incur the greatest increase in flow as this road is already close to capacity, with tailbacks at peak times. The road is no longer fit for purpose and modelling shows that developments planned, and the introduction of a new westerly route through Blackwell Farm, will severely worsen the situation, whether major work takes place on the A3, or not.

The Highway Assessment

I OBJECT

The strategic highway assessment requires a great deal more work and hence I OBJECT to the inclusion of this as evidence.

The B3000 runs through Compton, a small village with many listed buildings, most of which are very close to the road. The road already carries in excess of 5 million vehicles a year with average flow rates exceeding most A roads. It is the only settlement area in the borough where pollution levels exceed EU regulations and it is close to capacity now, with tailbacks at peak times, which add to the pollution problem. [see legal section]

The study is highly misleading. It refers to a figure of zero additional traffic from scenario 3, which includes the traffic from the strategic sites, one of which is partly in Compton. The assessment does not make it clear that the modelling is extremely limited and only includes impact on developments within the immediate area. Blackwell Farm is excluded from Area 107 (part of Compton) as false boundaries have been set. I believe that the impact from the strategic sites will be far-reaching and will most certainly impact Compton and beyond. Each village needs to be able to see the impact that development will have.

The Highways Assessment concentrates on peak time traffic only and gives no indication of overall volume increases or traffic type using specific routes outside peak hours. Understanding of the overall increase is important, as there is a bridge on the B3000 between Artington and Compton, which has a width restriction and may also require a weight restriction as it needs replacing within the next 2 years and no funding has been set aside for this. Instead Network Rail, SCC, GBC and Waverley BC continue to battle over responsibility for, and scope of, the project.

It appears that traffic data has been collected at different times of the year and over varying time scales in order to provide averages. This method of data collection can underestimate measurements by at least 30%.

Furthermore, I have been told that the person responsible for ratifying traffic data at Surrey County Council (SCC) has been off sick for over a year and that, whilst the daily data boxes continue to collect data, that data has not been collected or analysed for 2015. The data put forward for Compton's B3000 was based on a 3-week period in January and, as this was not representative, we understand it was removed. That said, the year-on-year data is for different periods and different times, varying from a few weeks in winter to longer periods over many months. I would like a more robust approach to traffic data collation.

The cumulative effect of the additional traffic generated by the developments in the proposed submission Local Plan will be to increase congestion, even with the proposed highway improvement schemes in place. More detailed analysis of the junctions and queuing is required. We question the conclusion that the developments would have An
acceptable impact on the capacity of the highway networks in terms of the policy test set in paragraph 32 of NPPF". We do not believe that the impact on the B3000 will be acceptable, as it is already operating beyond capacity, and this situation will be made much worse following the mitigation proposed for the A3.

The Highways Assessment is limited to 30 results. Roads have been omitted from the report and it is unclear whether findings for the B3000 (also referred to as The Street B3000) are in fact from the Street or the roundabout from which there is a feeder road to Godalming via Priorsfield Road.

The table comparing scenarios and the impact on traffic is difficult to decipher. Scenario 1 includes current planning permissions plus Waverley's strategic sites. This shows an increase of just 9 vehicles per hour at peak times on the B3000. The next scenario 2 is the same, but includes GBC's strategic sites. Given that there is a strategic site in Compton of 1,800 homes and another of 1,000 at Normandy, the expectation would be for the volume to be not only higher, but considerably higher. The result is however, ZERO. We understand that this is because the impact measured is only from the immediate area and, as Blackwell Farm has been removed from the village for modelling terms, this does not give a realistic result. The omission of the Town Centre Master Plan and its impact on the roads further diminishes the integrity of this Highways Assessment.

Even without the full impact being understood, it is clear from the scale of development on the west of Guildford (1,800 homes at Blackwell Farm, 1,000 homes at Normandy, 1,300 homes at Ash, 3,800 homes in the Aldershot urban area, 1,200 homes at Borden) that the increase in traffic on the B3000 and other main routes would be severe.

The Highways Assessment shows that as a result of the proposals put forward in this draft of the Local Plan the B3000 will suffer the highest increase in flow rates at peak times (after the M25, A320 and A25. It also reveals that traffic flows would increase if the A3 was widened, as the A3 would then attract more traffic via the B3000. Despite this, there are no solutions planned to mitigate the situation and we are therefore strongly objecting to the level of development and in particular strategic development at Blackwell Farm as outlined in the Local Plan.

The proposal to introduce a new route to Guildford town centre from the west via Blackwell Farm has been ill thought out. The volume of traffic that will use this new ‘rat run’ through the new development and the university campus/business park, has been underestimated. There will be problems for traffic wishing to exit the new development in both directions during peak hours - traffic is frequently queueing for miles along the A31, and the Tesco roundabout is one of the worst bottlenecks in Guildford. The knock-on effect on the Egerton Road/Gill Avenue junction would impede emergency vehicles getting to and from the hospital.

The 4-way junction on the A31 has no detail at all and the concern is that permission in principle will be given to the site in the hope that these problems are surmountable. If they are insurmountable, which I believe they are, then enormous amounts of Green Belt land within the setting of the Surrey Hills AONB will have been sacrificed for nothing. The 4-way junction, if it goes ahead, is likely to be huge and, due to its elevated position, will cause significant harm to the AONB in terms of landscape and light pollution.

The Highways Assessment has many limitations, not least being the absence of the Town Centre Master Plan, which includes potential road closure and re-routing. Compton is likely to be very much affected by any reduction in road capacity in the town centre and it is important that we are presented with the whole the picture.

The Assessment acknowledges that not all impacts of proposed Blackwell Farm development have been modelled and that, due to the emphasis on the A31 and the A3, not all roads were included.

The report concludes that the improvements to the A3 are necessary to maintain adequate flow rates on the strategic network. Further work is needed to determine what impact any widening or junction improvements will have on local roads, and what will be done to mitigate against the increased flows through Compton, particularly given that a section of the B3000 though the Village is anticipated to become an Air Quality Management Area. GBC has resisted requests by members of the PC to have the northern end of The Street made an AQMA, but readings of nitrous oxide in this area are well above EU legal limits.

There is little information about the tunnel but the map indicates that one access / egress point will be in Compton near the A3, although no land has been safeguarded for this purpose. This is likely to have the same impact as the improvements to the A3, i.e. increased traffic (and pollution) through Compton.
The Spatial Hierarchy

The spatial hierarchy, which outlines Guildford's preferred strategy, does not match up with the proposed plan. The hierarchy places Brownfield sites (including those on Green Belt) as a priority, but the Plan has 66% of development on Greenbelt and only 34% on Brownfield. The hierarchy lists Guildford town and urban areas as a priority followed by inset villages and identified Green Belt villages. A relatively small percentage of housing is allocated for Guildford town (the most sustainable location) and Green Belt areas, such as Blackwell Farm, with high sensitivity have been classified as within the 'Guildford urban area' when they are in fact in the open countryside. We are told that only 1.6% of the 89% Green Belt has been earmarked for removal and that the 6% removed via insetting doesn't count as these villages are already developed. If this is the case, why list them in 4.1.16 of policy s2 - Spatial Strategy?

4.18 The preferred options cannot accommodate all that Guildford 'needs'. This is untrue. Two specialist consultants have independently critiqued the OAN and both question the level of uplift and the use of ONS data without full correction for changes and anomalies. They refer to 'double accounting' as the uplift is introduced at several stages and the assumptions that result in the final OAN are not explained. See comments on Strategic Housing Market Assessment (SHMA).

Strategic Housing Market Assessment (SHMA)

I Object

The “objectively assessed need” figure of **693 homes a year is too high**.

A professional review by NMSS has concluded that, even basing the calculations on a period of stronger economic and student growth, **the housing need figure should be revised down to 510 homes a year** and the SHMA method should be changed to consider student housing need separately due to the distorting effects of students on the figures.

The current SHMA inflates the proposed housing figure due to:

- failure to correct for errors in the historical data for international migration flows,
- issues with the way it considers students and affordability, and
- flaws in the method for estimating the number of homes needed to support job growth.

It is unacceptable that demographic and economic model assumptions have been withheld and cannot be checked making the process unaccountable.

Two additional reviews of the SHMA reach similar conclusions, one having been produced by CPRE and the other by Cllr. David Reeve.

The Land Assessment

I object

The exclusion of sites of 5 dwellings or fewer from the list might make administration easier, but the addition of these sites plus windfalls and outstanding (but current) permissions gives rise to a higher number of dwellings than is actually needed, thus reducing justification for release of the Green Belt put forward.

The criteria used to include or exclude sites because of this study lack consistency, with many sites excluded as 'unsuitable' with no further explanation offered (many of which were in the urban area of Ash). The assessment lacks objectivity and detail.

Green Belt & Countryside Study

I object
GBC’s Green Belt & Countryside Study does not value appropriately the “fundamental aim” of Metropolitan Green Belt or look strategically at options for developing in major settlement areas beyond the Green Belt. It is pointless for London to apply constraints to protect its Green Belt if areas within it, such as Guildford, choose to ignore this option. It is the same Green Belt and serves the same purposes, all of which are acutely valuable.

The way Green Belt is parcelled up and scored is invalid: serving 2 Green Belt functions well is as legitimate as serving 3 to 5 functions less effectively. The Green Belt sensitivity analysis is not a valid basis for informing decisions. This method also omits purpose one, on the basis that all Green Belt sites encourage regeneration of urban sites. This should not be excluded for it is valid and could even be argued to be particularly valid in areas close to the town. Boundaries used for Blackwell Farm were neither permanent nor defensible.

Proposed removal from the Green Belt of a number of relatively small sites where development of an exceptional nature has taken place, plus adjoining land, has lost sight of the scale at which Green Belt is effective.

Assessment of which villages to take out of the Green Belt does not adequately consider that villages contribute to the openness of the Green Belt, as seen from surrounding AONB.

A key principle of Green Belt is its permanence. The University Consultants stated this 13 years ago when seeking permission to take Manor Farm out of the Green Belt to create Manor Park. They reassured residents that the boundary would not be frequently moved and that Blackwell Farm would be opened up to the public for “informal recreation”. The same Consultant has now repeated this promise in putting forward the University plans to develop on Blackwell Farm, saying that the new boundary would be permanent for at least 25 years!

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents: 
- NMSS SHMA review annex 5.pdf (1.3 MB)
- Green Balance SHMA review annex 6.pdf (469 KB)
- Annex 1 - Hogs Back Natural Beauty Evaluation V2 24.05.16.pdf (5.9 MB)

Comment ID: SQLP16/397  Respondent: 8570273 / Fiona Curtis  Agent: Fiona Curtis

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Question 2: Legal compliance

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (No)

The Plan preparation process has had inadequate regard for national policy, which attaches “great importance” to the “openness” and “permanence” of Green Belt. The test of “exceptional circumstances” that might justify allocating Green Belt land for development in a Local Plan has not been rigorously and transparently applied at a strategic level.

The Sustainability Appraisal seems to have lost sight of the concept of Sustainable Development as described in the National Planning Policy Framework to the extent that we question whether it complies with the requirement.

The report states that there are no pollution issues in Guildford. This is not true. The A3 end of the B3000 exceeds Eu regulations and this should be flagged in the 2015/16 air quality report which the Council has yet to publish.

I object
The 2015/2016 air quality management report has not yet been published and this will/should include an area at the A3 end of Compton, which exceeds the recommended max NO2 reading. One year results for NOx are 48.728 with high's of 68 using National bias adjustment.

Cllr Furniss indicated that the location of the test tubes may have made them invalid, but measurements show that they were positioned correctly and monitored for over a year by GBC environment officers, who have now added additional monitoring devices (See Annex 2 – Correspondence between Cllr Curtis and Cllr Furniss). This area qualifies as an air quality management area (AQMA) and it is disingenuous to omit this from the report or to use an old report on the basis that the 2015 report is not yet published, as the problem is known and recognised by the environment department within GBC.

The traffic survey shows increases in overall flow at the B3000 monitoring point, of values between 5.6% and 16.5%. This would severely impact flow, which is not in line with National Policy as further congestion would exacerbate the current air quality issues as the A3 end of the Street.

I do not believe that a regulation 19 consultation is appropriate. Whilst few changes have been made, additional sites have been included without opportunity for regulation 18-consultation input.

The video used and paid for by GBC and taxpayers is biased towards development, and hence raises questions over the validity and legality of such marketing campaigns. All the individuals featured in the video, with the exception of one nurse have previously spoken in the Council Chamber in favour of house building/building on Blackwell Farm; and there is not a single voice representing protection of the Countryside or outstanding landscapes.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:** [Air Quality correspondence.pdf](#) (408 KB)
concluded that most of the 265 hectare farm was of a landscape and scenic quality that merited inclusion within Natural England’s revised Surrey Hills AONB boundary.

It raises serious question about the soundness of the evidence base when Surrey CC says that it only has to account for evidence submitted and not for that omitted? The area within the proposed development site at Blackwell Farm should now be considered by Surrey Hills as part of the AONB boundary review and land to the west should remain undeveloped, as it is important to the setting of the AONB.

The plan is not justified. Residents groups have suggested other strategies but these have not been tested or considered against the current trajectory, which has remained largely unchanged since day one.

Many aspects of the Plan were strongly objected to in 2014 and not only have these points been ignored, they have in fact been embellished or made worse. I refer to the points that GBC referred to in their own summary, which stated that most people objected to the scale of development and the harm to the Green Belt. At that time there were 4 strategic sites and now there are 5. At that time approx 50% of development was in Green Belt and now it is 66% with only 34% on previously developed sites. 58% of development is on just 5 sites.

A more realistic appraisal of the town centre with more multi-storey car park development and less retail would make way for a greater percentage of housing in the town centre, which is after all the most sustainable and sought after area. Additionally, greater pressure must be placed on the University to house more students at Manor Park in order to free up affordable rented accommodation in the town for key workers.

There is a conflict of interest when the developer (University) drags its feet over the provision of promised student accommodation (thereby putting pressure on the housing market) whilst at the same time seeking permission to build 1,800 new homes to help Guildford’s need? The University is at least five years behind with programme of building student residences and staff housing. It is widely agreed among residents groups that the University must fulfil all of its current building plans and substantially increase the proportion of students on campus. If the University built the outstanding units, the housing need would reduce substantially yet much of this is omitted from the outstanding permissions list?

GBC has approached development without applying constraints that are applicable such as Green Belt and infrastructure. It is wholly inappropriate to build a Plan without constraints when there is widespread opposition to this approach. Furthermore, there are serious doubts over the validity of the objectively assessed housing need. Housing need underpins the entire plan, and we are being asked to accept the figure of 693 on trust. Without an understanding of the methodology behind the OAN, the public cannot 'buy into' this figure, especially as it has been illustrated by two reputable professionals that there have been errors such as ‘double accounting’, which has resulted in uplift. Both consultants have concluded that a more accurate figure would be around 500 new homes pa and the most recent one, which was done in pre Brexit -June 2016 acknowledges that due to the high number of International students here in Guildford a student SHMA would better inform this plan. Both consultants feel that the current SHMA is flawed and that the OAN of 693 is too high. These reviews will be submitted by CPRE and the GRA and we support the findings of both.

Putting 58% of development on 5 sites, which are within the Green Belt, or largely within the Green Belt, is not consistent with national policy. The definition of 'exceptional' is forming an exception or rare instance; unusual; extraordinary. What possible exceptional circumstances can justify 3 sites of approx 2,000 each and two of 1000 each, on Greenbelt. This makes a mockery of the term 'exceptional'?

The plan has a maximum number and a hefty buffer. It has underestimated windfalls and overestimated need. It is likely therefore that if one of the major sites fails to come through, the Plan could still succeed in terms of numbers, but would fail in terms of impact on infrastructure and reliance on aspirational, but distant 'yet to be discussed' schemes such as railway stations, making the plan undeliverable. If more people are not given the opportunity to live in Guildford town, the night time economy cannot grow and if the gamble to use 40% of the land for retail fails, shops will close and we will have created a leafy green ghost town, whilst the villages outside the town will have changed beyond all recognition as the impact of urban sprawl takes its toll.

The plan puts many eggs into 5 baskets with 58% of all development on just 5 sites. If these are not deliverable, the plan will fail. This strategy has been roundly criticised by Inspectors in other parts of the country.
Taking on such a high OAN without scrutinising it and then taking land out of Green Belt to fulfil it, and using developer funding to secure infrastructure (which reduces significantly the proportion of affordable housing delivered) is destructive and risky.

It is inconceivable that 5 sites between 1,100 and 2,000+ each can be built on Green Belt land without affecting the purposes of the Green Belt.

AONB should be given the highest protection. Despite being put forward for AONB review Blackwell Farm was omitted and an independent consultant had to be commissioned by local parish councils. The findings showed that the area met Natural England’s latest criteria for AONB and should not therefore be developed but should instead be properly recognised.

The proposal at Blackwell Farm has been reduced from 2100 to 1800 to take account the impact on future AONB or for views in and out of the existing and future AONB from public areas as determined by planning policy. It is feared that if this site were approved and if access could be made possible without causing serious problems to the surrounding road network, that the AONB in this location would undoubtedly be destroyed.

GBC argues that it is necessary to remove more than 1.6% of its 89% Green Belt and to remove more than 6% of its Green Belt from villages (by way of insetting) in order to meet its need, yet at the same time the Council advocates making an additional area Green Belt? The area of land being put forward for inclusion within the Green belt is on the same ridge as two areas of Green Belt it wishes to remove (Normandy & Blackwell Farm). This approach lacks consistency.

Cllrs Paul Spooner and Matt Furniss have stated clearly that there will be no development without supporting infrastructure and that the infrastructure must come before, or alongside, development. It is difficult to see how this will materialise as developers’ CIL contributions (which will fund infrastructure) are paid from profits made from the development. This statement appears to be unenforceable and could offer false reassurance to residents who may support the Plan on this basis.

Developers are being asked to fund large amounts of infrastructure. They will offset this against any agreement for affordable housing and it is highly possible that affordable housing will not be built or that only a small proportion will be built. This was one of the key drivers and is factored into the housing need, yet may not be delivered. Where is the general analysis to see what level of affordable housing might actually be delivered given the level of infrastructure needed to implement this level of development on new sites?

The omission of the Town Centre Master Plan (on the basis that this has different timescales) invalidates two key components of the Plan - the Infrastructure and Highways assessments. The suggested road closures in the town centre and the resulting re-routing of traffic should be factored into the highways assessment, but they are currently omitted. The consequences of this could render the whole Plan undeliverable and I don’t believe the Plan can be approved without factoring in the Town Centre Master Plan.

GBC has proposed an OAN of 693 houses per annum in the GL Hearn West Surrey Strategic Housing Market Assessment (SHMA), which CPRE and GRA consider unsound. The methodology for the uplift and assumptions made have not been made available and thus the openness and transparency required for public understanding as outlined in the NPPF has not been adhered to.

I understand that Highways England will not start to consider its intentions as regards the A3 in the vicinity of Guildford until 2018. It is difficult to see how plans can be approved without the inclusion of this information.

Network Rail has not made available for the public consultation any plans for a new railway station at Merrow, nor have we been told where the station car park would be situated nor how the railway bridge between Merrow and Burpham would be re-constructed to take the additional traffic. Likewise, there are no detailed plans for the railway station at Park Barn and Network Rail has not confirmed the status of either. These schemes must have a sounder footing to be included in the Plan if they are to be used to justify major developments nearby.

The access to, and from, Blackwell Farm (via the A31) has not been thought through. There proposed new route will likely be used as a rat run to the A3/Guildford, but this will put pressure on a congestion hot spot, and result in increased traffic at the Compton turn-off and Down Lane (home to Watts Gallery). It is also recognised that congestion at the Tesco
roundabout will be made worse and this area is already subject to considerable problems. Additional traffic via the business park from Blackwell Farm will add to congestion at the Egerton roundabout and impede access for emergency services to the hospital.

The proposal at Blackwell Farm has been reduced from 2100 to 1800 to take account of the AONB, but this does not account for views in and out of the AONB from public areas.

The greenbelt sensitivity study is not objective. The reference to Blackwell Farm as 'South West Guildford Urban' is totally misleading as it is unadulterated countryside that fulfills all the purposes of Green Belt. I consider this Study, which was the subject of much criticism in the last plan, to be flawed, yet it remains in this Plan. Why?

The damage caused to the Green Belt by the addition of Blackwell Farm would outweigh benefits gained from development, as there is ample space and lapsed planning permission on the existing Manor Park land for development for student accommodation, which would free up affordable rented accommodation in the town.

The proposal for Garlic Arch was added to the draft Local Plan without any consultation under Regulation 18.

No adequate explanation is given as to how the aspirational proposal for a tunnel will be used to overcome traffic issues relating to the quality of life and amenity of Guildford citizens.

No land has been safeguarded for a tunnel, which would show a real intent.

This consultation included 'significant changes' according to GBC, although most residents would strongly dispute this. Some key reports were added and 6 weeks was not long enough to properly digest the information and impart this to residents. Many additional questions had to be asked and many points required clarification, which essentially meant adequate information, was not made available until two-thirds of the way through the consultation.

The level of objection at the 2014 consultation was considerable - these objections have NOT been dealt with, but have been carried through to a regulation 19 consultation, undeterred. This is not in the spirit of Localism or the NPPF.

See annexes included with Q1 - ie Independent SHMA reports and land assessment report

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
both Woking and Waverley (and indeed London as it is the Metropolitan Green Belt) prefer to protect their Green Belt then the question must be asked as to why Guildford is happy to relinquish its Green Belt land, especially in the face of strong public opposition.

Many also question the choice of just Woking and Waverley as partners in the SHMA as there are considerable links with Aldershot and Farnborough in Rushmoor, which have very different needs and their inclusion could have provided a better balance.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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| Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination |
| Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 7: Any other comments? |
I object to the inclusion of Blackwell Farm in this Local Plan, for the following reasons:

- The southern slopes of the Hog's back are AONB and views in and out of that area should be protected and this is not possible if the development goes ahead.
- Blackwell Farm has recently been assessed by an independent expert as being of AONB quality and we anticipate that it will be included within the Surrey Hills AONB as part of the forthcoming boundary review.
- The South Downs is National Park and there has been a call for the North Downs to be considered in the same light. This would make Blackwell Farm a great asset to Guildford and a tourist attraction (particularly as it is home to one of the few Model Farms in the South East) and would fit in well with the rural ventures such as Greyfriars Vineyard, Mane Chance horse sanctuary and Watts Gallery, all of which are in close proximity.
- Blackwell Farm is very effective in fulfilling the functions of Green Belt.
- Blackwell Farm land which has been categorised as the best and most versatile (Grades 2 and 3a) and there is strong demand for local food production.
- More people objected to the inclusion of this strategic site than to any other strategic site, its inclusion is not supported.
- The 4-way access to the site on the A31 (Hog’s Back) is highly unlikely to be viable, and would harm to the AONB for miles (due to the need for lighting and its elevated position). The suggestion that rat running could be deterred through the use of automatic number plate is unrealistic. What about visitors and deliveries and changes of vehicle? Likewise, a barrier would cause chaos and possibly increase the volume of traffic wishing to use the A31. If no restrictions were put into place, the route will become a rat run, then there is nothing from stopping traffic on the A31 from using it if it is indicated as the shortest route. If the A3 were congested traffic could also come off at the Compton roundabout and take this route via Down Lane, which would add to congestion in this busy village and would negatively impact the tranquil lane, which is the home of Watts Gallery and Chapel.
- Maps, tables and results from assessments such as traffic impact all refer to the Blackwell Farm site as in “Guildford urban area” and refer to non-existent boundaries as if they are current. There is nothing urban about this area of countryside as the independent landscape assessment reveals.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:  

- Annex 1 - Hogs Back Natural Beauty Evaluation V2 24.05.16.pdf (5.9 MB)
Comment - Localism

The Plan is supposed to be informed by residents and by parish councils and residents' groups and their input used to formulate the Local Plan, not for it simply to be presented to them and objections and subsequent input ignored. Despite a great deal of effort from these groups and many like-minded responses, the Plan has not taken their concerns on board. The Plan has barely changed since day one and residents feel their views have been ignored and that the consultations have not been genuine. To add insult to injury, some of the key points raised have actually been exacerbated or made worse, such as the scale of development and harm to the Green Belt and issues over infrastructure.

The NPPF is open to interpretation, but it is my belief that GBC has chosen to interpret it in a way that lacks objectivity in an effort to appease developers in order to avoid costly court cases at a later stage. GBC has cited cases where development has been granted in an effort to justify this pro-development stance but has failed to balance this against the many sites where development has been refused.

To gain true public reaction, material presented has to be factual and unbiased and written without jargon and acronyms. This has not been the case. A degree of 'double speak' has led to absurdities such as 'affordable housing' which is over £300,000 i.e. ten times the average salary; 'safeguarding' which does not mean protection of land as most people would think, but rather potential future development and 'insetting' which means removal? It is recognised that these terms are not locally derived but all the same they are confusing for most of us.

Some Councillors have shown a lack of knowledge about environmental matters. Cllr. Gunning - webcast 24th May section 7 - 3:39

'About ancient woodlands, of course they are very attractive things, but they are ancient and trees don't last forever, so can we be practical about ancient woodlands and consider their value or their life, I should say, their life'

May 11th - Cllr Ellwood announced that he couldn't understand what all the fuss was about pollution as his Mother had lived (presumably unaffected by it) under the flight path at Heathrow?

Whilst people have been encouraged to take part in consultation, objectors have been subjected to name calling and public humiliation. There are too many examples to list and so I am listing the most recent. http://www.guildford-dragon.com/2016/07/10/letter-not-surprised-mr-patons-comparison/#comment-157440

The Local Plan has divided communities and highlighted weaknesses and alliances, which have resulted in a breakdown of trust between residents and those whose job it is to implement the Plan.

The Plan has been roundly criticized and objected to and yet it is presented to us once again. Many feel the consultations to date have been worthless and feel they have already made their points, which were ignored and will not therefore be making them again as they fail to see the point?

It simply is not possible to address infrastructure shortfalls by building in the hope that developers contributions will cover the costs as the level of development needed negates any benefits gained and in many cases, the situation is made worse.

Central government funding is needed to address current problems so that funding from development can be used to implement additional infrastructure needed to make new sites viable without damaging their surroundings. It must be accepted that geography and lack of previous investment leaves some areas with less opportunity to do this than others.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Applying Constraints

Ministerial guidance in relation to building on the Green Belt is clear: 1. “the single issue of unmet need - is unlikely to outweigh the harm to the Green Belt and other harm to constitute the "very special circumstances" justifying inappropriate development in the Green Belt” - Nick Boles to Sir Paul Beresford MP 7th February 2014. 2. “we were always very clear that we would maintain key protections for the countryside, and, in particular, for the Green Belt. The Framework makes it clear that a Green Belt boundary may be altered only in exceptional circumstances and reiterates the importance and permanence of the Green Belt” – Nick Boles to Sir Michael Pitt, Planning Inspectorate 3rd March 2014. 3. “Planning Guidance, updated in March 2014, also states that unmet housing need is unlikely to outweigh the harm to the Green Belt to constitute the very special circumstances justifying inappropriate development within the Green Belt” – Nick Boles to Sir Paul Beresford MP 18th June 2014 70% of the sites put forward in the Local Plan are in the Green Belt which flies in the face of current government planning policy. The National Planning Policy Framework (NPPF), National Planning Policy Guidance and case law make it clear that Green Belt is an absolute constraint on housing supply. Exceptional circumstances need to be shown to adjust boundaries. Other constraints under the NPPF include assessments of sustainability, strategic flood risk assessment, physical constraints on land use and infrastructure constraints (this can include road congestion, schools, drains, power supply and medical requirements). Constraints should be applied to the Objectively Assessed Housing Need (OAN). However this itself is overstated and should be reduced from 693 per annum to 500. In view of the comments above it would appear logical to apply CONSTRAINTS in line with government policy to a corrected OAN of approximately 50% to account for the fact that 89% of the borough is in the permanent Green Belt and development is not supported by adequate major infrastructure. This reduction is in line with the constraints percentage of 50% applied by Woking Borough Council. This would result in a more acceptable and practically achievable HOUSING TARGET of 250 homes per annum which over a 20-year period would be 5,000 homes. All of these homes could be built in the existing urban brownfield areas of the borough and would in part satisfy the 20,000 objections made by residents to the 2014 draft plan and also relieve the additional problems of inadequate infrastructure. It would also mean that there is currently 8.5 years supply of housing (2131/250) which is made up of existing permissions granted (1,518) and completions made (613) during 2013/2015. (Monitoring Report by GBC 2015) The Brexit vote may have strengthened government policy further. Theresa May, the new prime minister, announced on 11 July that she is personally committed to protecting the Green Belt once she takes office. Whilst I have many significant objections to the GBC Local Plan I applaud the policy statement by GBC in their Monitoring Report, “We will continue to monitor the use of previously developed land, and continue to identify as many opportunities as possible for redevelopment of previously developed land.” I believe it will be to the benefit of all residents if GBC can apply themselves vigorously to this endeavour in order to protect the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp173/607  Respondent: 8570273 / Fiona Curtis  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
SHMA • reduced total housing target by 1,400 units until end of plan period in 2034

This is not a reduction, but a postponement or a delay

• reduced housing need from 693 to 654 units per year – revised Objectively Assessed Need (OAN) for housing in updated Strategic Housing Market Assessment (SHMA): Guildford Addendum

• sites removed completely from the plan – primarily for homes in rural areas such as a large site in Normandy and Flexford for 1,100 residential units

The Normandy site was not in the regulation 18 consultation or the Issues and Options and hence it was only removed from the most recent plan. It was also added at the last minute despite being safe guarded since the last plan and many doubt the intention to ever seriously consider this site but feel that this was added with a view to removing it, to demonstrate that the authorities are listening to communities.

• updated sites with reduced numbers of homes during the plan period – primarily in green belt areas such as Gosden Hill Farm and Blackwell Farm, with 300 fewer residential units at each site, due to phasing of delivery expected beyond 2034

Again, the numbers are NOT reduced at all, they are merely delayed or phased and hence their whereabouts is inconsequential.

• updated sites with increased numbers of homes – primarily brownfield in the town centre such as 200 more residential units on the North Street redevelopment

• updated sites for student accommodation and Travelling Showpeople – such as Guildford College changing from 100 homes to 200 student accommodation units instead and land at Garlick’s Arch site that is now accommodating six Travelling Showpeople plots

• new sites for employment floor space/industrial land – such as land around Burnt Common warehouse is the new site for 7,000sqm of industrial land moved from the site at Garlick’s Arch

• new rail station at Guildford West, Park Barn -- is now included as a site allocation

• reduced total growth requirements from last year’s Local Plan period in 2034

This is not a reduction, but a postponement or a delay
• **reduced housing need from 693 to 654 units per year** – revised Objectively Assessed Need (OAN) for housing in updated Strategic Housing Market Assessment (SHMA): Guildford Addendum

• **sites removed completely from the plan – primarily for homes in rural areas** such as a large site in Normandy and Flexford for 1,100 residential units

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*Again, the numbers are NOT reduced at all, they are merely delayed or phased and hence their whereabouts is inconsequential.*

• **updated sites with increased numbers of homes – primarily brownfield in the town centre** such as 200 more residential units on the North Street

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

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**Answer (if comment is on questions 1-7 of the questionnaire):** ()

<p>| 2.10a | New comment on infrastructure needs | I particularly support the recognition that villages and village networks are affected by poor infrastructure. | I support parts of the comment BUT <strong>object</strong> to this being the only comment relating to infrastructure. This does not go anyway near clarifying necessary details. |</p>
<table>
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<tr>
<th>2.13</th>
<th>There is also a network of footpaths and bridleways forming a Rights of Way network which includes various routes that can be used by off-road cyclists.</th>
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<tr>
<td><strong>Comment</strong></td>
<td>Cut backs have resulted in issues for both horses and cyclists. In the summer months encroachment and in the winter months, flooding makes many routes impassable. Comments about communities being served by a bus route should be amended as this is subject to constant change as bus services are being cut and others are running subject to review only (ie 46).</td>
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<td>2.14a</td>
<td>Note on congestion 'whilst most local roads are single carriageways with a lane in each direction, it is at their junctions that the free flow of traffic is most often impeded during peak periods'</td>
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<td><strong>Object</strong></td>
<td>This is true, however this omits to say that road widths in villages and parts of the town are often inadequate for the size of vehicles which results in lorries using pavements or more than one lane. This affects traffic flow. Off street parking also places restrictions on busy roads. This is used in Waverley (Chalk Rd Godalming and parts of Binscombe) and creates issues with flow, forcing high volume traffic through the B3000 which already has high pollution readings. It also omits to take into account the possibility that some roads have reached capacity, especially at peak time. The b3000 in Compton has reached capacity at peak time and is close to maximum capacity for most of the day during the week. It does not acknowledge the knock-on effect of congestion on A3 / A31, which is rat-running which results in congestion on minor roads (B3000 Compton) and pollution.</td>
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<td><strong>Comment</strong></td>
<td>The policy does not fully recognize the impact on rural roads.</td>
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<td>2.21 - Shortage of affordable housing</td>
<td>The para notes a shortage of affordable housing without putting this into context. That is to say what percent of people in Guildford find themselves unable to afford 'affordable' housing and omits to mention the shortage of 'social housing' or the impact that 'right to buy' has on social housing stock.</td>
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<td><strong>Needs putting into context</strong></td>
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<td>2.35</td>
<td>The addition of a full stop after this URL makes it unobtainable. It works fine without the full stop, but some may not realize this.</td>
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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/3258  Respondent: 8570273 / Fiona Curtis  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Key facts

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Answer (if comment is on questions 1-7 of the questionnaire): ()

4. In para 2.15, the text now says that there are opportunities improve the capacity of the road network, rather than performance. This is more realistic and fits with the plans. However, it does not match the ambition of the Transport Strategy to ‘address the historic infrastructure deficit’.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/4160  Respondent: 8570273 / Fiona Curtis  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

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Answer (if comment is on questions 1-7 of the questionnaire): ()

Inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9]:

1) disregards an independent expert landscape study, which demonstrates that part of the site merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]

2) directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E

– and will also encourage rat–running through residential areas
3) ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]

4) adds to air pollution in neighbouring areas, which already exceeds safe EU limits for nitrogen oxides [Policy A26].

Policy A26: Blackwell Farm has been amended and now the proposed development includes a secondary school with up to six form entry. This will add to morning peak hour traffic which was not included in the 2016 modelling. The SHAR findings indicate that there will be congestion in peak periods on the network that will serve this development. The A3 will be at or over capacity which means that the network will lack resilience, as it does today. The roads connecting to the town centre will continue to be under pressure. The SMC concept is more advanced on this section than elsewhere, but the effect on capacity has yet to be established. There will be queuing on the A31 on the approach to the new signalised junction that will give access to the Blackwell Farm site. The A31 is regarded as a key route by the LEP and LA partners.

I fully endorse all the comments made by Richard Bate of Green Balance in the response he produced for Compton Parish Council and include this as annex 13.

Northdowns Housing Ltd

GBC has given considerable amounts of taxpayers money to a company called Northdowns Housing Ltd, where the Directors are Councillors or Ex councilors or are connected to GBC. The company is based at GBC yet when it was agreed that £22m of tax payers money be diverted to this company it was not to add to the housing number by building social housing, but to buy affordable housing to rent and to be profitable. This does not help those most in need and directly competes with first time buyers. Financial details of the company and salaries of directors were not published with the reports pack and whilst exceptions can be applied to information held with Companies House, this is not at this stage.

This direction is not one I feel comfortable with and I am not sure that all other GBC councilors are comfortable with it either.

I support building social housing but do not support this modus operandi and hope that the Local Plan can clearly identify the purpose of this company and how it plans to operate.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

**Comment ID:** pslp172/4163  **Respondent:** 8570273 / Fiona Curtis  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I endorse the submission by WAG

WAG commented in its 2016 representations that the over-allocation of housing meant that there was no justification for including the former Wisley Airfield (A35) given the harm it would cause. That case is strengthened by the reduction in the housing requirement.

There are issues concerning pollution levels due to its proximity to the M25 and A3 and proximity to SPA, and sustainability, none of which have been addressed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

| Comment ID: pslp172/4161  | Respondent: 8570273 / Fiona Curtis  | Agent: |
| Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A43 |

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

A43 Garlicks Arch

The stated, albeit unproven, need by GBC is 400 homes. Normal residential density is 30 homes per ha. Land required would therefore be 13 ha. Land actually proposed to be allocated is 28.9 ha. This is more than double land required in beautiful irreplaceable Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

| Comment ID: pslp172/4162  | Respondent: 8570273 / Fiona Curtis  | Agent: |
| Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A58 |

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
<table>
<thead>
<tr>
<th>Burnt Common Policy A 53</th>
<th>The stated, albeit unproven need, is 7,000 sq m B1c, B2 and B8 development. Normal density 50% plot ratio. Land required 1.4 ha. Land allocated 9.26 ha. This is more than six and half times more land than necessary in valuable Green Belt which the planners should be looking after.</th>
<th>Object</th>
</tr>
</thead>
<tbody>
<tr>
<td>Town Centre</td>
<td>The plan fails to produce a coherent development strategy for Guildford Town. GBC has deleted its independently commissioned Town Centre Master Plan by the well renowned firm of architects and master planners Allies and Morrison as a source document from the plan even though this master plan was previously well publicised and enthusiastically adopted by the Council.</td>
<td>Object to exclusion of the town plan.</td>
</tr>
</tbody>
</table>

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: pslp171/2379</th>
<th>Respondent: 8570273 / Fiona Curtis</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy D1</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

<table>
<thead>
<tr>
<th>1. We require All new developments must to achieve high quality design and enhance the environment in which they are set.</th>
<th>If only the same direct statements were made throughout. There are still too many statements of intent without a real outcome in this plan.</th>
<th>Support</th>
</tr>
</thead>
<tbody>
<tr>
<td>2. Residential developments of 25 or more dwellings must should:</td>
<td>This is an example of a direction that has been diluted, to ensure directions are followed, MUST is stronger than 'should'.</td>
<td>Object</td>
</tr>
<tr>
<td>Key evidence Removal of NPPF</td>
<td>NPPF has been removed, but should be included -- see paragraphs 56--68 of NPPF which outlines the importance of good design not only for the building itself but also for its surroundings.</td>
<td>Object</td>
</tr>
<tr>
<td>GBC's Landscape Character Assessment has been included, this should also include any independent work relating to design / assessment ie Richard Bate's assessment of Blackwell Farm landscape and those submitted by GSoC /</td>
<td>Object</td>
<td></td>
</tr>
</tbody>
</table>
Monitoring Indicators

Built for Life is helpful but this does not account for the setting or the appropriateness of the development within the setting. It is therefore useful to leave information relating to previous applications, which will have this additional information.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/2381  Respondent: 8570273 / Fiona Curtis  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy D3 Historic Environment

Adequate resources must be given to ensure the policies can be carried out. Conversely, to the statement that conservation and economic sustainable growth are complimentary objectives, this is not always the case and policies must be put into place to better define outcomes where the two do not co-exist. For instance, there is an ancient monument within Blackwell Farm that is overgrown and completely neglected. In what way will policies that support economic growth also support the restoration and setting of this monument and its surroundings (historic royal park)?

Many conservation reports/assessments are 20–30 years old and to date resources are not in place to keep up to date with this.

Last year I suggested that the Arts and Craft building (1912) that was the former Rectory in Compton, should be listed. It was agreed but again due to lack of resources it was necessary to source and provide all the evidence that was needed myself.

The policy does not provide a framework for the enjoyment of the historic environment and in order to fulfill 4.5.45, resources must be put into place to fulfill the programme.

Key Evidence

Planning practice guide has been removed as has the NPPG, without any justification? These should remain in place unless justification is supplied for their removal.
**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

**Comment ID:** pslp171/2330  **Respondent:** 8570273 / Fiona Curtis  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy E1

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ()**

<table>
<thead>
<tr>
<th>Policy E1</th>
<th><strong>Replacement of 'Sustainable employment needs' with 'Meeting employment needs'</strong></th>
<th><strong>Object</strong></th>
</tr>
</thead>
<tbody>
<tr>
<td>Policy E1</td>
<td>I object to this omission. It is up to local authorities to balance the economic guidance received with the need to provide a sustainable plan. It is therefore important to retain sustainability at the heart of the plan and not forget that LEPs are one of many formal consultees. Failure to balance the needs of all could result in a plan that is LEP / economy driven and balance would be lost.</td>
<td></td>
</tr>
</tbody>
</table>

| Indicators | The criteria used to determine the significance of an employment site appears to be based on space and the amount of land it takes up and does not account for value / number of people it employs? This means farms with relatively low turn over and staff numbers are mapped whilst their contribution to the economy is relatively small? All sites meeting the criteria are added to the list, which currently only lists 9 sites? Protection of sites must surely be based on a much wider remit than space alone and I would recommend that this policy be reviewed to encourage efficient use of space and monitoring indicators based on the contribution to our economy. | **Object** |

| Indicators | I am concerned that the emphasis on B8 class jobs (storage & distribution) will lead to land hungry warehousing and increases in large trucks and lorries on our roads which are already amongst the most congested roads in the UK. Very few jobs are generated from warehousing and the salaries commensurate with this business class add to pressure on affordable housing. I would prefer to see a greater emphasis on A2 and B1 | **Comment** |

I object to the ongoing poor quality of the updated research undertaken by Aecom. The Employment Land Needs Assessment 2017 is superficial and lacks sufficient detail and analysis between B1a, B1b, B1c, B2 and B8 use classes and no reliable analysis has been undertaken of the widely different supply and demand dynamics of the
categories ie. office, research and development, light industrial, general industrial and warehousing and distribution floor space.

The Employment Land Needs Assessment update 2017 (ELNA) states “that the pipeline for employment floorspace defined by planning permissions yet to be implemented and prior approvals suggests the potential for an additional 33,607sqm of B use class floorspace to come forward. This figure comprises a net loss of 4,750sqm of B1a use class floorspace and a net gain of 38,357sqm in B1c, B2 or B8 use class space.”

38,357sqm of B1c, B2 or B8 use class is quite sufficient supply for the plan period and does not justify the need for new development of industrial space on the Green Belt in such areas as Burnt Common. The reality of demand for industrial space is that it is both nationally and locally in decline and this is evidenced in part by old existing permissions that have not been taken up and developed. The ELNA alludes incorrectly to the poor quality of existing space being a “constraint” on supply and fails to acknowledge that this assertion cannot apply to potential newly developed space e.g. the undeveloped pipeline of 38,357sqm.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/2331  Respondent: 8570273 / Fiona Curtis  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy E2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

| 4.4.23 | I object to the change in policy E2 under paragraph 4.4.23a in relation to development involving waste management facilities to be directed to the Industrial Strategic Employment Sites. This fails to provide sufficient public consultation in relation to access and traffic flows. It also fails to provide sufficient public consultation in relation to unpleasant aspects of waste management Waste sites should, in my view, not be developed near residential areas and if this is followed through, their presence will of course prevent development in the area in the future. | Object |
| 4.4.14 | This policy omits Park and Rides as integral to linking business and transport | Comment |

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
I believe that proof of a business being non viable before change of use, should remain (this has been removed) as easing the way to change of use increases value and restricts stock. This should not prevent business premises from being re-housed, where housing is a priority or where new transport hubs improve economic viability.

I can see no reason why restrictions on change of use should not apply to other classes of business?

I believe that proof of a business being non viable before change of use, should remain (this has been removed) as easing the way to change of use increases value and restricts stock. This should not prevent business premises from being re-housed, where housing is a priority or where new transport hubs improve economic viability.

I can see no reason why restrictions on change of use should not apply to other classes of business?
<table>
<thead>
<tr>
<th>Policy E4</th>
<th>Proposals should be well designed and landscaped to maximize use of land as well as complementing the setting.</th>
<th>Object</th>
</tr>
</thead>
<tbody>
<tr>
<td>4.4.34</td>
<td>The NPPF: A sentence is included from the NPPF that supports local business. This however must be balanced with all other parts of the NPPF, including the protection of the Greenbelt, historic environment and development or growth must be sustainable. I strongly object to the use of what was Greenbelt land being used for 'low density' business. Permitting low rise office and research space with vast levels of landscape and surface car park puts huge pressure on the borough to release more Greenbelt and this is not sustainable.</td>
<td>Strongly object</td>
</tr>
<tr>
<td>4.4.38</td>
<td>Omission: The plan notes the Park's location in relation to the A3, Sports centre and Holiday Inn but omits to include two key sites that lead to high volume traffic, namely the Tesco super store and the Hospital.</td>
<td>Comment</td>
</tr>
<tr>
<td>4.4.40</td>
<td>removal of detail relating to the new extension: The plan could retain this information. 'Mixed use' development is far too generic.</td>
<td>Object</td>
</tr>
<tr>
<td>4.4.40</td>
<td>I would like to see further detail relating to floor space used, density and use of other space such as car parks and landscaping. I am concerned that this land is not being used efficiently. The Local Plan must include policies that ensure space is well used i.e multi-storey or subterranean car parking, medium density building and type of business. Failure to do so, could see the research park being used for other types of business which would not necessarily be in keeping with the overall ethos and direction that Guildford aspires to.</td>
<td>Object</td>
</tr>
<tr>
<td>4.4.37</td>
<td>omission: The original planning permission also stipulated that traffic should not increase by more than 5%. An independent review is needed to verify traffic flows as data produced by the University is not impartial and has manipulated results by removing sections of traffic deemed to be excluded? I attach a clip from Surrey mail 1988 in which the University seeks to prevent planning permission for the Tesco development on the basis of traffic issues. In almost 30 years, traffic is markedly worse than it was then and forecasters of congestion at this point have been proven correct. Traffic is a major issue at this point and failure to effectively deal with it as well as deal with future growth will affect the integrity of the whole Plan and put other businesses at risk (as many will leave due to congestion) as was proven by the evidence base.</td>
<td>Object</td>
</tr>
</tbody>
</table>
complement and enhance the existing Research Park setting.

<table>
<thead>
<tr>
<th>4.4.1</th>
<th>The density usage of 30,000 sq m in 10 hectares is an outrageous waste of space. 30,000 sq m could be incorporated into existing space whilst maintaining its character and without releasing more Greenbelt land at this stage. The existing site is now brownfield and must be optimally utilized before spread is permitted. I strongly oppose plans for low lying sprawl especially for commercial use. Land must be used wisely. Any plan that focuses on delivering timescales as a mark of success but does not monitor the quality or quantity against the wider plan and NPPF cannot be sustainable. Permitting sprawl on this scale will reduce scope for development and ability to enjoy our countryside setting for future generations. This is against the principals of sustainability and the NPPF</th>
</tr>
</thead>
</table>

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: pslp171/2333</th>
<th>Respondent: 8570273 / Fiona Curtis</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2017 / Policy E5</td>
<td></td>
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</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

<table>
<thead>
<tr>
<th>Rural Economy</th>
<th>Throughout this policy there is an assumption in favour of sustainable rural development in order to support economic need, as stated in the NPPF. It should also be noted that the NPPF guidance states</th>
</tr>
</thead>
<tbody>
<tr>
<td>• support sustainable rural tourism and leisure developments that benefit businesses in rural areas, communities and visitors, and which respect the character of the countryside. This should include supporting the provision and expansion of tourist and visitor facilities in appropriate locations where identified needs are not met by existing facilities in rural service centres</td>
<td></td>
</tr>
<tr>
<td>• promote the retention and development of local services and community facilities in villages, such as local shops, meeting places, sports venues, cultural buildings, public houses and places of worship</td>
<td></td>
</tr>
</tbody>
</table>

This policy is driven by rural businesses. The main stakeholders are rural businesses and even the forum at which findings are represented is at a paid ticket event for local business. Communities have been largely removed from the policymaking, and tourist's views are represented by a relatively small and select sector. Parish Councils were contacted very late in the day and hence had little time to respond. On gathering their submissions, I am able to see that their views were not included in the summary findings and neither were views of residents groups (as they were not included at all). | Object |
<table>
<thead>
<tr>
<th>I believe that the consultation process fell short of what would be expected and hence I object to this policy.</th>
</tr>
</thead>
<tbody>
<tr>
<td>4.4.46 The creation of new business opportunities must be balanced with the needs of the farming industry.</td>
</tr>
<tr>
<td>I support this statement but feel it should also include the <strong>rural community</strong>. It seems that residents have been completely disenfranchised under this strategy. Whilst I agree with the need for balance, I fail to see how this is reflected when 3 very large good grade agricultural sites (Wisley, Blackwell Farm &amp; Gosden Hill) have been put forward for development?</td>
</tr>
<tr>
<td>Support but needs extending.</td>
</tr>
<tr>
<td>The Council will also work with partners to support the provision of small-scale business incubation centres in rural areas.</td>
</tr>
<tr>
<td>I support the ethos behind this, however new business ventures must be truly sustainable and this means on a regular bus or train route to avoid the introduction of more cars into rural areas that are ill equipped to cope. The buildings must also be in keeping with the vernacular and on an appropriate scale.</td>
</tr>
<tr>
<td>Support but needs greater definition</td>
</tr>
<tr>
<td>(5) Proposals that would result in the loss of shops and services that provide for everyday needs (within Use Class A1) located in rural areas but outside of Local and District Centres, will only be acceptable if evidence is provided of active and comprehensive marketing of the site for its current use for a minimum of 12 prior to submission of a planning application.</td>
</tr>
<tr>
<td>I agree with this in principal but cannot see why this does not also apply to local or district centres? The policy has omitted to say 12 what? Ie weeks, months?</td>
</tr>
<tr>
<td>comment</td>
</tr>
<tr>
<td>4.4.51a In May 2017 the Council has adopted a new Rural Economic Strategy aimed at protecting our natural and built heritage, sustaining our rural communities, and enabling enterprise and diversification in our changing countryside. This Rural Economic Strategy focuses on five policy priorities for the period 2017 to 2022:</td>
</tr>
<tr>
<td>The strategy is most definitely not aimed at protecting natural and built heritage.</td>
</tr>
<tr>
<td>If it were it would make more of the ancient monument at Blackwell farm and the enormous amount of history and heritage that accompanies the area. The area has a vineyard a horse sanctuary and of course Watts Gallery, Limnerslease and Chapel. It was once a royal park and much more could be made of the combined heritage assets, yet this has not been considered. If it has been looked at and rejected, then please send the report to Compton Parish Council and to me.</td>
</tr>
<tr>
<td>Object</td>
</tr>
<tr>
<td>I put forward this suggestion in my written feedback as part of this very limited consultation (as Chair of Compton Parish Council), to which I received no feedback.</td>
</tr>
<tr>
<td>I object to the lack of consultation on this policy.</td>
</tr>
</tbody>
</table>
Most Parish Councils knew nothing about it and I had to request an extension to the deadline to enable them to take part. As the launch date for the publication of the policy had already been set (only weeks away from the deadline at a ticket only conference) it is likely that many felt this policy was a 'fait accompli'.

The Strategy covers the River Wey catchment and will link Parish Councils, businesses and other local organisations in rural Guildford, for example, Surrey Hills AONB, Surrey Wildlife Trust, University of Surrey, and also the neighbouring boroughs of Waverley and Woking. Key to the strategy is continuous engagement between all these organisations on aspects of policy, planning and delivery. Delivery of the Strategy will be monitored by Guildford Business Forum's Rural Group whose members include environmentalists, farmers, landowners and producers.

I am concerned about the lack of impartiality when those with a financial interest become directly or indirectly involved in conservation matters. This does not result in 'balance' but in 'imbalance' as policies have been weakened and the strategy is not reciprocated ie businesses such as the University do not have conservationists on their team?

I cannot find any details about the Guildford Business Forum? Who are they, how were they elected, are the meetings public and if so where are they advertised and where are the minutes? If the group is tasked with shaping the development of the rural economy then decisions must be public and inclusive of the rural community.

4.4.51b
These provide low cost, flexible office space for start-up businesses and nomad working and may be able to provide faster internet than at residential properties along with the benefits of interacting with other local entrepreneurs.

Fast broadband for businesses should be widely available and hence they should not need access to special units for delivery.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/2334  Respondent: 8570273 / Fiona Curtis  Agent:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

<table>
<thead>
<tr>
<th>4.4.54</th>
<th>The historic built environment also significantly contributes to Guildford's appeal.</th>
<th>Object due to omission</th>
</tr>
</thead>
</table>

The results showed that the countryside surrounding Guildford was a significant attribute, yet this had been omitted, whilst the built environment has been included? It is inappropriate to select parts of the survey and omit others.

<table>
<thead>
<tr>
<th>Monitoring</th>
<th>Tourists come to Guildford from all over the world and it important that public transport links be retained at key sites and that they are linked up. This should be added in. It is not viable to be continually subject to review (as the 46 bus is in Compton) when Watts Gallery and restaurants and pubs as well as Nursing homes, all rely on the bus. The 18 month marketing clause should also include local pubs.</th>
<th>Comment</th>
</tr>
</thead>
</table>

<table>
<thead>
<tr>
<th>4.4.59</th>
<th>I agree with the broad principals but new development must also provide traffic impact info and this should be independently monitored.</th>
<th>Comment</th>
</tr>
</thead>
</table>

<table>
<thead>
<tr>
<th>4.4.60</th>
<th>Independent provision should also be marketed (ie B&amp;B / holiday rentals).</th>
<th>Comment</th>
</tr>
</thead>
</table>

<table>
<thead>
<tr>
<th>Key Evidence</th>
<th>Key evidence should INCLUDE the NPPF, which has been removed?</th>
<th>Object</th>
</tr>
</thead>
</table>

<table>
<thead>
<tr>
<th>Addendum</th>
<th>The Carter Jonas report states:</th>
<th>Comment</th>
</tr>
</thead>
</table>

3.22 The findings of the retail section of this report should be read in line with the economic paper.

If forecast floorspace cannot be accommodated within existing or proposed town centres policy consideration may be required to support out of centre retail facilities. However, new out of centre floorspace should only be directed to existing locations that are well served by public transport and other sustainable travel modes, and where it can be demonstrated that there will be no ‘significant adverse impact’ on the vitality and viability of existing centres in accordance with the NPPF (paragraph 26).

Table 4.2 Does not indicate whether this table includes internet shopping?
1.15 Lack of growth in Guildford's nightlife may not be due to people choosing to go to places closer to home, but could also be due to poor night time public transport, expensive taxis and lack of diversity (venues are largely for younger people and older people often have more disposable income).

Is Surrey Sports Centre missing from the report?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/2369  Respondent: 8570273 / Fiona Curtis  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy E7

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

<table>
<thead>
<tr>
<th>E7</th>
<th>Guildford Town Centre</th>
<th>Object</th>
</tr>
</thead>
<tbody>
<tr>
<td>4.4.67</td>
<td>Guildford does not have good nighttime transport and hence this should say 'good day time transport'. The Town Centre Master Plan is pivotal to the plan as a whole and it should be included within the Local Plan.</td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Object</th>
</tr>
</thead>
<tbody>
<tr>
<td>Removal of vision for the town</td>
</tr>
<tr>
<td>I object to the removal of a vision for the town. Reference is made to the Spatial Strategy, but this does not have a specific vision. It is also ominous to see that the 5 pillars that formed the basis of earlier incarnations of the plan have been replaced with 4 'core themes' and that development and sustainability have been replaced with 'economy'. Given that the economy is largely about development, sustainability appears to no longer have a place. As 'conservation and protection' are secondary in this plan the removal of 'sustainability' as a key component is of concern.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Comment</th>
</tr>
</thead>
<tbody>
<tr>
<td>4.4.86 Removal of section on 'flooding'</td>
</tr>
<tr>
<td>I hope the removal is because preventative measures will be put into place and / or development designed for floods is used. There is however no mention of either.</td>
</tr>
</tbody>
</table>
The Regeneration Programme has not been consulted on, on the basis that it bears no weight, as it is purely aspirational. The projects included are far from aspirational as they cross over into other parts of the evidence base. A balance is needed between good design and appropriate levels of development and meeting needs as the majority of people would like to live in the town, close to amenities. The outcome falls short of this with the majority of new housing proposed for the countryside. The Regeneration programme should see all brownfield and urban sites (outside conservation areas) optimally developed. This must include more multi-storey car parks and increased density in certain areas. This would go a long way towards taking the pressure off the Greenbelt. This document should also be open to formal consultation and have input from all Councillors, not just the Executive.

Who are the internal and external stakeholders?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: pslp171/2371</th>
<th>Respondent: 8570273 / Fiona Curtis</th>
<th>Agent:</th>
</tr>
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<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy E8</td>
<td></td>
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</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

<table>
<thead>
<tr>
<th>E8 District Centres</th>
</tr>
</thead>
<tbody>
<tr>
<td>(4) retail impact assessment.</td>
</tr>
</tbody>
</table>

The addition of the word retail removes all other impact. It is essential in my view that a traffic and transport assessment be included

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: pslp171/2378</th>
<th>Respondent: 8570273 / Fiona Curtis</th>
<th>Agent:</th>
</tr>
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<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy E9</td>
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</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
4.4.92 The size of the local centres at the 3 strategic sites and the traffic they will encourage is such that it is, in my view, inappropriate to determine the location at planning stage. Their location within the plot should be included within the plan to ascertain whether the centres themselves are viable for without them, the sites are unsustainable and should be removed from the

6A traffic and transport assessment should support the retail assessment.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment ID: pslp171/2322</th>
<th>Respondent: 8570273 / Fiona Curtis</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2017 / Policy H1</td>
<td></td>
</tr>
</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

<table>
<thead>
<tr>
<th>Policy H1 Homes for All</th>
<th>References to density of development have been removed</th>
<th>I strongly object to the removal of density frameworks. This is especially valid where land is being taken out of Greenbelt, but must equally apply to ensure precious land and space is optimized. Density recommendations are normal practice and it is of great concern to see these being removed from policy?</th>
<th>Strongly object</th>
</tr>
</thead>
<tbody>
<tr>
<td>Policy H1 Homes for All</td>
<td>Accessible Homes</td>
<td>I support the inclusion of wheel chair accessible housing and view this along with 4.2.4 with respect to percentage need.</td>
<td>Support</td>
</tr>
<tr>
<td>Policy H1 Homes for All</td>
<td>Accessible Homes</td>
<td>I can see no benefit to the change. Both phrases are equally 'wooly'.</td>
<td>Comment</td>
</tr>
</tbody>
</table>

4) We will support The provision of well designed specialist forms of accommodation in appropriate sustainable locations is encouraged, taking into account
<table>
<thead>
<tr>
<th>Local housing needs.</th>
</tr>
</thead>
<tbody>
<tr>
<td>5) Purpose built student accommodation for full time higher education Guildford based students will be encouraged on campus locations where appropriate. We expect about 60 per cent of full time Guildford based University of Surrey students are expected to be provided with accommodation on campus.</td>
</tr>
<tr>
<td>This statement has no teeth. GBC is in a strong position as the University wishes to remove land bequeathed to it from greenbelt and hence plans to accommodate a minimum of 60% of students from the University on Manor Farm MUST be submitted before any planning approval is given to remove more Greenbelt.</td>
</tr>
<tr>
<td>Object</td>
</tr>
<tr>
<td>4.2.6</td>
</tr>
<tr>
<td>This does not go far enough. The policy accepts that most people will fit into general housing need but categorises, students, travelers, nursing and residential care homes as having different requirements. Elderly in general have different needs and this plan is a long way off providing for these needs. Elderly frequently need to downsize but need likeminded people around them, in a supportive environment with amenities close by.</td>
</tr>
<tr>
<td>Object due to omission.</td>
</tr>
<tr>
<td>4.2.8</td>
</tr>
<tr>
<td>I strongly object to the removal of advisory notes and need for density.</td>
</tr>
<tr>
<td>Object</td>
</tr>
<tr>
<td>4.2.10</td>
</tr>
<tr>
<td>I object to the removal of policy that protects the needs of elderly in favour of 'general' housing as the needs of older people will not necessarily fit this mould. General housing with wheelchair access is to be applauded, especially for disabled people who are not elderly. Retirement villages work well for elderly and these appear to be missing from the plan? Various models are in place and given the pressure there will be on places in care homes, these facilities should be encouraged.</td>
</tr>
<tr>
<td>Object</td>
</tr>
<tr>
<td>4.2.11</td>
</tr>
<tr>
<td>Addition of integrating technology in new homes can assist with telecare and telemedicine facilities.</td>
</tr>
<tr>
<td>Strongly support this technology</td>
</tr>
<tr>
<td>4.2.15</td>
</tr>
<tr>
<td>Should include sheltered housing.</td>
</tr>
<tr>
<td>Comment</td>
</tr>
<tr>
<td>4.2.16</td>
</tr>
<tr>
<td>4.2.18</td>
</tr>
<tr>
<td>4.2.21</td>
</tr>
<tr>
<td>4.2.25-28</td>
</tr>
</tbody>
</table>

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** pslp171/2323  **Respondent:** 8570273 / Fiona Curtis  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy H2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

| 4.2.30 | There is no mention of proximity to London and is THE KEY reason why Guildford is sought after and highly priced. | Object due to omission |
| 4.2.32 | The affordability ratio for Surrey is more relevant than that of the whole of England. I therefore object to the removal of the comparison to Surrey in favour of England. | Object |

We will seek at least 40 per This policy has been weakened by removal of 'must be' to 'we will seek'. Object
Gaining 40% affordable homes is important and every effort must be made to attain this. Weakening this policy at this stage is a clear indication that the volume of affordable homes is expendable. This is amplified by the removal of 'Developers will be expected to provide land for affordable homes at nil value'.

I am concerned that the number and type of home needed as identified by the SHMA will be built irrespective of the affordability aspect and this is the deciding factor for many people and is more important than having a spare bedroom or even a garden. Given the cost of housing in Guildford and the belief by most that building will not reduce the price of housing, it might be more helpful if the emphasis were on building more starter homes and smaller well designed flats and truly affordable homes rather than percent of market value.

4.2.41 How can failure to use land efficiently be measured if density requirements are removed from policy? They must be added.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/2324  Respondent: 8570273 / Fiona Curtis  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy H3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

H3 Rural Exception Homes

I believe that affordable homes should retain this category for at least the length of the plan / as long as possible but appreciate that in perpetuity is a long time. They should however be affordable for as long as possible and hence this phrase should, in my view, remain.
4.2.49 I do not agree with the categorization for rural exception housing. I agree that there should be provision for exceptional circumstances ie when a family member needs care and the carer is unable to afford housing, but I believe that the criteria needs more thought. My concern relates to the number of college courses that bear no resemblance to employment opportunities and the inevitable consequences. Equal opportunity should ensure that everyone has the chance to take a path in life where they can stand independently. Where this fails at a local level, I do believe that housing should be made available, but it should be, as its name suggests, an exception. I do not agree that people who have recently left the locale should be considered unless their reasons for leaving are linked to cost of housing and they fulfill the criteria otherwise set.

I also believe that Parish Councils should be able to write and carry out their own surveys.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/2390  Respondent: 8570273 / Fiona Curtis  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

<table>
<thead>
<tr>
<th>Policy ID1</th>
<th>Infrastructure &amp; delivery</th>
</tr>
</thead>
<tbody>
<tr>
<td>Doc Ref T12a Addendum to 2016 Strategic Highway Assessment Report: high level review of potential key changes in the Guildford borough PSLP: strategy and</td>
<td></td>
</tr>
</tbody>
</table>

A
This presents a qualitative assessment of the effect of the changes made to the 2016 plan on traffic forecasts. Essentially, because the amount of development in the plan has been reduced, GBC’s argument is that things will be better than estimated in 2016. We can readily agree that where development sites have been removed, notably as in the case of the Normandy/Flexford strategic site, the forecast traffic level will be lower in the vicinity of the development. However, there are some sites where the planned development is now greater than in 2016. The software chosen would also have resulted in an underestimation of volume. There are also potential changes to plans outside the borough to be taken into account, such as Dunsfold Park, which may have significant consequences for Guildford, as was pointed out by SCC and GBC in their submissions to Waverley in response to that planning application. The trip rates used in the forecast assume a level of public transport use and an appropriate level of bus services.

B
On the evidence provided by the SHAR based on the 2031 traffic forecasts using the SCC traffic model, congestion will be widespread in peak periods across much of the highway network, including on strategic routes. The A3 and M25 are forecast to be at or over

OBJECT
To each of the policies or comments stated.
capacity. The cumulative effect of the additional traffic generated by the developments in the plan will be to increase congestion, even with the proposed highways schemes in place. Interpreting the model results is not straightforward, as was pointed out in response to the 2016 consultation. Table 4.12 is significant – showing the roads with the ten largest ratios of flow to capacity for Scenario 3, which includes all the planned development but not the major strategic route improvements on the A3 and M25. There is no equivalent for Scenario 5 (i.e. with the strategic improvements), but we can infer that all the roads in Table 4.12 will be at or over capacity in Scenario 5.

C

With regard to the comments on Policy A6: North Street redevelopment (page 9), the model used for the Strategic Highway Assessment is not sufficiently detailed to provide a satisfactory assessment of conditions on the town centre road network. This has been recognised by GBC and has led to the commissioning of more detailed analysis using a simulation model. Added to which, there is uncertainty over the highway capacity implications of the Sustainable Movement Corridor in the town centre and possible changes to the town centre gyratory, as discussed in the draft Town Centre Regeneration Strategy, which indicates that the intention is to reduce the capacity of the town centre network. The experimental closure of Walnut Tree Close is already being planned. Taking into account the demand forecast on the A281, the A322 and A31 in Table 4.12, the consequences of such a reduction will be far-reaching and must be accounted for.

D

Policy A26: Blackwell Farm has been amended and now the proposed development includes a secondary school with up to six form entry. This will add to morning peak hour traffic which was not included in the 2016 modelling. The SHAR findings indicate that there will be congestion in peak periods on the network that will serve this development. The A3 will be at or over capacity which means that the network will lack resilience, as it does today. The roads connecting to the town centre will continue to be under pressure. The SMC concept is more advanced on this section than elsewhere, but the effect on capacity has yet to be established. There will be queuing on the A31 on the approach to the new signalised junction that will give access to the Blackwell Farm site. The A31 is regarded as a key route by the LEP and LA partners.

E

The improvement to the A3 is obviously critically important to the Gosden Hill Farm development. We do not have the benefit of analysis of the proposed new slip roads giving access off and on to the A3 S-bound carriageway, nor an understanding of the implications of the SMC for the allocation of highway capacity on the local roads. What is self-evident is that the pressure on local roads in Burpham is already intense in peak periods, and these roads are not suited to carrying large volumes of traffic. Under the plan, congestion is very likely to be worse than today. The proposed Policy A24 Slyfield development will also add demand to the A320 and roads in Jacob’s Well.

F

The change to Policy A29: Land to the south and east of Ash and Tongham involving more houses means that there will be more traffic locally. While this will not be ‘major’ in terms of the borough as a whole, it will be significant locally. Ash and its surroundings will be impacted by the large Wellesley expansion in Aldershot. It is not clear to what extent the modelling reported in the SHAR allowed for this development. The pressure on the A331 and the roads connecting Aldershot to Guildford and Woking will increase.
G

The M25 is forecast to be at capacity after the planned improvements have been introduced, as shown both in the SHAR and also in the recently published DfT/HE report on the South West Quadrant. This is relevant to Policy A35 Wisley airfield. It should be noted that RHS Wisley is expanding its facilities with the aim of significantly increasing visitor numbers. The DfT/HE Stage 3 report concludes that the focus should not be on widening the existing road further beyond currently planned schemes but on how to reduce pressures and provide parallel capacity to relieve this part of the network. If the M25 and A3 are at capacity, then the Wisley development will add pressure on local roads that are not well-suited to carrying higher volumes of traffic. This is also relevant to the proposed developments at Burnt Common. The consequences for Ripley are likely to be serious. It is noted that Policy A35 now includes a requirement for mitigation of impacts in Ripley and on surrounding roads, which goes some way to recognising that there will be a problem.

H

A comprehensive up-to-date analysis is required to inform decision-making. This should include analysis of the mid-term stage of the plan, before the A3 improvement is complete, as well as 2034.

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<table>
<thead>
<tr>
<th>Doct Ref</th>
<th>Transport Strategy</th>
</tr>
</thead>
<tbody>
<tr>
<td>T13</td>
<td></td>
</tr>
</tbody>
</table>

B

Section 2 Surface access to airports. The problem is that the improved A3 will be at or over capacity in peak periods under the Plan, and the M25 SW Quadrant study has concluded that the M25 will be overloaded. So surface access to Heathrow from Guildford will continue to be affected by the weaknesses listed in this section. The unofficial East-West route south of Guildford is the B3000 and traffic counts and air quality stats show that the route is over capacity at peak times and close to capacity at all times during the working day. Links permitting travel East-West must be addressed especially if benefits of the proximity to both Heathrow and Gatwick are to be realized. C Rail. This section is welcome. However, it is noted that Crossrail 2 has not yet been secured.

D

Strategic roads. Surely the strategy should be aligned with the position of Highs England set out in the Topic Paper: Transport, where it is evident that the improvement of the A3 will not be completed until 2026/27, or even 2027/28? The removal of schemes SRN1 and SRN6 from the list of key infrastructure for the plan, and redesignating them as ‘aspirational’ is inconsistent with the safety objectives of the borough and surely of Highways England and Surrey County Council (the highway authority). Under the strategy and the Plan, the issues for Beechercroft Drive and the weaving and merging issues on the existing A3 will not be addressed until half way through the plan period.

E

Section 5 Local roads. While welcoming the aspiration to transform the town centre, the traffic implications have not been dealt with in the strategy or the Plan. Section 1 correctly included the issue of “severance of the town and its constituent neighbourhoods resulting from a combination of the A3 trunk road, railway lines and the River Wey”. The case for a new crossing of the river and railway relieving pressure on the Farnham Road railway bridge should be taken very seriously and examined in depth. There is a real risk that a significant reduction in capacity in the town centre, both the gyratory and Walnut Tree Close, and on routes carrying the SMC, will lead to road users transferring to minor roads around the town.
that are unsuited to carrying more traffic. Detailed analysis is needed to assess the impact of changes in the town and development outside the town on the network as a whole. I appreciate that the task is huge but it is necessary. Prevention of traffic issues has to be better than trying to cure them afterwards?

F

The M25 SW Quadrant study report recommends that alternative routes are developed to carry orbital traffic, and this could mean more use of the A31/A331 in Guildford. There are local roads where capacity is already an issue and planned growth will add to problems that are not mentioned in this strategy. The scope of this element of the strategy is not wide enough.

G

The bus transit strategy is welcome. However, there is insufficient information on the Sustainable Movement Corridor to gauge either what it might deliver and its potential impact on road capacity. A high quality bus station in the town centre is critical for the future of the town. There is a lack of park and ride on the east of the town and not even an aspiration for future provision.

H

The active modes strategy is welcome. However, many roads in the borough are two-lane carriageways of restricted width, with little scope for allocating space for cyclists, and this has to be either accepted or addressed over the long term.

I

Section 6 Air quality. If traffic is going to increase in aggregate, as the forecasts show, even with the measures being proposed, then air quality will continue to be a concern. The Aecom paper states that Guildford is not in need of an AQMA, but officers and councillors know that this is not true as a site on the B3000 has exceeded EU legal limits for NO2 since monitoring began in 2013. The point has been reached where 'further monitoring' or further delay tactics cannot go on and an AQMA must be implemented in order to form a plan of action.

J

Section 7 Road safety. The proposals are welcome, but as stated above, the schemes SRN1 and SRN6 should be reinstated in the Plan for safety reasons.

<table>
<thead>
<tr>
<th>Topic</th>
<th>Paper: Transport</th>
</tr>
</thead>
<tbody>
<tr>
<td>1.</td>
<td>This is a helpful paper providing context and background to the transport aspects of the Plan.</td>
</tr>
<tr>
<td>2.</td>
<td>The fact the new supplementary technical work is planned to be carried out prior to the submission of the plan to the Secretary of State (para 3.18) is welcome, but just as he needs to see this to make an informed decision, so do we, it would have been better if the results had been available for this consultation.</td>
</tr>
<tr>
<td>3.</td>
<td>It is recommended that the wider evidence base should be expanded to include the following:</td>
</tr>
<tr>
<td></td>
<td>• Local Enterprise Partnerships and Local authorities: Influencing Strategic Transport in the South East, WSP, 2016</td>
</tr>
</tbody>
</table>

| Object | this paper is in its infancy and lacks enough detail to support |

Page 495 of 3335
• Surrey County Council: Response to Waverley borough Council on WA/15/2395 Dunsfold Park, Dec 2016

• Guildford Borough Council: Guildford Town Centre Highway assessment –Town Centre Highway Layout Concept Testing, WSP, April 2016

• Comprehensive traffic modeling using new software

• Inclusion of other expert evidence ie RGP transport note on the A31 junction, The Landscape Assessment produced for Blackwell Farm and the review of the SHMA by Richard Bate (2016) and Neil MacDonald 2017.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>pslp171/2325</th>
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<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2017 / Policy P1</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

<table>
<thead>
<tr>
<th>Policy P1 AONB</th>
<th>The criteria and parameters under which this policy is measured have been diluted leaving this policy open to interpretation. This is of particular concern when the Chairman of Surrey Hills is not in a position where he can be completely impartial.</th>
<th>Object</th>
</tr>
</thead>
<tbody>
<tr>
<td>4.3.5/4.3.6</td>
<td>I object to the removal of the statement relating to the presumption against major development in AONB and the authorities responsibility to ensure that AONB affords the highest protection.</td>
<td>Object</td>
</tr>
<tr>
<td></td>
<td>I object to the obvious efforts to dilute this policy to enable development by referring to case by case when the NPPF makes it very clear that AONB should be protected.</td>
<td></td>
</tr>
<tr>
<td>4.3.8</td>
<td>It is also of great concern that the majority of Blackwell Farm was assessed by a professional independent as fulfilling the criteria for AONB yet this report has been ignored. The AONB review should take place and Blackwell farm should be reviewed as part of this process.</td>
<td></td>
</tr>
<tr>
<td>4.3.10</td>
<td>The Council must review the AONB in conjunction with the Surrey Hills board.</td>
<td></td>
</tr>
<tr>
<td></td>
<td>I believe there is a conflict of interest when the Chair of the board is also a Cllr.</td>
<td></td>
</tr>
</tbody>
</table>
Key evidence
Should include external professional independent reviews (this applies to all policies).

Monitoring Indicators
Can be represented as a percentage but this us usually a way of hiding actual numbers, which should be made clear. As the definition for 'major development' has been obfuscated, it cannot then be listed as an indicator? It must therefore be defined.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Attached documents:

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Comment ID: pslp171/1926  Respondent: 8570273 / Fiona Curtis  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the GBC Proposed Submission Local Plan particularly the changes relating to Ripley and Send.

I object to the extended development in the green belt (policy P2 site). The area is already extremely congested and this will result in unacceptable traffic issues, together with the merge of Send and Ripley.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Attached documents:

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Comment ID: pslp171/2326  Respondent: 8570273 / Fiona Curtis  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
<table>
<thead>
<tr>
<th><strong>Policy 2 Greenbelt</strong></th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>4.3.13</td>
<td>The Local Plan process is not complete yet 14/15 villages have been 'inset' or had greenbelt status removed. This would appear to be jumping the gun? The criteria relates to their openness, or lack of the same. Yet the Hog's Back, which is an entirely open stretch of Greenbelt, is the subject for large scale development. Openness appears to be entirely subjective and where development is possible, it is being shoe horned in and policies are twisted or diluted to facilitate this. Greenbelt policy is nothing short of a shambles.</td>
<td></td>
</tr>
<tr>
<td>4.3.16</td>
<td>It is not good enough to simply say that exceptional circumstances exist, they must be clearly demonstrated and justified and this is not the case. I therefore strongly object.</td>
<td>Object due to omission</td>
</tr>
<tr>
<td>4.3.17</td>
<td>The characteristics of the Hog's back run in an East/ West direction and it is nonsensical to remove vast swathes of Greenbelt to facilitate coalescence at the Guildford end (Blackwell Farm) whilst adding Greenbelt at the Ash end, to</td>
<td>Object</td>
</tr>
<tr>
<td>4.3.17</td>
<td>The characteristics of the Hog's back run in an East/ West direction and it is nonsensical to remove vast swathes of Greenbelt to facilitate coalescence at the Guildford end (Blackwell Farm) whilst adding Greenbelt at the Ash end, to prevent coalescence with a much smaller area? There is an obvious lack of consistency here and concerns raised about the rationale (that the current and previous lead of GBC are / were Ash Cllrs) has not been addressed.</td>
<td>Object</td>
</tr>
<tr>
<td>4.3.18</td>
<td>This should be retained, as the context is lost without this. It also makes no sense to remove Greenbelt status from 15 villages on the basis of their contribution to openness, whilst at the same time diluting a policy to protect openness?</td>
<td></td>
</tr>
<tr>
<td><strong>Key Evidence</strong></td>
<td>Should include the NPPF, which has been removed.</td>
<td>Object</td>
</tr>
</tbody>
</table>
Monitoring Indicators

Should refer to both number and percentage as percentage alone can be used to obfuscate real volume.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/2327  Respondent: 8570273 / Fiona Curtis  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

<table>
<thead>
<tr>
<th>Policy</th>
<th>Countryside</th>
</tr>
</thead>
<tbody>
<tr>
<td>P3</td>
<td>(4.3.35)</td>
</tr>
<tr>
<td>Paragraph</td>
<td>intentionally blank</td>
</tr>
</tbody>
</table>

Is this policy missing?

Comments relating to 4.3.17 apply ie The characteristics of the Hog’s back run in an East/ West direction and it is nonsensical to remove vast swathes of Greenbelt to facilitate coalescence at the Guildford end (Blackwell Farm) whilst adding Greenbelt at the Ash end, to prevent coalescence with a much smaller area? There is an obvious lack of consistency here and concerns raised

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/2328  Respondent: 8570273 / Fiona Curtis  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

<table>
<thead>
<tr>
<th>Paragraph</th>
</tr>
</thead>
<tbody>
<tr>
<td>4.3.37</td>
</tr>
</tbody>
</table>

Flooding from rivers is not necessarily linked to climate change but can be due to poor management and drainage. It should be noted that flooding from surface water is also a major issue in parts of the borough and that due to fear of blight, areas subject to manageable damage from flooding often do not report this as it affects insurance and ability to sell.
Evidence

Should include professional independent assessments for specific sites. This is particularly relevant for Worplesdon and parts of Ash as well as the town centre and Shalford.

Flood zones are based on previous events without development. Large scale development on porous ground will naturally increase flood risk as any natural soak away is removed. A professional independent opinion would be needed to verify the real risk.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attended documents:**

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**Comment ID:** pslp171/2315  **Respondent:** 8570273 / Fiona Curtis  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

<table>
<thead>
<tr>
<th>Question</th>
<th>Response</th>
</tr>
</thead>
<tbody>
<tr>
<td>4.1.2a Sustainable development will be achieved by seeking economic, environmental and social gains jointly and simultaneously through the planning system.</td>
<td>I support this statement, but these 'gains' must be demonstrable and preferably measureable and cannot be seen as net gains where there is a loss that needs to be accounted for. This would then be better balanced with the criteria used to determine whether planning should be approved where there are no policies.</td>
</tr>
<tr>
<td>Policy S1 -- Presumption in favour</td>
<td>I believe that case law now shows that approval does not necessarily have to be approved when policies are out of date. Planning regs in line with NPPF still apply and these still include protective clauses.</td>
</tr>
<tr>
<td>4.14 In accordance with the NPPF, the presumption will not automatically apply to policies relating to sites protected under</td>
<td>I see no reason to include the word 'automatically'? In line with the NPPF the presumption should not apply to protected areas, otherwise they are not protected? The addition of the word 'automatically' adds ambiguity to the policy.</td>
</tr>
<tr>
<td>4.1.1 Sustainable development any adverse impacts of doing so would</td>
<td>Included as part of a three tier framework within NPPF guidelines</td>
</tr>
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significantly outweigh the benefits or specific policies in the NPPF suggest that development should be restricted.

4.1.1

unless any adverse impacts of doing so would significantly outweigh the benefits or specific policies in the NPPF suggest that development should be restricted.

| OMISSION | Sustainable development should also be in line with the 12 core principals of planning, some of which are not properly accounted for in this plan. |
| Objection | I object to the omission of this principle and in particular to the two points listed. (1A/B) |

<table>
<thead>
<tr>
<th>Omitted NPPF Guidelines 17</th>
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<tbody>
<tr>
<td>- 1A</td>
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<tr>
<td>Object --</td>
</tr>
<tr>
<td>Omission of an independent traffic survey produced by Parish Councils has not been commented on or included as evidence.</td>
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</table>

<table>
<thead>
<tr>
<th>Omitted - 1B</th>
<th>Omitted</th>
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<tbody>
<tr>
<td>- 1B</td>
<td>More than half of all development (56.7%) is still on Greenbelt and 70% is on countryside, including Greenbelt. This is NOT respecting the Greenbelt, nor have any exceptional circumstances been proposed although it is difficult to think what circumstances would be exceptional enough to ever warrant the degree of loss proposed.</td>
</tr>
<tr>
<td>Support the statement but cannot see where this is implemented</td>
<td></td>
</tr>
</tbody>
</table>
When implementing Policy S1, local circumstances will be taken into account to respond to different opportunities for achieving sustainable development. In accordance with the NPPF, the presumption will not automatically apply to policies relating to sites protected under the Birds and Habitats Directives and/or designated as Sites of Special Scientific Interest (SSSIs), land designated as Green Belt, Local Green Space, the Surrey Hills Area of Outstanding Natural Beauty, designated heritage assets and locations identified as at risk of flooding.

I support the statement however I object to the fact that in practice this has not been put into practice.

The plan is not so much positively prepared as avariciously prepared. I do not consider that it is reasonable to take on unmet need from neighbouring authorities, which have applied permitted constraints i.e. given greater protection to their Green Belt, if it means our own is compromised on the scale being put forward.

I believe that constraints should be applied to the housing target, which we understand equates to the objectively assessed need (OAN). Flooding issues (particularly in the town) have been accounted for but those around Greenbelt and infrastructure are wholly inadequate. The solution suggested to accommodate inordinate levels of growth are both inadequate and costly and the net result will be serious debt for many years if not generations. The impact has still not been fully assessed to determine whether the plan is sustainable or whether its impact will blight the future of future generations. The traffic modelling underestimates issues, but remains unaltered / uncorrected. The SHMA has been amended BUT includes fundamental errors, which have been independently verified by three independent commissions. A) By Cllr. David Reeve B) by Neil McDonald and c) Green Balance (B and C are attached).

It was recommended by landscape consultant Alison Farmer Associates that the area known, as Blackwell Farm should be considered in the AONB boundary review, yet it was omitted in Surrey CC’s landscape evaluation. This meant the Parish Councils of Worplesdon, Compton and Wanborough had to fund an independent review to ascertain whether the area was a contender for AONB classification. The survey was carried out by in May 2016 by Land Management Services Ltd, which concluded that most of the 265 hectare farm was of a landscape and scenic quality that merited inclusion within Natural England’s revised Surrey Hills AONB boundary. No comment has been made about this assessment report, which I believe is a significant piece of evidence.

The air quality assessment (10.1.1) relates to increases in pollution caused by additional development and its impact on SPA. The impact on human life is not included and neither is the B3000 where Nox readings at the A3 end have consistently exceeded recommended safety levels and where an AQMA is now expected. The B3000 would be affected by the Blackwell farm development in particular and possibly by Dunsfold.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>pslp171/2321</th>
<th>Respondent:</th>
<th>8570273 / Fiona Curtis</th>
<th>Agent:</th>
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<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2017 / Policy S2</td>
<td></td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire): ()**

| 4.1.6 | The direction given prioritizes development in Guildford town centre and urban areas, yet only 30% of housing is in these areas. It might be the 'preference' as stated in 4.1.6 but the reality does not match up with this and efforts to achieve growth in the preferred urban areas is lacking. The enormous level of objection to removal of 15 villages from Greenbelt (insetting) has been ignored and Greenbelt villages should be removed as a priority. | The policy must deliver and this one does not. |
| 4.1.8 4.1.9 | Whilst these sustainable locations are our preferred locations for new development, they are unable to accommodate all of the new development we need. We will therefore release allocated land for development in other areas. These include: (followed by changes / Ash / Tongham) The NEED has not been properly established as the SHMA produced by Neil McDonald shows. The need must be accepted before a plan can be formed / accepted by residents. This statement is NOT in line with the NPPF which affords some Greenbelt protection. No exceptional circumstances have been demonstrated to justify this level of development on these protected areas. It would be useful to add numbers to all sites and status ie Blackwell farm 1500 (in plan period) 300 after -- Greenbelt | Object |
| Policy S2 1 | to help meet the needs for new homes, support the economy and supply 3,200 additional class B jobs. The justification has been removed. Whilst I agree that the plan as it stands is not justified, I do think an attempt should be made to justify the growth proposed. | comment |
| 4.19a | I object to the Annual Housing Target on a number of grounds It is too high and uses opaque methodology that focuses on the highest outcome. Known flaws in the SHMA have not been corrected and had they been, the annual housing | Object |
number would be more like 400 a year, a figure that would be far more palatable to residents.

No exceptional circumstances have been demonstrated to justify the level of development on Greenbelt land.

The lower figure of 400 could perhaps be achieved with the parameters of the NPPF by focusing on pre-developed sites.

4.1.9a The figures set out in the Annual Housing Target table sum to a total of 12,426 homes. This is lower than the total supply of homes identified in the Land Availability Assessment as having potential to be delivered over the plan period. This buffer builds flexibility into the plan and demonstrates that our strategy is capable of delivering the target. It also adopts a phased target that gradually increases over time rather than the same annualised target of 654 homes each year. This is due to the likely rate of delivery, particularly on the strategic greenfield sites, which is dependent upon the delivery of necessary infrastructure expected to occur towards the end of the plan period.

Buffers are already built into the housing number; this figure should therefore be reduced.

Land identified includes a very large percentage within Greenbelt; this should be removed rather than included to act as a buffer that is not needed. Deliverability is dependent on a number of factors in addition to whether the landowner would like development (including access). Access for Blackwell Farm is over AONB and there are serious traffic and pollution issues all of which make it difficult to see how this land can be considered 100% deliverable?

I am pleased to see the phased delivery but object to additional targets outside the plan period, for reasons, which have been explained. When Manor Park was removed from Greenbelt, it was with a caveat that no further land would be taken out during the period of the plan. This has been overturned and any importance given to the permanence of Greenbelt, ignored.

4.1.9b 20% buffer

I do not understand how the buffer is calculated, especially when it has been built in for different reasons throughout the SHMA too. Given that Guildford seeks to meet an OAN that is more than 20% too high in the first place it is difficult to understand an additional 20% buffer can be justified?

4.1.4 KEY EVIDENCE

Refers to the addendum, in which it states that the reduction in housing will not have an impact on the results of the traffic study and that in scenario 5, no significant impact will be seen providing the RIS works are carried out. It notes that without the RIS works impact will be severe.

This is NOT true for the B3000 in Compton which will be severely impacted by increased traffic levels whether the A3 is improved / altered or not. In fact it will see MORE traffic if the A3 is improved as more traffic will use the B3000 to reach the A3. As the B3000 is likely to be recommended for an AQMA, it is important that this is highlighted and accounted for in the plan.

Object

Object & Omission
The traffic modeling also underestimated traffic levels and hence it may NOT be true to say that changes in site allocation will reduce impact on traffic, although it may do. The traffic modeling should be done again, with the sites that will go forward and should input the suggestions by Mouchel to get more accurate readings.

My understanding is that areas were split into zones and traffic modeled within the immediate zone. Blackwell Farm was in a zone of its own and hence the impact on Puttenham or Compton may not be properly reflected. Likewise, major routes such as the A3, A31, A281, A25, A320 etc would all be affected by development outside Guildford (ie Dunsfold, Farnham, Woking, Sussex). It is hugely important that regional modeling be carried out by Highways to ensure our main routes can cope with the growth proposed.

There is no explanation as to why the Housing Needs Assessment and the Traveller Strategic Housing Land Availability docs have been withdrawn from the Key Evidence?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/3259  Respondent: 8570273 / Fiona Curtis  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

First past the post

The hearing for the Waverley plan appeared to adopt a first past the post strategy, whereby Woking decided to protect its Greenbelt and hence declared it would not meet its OAN and the Inspector appears to have decided that this should be split between the two remaining authorities, who each have constraints of their own? Surely each should be considered on its own merits and constraints, otherwise the last one to touch base could end up with everyone elses unmet need, irrespective of whether it makes sense or not?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp17q/658  Respondent: 8570273 / Fiona Curtis  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Question 1: The evidence base and submission documents
The extent to which the Sustainability Appraisal fails to test the sustainability of the spatial options in a meaningful way casts doubt over whether sustainability has been assessed. The report treats various major development sites in Green Belt, contrary to the importance attached to protecting Green Belt, as “a given”, fails to consider options that constrain development or that make greater use of brownfield or previously released greenfield land, focuses on a range of options that involve developing on even more Green Belt around Guildford in order to protect Green Belt around Woking does not consider environmental limits or impact on the next generation in terms of weighing demand for homes for the young alongside the use of all possible last resort greenfield options by one generation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<tbody>
<tr>
<td>B3000 -- Omission from Transport Strategy</td>
</tr>
<tr>
<td>This road is considered a strategic route, yet it is narrow in places, windy and close to many residential properties. Pollution levels are outside EU legal limits at the A3 end of the village and congestion is a regular feature, suggesting the road is at / has exceeded capacity. Adding to the network will cause gridlock as there are no alternative East West routes, south of Guildford. Consideration must be given to address this, yet no scheme has been outlined in this plan.</td>
</tr>
</tbody>
</table>

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
1. The plan does not appear to be led by the evidence base, instead the evidence base is used to influence and justify decisions which have been part of a trajectory from day one. This includes the decision to build on Greenbelt, which was decided before any assessment into land availability or housing need had been conducted. Detailed plans for Blackwell Farm were seen long before the Greenbelt & Countryside study produced its controversial study, that marked down the openness of areas with trees yet set random boundaries in mid-field. The scoring of the area was entirely subjective and bore no resemblance to independent work by Land Management Services (attached Annex 1). The work was omitted from the evidence base and should be included or at least acknowledged with some rationale given for its exclusion. Residents felt that some of the evidence was weak and subjective (Greenbelt & Countryside) and comments around lack of justification for the classification of the RAG system have not been addressed. It is totally unacceptable to simply state that 'the page was lost' in answer to the question to see the assessment that led to the 'medium sensitivity' classification given to Blackwell Farm for instance.

2. Housing targets have remained much the same despite changes in ONS, removal of some retail sites, professional challenges to the SHMA and Brexit. This raises concerns over pre-determination. At the last consultation, independent reviews of the SHMA were carried out. All suggested the OAN put forward by G L Hearn was too high. Whilst further work has been carried out by G L Hearn to bring their 2016 up to date, they have once again failed to fully account for errors and market changes. I support the review, commissioned by GRA and carried out by Neil MacDonald (attached as annex 2) which should be considered as new evidence. It should be noted that the work conducted by the same consultant for Waverley Borough Council was recently upheld by the Planning Inspector. Highways England will not start to consider what it intends to do as regards the A3 in the vicinity of Guildford until 2020. This is too late for this plan and hence the infrastructure constraints must push large sites out of this plan. If the OAN of 8,000 is adopted, this would mean that all the strategic sites could be removed from the current plan and the additional 500 or so could be dissipated over brownfield sites by increasing the density (especially within the University grounds where land is wasted on acres of surface car parking).

3. It is concerning to see that targets are now minimum requirements rather than firm targets. The presumption being a need for upwards adjustment within the plan period rather than general flexibility which would be more acceptable as Brexit for example could result in Internationals leaving the UK. Numbers are also greater than indicated as proposals such as Blackwell Farm already include large numbers planned for after the plan period of 2034. Development that is not planned within the plan period should not be taken out of Greenbelt. It is also very risky to take land out of Greenbelt now for development that cannot take place for at least another 10 years due to limitations with infrastructure. Doing so, risks piece meal development and hence should not be supported.

4. The traffic survey underestimates congestion levels and impact and no attempt has been made to correct this, instead comment is made in the plan that traffic modeling looks at worst case scenario, but in fact it does not. Account must be taken of the comments made by Mouchel (annex 3) which still stand and which remain a concern for Highways. It is misleading to present traffic impact in the way that it has been presented as part of the evidence base. It should also be noted that Highways withdrew their objection following a meeting at which it could be said that some pressure was applied and they did so in order to cooperate. It must be noted from their letter of October 2016 that improvements appear to be conceptual as funding for some and feasibility for all, have yet to be confirmed. This is particularly true of Garlick's Arch which was introduced very late in the last consultation (annex 4). The sound bite that 'there will be no development without infrastructure' to some degree supports the issues raised by Highways in this annex. The Local Plan should however have some detail around this statement. Ie what infrastructure and which developments and what proof exists to endorse the impact and has it been subject to scrutiny?

5. The impact of development is far reaching yet modeling concentrates very much on the impact of specific zones in relation to one another. New evidence by RGP (attached annex 5 and annex 6), appears to be in line with comments...
made by Mouchel (see comment 4) and shows that the impact has been underestimated. It is known that Blackwell Farm and other major developments cannot go ahead without major improvements to the A3, to assist traffic flow. These same improvements will draw traffic and this will include the B3000. It is not thought that a number plate recognition scheme will work through the Blackwell Farm development and if it fails, as is predicted, this will become a legitimate route to bypass Guildford and once again will draw more traffic through smaller routes in order to access it. These include the B3000 which already exceeds NO2 legal limits and should be made an AQMA. Account should also be taken of existing AQMA’s in Godalming in Waverley, when considering developments that will increase traffic volume and lorries in particular, on the A3. The same must apply in Farnham (which also has an AQMA) when considering development that will increase traffic on the A31.

6. It has been known for some time that the B3000 warrants an AQMA. Recent results confirm that, yet reports continue to boast that Guildford has no AQMA’s (true) but also that Guildford does not require any AQMA’s (false). The Aecom report stating this, is misleading. It would be quite untenable to knowingly increase traffic levels on the B3000 given the safety issues that exist. I wrote to [Officer] and Planning Policy and received a joint response from both to a report that was sent by me on behalf of the Compton Traffic Committee (a sub-committee of Compton Parish Parish Council). It was suggested that I include the report in my submission to the consultation (attached annex 7). No answers to any of our questions were given on the basis that this would not be a good use of council resources (attached annex 8). It would seem that the council does not have enough resources to ensure that people wishing to respond to the consultation, do so, fully informed. This is born out by comments made in the survey I conducted recently (annexes 9 and 10).

7. The removal of plans to improve access and safety at Beechcroft Drive. This project has been prioritised and dropped for many years and for safety reasons, it is time it was addressed.

8. The vast majority of people in Guildford do not support the plan. A survey was carried out (by me), details of which are attached (annex 9 and 10) which showed that 81% of respondents objected to the plan in its current form versus 19% who supported it. The survey is on-going but interim results were sent to groups with substantial email databases. Comments were collected as to what changes would facilitate support for the plan. These comments are included in the attachment. Whilst I endorse many of them, I do not agree with them all, but in the interests of impartiality have included them all, save a couple that were modified for legal or data protection reasons. In the last consultation many residents and Parish Councils stated that their comments had not been accounted for and that they had significant issues with the process. The process has however rolled onto regulation 19, without, it would seem, not only valid but submittable. There are also several comments about concerns over the deliverability of the 5 year supply, that I share and hence am submitting this to support my own views on this and also to confirm concerns over procedural weaknesses.

9. Changes to the plans for Blackwell Farm were presented as an example of having listened to the public outcry at the scale and location of the site. This was disingenuous as the number is the same except 300 houses have been deferred beyond the plan period. Concerns over access and impact (particularly to the A31, Egerton roundabouts and the B3000) have not been addressed and evidence by RGP that suggested the site was unviable has been ignored. Issues relating to the inclusion of this site are compounded by the addition of a school, that was not deemed necessary for the site from which it was removed at Normandy but has been added to Blackwell Farm, without evidence supporting the need for it?

10. Lack of consistency -- key areas off the Hog's Back have been dealt with differently. Countryside near Tongham has been put forward for additional Greenbelt status to prevent coalescence with Ash, whilst 78 hectares or 192 acres of land at Blackwell Farm will be removed from Greenbelt despite the fact that only 13 years ago, 64 hectares (158 acres) were removed on the basis that this would not be repeated. This will permit coalescence with Guildford and Onslow, Park Barn, Flexford, Wanborough and Wood Street. These figures exclude land that will be needed to facilitate access, much of which is within AONB. The area known as the Hog's Back that stretches alongside the A31 is iconic, it stretches for many miles and provides a fabulous open rural view across land that is good agricultural land as well as Greenbelt. It serves the purposes of Greenbelt by preventing urban sprawl from Guildford into nearby villages. The plan takes the view that sprawl is 'inevitable' which presumes a need to build on Greenbelt without fully exploring all Brownfield possibilities.

11. The strategic site at Normandy (1000) which was safeguarded from 2003 plan, was excluded from the Issues and Options & initial consultation, it was added at regulation 19 stage, which would appear to be against due process and then removed as part of these amendments, for reasons that could equally apply to Blackwell Farm. Neither Blackwell Farm nor Wisley 'Strategic Sites' have ever been safe guarded. The selection of areas to be included or dropped appears ad-hoc and
late additions and speedy removal reminds me of retail 'SALE' tactics, which should not be deployed in plans which will have an irreversible impact on people’s lives.

12. 20 years ago the University argued against the Tesco development on the basis that it would exacerbate an existing traffic. It is incomprehensible therefore that Blackwell Farm can be considered as viable on the location mentioned, some 20 years on, when congestion is already a daily occurrence before development traffic is added. (annex 12)

13. The Rural Economic Strategy and policies have not been subject to proper or open consultations. I do not believe that due process was followed. Parish Councils were not aware of the consultation, which was a tick box affair, over a very short space of time. On finding that the majority of Parish Councils knew nothing about it, I informed the officer in charge and a short extension to the deadline was given. No feed back was given on submissions and comments were not referenced in the strategy, which was produced and published at a paid conference (£60 a ticket or thereabouts) within such a short time frame that one would be forgiven for thinking it had already been written. Parishes have had little to no involvement in this policy and they should have been key stakeholders.

14. In terms of its transport aspects the Plan cannot be regarded as sound. GBC has provided vivid descriptions of the conditions on the network today and the evidence is that these will be as poor, and in some cases worse, at the end of the plan period, even with the mitigation. Growth and infrastructure have to be better aligned. While the level of growth in homes in this latest draft plan is somewhat lower than that in the 2016 version, it is still substantial and growth is planned outside the borough. The evidence provided indicates that congestion will be widespread on much of the highway network in peak periods, even with the proposed highway schemes and with the measures to encourage the use of public transport in place.

15. Regulation 19 - The Council report for 16th May 2017 says that ‘comments made to parts of the plan that are unchanged should be considered not duly made’ (para 6). The local development scheme and the Council report (para 4.4 to 4.6) refers to this as a ‘targeted Regulation 19 consultation’. That is incorrect. A regulation 19 consultation is on ‘the local plan’ (see regulations 17, 19 and 20) not parts of it, which have changed from an earlier regulation 19 consultation. A number of consequences follow:

  (i) The local plan which is intended to be submitted to the Secretary of State is the 2016 submission local plan;

  (ii) The changes proposed in the 2017 document can only be made if:

      (a) The Inspector finds that the 2016 local plan is unsound;

      (b) The Council asks the Inspector to recommend modifications to cure the unsoundness; and

      (c) The Inspector exercises his or her discretion to recommend the changes which the Council have proposed rather than any other changes to make the plan sound;

  (iii) The 2017 changes proposed by the Council have the same status as any other changes proposed to remedy unsoundness in the 2016 plan;

  (iv) Representations can be made seeking changes, which are consequences of or alternatives to the 2017 proposed changes.

Whilst the buffer over the plan period has been reduced to 10% from 14%, it is unnecessary as GBC confirms that it can provide a 5 year supply. The only requirement for a buffer is for the five year housing land supply and that draws forward housing from within the plan period. There is no justification for any buffer over the plan period.

16. It is noted that there is no explanation in the 2017 local plan document or the Council report as to why the 2016 plan is unsound, the ways in which it is unsound, why the proposed changes would render the plan sound and why they are the best changes to make. I consider the plan 'unsound' as do action groups against Wisley and Blackwell Farm developments.

17. There is no justification for moving the end date of the plan back by a year. The 2016 plan was not unsound because of its duration. This raises concerns that the change was to increase the housing requirement (by adding a year) and to delay
the delivery of new housing (by proposing 850 houses, so above the annual requirement) in that final year. This goes
towards a solution for Guildford’s housing needs of strategic sites which may take a long time to come forward rather than
promoting smaller, sustainable sites within urban areas with infrastructure or on existing Brownfield sites (which can be in
countryside) to enable earlier provision of homes.

18. Additions and removal of sites. No exceptional circumstances have been given for the inclusion of sites on
Greenbelt and there is no explanation as to why some sites remain in the plan whilst others have been removed.

19. Information -- Throughout the plan it has been a given that Greenbelt sites MUST be included with threats that it would
be worse for everyone if the larger sites were not supported as planners would have less control and they would likely be
approved after a costly appeal. An FOI shows that this is not the case. To date only one Greenbelt site of the size of the
strategic sites put forward in Guildford has been approved at appeal. This was in Tewkesbury. It was also confirmed that
planning regulations apply irrespective of how permission is given. It cannot be considered sound to mislead the public in
this way?

20. The plan has failed to account for the many thousands of comments made in the previous consultations. The survey
(annex 9 and 10) helps to demonstrate how powerless residents feel and the genuine sense of despair that is felt by many
who try to engage with the process but feel the plan and the OAN is predetermined and not really evidence based at all.

Overall issues

In my view, the overall plan is in contravention of the basic principles of good development and the NPPF. Expansion on
the scale purported should see development where infrastructure exists to facilitate urban regeneration and promote
sustainable living.

Information appears to be held all over the place and it is difficult to know what exactly we are being asked to do in this
consultation. There are different ways of accessing the consultation documents and then there are additional papers and
appendices. Some are marked up with the changes but some are not. There is not enough time to read all the documents
within the 6 week period.

The survey (attached annex 9&10) confirms the issues many are having with understanding the process and getting
adequate information and answers to questions in order to make an informed submission. This in itself must impact the
soundness of the consultation.

This plan makes a mockery of Greenbelt policy and the NPPF which states that Greenbelt retain its openness and
permanence and development can only be considered (and removed from Greenbelt) if it is appropriate and in exceptional
circumstances. No exceptional circumstances have been demonstrated and it is widely thought that the scale of
development proposed is to enable highways and infrastructure improvements without due consideration of permissible
constraints or impact from the growth proposed.

Comments concerning missing evidence and subjectivity of the Greenbelt study that led to the flawed sensitivity results
(red, amber, green) resulted in Blackwell Farm being given medium sensitivity rather than high sensitivity. This in turn has
resulted in it being moved forward as 'given' without seeking to address the professional independent evidence submitted in
the last consultation, that contradicts this.

It was initially stated that the figure for Blackwell Farm had been reduced from 1800 to 1500 in an effort to reflect public
opinion. It was later acknowledged that this 'reduction' was untrue, the extra had been phased for outside the plan period.
The same was said of Gosden Hill, which also has housing planned after the plan period.

Language used reflects the direction GBC wish to take the plan whether policies are consistent or not. Page 30 of the
AECOM report Box 6.9 Greenbelt around the Guildford urban area, notes that Clandon Golf area is red rated Greenbelt and
that it borders AONB and is within AGLV. Blackwell Farm also abuts AONB and is partly within AGLV and access would
be via both. This however goes unmentioned.

The employment needs assessment, previously stated that 30% of employers consider leaving the area due to problems with
congestion and lack of affordable housing for employees. It also stated that 9% of commercial outlets were empty. The
reduction applied to employment land is still therefore insufficient.
Traffic study

Compton and Worplesdon Parish Council’s have jointly agreed to fund an addendum to the professional Technical Note, which identified problems with the proposed link road from the A31 to Egerton Road (which will form the sole access to the Blackwell Farm site). The addendum will look at the impact of this new road (and of the entire development) on the surrounding road network in the light of changes to the Local Plan. The planned new road will cross the Surrey Hills Area of Outstanding Natural Beauty, an Area of Great Landscape Value, and historic parkland. It will also pass through, or very close to, a belt of ancient woodland.

Question over housing need number

A review of the Strategic Housing Market Assessment commissioned by Guildford Residents Association has identified a flaw in the way that the housing need figure has been calculated. This is outlined in the two paragraphs below:

“A review of the latest ONS population estimates and projections has found compelling evidence that there are substantial errors in past estimates of student migration flows. It is probable that migration flows out of Guildford, both to other parts of the UK and abroad, have been under-estimated by sizeable amounts.

"Owing to the way in which migration estimates are used to construct population and household projections, the errors in past migration estimates are likely to mean that the latest demographically-based housing need estimates by GL Hearn overstate the number of homes needed by over 25%.”

Note that it is important to distinguish between a “demographic need” (births, deaths, migration), an adjusted need figure (which takes into account economic growth and affordability), and the “housing figure” used in the Local Plan (taking account of constraints and ambition). The GRA review is saying that it is a fundamental demographic building block that is wrong.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
- Annex 10-SURVEY Final a.pdf (9.1 MB)
- Annex 3 - Highways + Mouchel.pdf (8.3 MB)
- Annex 13 - Green Balance response.pdf (322 KB)
- Annex 11-G Bridger.pdf (4.9 MB)
- Annex 2 - SHMA Review.pdf (849 KB)
- Annex 6.pdf (194 KB)
- Annex 4 Highways Oct 2016 Letter to GBC.pdf (1.3 MB)
- Annex 9-Satisfaction Survey Summary2.pdf (134 KB)
- Annex 1 - Hogs Back Natural Beauty Evaluation V2 24.05.16.pdf (5.9 MB)
- Annex 8- GBC response - Air Quality.pdf (138 KB)
- Annex 5- RGP Technical Note.pdf (265 KB)
- Annex 7 - Issues with Aecom Air Quality Report.pdf (384 KB)

Comment ID: pslp17q/421   Respondent: 8570273 / Fiona Curtis   Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Significant updates to the Draft Local Plan These were made for good planning reasons -- based on past consultation comments or changes in circumstances or the supporting evidence -- including:

If changes are truly 'significant' then doesn't this merit a regulation 18 consultation rather than regulation 19? If they are not significant in terms of real outcome, then they should not be referred to as significant.

I object to the wording of the press release, which I believe is misleading for the reasons stated in blue.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp17q/430  Respondent: 8570273 / Fiona Curtis  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Question 6: Any other comments?

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Blackwell Farm and Gosden Hill are listed under Guildford Urban -- It should be noted that this is aspirational and is not current. It is misleading to list these greenbelt fields in this category. Those without an in depth knowledge of the plan may not realize that these are not currently urban sites.

Wisley is listed as a 'new settlement' a description that does not do justice to its size. Blackwell Farm and Gosden Hill are also new 'settlements' and should be listed as such rather than as 'urban extensions'.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/2312  Respondent: 8570273 / Fiona Curtis  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Vision and objectives

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
### Answer (if comment is on questions 1-7 of the questionnaire):

<table>
<thead>
<tr>
<th>3.1 Spatial Strategy</th>
<th>The plan aims to deliver a minimum of 12,426 over 19 years (654 a year) rather than 13,860 over 20 years. (793). The figure per year in real terms remains much the same and has done throughout, despite suggestions that it has been changed to account for residents comments as some now falls outside the 'plan period'. Essentially change has been obfuscated to appear more pronounced than it actually is.</th>
<th>Object</th>
</tr>
</thead>
<tbody>
<tr>
<td>3.1 Spatial Vision at least 12,426</td>
<td>I strongly object to the addition of the words 'at least' as this is non-specific and disingenuous particularly when accompanied by news bites referring to a reduction.</td>
<td>Object</td>
</tr>
<tr>
<td>3.1 Spatial Vision The plan therefore focuses on some development on large strategic greenfield sites</td>
<td>This is preceded by the statement Not all of the borough’s development needs can be met within Guildford’s urban areas. The SHMA figures are flawed and hence the OAN is far too high. This combined with the lackluster approach to surface level car parking and other Brownfield sites as well as not applying permitted constraints has forced development outside Brownfield. The decision to build on Greenbelt was taken long before the evidence base or results of the SHMA were known, which could be seen as pre-determination. If GBC placed equal emphasis on finding ways to gain an OAN that was not inflated but met actual need and on revitalizing brownfield sites and implementing policies for appropriate densities in urban area, the need to build on Greenfield or greenbelt would be limited or non-existent. Only 30% of development is urban based and 58% is currently on Greenbelt. The statement about the need to preserve the character of Guildford would appear to apply to the town and not to the borough. The Hog's Back is an iconic landmark that can be seen and appreciated for miles by users of the A31 as well as walkers and riders. All the Greenbelt sites serve a useful purpose and the validity of the 'sensitivity analysis' is questionable given its 'tick box' approach to analysis.</td>
<td>I strongly object to this and the way in which it is presented without caveat.</td>
</tr>
<tr>
<td>3.1 Spatial Vision Over 240ha, equivalent to more than 330 football pitches, will be provided in perpetuity</td>
<td>This relates to land that will be used as green space for residents in new housing but makes no reference to the level of countryside that will be lost and what the net figure will be (the countryside is for the benefit of everyone and not just residents in new homes).</td>
<td>Object</td>
</tr>
<tr>
<td>3.1 Spatial Vision</td>
<td>I object to incredibly low density of this urban facility, which wastes more space than it actually uses. There are 10,000 square meters to 1 hectare and an area</td>
<td>Strongly object</td>
</tr>
</tbody>
</table>
Up to 11 ha, comprising 30,000 sq m of premises for business use (including offices, research, development and design activities in any science) will be provided within the plan period. Such as this could facilitate units that are 2--5 levels high, without compromising surroundings. This begs the question as to why 11 ha is required for what could fit on 1 or 2 hectares, if landscaped? The bigger question however is why density policies have been removed and why better has not been made of the Manor Park facility?

3.1 Spatial Vision

The role of Guildford town centre as the largest retail, service, administrative and commercial centre in Surrey will be maintained and enhanced. The major town centre redevelopment of North Street will include 41,000 sq m of comparison retail floorspace together with 6,000 sq m of food and drink uses and up to 400 flats.

The reduction in land / space given over to retail is insufficient given the national and indeed global trend to internet shopping. It is good to see that the number of flats has increased from 200 to 400, but this is not nearly enough. Small affordable units in a town centre setting are hugely desirable and more, could allow older people to down-size thus releasing much needed family homes onto the market.

3.1 Spatial Vision

The transport strategy and Local Plan policies will be aligned to encourage residents, employees and visitors to use alternative modes of transport and to seek to reduce car traffic especially through the town.

The transport strategy does not include any traffic re-modeling despite the note by Mouchel that points out that traffic volumes are UNDERESTIMATED due to 3 flaws in the paper, none of which have been corrected. The use of traffic averages obfuscates peak time data. Issues relating to merging and X are also mentioned but have not been dealt with.

The Transport Strategy (page 19) states that there are NO requirements for AQMA in Guildford and that air quality improvements will be made ‘where feasible’.

Despite our leaving the Eu, government policies should remain in line with the Eu and ‘where feasible’ for what should be a legal requirement is not good enough.

It should also be noted that it is likely that the environment dept. will recommend the implementation of an AQMA at the A3 end of Compton village in the near future. The transport strategy should be in line with the most recent Air Quality Report and be mindful of the consequences of traffic systems that push more traffic out into the villages where residential properties abut busy streets.

It is of great concern that the transport report makes no reference to Compton's problems and that the village had to fight for many years to gain access to equipment due to lack of resources in the department and that many other villages are still awaiting to be listed for monitoring. It is somewhat
presumption therefore to say that Guildford has no requirement for AQMA’s, although I would hope very much that this is the case.

It is of even greater concern that the lead councilor for infrastructure, Cllr. Furniss, publicly denied that Compton had an air quality issue and attempted to invalidate the initial results by suggesting the monitoring carried out by the environment dept. was erroneous. This claim was not endorsed by the environment dept. and when evidence was sent to Cllr Furniss to demonstrate the error in his way of thinking, he declined to comment.

I can see no evidence to demonstrate how some of the infrastructure proposals put forward to address concerns over congestion, will actually deal with the current problem and more traffic from growth? Minor tweaks of junctions appear to be wholly insufficient particularly bearing in mind the data used underestimates the scale of the problem.

3.2 Spatial Vision 13 objectives

I note the following:

Unemployment is not a key issue in Guildford.

Cost of homes is influenced by proximity to London & coast and strategic position. Providing more facilities is likely to INCREASE the cost of homes not decrease them. There is ample space on Manor Farm to house more students and the University should take responsibility for its growth programme and this should include the provision of adequate housing.

The plan FAILS to balance growth with protection as 70% of housing development is on Greenfield.

An independent report commissioned by Parish Councils shows that the 4 way junction on the A31 will not work and that congestion on the A31 will not be solved by this junction. Add several thousand extra vehicles to this and the impact will not only impact Guildford town but all surrounding villages, and Puttenham and Compton in particular. This was clearly demonstrated recently when the A31 west route was closed due to use of sub-standard materials and hot weather. Despite diversions being set up, traffic took the shortest route and Compton (an area that is likely to be within an AQMA very soon) saw traffic at a stand still from the A31 to the Withies at the far end of the village. The last paragraph in the Spatial Vision statement refers to ‘early targeted improvement schemes to deliver road safety and some congestion relief on the A3 will be delivered within the plan period’. While it is correct that funding has been committed for two improvement schemes – SRN7 (£1.6m) and SRN8 (£2.5m), the two safety related schemes SRN1 and SRN6, previously regarded as urgent, have been removed from the infrastructure schedule.

The final sentence of the Spatial Vision should be changed to read as follows: The rate of delivery of housing in the plan period is conditional on major improvement of the A3 through Guildford and the other highway improvement schemes listed in the Infrastructure Schedule, following an impact assessment of any proposed changes.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
I strongly object to the housing number SHMA as feel this is too high. This seems to account for a lot of students which could be housed on the University. The calculation for the SHMa have still not been disclosed so this is hardly a clear process.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

I strongly object to the inclusion of site A35. It should be removed from the Local Plan for all the reasons that the recent unsucessful planning application was rejected.

To name a few: proximity to the Thames Basin Special Protection Area, RHS at Wisley Gardens, and the already polluted gridlocked A3/M25.

I strongly object to the former Wisley airfield being removed from the Green Belt. I strongly support the Green Belt and feel that the large proposals within the local plan for building on the Green Belt is wrong.

I strongly object to the idea of an increase of 5,000 cars into the small rural country lanes of Ockham.

I strongly object to Allocation A35.

Just recently the council refused permission for numerous reasons, none of these have changed, SO WHY IS THIS SITE STILL IN THE LOCAL PLAN???
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9958  Respondent: 8570305 / Gareth Porter  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I strongly object to the erosion of the Green Belt. All Green Belt sites should be removed from the plan until “exceptional circumstances” for development are proven, as stipulated repeatedly in the NPPF.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/6003  Respondent: 8570593 / John Newman  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

On reviewing the proposed local plan, I object to Policy 43 - land at Garlick's Arch.

The land suffers from being a Flood Zone, I understand it is Zone 3. Looking at recent flooding I consider this should be reviewed. There are electric pylons on the site which would put development into the second five year period. The site has Ancient Woodland dating back to the 16th Century!

The addition of 400 new home is a major increase in the local population is this wise?

The need for schools, Doctors surgeries, transportation and with only one shop in the locality.

At the last meeting the Garlick's Arch replaced the Burnt Common Nurseries site which had been in since the beginning had been thoroughly reviewed. The site already has three industrial units totalling 5000 square metres and is logical to extend. The proposal is for small industrial units to met the local requirements.

The site can also handle 100 new houses which would not put undue pressure on local facilities.
Policy A43a - Land for new north facing slip roads to/from A3 is dependent on the owners of Garlick's Arch gifting the land for the slip road on condition of receiving planning permission for housing. Use of slip roads will have a severe impact on the population of Wisley, Send, the Clandon's and other local populations.

The decision was made before they built the Wisley bypass not to have slip roads to/from A3. With the increase in traffic why should this have changed?

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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Answer (if comment is on questions 1-7 of the questionnaire): ()

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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT to your plan for the building of 45 houses at Clockbarn Nursery due to the very poor vehicular access.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
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<th>Respondent: 8571137 / G Mansbridge</th>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<td></td>
<td>1. I OBJECT to your plan for the building of 400 houses and 7000 sq. mtrs. of industrial space at Garlick's Arch due to the destruction of very ancient woodland and adding to the area flood risk.</td>
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<td>I OBJECT to your plan for the building of 45 houses at Clockbarn Nursery due to the very poor vehicular access. I OBJECT to your plan for the building of 400 houses and 7000 sq. mtrs. of industrial space at Garlick's Arch due to the destruction of very ancient woodland and adding to the area flood risk.</td>
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1. I OBJECT to your plan for the proposed new interchange with the A3 at Burnt Common because of the total traffic gridlock through Send which will definitely result if this plan went ahead.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/7584  Respondent: 8571137 / G Mansbridge  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to your plan for the proposed new interchange with the A3 at Burnt Common because of the total traffic gridlock through Send which will definitely result if this plan went ahead.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/7583  Respondent: 8571137 / G Mansbridge  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A44

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT to your plan for the building of 40 houses and 2 traveller's pitches at Send Hill because of the very narrow road and the site contamination with very unsafe landfill.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Answer (if comment is on questions 1-7 of the questionnaire): ()

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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1. I OBJECT to your plan for Send Village and Send Marsh being removed from the Green Belt, which is permanent according to the National Planning Policy Framework. There are no Special Circumstances that justify this action.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<p>| Comment ID:            | pslp172/3187 | Respondent: | 8571137 / G Mansbridge | Agent: |</p>
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</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
</tr>
<tr>
<td>I object to POLICY A42, CLOCKBARN TANNERY LANE: because it will illegally erode the Green Belt in Send Village, cause more flooding due to the greater number of houses proposed and worsen traffic problems and pollution.</td>
</tr>
<tr>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
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</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
</tr>
<tr>
<td>I object to POLICY A58, BURNT COMMON: because there is no need for excessive amounts of industrial and warehouse development in the middle of the Green Belt - see the 2017 Employment Land Need Assessment.</td>
</tr>
<tr>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
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<td>Attached documents:</td>
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<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
</tr>
<tr>
<td>I object to POLICY 2 paragraph 4.3.15 to inset Send Business Park from the Green Belt: because Tannery Lane is totally unsuitable for a large increase in traffic being a single track road and the area is an outstanding countryside amenity.</td>
</tr>
<tr>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
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<td>Attached documents:</td>
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</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

At 2.33 you describe the role of the relevant LEP to Guildford Borough (Enterprise M3). For consistency, you might also make early mention of the Surrey Nature Partnership at this point in the document. The Partnership’s latest publications might then be referenced here, including Naturally Richer: a Natural Capital Investment Strategy for Surrey (2015) and The State of Surrey’s Nature (2017).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

At 2.33 you describe the role of the relevant LEP to Guildford Borough (Enterprise M3). For consistency, you might also make early mention of the Surrey Nature Partnership at this point in the document. The Partnership’s latest publications might then be referenced here, including Naturally Richer: a Natural Capital Investment Strategy for Surrey (2015) and The State of Surrey’s Nature (2017).

Attached documents:

<table>
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<tr>
<th>Comment ID: pslp171/284</th>
<th>Respondent: 8571521 / Surrey Nature Partnership (Sarah Jane Chimbwandira)</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy D2</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We welcome and support this policy, and the importance the Borough places on such matters through its inclusion and prominence in the plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: pslp171/293</th>
<th>Respondent: 8571521 / Surrey Nature Partnership (Sarah Jane Chimbwandira)</th>
<th>Agent:</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy D4</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
There may be an opportunity here through the re-drafted policy to link aspirations for achieving a biodiversity net gain with those for high standards in development design.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/282  Respondent:  8571521 / Surrey Nature Partnership (Sarah Jane Chimbwandira)  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy E5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

With reference to para 4.4.51a, the Surrey Nature Partnership has been consulted on the development of the Rural Economic Strategy, and has influenced this document’s solid reference to the natural capital investment approach in Guildford Borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/283  Respondent:  8571521 / Surrey Nature Partnership (Sarah Jane Chimbwandira)  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy E6

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We welcome and support the clear reference here to the importance of Guildford’s natural environment to leisure activities and as an attraction to visitors from beyond the Borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/286  Respondent:  8571521 / Surrey Nature Partnership (Sarah Jane Chimbwandira)  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy ID3

Page 524 of 3335
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We welcome and support this policy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

| Comment ID: pslp171/296 | Respondent: 8571521 / Surrey Nature Partnership (Sarah Jane Chimbwandira) | Agent: |
| Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy ID4 |

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We greatly welcome and support this enlightened policy, especially its references to the Surrey Nature Partnership and its work promoting the recognition of Biodiversity Opportunity Areas in 4.6.34-36 and 4.6.50. Additions at para. 4.6.42a-45 are useful and provide important clarity. With reference to para 4.6.50, we look forward to working with you on the intended Green Infrastructure Supplementary Planning Document, where we can perhaps assist with interpreting the achievement of biodiversity net gain standards within the Borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

| Comment ID: pslp171/294 | Respondent: 8571521 / Surrey Nature Partnership (Sarah Jane Chimbwandira) | Agent: |
| Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P4 |

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We welcome and support this policy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
### Comment ID: pslp171/281  Respondent: 8571521 / Surrey Nature Partnership (Sarah Jane Chimbwandira)  Agent:

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy P5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

We welcome and support this policy, and especially the prudent addition of para. 4.3.50a as well as other refinements in this version of the Plan.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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### Comment ID: pslp171/292  Respondent: 8571521 / Surrey Nature Partnership (Sarah Jane Chimbwandira)  Agent:

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

The central purpose of the National Planning Policy Framework is to plan for sustainable future development and economic growth. That sustainability is partly defined as the ability to clearly demonstrate a contribution to protecting and enhancing the natural environment, including to “improve biodiversity, use natural resources prudently, minimise waste and pollution, and mitigate and adapt to climate change.” We are pleased therefore to see the environment placed so prominently as one of the four core themes for implementing the Plan’s Spatial Vision for Guildford Borough. With respect to Policy S1: **Sustainable development**, we also welcome the addition of para. 4.1.2a; “Sustainable development will be achieved by seeking economic, environmental and social gains jointly and simultaneously through the planning system.”

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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### Comment ID: pslp171/180  Respondent: 8571617 / Gordon & Jane Farquharson  Agent:

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()
Plans to expand Guildford by 20 to 25% appear to be based on an error.

Compelling evidence by a respected national expert, who worked for the Government, shows Guildford has greatly over-estimated its population growth.

This means we do not need to sacrifice so much Green Belt or to allow town cramming.

If the Council persists in releasing so much Green Belt for development, we will be asked to provide for Woking’s unmet housing needs – sacrificing our Green Belt to protect Woking’s!

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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<th>pslp171/187</th>
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<th>8571617 / Gordon &amp; Jane Farquharson</th>
<th>Agent:</th>
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The revised proposal that only 60% of full time Guildford based University students will be provided with accommodation on campus puts unnecessary pressure on housing stock in the town. An 80% target could help by freeing up affordable homes relatively quickly.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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<th>Comment ID:</th>
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Even taking account of all the proposals in the 2017 Plan, congestion which is already severe is set to get worse over the plan period. Whilst there are expressions like “modal shift” in transport being the solution to the problem. However, the is no clarity about how on earth this is to be achieved. I would have expected to see the necessary radical solutions like mega park & rides at Gosden Hill Farm, and towards Elstead, with a high-tech automated transport solution to the town and Research Park (such as autonomous PODS on an elevated track).

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**
In view of flawed new evidence, Guildford’s proposal for more than 12,426 homes (plus a buffer of 1,155 homes) is excessive and will result in needless loss of Green Belt and green character, and increased congestion, that cannot be justified in our heavily constrained borough.

There is evidence Guildford’s population growth is overestimated by about 40% because of under-recording of students leaving at the end of their studies.

If the Council fails to apply Green Belt protection or constrain expansion to reflect widespread, legitimate environmental and transport constraints, the 2017 Plan will cause harm to the qualities that underpin the economic success of Guildford and aggravate congestion.

The Council completely ignores the objective of Green Belt to avoid urban sprawl. For example, the development of Gosden Hill Farm simply perpetuates the sprawl of Merrow Park Eastwards. At the very least, the plan should skip a few fields, develop Wisley Airfield first, and then work back towards Guildford if the high numbers of houses are required post this plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Allocating too much land for development in the 2017 Plan will also result in Guildford being required to provide homes for Woking on our Green Belt which is folly given the constraints in Guildford, a gap town with constricted roads set in the Surrey Hills AONB.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/5649  Respondent: 8572257 / Mr Graham Bower-Wood  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A22

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

GUILDFORD NEW LOCAL PLAN 2016

POLICY A22: Land north of Keens Lane Guildford – LAA reference: Site 126

I would like to strongly object to the above proposal North of Keens Lane as a resident of Keens Park for the last 28 years.
Firstly, this is Green Belt land, which I thought was protected from this type of development?.
The infrastructure and road system surrounding this area is highly unsuitable if this were to go ahead.
Keens Lane itself is mainly a single lane road and would have to be upgraded from a leafy (one vehicle in most part) lane to a new two lane road completely destroying the hedgerow and many trees along it.
I was under the impression that this site was part of a vital wildlife corridor between Whitmoor and Broadstreet Commons and these very important corridors are already of strong concern by the Government?.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/3862  Respondent: 8573505 / Anthony & Hazel Teal  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
• A principal driver in this is the Strategic Housing Market Assessment (SHMA) commissioned by GL Hearn and calculated to be 693 per annum or a total of 13,860 houses to be built across the borough. In the previous draft Local Plan of 2014, a figure of 652 p.a. was arrived at giving a total of 13,040 houses, while four years ago it was approximately half this figure. There seems little logic or accountability in all of this. The calculation behind how this housing need is arrived at has never been explained and therefore there is a lack of transparency unacceptable in any serious consultation. An independent report commissioned by Guildford Residents’ Association has arrived at a much lower figure of 510 dwellings per annum. Now in the light of the recent Brexit vote to leave the EU this must radically affect many of the underpinning assumptions that were deployed in arriving at the 693 figure. This basic tenet of the draft Local Plan can only therefore be considered to be unsound.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/7233   Respondent: 8573505 / Anthony & Hazel Teal   Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A25

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We strongly oppose the planned development of Gosden Hill Farm with the second largest number of homes (2,000), eight traveller pitches, a new railway station, a park and ride, shops, primary and secondary schools, all situated in the Green Belt that includes an area of ancient woodland. As currently proposed this will have a devastating impact on Burpham, Merrow and other communities within this locality. Burpham is a victim of being at a major portal into Guildford. Already the traffic situation here is notorious and does the town no service; indeed it is a positive distraction. Access to the proposed development at Gosden Hill is by a new A3 southbound off/on slip road with the present southbound slip road to Burpham and Merrow becoming two-way. Thus all traffic from Gosden Hill going north to the M25, London and Heathrow will be forced to drive through Burpham to the Clay Lane Slip. How mad is that?

The only sensible solution is a four way intersection around Potters Lane as proposed three decades ago, providing north and south bound access to the A3. Yet here is the rub. A tunnel underneath Guildford is once again being supported by GBC as a way to alleviate pressure on the road network. It would cut out more than 6 miles of the A3, from Ripley to Compton and is part of the Borough Transport Strategy 2016. If it is decided that a tunnel is the only answer to Guildford’s traffic problem, it is short sighted in the extreme to dump homes and all associated infrastructure on land that would be used for a tunnel entrance. There seems to be a lack of consistency and joined up thinking and therefore we can only conclude that as presently formulated the Gosden Hill proposals are deeply flawed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16194   Respondent: 8573505 / Anthony & Hazel Teal   Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

If implemented they would have a dramatic and devastating effect on Guildford and destroy many of the fine aspects that make the town and its immediate environs such a good place to live, work and bring up a family. One of us has been a resident since 1960. While change is inevitable and must be accepted in a controlled, logical and sustainable fashion, this plan provides too much land for development. Further it does not do enough to tackle a major blight on our community, traffic congestion. This is strangling the life out of our communities. Ultimately the appropriate and essential long term infrastructure must be decided upon and put in place first.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16195  Respondent: 8573505 / Anthony & Hazel Teal  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

In the Sunday Times (10.07.2016) Guildford was extolled as a marvellous place to live “surrounded by glorious and protected countryside – but the A3 runs through it like an ugly scar- that gets annoyingly busy though there is talk of burying it in a tunnel”. However in this plan so much of the countryside in the Green Belt is now apparently being offered up for development while little is being done to ease congestion and prevent the town from becoming crammed. Given there is only limited time to make specific comments we wish to make the following points.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16197  Respondent: 8573505 / Anthony & Hazel Teal  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
The development of nearly 14,000 homes over a 20 year period is unsustainable without a complete loss of character to those centres included within the proposed extensions to various urban areas and villages. This policy does not appear to recognise these existing regions simply do not have the necessary road and other infrastructure capable of coping with expansions on this scale or magnitude and is therefore unsustainable. This excessive development appears skewed towards the northern sector of the borough. While Woking and Waverley are willing to apply constraints to their housing growth, Guildford is not and the uniqueness of villages such as Clandon, Ripley and Send appear destined to be enmeshed in an urban sprawl.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16196  Respondent: 8573505 / Anthony & Hazel Teal  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The development of nearly 14,000 homes over a 20 year period is unsustainable without a complete loss of character to those centres included within the proposed extensions to various urban areas and villages. This policy does not appear to recognise these existing regions simply do not have the necessary road and other infrastructure capable of coping with expansions on this scale or magnitude and is therefore unsustainable. This excessive development appears skewed towards the northern sector of the borough. While Woking and Waverley are willing to apply constraints to their housing growth, Guildford is not and the uniqueness of villages such as Clandon, Ripley and Send appear destined to be enmeshed in an urban sprawl.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/1792  Respondent: 8573505 / Anthony & Hazel Teal  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
We wish to express our concerns over the Draft Local Plan, currently out for public consultation and formally register our objections to what is being proposed very strongly indeed. It has been an extremely elusive and difficult document to try and get to grips with in order to understand the implications for the borough and our locality in particular. While it is essential to have a sound and robust Local Plan in place, the policies being put forward currently appear unsound and unsustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 7: Any other comments?</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The Draft Local Plan raises many other issues but time constraints preclude us from making further detailed comment. However we have been party to the carefully crafted response prepared by the Burpham Community Association (BCA) and viewed the extensive critique undertaken by the Burpham Neighbourhood Forum (BNF). We have also been given access to the extensive documents written by both the Merrow Residents Association (MRA) and the Campaign to Protect Rural England (CPRE). In conclusion we would wish to endorse the views, analysis and comment contained within the above replies that are being sent out to GBC. The scale of the draft Local Plan with its dense and difficult presentation makes it a daunting task for just one or two individuals to give a comprehensive response and where necessary rebuttal to many of the facets contained within this consultation. However it is apparent that much of what is proposed jars badly with the people of Guildford. Therefore essential the Council not just hears but listens carefully and make real improvements to the plan before irreparable damage is done to an historic town and its surrounding countryside.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<td>Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A25</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
As a resident initially of Merrow from 1960 but having lived in Burpham for the last 34 years my principal concerns are with issues that impact on these areas. In particular we refer to Policy A25, Gosden Hill Farm. Here it is proposed there will be developed at least 1,700 homes within the plan period as well as a new local centre, primary and secondary schools, a park and ride facility with 500-700 car parking spaces and a railway station. To accommodate this new village, the infrastructure requirements propose a new improved junction on the A3 comprising a relocated southbound off-slip, a new A3 southbound on-slip connected via a new roundabout to the A3100 with an associated corridor within Burpham.

This is a totally inadequate response that completely ignores the impact it will have on the wider community. Burpham is already the recipient of a traffic overload resulting from a lack of joined up planning decisions over many years with scant regard for the essential long term infra-structure necessary to accommodate what has already been developed. The daily outcome is a steady slow-moving column of traffic that winds its way from the A3 around and into the centre of Burpham while in the opposite direction vehicles of all types endeavour to access the north bound A3 via Clay Lane. There has been a big increase in HGVs and large diesel cars journeying to access residential and commercial properties and most notably for the two superstores at the village centre. Indeed on 6/12/2016 the Planning Inspectorate gave Aldi approval to increase HGV deliveries from one to seven per day despite local concerns, a simple example of another apparently “small” incremental effect with no regard as to the long term consequences.

Now add to this the residential traffic from the proposed Gosden Hill Village which at an absolute minimum is (1,700 x1.8 cars per house) = 3,060 vehicles daily. Under the proposals of the improved junction, unless travelling south down the A3 from the proposed new roundabout, they must travel along the A3100 (London Road) and into Burpham in order to access Guildford/Woking/Dorking/northbound slip of the A3. It is not unrealistic to suppose that this extra traffic including commercial vehicles will be of the order of 4,500 vehicles per day, morning and evening. Also local traffic wanting to access the south bound A3 and avoid Guildford centre will be making a bee-line through Burpham and up the A3100, now two-way, to the new roundabout at the Gosden Hill site. On this basis alone the scheme proposed is deeply flawed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/1011  Respondent: 8573505 / Anthony & Hazel Teal  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We are writing to express our grave concerns about the revised Local Plan for Guildford that has now gone out to public consultation. That we need more homes, particularly of the right kind is undeniable. The first challenge for planners is to formulate realistic targets that local people can understand and be persuaded to accept with a fair degree of confidence as at least being both reasonable and sustainable.

GBC is proposing the total housing need can now be revised downwards from 693 to 659 per annum i.e. a reduction of 4.9%. Such precise figures imply specific calculations have been deployed against clear assumptions. However there is a complete reluctance to explain the thinking and methodology that has underpinned such an analysis. In any professional, technical or scientific document that goes out for peer scrutiny, there is a pre-requirement to provide some account of underlying principles used in reaching a particular conclusion. Otherwise the validity of the result must be considered suspect, flawed or inaccurate. This now has to be the view that any rational person must take over the figure of 659 new homes p.a. It is further reinforced when an independent analysis undertaken by GRA has concluded 404 houses p.a.would meet Guildford’s projected needs. There is a 38.7 % discrepancy, which should set alarm bells ringing! Perhaps as a
university town, the statistics can easily be distorted by the inclusion of student numbers whose residency is at best transient and should not be included in any assessment of housing need for the borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

In the last year there has been a seismic shift and concern by government at all levels as well as the public over roadside pollution. A decade ago it was just greenhouse gases. Today it is nitrogen dioxide and ultrafine particulate matter (PM2.5), emitted by car engines and thrown up by brakes and road wear, that is making the headlines. Thousands of people die each year as a result of breathing air that is officially considered safe. While WHO recommend a cap of 10 µg/m³ and the EU set legal limits at 25µg/m³, very low levels of air pollution can shorten lives while tiny changes equivalent to taking a few cars off each road could save many lives. What is being proposed by the local plan in Burpham and it environs does nothing to alleviate the existing threat of traffic pollution, congestion and gridlock. In fact it conspires to make the situation far worse. Intelligent local planning should recognise the consequences of such action and respond with a scheme that is not simply one of expediency at the expense of the electorate.

Villages do need new housing if they are to survive, renew and thrive. This should not be to the almost exclusive advantage of big developers and volume housebuilders who relish the prospect of putting estates on the green belt because of its favoured position and the ability to sell units at a thumping profit. This does not meet the community need for decent affordable housing. Such a situation seems to be planned for Gosden Hill. Here a residential mixed use development is to be built on an agricultural site that is predominantly Grade 2 and 3a farm land. However the Guildford Borough Transport Strategy 2017 document refers to the potential of an A3 Guildford Tunnel. Should this come about, Gosden Hill is an obvious choice to begin such a venture and this conflicts with the current proposals.

In conclusion we object strongly to Policy S2, Policy H1 and Policy A25 for the reasons set out above. The changes proposed have done nothing to mitigate the concerns expressed in our previous letter of 16/07/2016. The case for more houses of the right kind cannot be denied and suitable developments are quite possible as long as realistic targets are set and supported by local government. The current proposals are driven by an over inflated housing need figure and an inability to create the necessary infrastructure to deliver a sustainable quality of life for both existing and future residents. We can only trust that it is not too late and planners will consider carefully the concerns of local people who have on a daily basis to deal with the consequences of their actions.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** PSLPA16/2161  **Respondent:** 8573793 / Harry Eve  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Responses to Evidence provided

Strategic Highway Assessment Report

1. I am not suggesting that a Borough-wide transport assessment is by any means easy to accomplish but **the current approach commissioned by Guildford Borough Council is not fit for the purpose of Local** It is a high-level strategic model with a severely understated baseline. Various issues were raised by me in the previous consultation and these seem to have been ignored in the consultation responses given by Guildford Borough Council.

2. The Transport Assessment was held back until the start of the consultation period and **was issued incomplete - much PM peak hour data being excluded.** Requested the PM peak hour evidence from Guildford Borough Council but they delayed for ten working days before stating that they would not provide it and that it can only be requested as a response to Evidence. This is unsatisfactory and there is no reason why it should not have been published for the consultation. Residents are every bit as concerned about their journey home as their journey to work. I can only speculate as to why the evidence was not published.

3. The evidence that is available in the Transport Assessment suggests that **congestion on the local road network will be worse** following completion of the proposed developments and assuming that all the highways schemes
are delivered. More congestion means that the Borough will be less attractive to businesses and visitors, and a less desirable place to live with higher levels of stress and pollution.

Here are some quotes from the Report:

"4.5.10 Currently it is unclear why some minor roads in or just outside Guildford town centre are showing increases. These include roads such as Nightingale Road, Denmark Road and Tormead Road. However, it could be related to re-routing occurring as a result of the improvements to the A3 through Guildford attracting drivers to both join the A3 and remain on the A3 at Guildford and weaving through local streets."

"4.8.3 At the same time, average vehicle speeds increase not just on the A3 but across the network within the borough as a whole. However, despite this it should be noted that although the average speed across the network in Scenario 5 is higher than in Scenario 1 (the Do-Minimum), there are differences within the network with average speeds on A roads and minor roads lower than in Scenario 1."

(In other words, traffic congestion on the local road network is predicted to be worse under this draft Local Plan even though existing traffic flows have been understated. With understated traffic flows, many roads and junctions would have some capacity to absorb additional traffic. If realistic current flows were used the impact of additional traffic would be far greater as junctions are already overloaded and additional traffic simply adds to queue lengths.)

"4.8.6 It should be noted that despite these improvements, Figure 4.7 shows the A3 is still operating overcapacity with resulting impacts on congestion.

4. The source of baseline data appears to be incomplete and, where it is available, seems to rely on single day or one week surveys conducted at various times over the last few years.

5. The Transport Assessment understates existing traffic levels by using a process of averaging over the three peak hours.

Averaging leads to a very substantial understatement of existing traffic levels. I was able to identify the source of some of the "observed" data (listed in the validation report) for my local roads and this shows that the effect of averaging can be to produce a flow rate that is very significantly lower than the peak hour flow.

It is clear from the recent Wisley Airfield planning application that Highways England find the averaging approach unsatisfactory for the strategic road network and there is no justification for using it on the local road network.

Guildford Borough Council's attempt to justify averaging on the grounds that the actual peak time varies across the network is a red herring. An obvious way round this would be to carry out the modelling for each hour, or half hour, separately. My understanding is that this was not considered possible due to lack of resources.

The very major reduction from observed to modelled flow for Forest Road in the north-east bound direction may suggest that other roads in the vicinity, or on related origin destination routes, may have even more severely understated flow rates which have been "shared" across the road system by the modelling process.

Other examples nearby are Validation Report Count Numbers 2617 and 2618 - B2039 Ockham Road South where averaging severely understates the AM peak hour and modelling further reduces the baseline to between 40 and 50% of observed data.

On another local road, Old Lane, the PM flow northbound for one link is stated to be 86 vph but the modelled flow is only 1 vph!

It appears that the Ockham and Horsley area has been very poorly modelled with the consequence that the very severe congestion and infrastructure failure that would result from the proposed developments has not been recognised.

Similar issues are likely to exist elsewhere in the Borough.
I would add that reliance on a single day survey is not good enough. Week long surveys, demonstrate how much traffic can vary from day to day and, to test the resilience of the road network, highest daily flows should be used - with proper allowance for the effects of queuing at the survey point. The surveys should be carried out when traffic is not reduced by holiday periods, school closures or other events such as roadworks that might divert traffic away from the road in question.

6. The result of modelling understated baseline flow rates is a failure to fully identify existing congestion hot spots. Given that, despite this, the transport assessment shows that congestion will be worse on the local road network it is clear that the reality will be far worse, and widespread, and that the highways infrastructure requirements have been severely underestimated.

7. Guildford Borough Council intend to reduce road space in the town centre in order to tackle congestion there. It is clear that they cannot apply the same approach across the Borough as that would deter businesses from operating in Guildford and discourage visitors. The Plan proposes massive levels of growth outside the town centre and that will lead to highway infrastructure changes that require demolition of property, road widening through villages and residential areas and, in all likelihood, demand for by-passes that would have to run through countryside including the AONB. In fact, it is difficult to envisage where such by-passes would be put without serious damage to the environment and the existing tourism economy. I object to planning for such massive growth in the Borough where such dire consequences would be inevitable.

8. My requests for details concerning the way junctions are dealt with in the model, and the details for three local junctions, went unanswered by Guildford Borough Council and Surrey County. It is my belief that SINTRAM uses only a very crude approach to assessing issues at junctions and concentrates only on link capacities and the associated ratios of link flow to capacity (RFC approach). The separate “Level of Service” (LOS) approach appears to be limited to just a small selection of the many congested junctions across the Borough.

An example of the effect of averaging is given below:

Validation Report Count Numbers 2513 and 2605 - Forest Road

A single day Surrey County Council traffic survey was carried out on 6th November 2012 at the junction of Forest Road, Horsley Road and Howard Road with the results for peak hours subdivided into half hour periods. The average peak hour figures (AM) from this survey were 278 vehicles per hour (vph) and 142 vph and these correspond exactly with the observed flows in the validation report.

However, the corresponding peak hour flows (08.00 to 09.00) on that day were 371 vph and 187 vph. The observed flows have been taken as 75% and 76% of the peak hour due to averaging. The alternative way of expressing this is that peak hour flows were 33% (and 32%) higher than the chosen observed flow.

This is by no means the most extreme example and the effect varies but it should be obvious to anyone that averaging always reduces the peak hour flow and, in many cases, very significantly. Averaging can only make little difference in the town centre and on roads such as the M25, for example, where peak hour queuing is prolonged and results in lower measured flow rates spread more evenly (traffic that can flow rather than traffic that wants to flow). To obtain a clearer picture in these circumstances it is necessary to take account of changes in queue length - but this is not practical when the queues stretch back to affect other junctions. Questions also arise as to where the end of the queue (or queues) is defined to be.

Furthermore, in this example, the modelled flows are only 38% and 67% of the peak hour flow (observed peak hour flow is 2.63 times greater than modelled flow in one direction) - meaning that the methodologies described in the report as "fixed trip equilibrium assignment and method of successive averages" have had the effect of further reducing the flows modelled for this road link making it far less likely to register as congested.

Very long queues develop on a road that meets Forest Road at a junction and these are related to the flow rates on the road that has priority. If the priority road has an understated flow rate in the model then any technique that it uses to identify delays at its junctions with lower priority roads will also be understated. My questions related to the technique used by the model remain unanswered at the time of writing.
At non-signalised junctions the capacity of an approach arm on a road that does not have priority reduces as the flow on the priority arm increases. There is a "tipping point" at which the flow on the approach arm exceeds the capacity, queuing begins and increases indefinitely until this variable capacity exceeds flow.

At signalised junctions the capacity of an approach arm is determined by the proportion of "green" time available to it. This may be fixed or variable depending on the sophistication of the traffic light system and the way in which it shares time between the approach arms and any filter lanes.

At any junction, the tipping point for any arm may not be exceeded in a model that has understated flow rates. A simple case of "rubbish in, rubbish out".

9. The Link capacities used in SINTRAM are too high in my opinion having regard to local knowledge concerning the effect of pinch points and considering the implied gap between vehicles (bearing in mind that traffic does not flow evenly spread and weather and road conditions are not always ideal).

10. The proposed town centre road changes could have a substantial impact but they have not been incorporated in the model. A concern here is the impact of traffic diverting onto other routes following the proposed reduction in town centre road space.

11. Waverley and Guildford were modelled together but it is not clear whether other adjacent Boroughs have been dealt with adequately as they appear to rely on general growth factors rather than proposed site developments near Guildford that could have a very significant impact on our road network.

12. More traffic congestion means an increase in local air pollution with significant adverse effects on the health of Guildford's residents.

13. More traffic congestion will increase journey times for emergency vehicles making good outcomes for life-threatening incidents less likely.

14. The local road network is required to provide alternative routes for traffic when the strategic road network is temporarily closed or providing a severely reduced capacity. The existing local road network suffers major congestion and delays when this happens under current conditions and this will become far worse under the proposed increases in flows on strategic road network and the massive increase in local traffic that will be generated under this draft Local Plan.

15. I consider that the traffic evidence is inadequate for the purposes of Local Planning and my requests for information concerning the evidence that was provided were largely unanswered at the time of writing despite initial requests being made within a few days of the start of the consultation period. Please provide full answers to the following questions and requests:

16. I request full details of the TEMPRO factors actually used in taking the model from 2009 to Scenario 1 (Please do not just refer me to a website as you did in the consultation period). I want to know what was actually used in the model).

17. I request that the missing PM evidence be provided without further delay.

18. Why was the missing PM evidence not published at the same time as the rest of the report?

19. I request the number of nodes, number of links and number of origin-destination pairs included in the Guildford model.

20. Please list the origin/destination pairs used for trips in the Guildford model.

21. It has been suggested that SINTRAM allows for junction geometry and opposing flows. Is this the case for all junctions on the local road network?

22. Please explain what aspects of "Junction geometry" are used in the model.

23. Please explain what data items you put into SINTRAM to allow for the details of each junction.
24. Section 4 appears to imply that SINTRAM has junction capacities. **Please advise** the junction capacities used in SINTRAM for the following junctions, for each arm:

- Effingham A246/The Street/Beech Avenue
- West Horsley A246 Bell&Colvill roundabout
- B2039/East Lane/The Drift

25. How were the delays in Table 6 determined?

26. If SINTRAM uses a "mathematical" function to determine delays, **please advise** the function employed and the data items that it Please note that your initial answer "calculated in the model" is not an adequate response.

27. Table 3.1 includes some negatives - the most extreme being for the Boxgrove I have been trying to think why this might be. **Please advise** the reason for this.

28. I **request** a clear description of the LOS assessment process and a list of the junctions for which this assessment was carried out.

29. I **request** that detailed junction modelling (with realistic data) be carried out across the Local and Strategic Road Networks before sites are included, and that it is not left to developers to provide data and modelling as they have a vested interest in the results.

Model Development Validation Report

30. This appears to indicate that the model contains 408 road links. However, **certain roads seem to be missing.**

For example, a highly significant commuter route has developed across the AONB using Ranmore Common Road, Crocknorth Road and Greendene. This route, which crosses the Borough border, does not seem to appear in the list of road links in the validation report.

This particular traffic flow seems to consist of traffic taking a shorter route between the A24 at Dorking and the A246 at East Horsley as an alternative to main roads that involve regular, and frequently excessive, queuing at peak times. Much of this traffic travels at dangerously high speeds, cutting corners on a narrow, winding and hilly road with the occasional slow-moving cyclist commuter on uphill sections with blind bends. Some sections of the route can be very treacherous in damp or icy conditions. It is also used increasingly by HGVs including some that seem lost.

One possibility is that the model contains other links for there was no observed data and so it was not possible to validate them. My questions on this aspect were unanswered at the time of writing.

31. Some observed/modelled **flows seem very low.**

32. I requested more detail on the road links so that I could understand which section of a road was described and the direction **This information has not been provided** at the time of writing. I was able to infer the detail for certain links through some time consuming effort.

33. Please provide full answers to the following questions and requests in relation to the validation report:

34. It is good to see a list of validation data (Appendix A of the validation report) but for many links it is not clear which stretch of road the data relates to. Also, the direction of travel is given in some, but not all cases.

I **request** that fuller detail be provided on the road links to indicate section, direction, capacity, trip origins and destinations that apply to the link (i.e. the first choice route for those origins and destinations), and the date (or date range where applicable) of the survey used for the "observed flow".
35. Are Greendene and Crocknorth Road included in the model?

36. Please provide a complete list of road links included in the model for which there is no observed flow data, together with the baseline modelled flows that are included for them.

37. Is the baseline modelled year 2009?

Green Belt and Countryside Study

38. This was not a true re-assessment of Green Belt land, was not requested with general consent, and no exceptional circumstances exist for making changes to the boundaries. Rather than consider the purpose and value of the Green Belt in restricting urban sprawl the study was driven by a consideration of where developers wanted to build and then made up reasons for moving the boundaries in order to accommodate them. The study was prepared by a company that represents the interests of developers.

39. The subsequent use of a "traffic light" system of sensitivities is a bogus attempt to justify erosion of the Green Belt when there are no exceptional circumstances for doing so.

40. I object to the Green Belt and Countryside Study request that it be excluded from the evidence and that no changes are made to Green Belt boundaries.

41. I object to the changes to settlement boundaries.

42. I object to the entirely new concept of "village boundaries" (introduced in this latest version of the draft plan) designed to encourage development in the Green Belt and request that they be scrapped. Furthermore, the boundaries chosen were inappropriate, and this aspect is dealt with in further detail for a local example under "Appendix H Maps" later in this letter.

43. I object to the insetting of villages. It will destroy their character by an insidious process of inappropriate development. Inssetting will also have an adverse impact on biodiversity in villages where the relatively low density of housing makes them permeable to wildlife. For example, East Horsley makes an important contribution to the openness of the Green Belt due to its low average housing density, woodlands, open space and large residential gardens. It passes the NPPF test for remaining "washed over" in contradiction to the conclusions reached by the development industry study.

44. The Government and Guildford Borough Council have no mandate to undermine the integrity of the Green Belt and have broken election promises made at a time when they were fully aware of what they intended doing.

SHMA

45. The West Surrey SHMA cannot not be regarded as objective and residents were denied access to the underlying details. Guildford Borough Council even refused to scrutinise it. The referendum result has further undermined its credibility and I request that it be withdrawn from the evidence. The result of the EU referendum changes the future of migration to and from the UK. It is not simply a matter of government policy and one possible scenario is a net outflow of economic migrants for a number of years.

It makes no sense whatever to release countryside and Green Belt for development, against residents' wishes and with no mandate, when any development genuinely needed could be met using brownfield sites in sustainable locations.

The adoption of a grossly inflated housing number will result in forced growth - encouraging inwards migration that will consist mainly of commuters.

The student population has a highly significant impact on occupancy and the local market and should be dealt with separately for projection purposes. In my view this is essential in trying to understand Guildford's future population and the options for accommodating it.

The underlying ONS data reveals that the fertility rate is well below replacement level and this means that, once the effect of improved mortality has worked through, the population will only rise a little before declining in the absence of net inwards migration.
46. The ONS trend-based assumption that mortality rates will continue to improve significantly could be considered optimistic. In effect they are assuming that the trend will not be broken by any of the many events that could upset this rosy viewpoint.

47. A revised SHMA is needed, followed by the application of constraints for infrastructure, Green Belt and to protect our landscape and biodiversity.

**KEY EVIDENCE**

2. Additional evidence should include:

   - Existing SNCI surveys, including those that took place in 2004-2007.
   - Biodiversity evidence emerging from Neighbourhood Plans.
   - Evidence obtained by requests to local naturalists and natural history societies including those with a specialist interest / expertise.

**Concluding comments**

As stated at the beginning, I require that the points that I have raised be included in the Examination process and that they are responded to.

In summary, this draft Local Plan would have an adverse impact on quality of life, biodiversity, agricultural production, and on local businesses through increased traffic congestion, loss of countryside and destruction of village communities. It will fail to provide genuinely affordable housing or meet genuine local needs. The evidence is weak, poor, misleading and, in some cases, absent. It is an attack on the quality of life, wellbeing and health of the residents of Guildford. The identified infrastructure requirements are merely the tip of the iceberg that will sink Guildford if this plan goes ahead.

Our Government and local authority will be failing in their duty if this plan is approved.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPA16/2176  **Respondent:** 8573793 / Harry Eve  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Guildford Urban Area

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ()**

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**Appendix H Maps**

194. The introduction of a "Village Boundary" to an area described as "Horsleys - East Horsley (south)" is an unacceptable weakening of planning restrictions in this gateway to the It includes two areas of countryside - Wellington Meadow which is managed as a wildflower meadow and known for its special biodiversity - and private chalk grassland fields on the south-western side. These fields belong to residents of Chalk Lane and, in some cases, the boundary between field and garden is no longer evident on the map. At least one of these fields, under favourable management, has nine species of orchid recorded and several rare invertebrate species. The invertebrate species include at least two that are not recorded at The
Sheepleas SSSI close by as far as I am aware. A colony of the Small Blue butterfly, which is a Surrey Biodversity Action Plan species, persists in one these fields but became extinct on the SSSI many years ago. The Greater Butterfly Orchid, *Platanthera chlorantha*, reaches population densities that are unlikely to be achieved on the publicly accessible Sheepleas SSSI.

196. I can see no justification for including these areas within the new designation of "Village Boundary" - the purpose of which is to encourage "limited infilling" in the Green Belt.

197. One of the roads within the "Village Boundary" is Chalk Lane - an ancient sunken drove road now surfaced as a single lane. It is tree-lined with the branches meeting over the lane and creating a picturesque "green tunnel" that can also serve as a corridor for the movement of dormice (which move in the tree canopy). Traffic using this lane has to pass oncoming vehicles by using residents' driveways. Adding further residences that would use this lane makes no sense whatsoever.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment ID: PSLPS16/8330</th>
<th>Respondent: 8573793 / Harry Eve</th>
<th>Agent:</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Introduction</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

**Responses to Sites**

**Various Sites**

1. I object to greenfield development, especially development on countryside that is designated for protection such as Green Belt (before the Council’s proposed changes), or is quality agricultural land, or is making a valuable contribution to biodiversity without any statutory designation. If the housing number had been calculated realistically and brownfield sites allocated for genuinely affordable housing rather than retail or business expansion there would be no need to hand over our countryside and villages to developers. This can be taken as a general objection to greenfield sites.

2. I am concerned about the implications of the Housing and Planning Act 2016 - particularly Section 150 and Planning in Principle. Planning matters such as detailed traffic assessment and sustainability are not being covered by the site selection for the Local Plan and are being left to the planning application stage. Under “Permission in Principle” it seems that these matters will be beyond public scrutiny and comment. Traffic assessments will be carried out by developers with a view to proving acceptability. Scrutiny by local residents is highly valuable in ensuring probity in the planning process.

Even if a site (within the current Green Belt) were subsequently found to be unsustainable it will have been released from the Green Belt, through the Local Plan, for no sound reason.

I have some additional comments on specific sites - mainly local to me and where I have some knowledge of the circumstances.
Site A25 Gosden Hill Farm, Merrow Lane, Guildford

161. I object to this site being included. It is Green Belt and there are no exceptional circumstances. These fields and woodland separate Burpham from West Clandon. Taken with other sites proposed it will form part of a ribbon development along the A3. The site would generate large volumes of additional vehicle traffic onto roads that are already congested.

Site A26 Blackwell Farm, Hogs Back, Guildford

162. I object to this site being included. It is Green Belt and there are no exceptional circumstances. It will put further pressure on the Thames Basin Heaths SPA and other remaining areas of high biodiversity such as Broadstreet Common.

163. The proposed development would ruin the setting of the AONB at this end of the Hog's Back and create major traffic problems.

164. The Strategic Highway Assessment Report indicates that the issue of traffic using the site as an alternative route to locations in Guildford, and to avoid congestion on the main road, has been recognised along with the serious problems it will generate in the vicinity of the hospital including increased use of the dangerous slip onto the A3 near the Tesco I understand that possible solutions might be to use a discouraging winding route through the site or a number plate recognition system (ANPR).
165. A winding route will add to all legitimate users' journey times, carbon emissions and air pollution times for emergency vehicles will be impaired. Legitimate users include delivery vehicles that may want to continue on a route into and through the site for efficiency reasons.

166. An ANPR solution sounds like a bright idea that has not been thought it would be a "Big Brother" solution fraught with difficulties - legal and administrative. Consider visitors choosing to leave by the opposite route and delivery vehicles continuing through the site and out the other side. Keeping up with changes in residents' and other legitimate users' vehicles would be difficult and create problems. Who would profit from fines or bear the cost?

167. Additional traffic congestion in the vicinity of the Accident and Emergency access is highly undesirable for Guildford residents due to the increased time it will take to receive emergency treatment - it is a life-threatening issue.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPS16/4294  **Respondent:** 8573793 / Harry Eve  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ()**

**Site A35 Land at former Wisley Airfield Ockham**

168. **I object** to this site being i It is a large open space in the Green Belt and there are no exceptional circumstances. The site has extensive views to the AONB. It is an SNIC next to an SSSI and the Thames Basin Heaths SPA. The recent planning application was turned down for many very good reasons that will not go away. There are serious and wide reaching traffic issues arising from the proposed development and these will impact on The Horsleys, Effingham, Cobham, Ripley, Send, the A3 and the M25 and further afield. The proposal is unsustainable and environmentally destructive.

169. With so many negative aspects, and grounds for rejection, the site should not have been included in the draft Local Plan and it appears that undue favour is being given to its developers.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPS16/4295  **Respondent:** 8573793 / Harry Eve  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A36

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ()**
Site A36 Hotel, Guildford Road, East Horsley

170. I object to this site being included.

171. This site is an example of extension of the settlement boundary, along with insetting, to encourage building on the greenfield part of the site as well as the existing built area and car park.

172. I do not accept the proposed change to the settlement boundary and any future development should be restricted to the brownfield part of the site.

173. The hotel is a valuable component of the local tourist industry and non-viability has not been proved and the main Chown-built building at the front of the site is a local icon and part of the local heritage.

174. A change of use to housing would lead to increased traffic movements from the site on to the busy A246 at peak time. In particular, this would involve commuters attempting to turn right, to travel to Guildford, Horsley Station, local schools, the A3 and the M25. These right turns across a busy road are in close proximity to other junctions, a petrol station and bends in the road.

175. If non-viability of the existing hotel use is proved satisfactorily then an alternative use, that does not generate commuter traffic, should be a care home, or smaller homes for retired people (freeing up larger homes elsewhere for families), could be sensible alternative options. The existing green space would provide a useful open space area for these alternative developments.

176. The recent planning application for this site identified the need for a pedestrian crossing on the A246 on sustainability grounds - so that residents could have safe access to the infrequent bus service. However, past discussions have suggested that a crossing is not viable at this location for a number of reasons given by SCC appear to be suggesting that a pedestrian island refuge will be sufficient but I am not convinced that there is room for this or that it will be safe.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/4296  Respondent: 8573793 / Harry Eve  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A37

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Site A37 land at and to the rear of Bell and Colvill, Epsom Road, West Horsley

177. I object to this site being included. Guildford Borough Council have proposed moving the settlement boundary and insetting the enlarged village in order to allow a development for which there are no exceptional circumstances. Much of the site is greenfield, close to buildings of historic interest and is in a rural location in full view of visitors to the area. The proposed development pays no respect to its setting.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Site A38 and to the west of West Horsley

178. I object to this site being included. It is a greenfield site in the Green Belt and Guildford Borough Council have proposed moving the settlement boundary and insetting the enlarged village in order to allow a development for which there are no exceptional circumstances.

179. Strangely, the "opportunities" include "Green Corridors and linkages to habitats outside of the site" when the proposal represents a major reduction in these features.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Site A39 Land near Horsley Railway Station, Ockham Road North, West Horsley

180. I object to this site being included. It is a greenfield site in the Green Belt and Guildford Borough Council have proposed moving the settlement boundary and insetting the enlarged village in order to allow a development for which there are no exceptional circumstances.

181. This development is likely to add significantly to existing flooding issues and puts housing next to Lollesworth Wood which will impact adversely on its biodiversity.

182. Access is proposed next to the railway bridge at a point where the narrow pavement is heavily used by children walking to and from the nearby schools. Traffic is also particularly heavy in this vicinity at school run times.

183. Strangely, the "opportunities" include "Green Corridors and linkages to habitats outside of the site" when the proposal represents a major reduction in these features.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Site A40 Land to the north of West Horsley

184. I object to this site being included. Guildford Borough Council have proposed moving the settlement boundary and insetting the enlarged village in order to allow a development for which there are no exceptional circumstances.

185. Waterloo Farm campsite is an important aspect of our tourist economy where visitors enjoy the countryside setting around the large pond. This development will put this campsite at risk of lowered popularity and subsequent demands for change of use.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/4300  Respondent: 8573793 / Harry Eve  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Site A41 Land to south of West Horsley

186. I object to this site being included. Guildford Borough Council have proposed moving the settlement boundary and insetting the enlarged village in order to allow a development for which there are no exceptional circumstances. This is a very obvious intrusion into the openness of the Green Belt.

187. Strangely, the "opportunities" include "Green Corridors and linkages to habitats outside of the site" when the proposal represents a major reduction in these features.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/4301  Respondent: 8573793 / Harry Eve  Agent:
Sites A36 to A41 - general reasons for objection

188. These sites and some smaller sites identified with densities that are very much higher than, and out of proportion with, the nature of this locality represent a massive increase in the population of The Horsleys and will destroy their character. Further development in the form of infilling and inappropriate development will take place as a result of the proposed insetting.

189. No genuine consideration has been given to the traffic impacts (the baseline traffic flows modelled for this area were severely understated) or adequacy of local services to support this growth. Public transport is very poor and these sites will generate a large volume of additional car journeys on roads that already have queuing. The site proposals are unsustainable.

190. The Infrastructure Development Plan largely ignores this area of the Borough with a token £1m added at the last minute, apparently as an afterthought, for an "East Horsley and West Horsley traffic management and environmental improvement scheme". Residents have been given no indication as to what this entails and I suspect that it has been given no real consideration. Residents have no idea whether the scheme will be acceptable in terms of any undesirable impacts that it might have or whether it will be effective.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/4302  Respondent: 8573793 / Harry Eve  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Site A43 Land at Garlick's Arch

191. I object to this site being included. The inclusion of this site is a major change from the previous draft and has not been consulted on previously. It is a large development that was not included in the strategic highway assessment. There are no exceptional circumstances to justify the removal of the site from the Green Belt.

192. Ancient woodland will be put at risk and, strangely, the "opportunities" include "Green Corridors and linkages to habitats outside of the site" when the proposal represents a major reduction in these features.

193. The site is unsustainable as its location will generate a large volume of car journeys.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
79. This policy is all very well in relation to new developments but the Plan overall will not make Guildford a better place – quite the opposite. A major constraint on the housing number is needed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

80. This policy is another example of hypocrisy. While it says many fine things it ignores the fact that the Plan involves putting housing estates in the countryside generating a huge amount of additional traffic and greatly increasing carbon emissions. A major constraint on the housing number is needed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
81. It is worth pointing out here that this policy could come into conflict with highways infrastructure developments that will be found to be necessary to keep traffic moving at junctions in limited space in built-up areas where there are historic buildings. Examples of two such locations are Ripley and Effingham. A major constraint on the housing number is needed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13054  Respondent: 8573793 / Harry Eve  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

82. This policy is another example of hypocrisy.

The proposal to inset villages will completely change them and nowhere is this more so than the Horsleys which appear to have been singled out for change from a low density village to an urban sprawl regardless of local concerns. A major constraint on the housing number is needed and the proposal to inset villages must be removed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13042  Respondent: 8573793 / Harry Eve  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object

67. I am not satisfied that the evidence is sound and it appears to me that, rather than meet existing employment needs in an area of low unemployment and concentrate on what Guildford is good at (i.e. high tech), this is a policy to create more employment needs to justify excessive housing growth in an area that cannot support it. The second paragraph – “The Plan aims….” Seems contrary to the likely outcome if this plan goes ahead. The Plan is likely to create conditions that make Guildford less attractive to businesses.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object

68. I am not convinced that the permitted area of the Research Park needs further expansion and the policy appears to involve a weakening of the range of permitted uses that could undermine the appeal of the site for the type of business enterprises for which it is intended.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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I object

69. This appears to be a policy to encourage growth in rural areas regardless of actual local needs and opinions. The last sentence appears to apply small-scale town centre uses to rural areas but with less consideration regarding location. This rather sums up Guildford Borough Council’s current unsatisfactory attitude towards its rural areas.

70. I am concerned about the emphasis on accepting agricultural developments regardless without consideration for their impact on the natural environment. The North Downs is an extremely important area for biodiversity but this policy could encourage landowners to destroy our chalk grasslands in favour of vineyards and other crops. Chalk grassland is a scarce habitat in international terms and Guildford has a duty to conserve what is left in the Borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E7</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire): ()**

71. **I support** the recognition of the value of tourism and leisure to Guildford and support the intention to resist change of use where appropriate. Non-viability might sometimes be used as an unjustified excuse to profit from a change of use to the detriment of the local tourist and leisure economy and I appreciate that Guildford Borough Council recognise this.

72. **I object**, however, to the encouragement of more development in the countryside. It should be appreciated that the undeveloped countryside is an asset to the tourist and leisure economy and it is all too easy to ruin the appeal of an area through further inappropriate development.

73. The sentence “proposals which promote greater use of the River Wey as a leisure and recreational resource.” Should be heavily qualified by the need to protect the River Wey environment, biodiversity, and its value as a wildlife corridor.

74. This policy has been constructed without reference to the Surrey Nature Partnership which will inform a Countryside Vision and Green and Blue Infrastructure Supplementary Planning Document **neither of which have been published**.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
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<th>Comment ID: PSLPP16/13048</th>
<th>Respondent: 8573793 / Harry Eve</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E8</td>
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75. **I object** to the emphasis on retail at a time when it is declining. More use should be made of the town centre for housing instead. Housing in the town centre is a sustainable solution whereas the proposed sites in the countryside are not.

76. I do support the last sentence – at least children will get some exercise by having to walk further for their unhealthy food preferences!

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
77. I object to the designation of Station Parade, East Horsley as a District Centre as this is based on an incorrect assessment of the facilities in the village centre. This would result in appropriate development in East Horsley.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

78. I object to further retail development adjacent to Bishopsmead Parade, East Horsley. It is unnecessary and inappropriate. The same objection is likely to apply to some or all of the other sites mentioned.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

53. Student accommodation in town has damaged the provision of “Homes for all”. A much higher level of student accommodation should be on campus.

54. While the policy requires that density should “respond” to local character, context and distinctiveness, this is not being adhered to in certain proposed site allocations in villages (example – site A36 (Hotel, Guildford Road, East Horsley) where the proposed density is exceptionally high in relation to the locality).
I object to greenfield development, especially development on countryside that is designated for protection such as Green Belt (before the Council’s proposed changes), or is quality agricultural land, or is making a valuable contribution to biodiversity without any statutory designation. If the housing number had been calculated realistically and brownfield sites allocated for genuinely affordable housing rather than retail or business expansion there would be no need to hand over our countryside and villages to developers. This can be taken as a general objection to greenfield sites.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

I object

55. No consideration has been given to where affordable housing is most needed and current Government policy does not support the retention of affordable housing stock such as social housing. The definition of “affordable” means that such housing in the Borough will not be genuinely affordable while, in parts of the Borough with very high market prices and rents this will simply be used as an investment opportunity by those who can afford to buy at a high, but discounted, price.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object

56. This policy fails to protect against market housing being used to pay for “affordable” housing and fails to protect against development in inappropriate locations (sites of high biodiversity, landscape value, and Green Belt for example). The definition of “affordable” and the issue of viability will lead to this policy being used as an excuse to profit from development in the countryside.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

83. I have commented at length on the failings of the Strategic Highway Assessment Report. The full impacts of traffic generated by this Plan have not been recognised and so the highway development proposals are inadequate. It would lead to a need for new roads through the countryside (including the AONB), road-widening and enlargement of junctions including within residential areas, and may require compulsory purchase and demolition of existing buildings some of which may be of historic interest or local character. The cost in financial and environmental terms would be immense and the alternative scenario of greatly increased congestion, unacceptable levels of local air pollution, and deterrent to business and visitors, is likely to persist well into the future affecting future generations as well as current residents and businesses.

84. Much of the infrastructure required is outside the control of Guildford Borough Council in relation to funding, timing and design. The schedule of proposals gives little detail and very broad brush estimates of cost suggesting that little detailed thought has gone into the requirements.

85. As elsewhere in the Plan this policy includes weak wording such as “should” and the “Reasoned justification” suggests (at 4.6.8) that the Council will be prepared to negotiate on infrastructure requirements – implying that significant developments may be delivered without the required infrastructure.

86. Guildford Borough Council should have applied a very significant constraint on the housing number but has refused to do so.

87. The highway aspects of the Infrastructure Development Plan were developed using hotspots identified in “OGSTAR” (the previous Transport Assessment used for the 2014 consultation) as a starting point. However, the site list used for OGSTAR was not even compatible with the former draft Local Plan let alone the current one. Despite this, the Key
Evidence mentions the June 2016 Highway Assessment but not OGSTAR. Key developments such as Garlick’s Arch, added at a late stage, are not included the Highway Assessment.

88. I have not investigated other infrastructure requirements in any detail but I do have concerns that over-development in the south-east, including Guildford, will lead to serious water shortages in the near future. The solutions could be very expensive and damaging to the environment. It is only a few years ago that the water table was severely depleted and this is more likely to be repeated as over-development continues.

89. Monitoring should be concerned with delivery and any change in infrastructure adequacy rather than CIL receipts.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13056  Respondent: 8573793 / Harry Eve  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object for the following reasons.

90. This policy is concerned only with the strategic road network – the A3 and M25 for which the responsibility and decision-making lies with Highways England. It is only reasonable that the council will work closely with Highways England to ensure that the Local Plan does not utilise land in a way that limits the scope for future improvements.

91. However, the proposals for the A3 are undecided and the council has suggested a very expensive tunnel proposal that, even if Highways England decided to go ahead with it, is unlikely to be delivered until the end of the plan period. Less expensive alternative A3 improvements would not be delivered before implementation of the current draft Local Plan and would deliver a massive growth in traffic.

92. The result of the EU referendum must raise uncertainties about existing budget provision and priorities for Highways England projects.

93. The road improvements are likely to lead to significant disruption to traffic during the construction phase on top of an already overloaded road network. It would be folly to make matters worse by committing to such a large housing number and the only logical conclusion is that a very significant traffic constraint should be applied to the housing number for this Local Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/18536  Respondent: 8573793 / Harry Eve  Agent:
Policy I3: Sustainable transport for new developments

I object for the following reasons.

94. I support the general idea of sustainable transport but have the following criticisms and comments on this policy and certain criticisms also apply to the proposals for the Sustainable Movement Corridor.

95. Guildford Borough Council hope that far more residents will prefer to ride bicycles, walk much longer distances, or make greater use of buses and park and ride. This is totally unrealistic and ignores residents’ actual needs and the deteriorating state of bus service provision.

96. The proposed provision of two new railway stations could have unintended consequences such as increased commuter traffic nearby and a need for onerous parking restrictions or inconvenience for local residents from commuter parking. It might also lead to impacts on the housing market local to the station, driving up prices with adverse consequences on affordability and any social housing.

97. I am concerned about proposals to move cyclists off the road and into space shared with pedestrians. This simply replaces one risk with another and is likely to be the cause of accidents – particularly where pedestrians, including schoolchildren and mothers with toddlers, need to cross the path of cyclists to reach a pedestrian crossing. Pedestrians should not have to worry about cyclists approaching from behind at speeds approaching 30mph (as many cyclists on modern machines are easily capable of). Children, in particular, can make unexpected moves across a shared area without thinking about other pavement users in the vicinity. Conflicts over who has priority are also likely to arise whatever signage is in place. Pedestrians are being seriously disadvantaged by this approach.

98. If the policy is successful in generating more trip choices by bicycle the immediately obvious environmental advantages have to be weighed against the impact on those parts of the Local Road Network where cycle lanes do not exist. The impact is that safe driving will lead to reduced average motor vehicle speeds and gap development in the traffic stream. Both these effects act to reduce the capacity of our local road network. This loss of capacity has not been recognised in the Transport Strategy.

99. The benefits of park and ride for the town centre have to be weighed against the traffic that they may generate elsewhere and the vast area of tarmac needed to accommodate them in a Borough where space is under great pressure. In particular, it is not acceptable, and does not fit in with the principle of sustainability, to tarmac over large areas of greenfield land for this purpose - or to use brownfield sites without putting building uses over the top of them. We cannot go on wasting precious space in this way.

100. Insetting of villages and the proposed relaxation of planning restrictions anywhere inside or outside settlements (Green Belt or not), implied in P2, will lead to substantial infilling that will not require traffic assessment but will contribute a highly significant amount of additional car journeys overall - by a more insidious process than the large developments proposed.

101. The obvious site choice for sustainable development would be on brownfield sites in the town but the Local Plan proposes allocating those sites to the declining retail industry instead.

102. Paragraph 4.6.21 suggests that sustainable transport is promoted. Far from providing sustainable transport this Plan will generate a massive increase in motor vehicle journeys. The Plan cannot force residents to ride bicycles or walk everywhere and most of the proposed housing sites will generate large numbers of vehicle journeys due to their greenfield locations. Wisley (Site A35) is a classic example of traffic generation through inappropriate location.
103. Paragraph 4.6.26 refers to reviewing existing transport facilities and likely transport generation as part of assessing the amount of incremental travel demand. That consideration should have taken place in a robust and detailed manner on a site-by-site basis before the sites were allocated in the Local Plan. It is not sufficient to leave that until the planning application stage, as intended by Guildford Borough Council and Surrey County Council, given that all sites will be subject to “permission in principle” under the Housing and Planning Act 2016 and so will not be capable of subsequent rejection on these grounds.

104. Paragraph 4.6.27 notes that Development must mitigate its transport impacts. The measures described rely entirely on residents responding positively to their travel information packs rather than dumping them in the nearest bin. It seems that Guildford Borough Council, in response to concerns about elderly and disabled people failing to be coerced into riding bicycles are now suggesting tricycles to overcome this obstacle to their aspirations. They should be aware that while tricycles may help with balance issues they are heavier and harder to ride uphill. While the policy (unusually) notes that mitigation must be provided, in fact this is then diluted to suggest that facilities for electric car charging points and encouragement to car-share can be sufficient; all are optional and therefore meaningless.

105. However well designed a development is it will make matters worse during construction and, if on a greenfield site, it is hard to see how it will achieve environmental benefits. On the other hand, replacing inefficient buildings on a brownfield site could lead to benefits in the long term.

106. Paragraph 4.6.28 notes “Developers should have regard” to the “Infrastructure Schedule at Appendix C”. The only thing that developers have regard for is forcing their application through and maximising their profit – that is the business they are in.

107. Appendix C is lacking in detail. It notes, for example that there will be new town centre bus facilities at a cost of £5-10 million – such vagueness make it clear that no real costing or analysis of proposals has been prepared, and that the Infrastructure improvements proposed have not been properly considered. Having regard to fluid and uncertain proposals is effectively meaningless as a constraint or a requirement.

108. Paragraph 4.6.29 requires that applications need to address the transport implications of the proposed development. Experience with recent planning applications suggests that developers will do everything in their power to understate transport impacts and I have no faith in Guildford Borough Council and Surrey County Council taking a sufficiently robust line on this.

109. Key Evidence is missing or inadequate.

I described the inadequacies of the transport assessment earlier in this letter.

Some examples in connection with sustainability from the Guildford Borough Transport Study 2016:

110. The decision on Heathrow or Gatwick has yet to be taken but airport expansion in the south-east cannot be regarded as sustainable development and, although Guildford Borough Council has no control over such external decisions, its own forced growth agenda will drive a need for that expansion.

111. Benefits are claimed from projects such as Crossrail 2 which are highly unlikely to be delivered within the plan period – if at all.

112. The Southern Rail Access to Heathrow is still in its early stages and would have significant impacts on open space beyond our Borough. For example, all options in the feasibility study would use Staines Moor SSSI and Option 4 would use Bedfont Lakes Country Park (a Local Nature Reserve and SNCI). The various options would use existing commercial, residential and highways land in varying degrees. It seems unlikely that a solution will be delivered within the Plan period and removal of highly valued open space with high biodiversity (wherever it is in South-east England) cannot be regarded as sustainable. So Guildford Borough Council appears to hope to benefit from unsustainable projects elsewhere that will destroy important areas of open space and biodiversity.

113. There is a stark contrast between the plans for the town centre which involve encouraging a reduction in traffic by reducing road space and the plans for the Strategic Road Network and parts of the Local Road Network which involve increasing capacity. While increasing capacity may reduce some areas of congestion in the short term, history suggests that
traffic will rapidly grow until the improved roads are congested once again. This can hardly be regarded as sustainable. A sustainable option would be to apply a very substantial traffic infrastructure constraint on the housing number.

114. While the A3 Guildford Tunnel aspiration has some environmental advantages over widening (in particular for residents living close to the A3), the environmental burden of the construction phase is likely to be far higher and aspects such as location of ventilation stacks and their local effect (in all weather conditions) do not appear to have been considered.

115. Under “Weaknesses” the point about A roads in Guildford Town also applies to surrounding areas in the Borough and beyond. The anticipated improvements ignore existing congestion to the south and east of Guildford – presumably because Surrey County Council’s strategic highway assessment methodology has an understated baseline and only identifies the tip of the iceberg. The current Plan will see increased congestion and a resultant reduction in air quality in many areas beyond the town centre.

116. “Largely commercial bus services” is seen as a strength whereas it should be seen as a weakness with a trend to reduced subsidies and the provision of bus services, especially in rural areas, being increasingly dependent on commercial gain. It is difficult to see this changing under the current Government cuts philosophy. The point “Subject to business case including funding” under Aspirations demonstrates this point.

117. Guildford is well behind other areas in monitoring air quality let alone attempting to reduce it. The study talks about reductions in some pollutants. This may be the case for pollutants such as Sulphur Dioxide, which contributed to the visible London smogs, but it is not true of diesel vehicle emissions which have increased as a result of Government policy including its aggressive growth agenda, and population increase through immigration.

118. The study mentions an aspiration to provide 30 accessible electric vehicle charging points but this will be nowhere near enough if there is a real shift to electric vehicles.

119. It is clear from the “Strategy outcomes” that GBC would prefer not to follow other areas in pro-actively tackling air quality.

120. The timescales indicate that the main rail improvements (Including the two new stations) are unlikely to be delivered until the end of the Plan period or even later. The sites that are supposedly justified by their inclusion will generate a major increase in road traffic in the interim and it may be more difficult to achieve this aspect of modal shift in the longer term. The same can be said about the other traffic infrastructure proposals. Residential development is being scheduled before the infrastructure that it will need.

121. Monitoring – “Increase” needs to be in proportion to population growth as otherwise failure will be taken as success. “An Increase in average vehicle speeds” is inconsistent with the desire to reduce the number of persons killed or seriously injured. For example, some A roads pass through residential areas where pedestrians, including schoolchildren, are trying to cross the road at peak times. It is noted that increase in vehicle speeds is only desired in the morning. Going home from work does not seem to matter!

Monitoring Indicators for the policy:

122. Ten years is far too long to wait for information on whether the approach is working or not. The target requires only an increase. This would permit an increase less than that in line with any population growth to be regarded as success. The bar has been set well within the failure range given the proposed forced growth in local population.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy I4: Green and blue infrastructure I object for the following reasons.

123. This policy has been constructed without reference to the Surrey Nature Partnership which, I understand, is supposed to inform a Countryside Vision and Green and Blue Infrastructure Supplementary Planning Document neither of which appear to have been published or consulted on.

124. The Policy shows concern for conserving and enhancing biodiversity, which I welcome. I also note and welcome the intention to extend the principle beyond Biodiversity Opportunity Area However the current plan to build on large areas of countryside, inset villages and create new village boundaries to encourage infilling in the Green Belt will have the opposite effect. The Policy appears to be a box-ticking exercise with no real teeth to it.

125. There is no mention of the value of wildlife gardening to biodiversity or the important role that larger gardens play in a village setting.

126. There is no mention of the impact of the plan on food production, or monitoring the loss of agricultural land.

127. Some quotations from relevant documents regarding the importance of biodiversity:

"The natural world, its biodiversity and its constituent ecosystems are critically important to our wellbeing and economic prosperity, but are consistently undervalued in conventional economic analyses and decision-making" (Biodiversity 2020 page 11)

"As a public authority in England you have a duty to have regard to conserving biodiversity as part of your policy or decision making." (Government Planning Guidance)

Part of the problem is that "Biodiversity benefits are unpriced" and so not valued by those who look only at the more obvious and simplistic economic benefits.

128. I am concerned that "enhancing" the River Wey in the town centre will avoid using the available brownfield land around Walnut Tree Close and Slyfield for urban regeneration and sustainable housing that could otherwise be Why should the Walnut Tree Close/Woodbridge Meadows industrial area not be regenerated from bus garages, urban car parks and empty factories to offer sustainable, well designed, urban homes which are medium height, and can meet almost all of Guildford's real housing needs? It is vitally important for the town as a whole that the run-down Walnut Tree Close area is used for well-designed housing.

129. The plan involves an aggressive desire to push development on to the Green Belt at all costs, ignoring, or eliminating for other reasons, sites which could be used in the town for residential purposes. This has informed recent planning decisions (both the Aldi site and the Waitrose site were originally zoned for residential purposes and were eminently suitable for this) and this bias seems to be informing the ocal Plan to the detriment of our countryside, biodiversity and villages.

130. It is not clear what form the "parkland" along the River Wey will take but the images available in the Town Centre Master Plan suggest mown grass similar to the area around Millmead. This misses an opportunity to enhance biodiversity and enable town centre residents to engage with wildlife. Engagement with wildlife should mean much more than throwing bread at ducks, chasing pigeons and antagonising swans. To achieve a wildlife corridor through Guildford, that can also benefit the health and well-being of residents living close by, the green space retained beside the river should be managed with the needs of wildlife in mind as well as people.

MONITORING
1. Simply maintaining open space will not be enough for a significantly enlarged population.
2. Providing more open space to meet existing shortfalls or the needs of a much larger population will reduce the area of land currently in food production or providing wildlife habitat.
3. SANG delivery is harming existing biodiversity.
4. It is not clear how you will measure a change in biodiversity just by looking at planning applications. “Net gains in biodiversity provided by development” is a contradiction in terms. There may well be a few examples in England where low density housing has been combined with manufactured habitat at the expense of loss of agricultural land with no surrounding habitat damage - but I see no evidence of that in the Local Plan. Even when a housing development replaces agricultural land, it increases pressure on the surrounding countryside. A simple example is where houses border woodland and residents dump their garden rubbish (and often worse) over the garden fence. Increased leisure use on nearby countryside also has an adverse effect on biodiversity.
5. There is no guarantee that mitigations listed in an application will be carried out and their effectiveness is not guaranteed either. Guildford Borough Council would need to carry out follow-up ecological surveys on all sites. Who would pay for these? Are there enough consultants to carry out the work in sufficient detail? What aspects of biodiversity will be measured?
6. How frequently are surveys by Natural England intended to take place? How will Guildford Borough Council ensure that Natural England carry them out? A baseline of existing surveys against which changes will be monitored should be included within the plan and it must be comprehensive for monitoring to be effective.
7. How frequently will SNCI surveys be carried out? At what expense? The last survey published in 2007 made recommendations for an increase in the size of the Wisley Airfield SNCI and stated that this should be taken into account for planning purposes. This was overridden in the recent planning inspector’s report and the Local Plan includes this particular SNCI as a building site. This is clearly a case of hypocrisy and suggests that the Council has no genuine intention to maintain biodiversity let alone enhance it.
8. My understanding is that a survey of SNCIs is currently taking place but that it is limited in scope to the previously known sites. This prevents other sites, where genuine biodiversity enhancement has taken place (often as a result of volunteer community effort), from being recognised in this way. While every stone is being turned over in the quest to find green space to build on, no genuine effort is being made to identify biodiversity hotspots that may have been overlooked in the past. In other words the approach being taken is one that intends to make no net gain, and possibly even reduce, sites of nature conservation interest – in contradiction to the stated aims.
9. If an existing SNCI (or one proposed on grounds of biodiversity but not formally accepted in a Local Plan) is found to be in poor condition the action taken should be to bring it back into good condition – not to remove its status and build on it.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13027  Respondent: 8573793 / Harry Eve  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

149. Additional evidence should include:

Existing SNCI surveys, including those that took place in 2004-2007.

Biodiversity evidence emerging from Neighbourhood Plans.

Evidence obtained by requests to local naturalists and natural history societies including those with a specialist interest / expertise.

**MONITORING**

150. Simply maintaining open space will not be enough for a significantly enlarged population.

151. Providing more open space to meet existing shortfalls or the needs of a much larger population will reduce the area of land currently in food production or providing wildlife habitat.

152. SANG delivery is harming existing biodiversity

153. It is not clear how you will measure a change in biodiversity just by looking at planning applications. “Net gains in biodiversity provided by development” is a contradiction in terms. There may well be a few examples in England where low density housing has been combined with manufactured habitat at the expense of loss of agricultural land with no surrounding habitat damage - but I see no evidence of that in the Local Plan. Even when a housing development replaces agricultural land, it increases pressure on the surrounding countryside. A simple example is where houses border woodland and residents dump their garden rubbish (and often worse) over the garden fence. Increased leisure use on nearby countryside also has an adverse effect on biodiversity.

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155. How frequently are surveys by Natural England intended to take place? How will Guildford Borough Council ensure that Natural England carry them out? A baseline of existing surveys against which changes will be monitored should be included within the plan and it must be comprehensive for monitoring to be effective.

156. How frequently will SNCI surveys be carried out? At what expense? The last survey published in 2007 made recommendations for an increase in the size of the Wisley Airfield SNCI and stated that this should be taken into account for planning purposes. This was overridden in the recent planning inspector’s report and the Local Plan includes this particular SNCI as a building site. This is clearly a case of hypocrisy and suggests that the Council has no genuine intention to maintain biodiversity let alone enhance it.

157. My understanding is that a survey of SNCIs is currently taking place but that it is limited in scope to the previously known sites. This prevents other sites, where genuine biodiversity enhancement has taken place (often as a result of volunteer community effort), from being recognised in this way. While every stone is being turned over in the quest to find green space to build on, no genuine effort is being made to identify biodiversity hotspots that may have been overlooked in the past. In other words the approach being taken is one that intends to make no net gain, and possibly even reduce, sites of nature conservation interest – in contradiction to the stated aims.

158. If an existing SNCI (or one proposed on grounds of biodiversity but not formally accepted in a Local Plan) is found to be in poor condition the action taken should be to bring it back into good condition – not to remove its status and build on it.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**
Attached documents:

Comment ID: PSLPP16/13058  Respondent: 8573793 / Harry Eve  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Some comments on the policy notes:

131. 4.6.33 Villages are generally permeable to wildlife. The lower density of housing and presence of gardens (especially larger gardens) provides a corridor for movement across the residential area. Insetting of villages and the relaxation of planning restrictions in the Green Belt implied by Policy P2 will lead to infilling, “garden grabbing” and consequent loss of biodiversity. It will replace connections and corridors between habitats with barriers and lead to further fragmentation of our natural infrastructure.

132. 4.6.34 In the past Guildford Borough Council recognised the role that wildlife gardening and management of parks and open spaces for wildlife could play in enhancing biodiversity. There seems to have been a shift away from this. These aspects should be recognised in the Plan as well as the importance of Biodiversity Opportunity Areas and although 4.6.35 goes part way towards this we have yet to see the Green and Blue Infrastructure Supplementary Planning Document or have an opportunity to comment on it.

133. 4.6.36 This is long overdue and should include the way that our lanes are managed. The current approach is unsympathetic, sometimes damaging tree roots and scarce native plants. It seems to be oriented towards encouraging faster traffic rather than recognising the traffic-calming effects of natural vegetation (See the original Quiet Lanes Initiative).

134. 4.6.38 I agree with this statement but public access is frequently damaging to biodiversity – the more obvious examples being dogs out of control in the vicinity of ground-nesting birds and trampling of grassland habitats. Public open space must be protected for the reasons given but wildlife needs undisturbed (or at least less disturbed) space too if it is to thrive.

Policy definitions:

135. This section starts with a definition that is not a proper definition and is followed by statements that are not definitions at all, apart from the last – suggesting that this part of the document has not been thought through or checked.

136. 4.6.42 “Biodiversity creation and/or enhancement” is not a definition – it requires definition.

Do you mean that you will create new species or encourage them to evolve? Or do you mean that you will increase the number of species living in the Borough, or the population of each species, or both?

137. The points made are aspirational that have no enforcement to back them.

138. I support the use of green roofs and walls.
139. Building on the countryside and increasing the population by such a large amount will not help vulnerable species. It will put added pressure on remaining habitats and increase light and air pollution, degrading the ability of the borough to support wildlife.

140. 4.6.44 This appears to be saying that you will deliberately put playing fields, sports facilities and other leisure activities in BOAs – but these are land uses that reduce biodiversity!

141. 4.6.43 Arrangements with developers have no guarantee of success or longevity. They involve partial mitigation and overall loss of the original biodiversity interest of a site.

142. 4.6.45 My understanding of SANG is that it is intended to reduce pressure on Special Protection Areas by providing an alternative area for people to walk their dogs – and hope that they do not prefer to use the SPA. In other words they are intended to attract the type of use that is damaging to vulnerable species such as ground-nesting birds. In the desperation to find SANG land Guildford Borough Council are making use of existing open space that will not attract people away from the SPA and they are ignoring the impact on existing wildlife. For example – Guildford Borough Council decided to include the towpath in the Parsonage Meadows SANG as a way of also facilitating a cycle route. Encouraging cyclists and dog-walkers to use the same narrow path will not encourage dog-walkers to use it rather than the SPA. At Effingham Common Guildford Borough Council plan to designate an important area for wildlife and ground-nesting Skylarks as SANG. The Council is riding roughshod over the opinions of the Commoners and local residents. The Council used to put up signage warning dog-walkers not to disturb the Skylarks during the nesting season – but these signs were not put up until well into the nesting season this year and only then after complaints and harassment of Skylarks by out-of-control dogs.

143. In allocating sites as SANG, Guildford Borough Council has ignored the requirement to consider existing biodiversity and clearly have little or any knowledge or understanding of the issue. The issues relating to Russell Place Farm have been pointed out by a qualified Biologist. Many invertebrates are dependent on the dung of grazing animals and this aspect of our countryside is being steadily driven out of our Borough.

144. 4.6.46 I welcome this acknowledgement of the damaging effects of the proposed building developments. This also has relevance to the manner in which the green spaces next to the River Wey are managed.

145. 4.6.47 I welcome the proposals but I am concerned that these may be no more than good intentions. How will Guildford Borough Council ensure that they are carried out fully – and paid for by the developer?

**Reasoned Justification:**

146. 4.6.50 As the emerging strategy for Surrey and the Green and Blue Infrastructure Supplementary Planning Document are not yet available, or consulted on, the plan should not be proposing sites that will jeopardise them. The implication is that this aspect of the plan is not being taken seriously and will carry no weight in site selection despite the guidance in the NPPF.

147. 4.6.51 In fact some Guildford Borough Council contract mowing and lane management is not in line with a strategy that is meant to protect biodiversity.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/13037  **Respondent:** 8573793 / Harry Eve  **Agent:**

**Document:**  Proposed Submission Local Plan: strategy and sites 2016 / Policy P1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally
Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object

57. While I fully support protection of the AONB from inappropriate development I am not convinced that the current
wording will achieve that. The recent proposals for Newlands Corner indicate one way in which this wording could be used
to justify inappropriate development in the AONB.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13039  Respondent: 8573793 / Harry Eve  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally
Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object

58. I place a very high value on the Green Belt and the contribution that it makes to public health and wellbeing, physical
and psychological, not only for the current residents of Guildford but also for Londoners and for future generations. This
policy extends the destruction of Green Belt land proposed by the flawed Green Belt and Countryside Study and proposes
allowing infilling in the Green Belt through the creation of “village boundaries”. This is a major change from the earlier
draft local plan that has not been consulted on previously. Far from being a “Protecting Policy” it is a policy aimed at
weakening planning restrictions in the Borough’s countryside.

59. This policy appears to be an invitation to developers to seek to infill anywhere in the Borough regardless of Green Belt
designation.

60. I object to the insetting of villages. For example, East and West Horsley are low density village areas that do contribute
to the openness of the Green Belt and there are no exceptional circumstances for removing their Green Belt status. I object
to the extending of their settlement boundaries which has been proposed simply to accommodate the wishes of developers
to build on the Green Belt in an area that attracts high prices for market housing.

61. Guildford Borough Council have tried to overcome residents’ opposition to Green Belt removal by spinning their
messages, introducing a subjective sensitivity assessment and using misleading statistics including a major understatement
of the area of Green Belt to be removed.

62. I have a particular objection to the proposed village boundary described as Horsleys – East Horsley (south) and this is
dealt with below under the heading Appendix H Maps.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
I object

63. While I support the protection of countryside from development and the creation of additional Green Belt, this policy is inconsistent with the plan to remove large areas of Green Belt elsewhere and increase the physical and visual coalescence of other parts of the Borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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64. I support the need for a policy to protect the SPA but,

I object to the manner in which it is approached.

65. As a naturalist I place a very high value on the protection of the Thames Basin Heaths and other areas important for wildlife. In my opinion the SANG approach is unsound and existing biodiversity at the chosen SANG sites is being ignored despite a requirement to take it into account. One example is Effingham Common which is a breeding site for ground-nesting Skylarks. This year, warning signs to inform dog-walkers of nesting Skylarks were not put up until complaints were made and Skylarks had been chased off their nest by an out-of-control dog (I was an unhappy witness to this).

This is an example of an existing valuable site for biodiversity being used erroneously to justify building near the SPA. It is wrong to claim that SANG is creating new open spaces and enhancing biodiversity. SANG is only created by using existing open space that may or may not have public access but does have existing biodiversity or agricultural use that will be...
harmed or removed by the change of use. Its effectiveness in drawing people away from the SPA is also highly questionable.

66. Throughout this process, Guildford Borough Council have demonstrated that they place no genuine value on biodiversity or have any real understanding of it. They merely see biodiversity and the SPA as obstacles to be overcome in their quest to impose a forced growth agenda on the residents of Guildford. I believe they underestimate the value that residents place on wildlife and fail to recognise its contribution to our wellbeing.

This policy is unsatisfactory in its current form.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Concluding comments

As stated at the beginning, I require that the points that I have raised be included in the Examination process and that they are responded to.

In summary, this draft Local Plan would have an adverse impact on quality of life, biodiversity, agricultural production, and on local businesses through increased traffic congestion, loss of countryside and destruction of village communities. It will fail to provide genuinely affordable housing or meet genuine local needs. The evidence is weak, poor, misleading and, in some cases, absent. It is an attack on the quality of life, wellbeing and health of the residents of Guildford. The identified infrastructure requirements are merely the tip of the iceberg that will sink Guildford if this plan goes ahead.

Our Government and local authority will be failing in their duty if this plan is approved.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object

50. This requires a clear definition of what is regarded as “sustainable” that has the acceptance of residents. Building on greenfield sites is not sustainable because, even now, our country cannot feed itself without relying on a high proportion of imported food and our wildlife is diminishing under the pressures of agricultural intensification, increasingly damaging leisure uses of the countryside and loss of habitat to development. Development of the sites allocated for housing outside the town centre, together with the proposed insetting and general weakening of planning restraints enshrined in draft Policy P2, would result in large amounts of additional vehicular traffic and that cannot be regarded as sustainable. This policy fails to address the core planning principles set out in NPPF 17.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/13031  Respondent: 8573793 / Harry Eve  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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I am concerned about the implications of the Housing and Planning Act 2016 - particularly Section 150 and Planning in Principle. Planning matters such as detailed traffic assessment and sustainability are not being covered by the site selection for the Local Plan and are being left to the planning application stage. Under “Permission in Principle” it seems that these matters will be beyond public scrutiny and comment. Traffic assessments will be carried out by developers with a view to proving acceptability. Scrutiny by local residents is highly valuable in ensuring probity in the planning process.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/13033  Respondent: 8573793 / Harry Eve  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object

51. Guildford Borough Council has no mandate to pursue such an aggressive growth strategy which uses an artificially inflated “housing target”. Constraints such as Green Belt and infrastructure have not been applied. I have commented on the SHMA earlier in my letter.

52. Why has Guildford Borough Council failed to apply constraints when it is happy to suggest that it values environment and separation of settlements?

I quote from the Strategy and Sites document:

“2.2.4 Guildford has its origins growing up where the River Wey flows through the North Downs ridge. This constrains development and creates a clear sense of separation between the town and outlying settlements, protecting the highly valued environment that is a distinctive part of the borough’s character.”

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>SQLP16/1285</th>
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<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (No)

See my letter dated 15/7/16

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (No)
I am not a member of the legal profession so I can only give a lay opinion. Regulation 19 submission seems inappropriate in view of the state of the evidence and highly significant changes made since the previous consultation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: SQLP16/1287  Respondent: 8573793 / Harry Eve  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (No)

See my letter dated 15/7/16

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: SQLP16/1288  Respondent: 8573793 / Harry Eve  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 4: Duty to cooperate

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (No)

I take this to mean duty to cooperate with neighbouring Authorities – I see no evidence that this has taken place. Traffic generated affects all neighbouring boroughs not just those taken as a joint housing area. For example the proposed Wisley Airfield site will have a major impact on Elmbridge.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: SQLP16/1289  Respondent: 8573793 / Harry Eve  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (Yes)

I have put a great deal of work into understanding the highway assessment and associated issues. I have also requested additional information that was missing from the highways assessment and the associated model development and validation report receipt of this information may enable me to respond further on certain aspects

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/2132  Respondent: 8573793 / Harry Eve  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 7: Any other comments?

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (Yes)

See my letter dated 15/7/16

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp173/456  Respondent: 8573793 / Harry Eve  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Appendix C: Infrastructure Schedule

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )

The infrastructure schedule falls a long way short of the requirements that would be generated by this draft Local Plan.

The earliest dates for the railway stations at Park Barn and Merrow are not expected before 2024 (six years later than first anticipated).

Two road safety schemes for the A3 have been abandoned.

SCC appear to have washed their hands of involvement in the delivery of a number of highway developments on the local road network (which is their responsibility) - e.g. those in LRN7.
LRN7 (For Wisley Airfield) is an example of inadequate infrastructure requirements to address the problems that would be created by a strategic site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** pslp173/457  **Respondent:** 8573793 / Harry Eve  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Appendix H: Maps - East Horsley South

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the continued inclusion of an identified settlement boundary for the area known as Horsleys – East Horsley (south). This area should retain full Green Belt protection and parts of worthy of inclusion in the AONB.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** pslp172/3485  **Respondent:** 8573793 / Harry Eve  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy A36

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I support the removal of the proposal for this site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** pslp172/5166  **Respondent:** 8573793 / Harry Eve  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy A41

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I support the removal of this site. It is inappropriate for development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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I object to the continued inclusion of this site despite the many issues raised in the consultation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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The inclusion of landscape in 4.5.1 is good but I object to the weakening of the policy wording and the removal of paragraph 4.5.8.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to retail developments being excluded from the carbon reduction requirement. The justification in 4.5.37a makes no sense and simply reflects GBCs attempt to increase town centre retail development, unnecessarily, and push housing into the countryside. This is the opposite of sustainable construction. It means that brownfield town centre sites will be wasted when they could be used to meet housing need in a much more sustainable way than the proposals in this draft local plan.

4.5.38 admits to the “particular issue of increasing pressure on water stocks in an area already classed as being under serious water stress” but seems to imply that improvements in standards of the way we use water will happen one day and that will be sufficient. Any improvement in standards is likely to be very small in comparison to the massive increase in domestic water consumption, locally, that will arise under this draft local plan. I object to the lack of a constraint based on water consumption and supply. This is an issue for planning in South-east England in general as well as for Guildford.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/1703  Respondent: 8573793 / Harry Eve  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy D4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

See my comments on Policy H1.

(The section on density has been removed and a reduced statement placed in Policy D4. The point that higher density development will be supported in the town centre has been lost in the process as has the explanation in 4.2.8. These points should appear in the Policies and I object to this change.)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/1692  Respondent: 8573793 / Harry Eve  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy E1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
4.4.3(a) mentions the role of the Enterprise M3 LEP in determining local priorities. The LEP is an unelected body covering a wide area and should have no power or influence over planning priorities in Guildford especially as they are focussed on growth for their area regardless of consequences for local people. **I object** to the influence that the LEP is having on the local plan process.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2017 / Policy E2</td>
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Waste management facilities are an essential feature but there should be no presumption that they can override public consultation.

The addition of 4.4.23(a) concerning waste management facilities is **insufficient** in itself. It should be made clear that all such facilities will be subject to full public consultation and scrutiny of their impacts.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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<th>Comment ID: pslp171/1695</th>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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</table>

**I have serious concerns** about the Rural Economic Strategy and involvement of Enterprise M3 LEP mentioned in the new paragraphs 4.4.51a and 4.4.51b. For example, the Strategy regards opposition and resistance to proposals as “Threats” implying that development has priority over genuine objections.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The section on density has been removed and a reduced statement placed in Policy D4. The point that higher density development will be supported in the town centre has been lost in the process as has the explanation in 4.2.8. These points should appear in the Policies and I object to this change.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<td><strong>Document</strong>: Proposed Submission Local Plan: strategy and sites 2017 / Policy H2</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The current definition of “Affordable” does nothing to help key workers in Guildford.

The policy has been further weakened in favour of developers’ profit (policy item (2)).

The issue is partly a problem of Government policy concerning the affordability definition and the right to buy (continually eroding the social housing stock) - and partly due to GBC’s reluctance to subsidise sufficient genuinely affordable housing for key workers (exacerbated by cuts to local authority budgets).
The wording has been amended to give an impression that provision of adequate infrastructure will be enforced. However, the reality is that GBC will not determine the required infrastructure. It will be determined by Surrey Highways for the local road network and they are required to support development – not put obstacles in the way. If the SHAR (2016) and its predecessor are anything to go by, the requirements will be understated or not even recognised. Transport assessments supporting planning applications will be prepared by consultants acting for, and remunerated by, the applicant. Improvements to the strategic road network (e.g. A3) will be determined by Highways England, budget constraints, and ministerial decisions.

A lead Councillor has stated that the proposed Blackwell Farm development will not depend on A3 widening (in response to a question put to the Executive Advisory Board meeting held on 20 April 2017). It seems likely that Highways England have felt the need to offer a reality check on the likelihood of major work on the A3, such as widening or a tunnel, in the foreseeable future – apart from improvements to two slip roads.

The policy states that infrastructure will be secured by planning condition and/or planning obligation but this will require enforcement and I doubt the ability and willingness of GBC to overcome developers’ viability arguments. For the permissions that require a longer timescale there could be non-delivery issues if the original developer abandons the project without fulfilling all the conditions and obligations. Item 4.6.8 still indicates that GBC will be prepared to reduce infrastructure requirements by negotiation; i.e. viability for the developer will take precedence over infrastructure.

No change has been made to the monitoring requirement which is based on CIL receipts and spending alone. This is not sufficient. The actual delivery of specified infrastructure, before a particular development takes place, should be monitored and enforced.

The Transport Topic Paper and associated letters from Highways England suggest to me that further modelling will be undertaken before the Examination and it also seems unlikely that it will be consulted on. I consider that any further modelling should include more detailed information than SHAR (2016) so that it can be subject to scrutiny by GBC and by the public under a consultation process. Failure to do this will further undermine the credibility of the evidence gathering process.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
The removal of item 4.6.17 is puzzling. In the rationale for changes it is described as a potential statement of common ground with Highways England. GBC believe that it is likely to be agreed nearer to the plan Examination – but once again it highlights the lack of control over key roads infrastructure in formulating the Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Item 4.6.20 makes a statement that is clearly at odds with the actual choice of sites which will generate a major increase in private motor vehicle journeys. For example, the lead Councillor for Planning seems to be alone in believing that a sustainable plan for Wisley Airfield will be found.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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While there has been some improvement in the wording it is clear that the selection of Biodiversity Opportunity Areas (BOAs) has been no more than a desktop exercise influenced by the proposal of new identified settlement boundaries, in this draft local plan, that were not fully thought through and which threaten landscape and biodiversity.

The addition of the words “where possible” is a let-out clause that demonstrates the reality that biodiversity will be greatly reduced by the many greenfield development sites proposed.
Important habitats for biodiversity (outside BOAs) are not restricted to those which are adjacent to BOAs. The policy appears to abandon them.

4.6.45 is misleading. The primary role of SANGs is to divert recreational use, and dog-walkers in particular, away from the TBHSPA. This requires making it more attractive in terms of access and lack of restrictions. It is extremely doubtful whether SANG will achieve its primary purpose. Existing biodiversity and recreational use is being ignored by GBC and developers in selecting sites. For example, dog walkers are being encouraged to use sites occupied by ground-nesting Skylarks. It is wrong to claim, in effect, that SANG will produce net gains in biodiversity when it will be used to justify the destruction of existing wildlife on greenfield sites by building on it.

I am suspicious of the introduction of 4.6.49a which appears to be an afterthought to weaken the policy. It could be taken as an indication of pre-determination in relation to certain local school proposals.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/1677  Respondent: 8573793 / Harry Eve  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The changes seem to weaken protection of the AONB and may be used to facilitate inappropriate non-major development. I object to removal of the tests.

It is not at all clear what will be regarded as major development.

There are areas of high landscape and heritage value that are not within the AGLV and AONB and that are placed under additional threats by this draft plan. They have no such protection despite being “areas of outstanding natural beauty and great landscape value” in fact (if not by designation) and in the opinion of those who visit them for that reason.

The scope of the review should be re-considered to include areas not within the AGLV and the scope should be open to consultation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/1681  Respondent: 8573793 / Harry Eve  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to the proposed changes. Far from protecting the Green Belt and scrapping the seriously flawed Green Belt and Countryside Study, Guildford Borough Council is undertaking further insetting and weakening Green Belt protection by also adding another “identified settlement boundary”. There is no genuine justification for removal of Green Belt protection or weakening protection of areas that remain within the Green Belt.

Guildford Borough Council has no mandate to reduce its area of Green Belt but proposes doing so on a massive scale. Most of the proposed housing development has been assigned to Green Belt sites.

I object to the “identified settlement boundary” of “East Horsley (south)” which includes a number of large fields and areas of special biodiversity. Access to much of it is only by a narrow single-track lane of high landscape value. It is clear that no serious thought was given to the areas designated or to the boundaries.

There is an anomaly between the approach taken here and for Policy P3. The new identified settlement boundaries will allow unnecessary development in the Green Belt countryside in the form of infilling.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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4.3.37 now highlights the need to take account of the effects of climate change. This should include the potential effect of a prolonged period of below average rainfall on the water supply in South-east England. Encouraging further net inwards migration into the region, as reflected in this draft local plan, will lead to even more pressure on water supplies and the need for expensive and undesirable solutions that may take many years to implement or prove impossible. Questions that should be asked are:

- Where will new reservoirs be located?
- How much energy will be required by desalination plants?
- What are the issues and costs involved in delivering water from desalination plants to inland locations such as Guildford?
- How much will water bills rise as a result of the solutions required.

Continuing to add more pressure on water supplies is clearly unsustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (No)

No.

The housing number is still significantly overstated and the Council Executive has refused to reveal the full details of the underlying calculations to those who have requested them. The Scrutiny Committee has refused to scrutinise the SHMA.

As part of the previous consultation I raised a number of issues, questions and requests for further detail concerning the SHAR (2016) and its associated Validation Report. This followed criticisms of the previous SHAR that were not addressed in the 2016 version. No attempt has been made to address the issues, my questions remain unanswered, and the details have been withheld.

The modelling choices and assumptions made mean that current traffic levels have been severely understated. The result is that forecast traffic levels resulting from the plan are far less likely to indicate levels of congestion requiring roads infrastructure development, and the current infrastructure development plan is just the tip of the iceberg of what would actually be needed. The Council Executive seems willing to plunge Guildford Borough into traffic chaos in pursuit of population growth, rather than face up to reality and apply a traffic constraint.

I note the criticisms raised by Highways England in their representations dated 18 July 2016 and find it extraordinary that GBC were prepared to rely on a high-level strategic model that did not even allow for back-blocking. Any resident of Guildford will be aware of the back-blocking issues that arise in the town.

Highways England is only concerned with the Strategic Road Network and the impacts on the Local Road Network should be a concern for SCC. However, as SCC carried out the modelling exercise it seems clear that, between them, GBC and SCC have no interest in identifying the real roads infrastructure needs that would arise from this aggressive growth plan.

It is not sufficient to say that detailed work on traffic impacts will take place as part of a planning application. Green Belt land will have been released for development, for no good reason other than to remove planning constraints, before viability has been demonstrated. Furthermore the transport assessments carried out by developers are not independent and are aimed at seeking approval. I doubt the ability and willingness of GBC and Surrey Highways to scrutinise them with sufficient diligence.

There was no mandate to carry out a Green Belt and Countryside Study and it is seriously flawed since it suggests the release of Green Belt land without providing genuine justification.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp17q/307  Respondent: 8573793 / Harry Eve  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Question 2: Legal Compliance

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (No)
I am not a member of the legal profession but I consider that much of the proposed plan should fail under legal challenge.

The consultation for the 2016 draft local plan was poorly executed. When the comments were published many of mine were missing (later found under a different name whose own comments had been excluded). I answered “Yes” to the question concerning interest in participation at the examination. This was recorded as “No”.

When I raised these points the errors were gradually corrected but, the last time I checked, there were still issues with the way in which some of my comments had been recorded with words left out or incomplete.

It is not clear how many errors exist for other respondents but the majority may not have checked that their views have been recorded correctly.

There has been a lack of transparency, lack of scrutiny, and failure to act on errors pointed out by residents and consultees. The GBC Executive has undermined confidence in local democracy and the planning system.

The housing number is overstated, constraints have not been applied, and various parts of the evidence are unsound. I do not consider the plan to be justified.

The plan will create major problems in the future without solving local social housing needs or achieving affordability for those who currently live and work in the Borough. The continued use of appeals as a monitoring indicator will encourage the Planning Committee to allow applications rather than run the risk of losing an appeal. This is a particular concern given the recent changes to the structure of the Planning Committee.

In my opinion the plan goes against national policy in failing to apply (or even to recognise) constraints with regard to Green Belt and infrastructure.

I reserve my right to participate at the examination.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment ID: pslp17q/308</th>
<th>Respondent: 8573793 / Harry Eve</th>
<th>Agent:</th>
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I reserve my right to participate at the examination.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPA16/1910  **Respondent:** 8574369 / Douglas French  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

I OBJECT to GBC withholding from residents their consultant's and sub-consultant's calculations of housing need, which is what is driving this whole issue. It would appear that even some individual councillors are not privy to the calculations or how the total has been reached but are blindly accepting a figure produced without workings or explanation. There are strong grounds for believing that GBC, aided and abetted by their consultants, have overstated by a wide margin what the figure should be. There are also grounds for believing that the numbers have been exaggerated as a result of pressure from developers. As the grabbing of Green Belt land is predicated on the need for a particular number of houses, a good starting point would have been to get the number right and to show transparently how it was reached.

Other submissions will provide supporting statistics and there are authoritative figures online to show the escalation of housing need in Guildford Borough has been about 5% per year for the last ten years. The draft plan provides no proper data which proves that it is increasing significantly more at the moment or that in future years it will rise by so much more. Guildford's projected number in the last draft local plan was challenged by the Office of National Statistics which is a more reliable source since it is not driven by developers. Since the current set of figures was published other underlying data has changed; for example it was too late to take into account the effects on housing demand of changes to the population which could arise from Brexit. Nor has GBC applied the normal constraints to their maximum projections. For a proper professional assessment of housing numbers I refer the reader to the submission from Andrew Procter on behalf of the Save Send Action group.

Applied specifically to Send, although it is the largest village in the borough it should not have to take a significantly higher proportion of new houses than the borough. It should also not have to take a significantly higher proportion of new houses on account of its current size which arises as a result of a disproportionate volume of housing previously being located in Send, Send Marsh and Burnt Common. When the Wimpy Estate of several hundred houses (Linden Road, Maple Road and all adjacent "tree" roads) was built in Send some 40 or more years ago it represented a massive increase in the size of Send Marsh which increase at the time was disproportionate to the size of the village and its amenities. A further massive increase now, which relates numbers proposed to numbers existing, compounds the offence. It would be more equitable to say that as Send accepted a very large number previously, it should not be expected to do so again.
The housing number calculations also have to take into account the constraints, in particular those resulting from the Green Belt. Therefore, I repeat the points made in paragraph 11 above which cannot be over emphasised. The NPPF states that in their local plans local authorities are required to meet objectively assessed housing needs “as far as is consistent with the policies set out in this Framework”. The policies referred to include Section 9 - Protection of the Green Belt. The Court of Appeal has clarified the interpretation of this by stating categorically that there may be nothing very special about a housing shortfall in an area, which has very little undeveloped land outside the Green Belt.

The key question is not “is there a shortfall in housing land supply?” You have to ask “have special circumstances been demonstrated to outweigh the Green Belt objection?” And such circumstances are not demonstrated simply because there is a less than five year supply of housing land. Special circumstances will not exist unless the potential harm to the Green Belt is clearly outweighed by other considerations. Given the large amount of Green Belt in Guildford Borough, the council can legitimately argue that it does not have to match the housing targets of boroughs with less Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I OBJECT to Wisley Airfield, which is classified as a brownfield site on a spurious technicality when everybody can see that it is not what is understood by brownfield, being included in the Local Plan as a development site for 2000 houses when Guildford Planning Committee have just refused the planning application relating to it. Either the left hand does not know what the right hand is doing or this is a devious diversion. I object for all the reasons identified by GBC Planning Committee when it rejected the application.

I OBJECT to building 2000 houses at what GBC calls Wisley but is actually at Ockham, because it would massively and detrimentally overwhelm Ockham village, East and West Horsley and the entire neighbouring area. The proposal is ill conceived, showing scant regard for the Green Belt, infrastructure requirements, transport, or pollution and lacking nearly all the evidence that is needed to show that such a development would be sustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

I OBJECT to the building of 45 houses on the Clockbarn site in Send (ref A42) which is designated as agricultural land within the Green Belt. The fact that it has been allowed to deteriorate should not be a passport to changing its status. It is not suitable because it has poor access and the road cannot take the additional vehicular traffic which 45 houses would generate.

I OBJECT to the Building of 45 houses on Clockbarn because the road already suffers from serious overload, as previously accepted by Surrey County Council. An additional 45 houses would increase the number of dwellings in Tannery Lane by nearly 400% because planning permission already exists for 63 apartments at the Tannery business centre site under reference 14/P/00575 and 00576 as amended. It is disingenuous for GBC to express the belief that these may not be built. GBC gave permission and the owner has the right and locally it is understood the intention of building them. Indeed work has commenced. Added to this would be the traffic generated by building and servicing the new narrow boat basin or “marina” under reference 14/P/00289. The road cannot cope with the traffic volume it currently has and could not possibly accommodate the massive increase in vehicular traffic consequent on these three developments. In simple terms if the number of dwellings increased by 400% so would the volume of domestic traffic in addition to an increase in commercial traffic. This does not bear thinking about.
I OBJECT to the building of 45 houses on Clockbarn because this massive increase in traffic would severely impact the junction of Tannery Lane and Send Road where there is a problem every day because of poor visibility for traffic emerging from the side road causing danger and congestion to traffic on the main road. The suggestion that this would be alleviated by traffic lights is completely wrong as the installation of temporary traffic lights in Send Road earlier this month demonstrated. When traffic has to stop in either direction, as it does for traffic lights, Send Road quickly gets gridlocked.

I OBJECT to the building of 45 houses on Clockbarn because it fails to take into account the cumulative impact on traffic volumes in the rest of Tannery Lane. Tannery Lane is very narrow, twisty and dangerous for its entire length. Much of it is single track with passing places and blind spots. There is a problem all the way down with vehicles trying to pass each other. When they meet they very often have to reverse in order to find a passing place. The problem is exacerbated by the high proportion of HGVs and large commercial vehicles currently going to the business centre, and destined to increase when the narrow boat basin is built. Tannery Lane is also very long. The biggest problem, which is often overlooked because planners fail to go there, is the stretch beyond the business centre going north. The final stretch of Tannery Lane before it joins Polesden Lane is only 9 feet wide for a distance of nearly 400 metres and cannot be made wider because of the nature reserve. A significant proportion of the traffic, estimated at about one third, enters Tannery Lane via Polesden Lane or Papercourt Lane which are themselves extremely narrow, especially Papercourt where some of the front garden boundaries on either side of the road are within little more than three metres of each other. There is also the extremely dangerous blind bend to the right when joining Newark Lane. These lanes were not meant for the high number of cars, vans and lorries which currently use them and could not possibly cope with an increase of the amount which would follow from this development, on top of the others.

The suggestion sometimes made that Tannery Lane could be widened totally fails to appreciate the constraints which exist. Any attempt to widen it would be defeated by the fact that the entrance from Send Road does not provide space for any significant widening; the Papercourt Lane exit is so narrow that front gardens on both sides of the lane would have to be compulsorily purchased; the stretch from Prews Farm Cottages to Papercourt Farm runs immediately alongside Papercourt Marshes so there is no scope for widening and in any event further traffic would damage Papercourt Marshes; the stretch from Papercourt Farm to the junction with Polesden Lane is single track nine feet wide which also runs alongside Papercourt Marshes. In any event a widening of Tannery and Papercourt by itself would be insufficient - because of the bends it would need to be straightened as well, a hugely expensive and well-nigh impossible task. In the whole of the Borough of Guildford, if one set out to find somewhere to build houses, Tannery Lane would be close to the bottom of the list of potential sites from the point of view of road access.

I OBJECT to the building of 45 houses on Clockbarn because there are virtually no pavements. The increase in traffic would therefore mean that pedestrians would face much greater risk. The only surfaced pavement in Tannery Lane is the first short section from Send Road confined to the north side. The other side is unsurfaced. After Peasblossom Cottage (about 80 metres from the junction with Send Road) there are no further pavements on either side for its entirety. Pedestrians walk in the road and have to dodge the traffic as best they can.

In addition to vehicular traffic it is used by residents and their visitors on foot: residents from Send Road and adjacent roads walking their dogs; walking groups and ramblers (on their way to Newark Priory, Ockham Mill and the Pyrford Water Meadows); equestrians; sports and recreational cyclists (because it is in the guide books as part of the cycling network based on Ripley); and anglers who fish in the Wey Navigation. It is therefore enjoyed by a lot of people whose safety should not be further jeopardised, and for whom a village amenity should not be ruined completely, by increasing any more the excessive number of vehicles the road already has to cope with.

Tannery Lane is an ancient rural road which is rich in wildlife which should not be damaged by pollution caused by increased traffic volumes. Clockbarn itself is a nesting habitat for bats which are a protected species, making it not only unsuitable to build there but a criminal offence to do so. Additional traffic pollution and noise alongside Papercourt Marshes will be detrimental to wildlife there too.

I OBJECT to building 45 houses at Clockbarn because all the land in that area is prone to flooding. Although the Environment Agency maps include the area in flood zone 1 the reality is different, as a great deal of photographic evidence and local testimony can show.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
1. I OBJECT to 400 houses and 7000 sq metres of industrial space at Garlick's Arch being brought forward as a last minute proposal without any warning and without it having been mentioned at all in the earlier Draft Local This attempt to push it through under Regulation 19 instead of Regulation 18 and thereby deny residents a proper process of consultation is a further manifestation of the contempt in which Guildford Councillors hold the electorate. This is a clear breach of administrative law.

2. I OBJECT to building 400 houses and 7000 sq metres of industrial space at Garlick's Arch because the site includes ancient woodland, too valuable to The site floods as photographic evidence and local testimony can confirm as a result of the East Clandon stream overflowing and surface water being trapped.

3. I OBJECT to building 400 houses and 7000 sq metres of industrial space at Garlicks’ Arch since this would increase the number of dwellings in Send (including Send Marsh and Burnt Common) by about 25% without a commensurate increase in services and infrastructure. There is already severe pressure on doctors surgeries, school places and other essential facilities which would seriously worsen. Infrastructure issues are substantially the responsibility of Surrey County Council but there is no evidence that SCC has formulated an infrastructure plan, or the means by which the infrastructure would be paid for, in respect of this site or any other site. What we were told at one public meeting, that the council thinks about infrastructure afterwards, is typical of a woefully inadequate approach to the whole Local Plan.

4. I OBJECT to 7000 sq metres of industrial space at Garlick's Arch because the space is not needed since there is inadequate take up of existing space in the area, but if it were needed it would make very much more sense to locate it at In any event Garlick's Arch is an unsuitable location for industrial space given the proximity of existing houses.

5. I OBJECT to a new interchange with the A3 at Burnt Common because Send would have to take traffic from the proposed 2000 houses at Wisley Airfield, 2000 at Gosden Hill and 1850 at Blackwell Farm as well as 485 from Send itself. This is in addition to what it takes at the moment. Much of this traffic to and fro the A3, M25, Woking and Guildford would go through Send. Send Road, which is already overloaded, would face gridlock. This would exacerbate noise and pollution levels which are already excessive and is wholly unacceptable.

6. I OBJECT to the new interchange with the A3 at Burnt Common because it is being presented as a way of facilitating the movement of a massive increase in vehicles whereas in reality it would cause havoc on the A247 and the many feeder roads in Ripley and Clandon in addition to Send.

7. I OBJECT to the fact that Guildford Councillors approved the Local Plan before the Transport Assessment had even been published which indicates what scant regard they had for the traffic implications which are at the forefront of residents’ They have to contend with the problem every day in terms of delays, pollution and noise which are already destroying our villages as decent places in which to live.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
I OBJECT to the development of 40 houses and 2 travellers’ pitches on Send Hill because the location is unsuitable. The subsoil of the proposed site contains unsafe landfill waste dating back to the 1960s when it was shown on Ordnance Survey maps as “refuse and slag heap”. The date of the landfill pre-dates the EU Landfill Regulations in 1999 but it was registered at GBC from 2005 onwards. Any disturbance could be a health hazard due to unknown substances which are also described as “unrestricted”. It would be dangerous to local residents for this hazardous waste to be disturbed. The site should, therefore, never have been brought forward for consideration. It would definitely not be sufficient to “condition” it as GBC is prone to doing.

I OBJECT to the proposed development at Send Hill since it does not appear to be in accordance with The Government’s 2015 guidelines on traveller sites. GBC’s Traveller Accommodation Assessment of 2012 is acknowledged in their 2016 Sustainability Appraisal as being out of date which has resulted in an over allocation of traveller sites. GBC needed to re-examine its evidence base before coming forward with this proposal in the Local Plan. It seriously failed in its duty of care by not doing so.

I OBJECT to the proposed development at Send Hill because it is on a narrow country road with inadequate on road parking, it is in the Green Belt, near a nature reserve and an amenity area of beautiful countryside. It is an unsuitable location which has been introduced into the Local Plan at the last minute without first doing proper research on the history and characteristics of the site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

I OBJECT to the Local Plan because it seeks to build on Green Belt land unnecessarily. The work of Professor Anne Power at the London School of Economics, amongst much other expert research, clearly demonstrates that there is more than sufficient land to build all the houses that are needed without taking any of the Green Belt. In our area several studies show that unused brownfield sites in Guildford Town itself are capable of yielding most of the required land. GBC has not properly explored the capacity which is available there or on brownfield sites elsewhere in the borough, which would have provided a sensible starting point since GBC own many of them.

I OBJECT to the Local Plan in that GBC’s approach to the Green Belt introduces a concept of grading its quality. This is an alien concept, not recognised in law. Of course some Green Belt is seen to be better than other Green Belt but the law does
not make any distinction, nor should it. It depends who is looking at it and from what standpoint they are looking. Green Belt is Green Belt and it is not for GBC to stand in judgement on what bits it thinks are worth keeping and what are not.

I OBJECT to proponents of the plan representing those against it as “nimby’s”. Those against are not against building houses. They recognise the need for them. They are against building them in unsuitable, unthought out locations which damage existing amenities. This relates particularly to building them on Green Belt land, thereby destroying an existing amenity, when it is not necessary to do so.

I OBJECT to the Local Plan because it seeks to promote sites for houses with woefully inadequate attention being paid to the infrastructure to support those sites. Without proper infrastructure none of the identified sites will deliver what is claimed for them. No detailed thought has been given to the form of the infrastructure required, still less to how much it would cost and, it would appear, none at all to where the money for it would come from.

I OBJECT to removing Send and other villages from the Green Belt. The Green Belt was intended to be permanent, and its permanence was enshrined in law through the National Planning Policy Framework, reinforced by the NPPG and a succession of Ministerial guidance statements. For all of this to be overridden requires “special circumstances” which do not exist in the case of Send.

I OBJECT to all four proposed sites in Send because they are all in the Green Belt and not one of them displays the very special circumstances which would be needed in order to outweigh the substantial harm caused by reason of inappropriateness. There is abundant legal authority but I would cite the Court of Appeal cases of City of St Albans v Hunstan Properties and Gallagher Homes v Solihull Metropolitan Council. These precedents, which have been ignored by Guildford Council before, show that it is necessary to demonstrate that harm to the community at large, by taking the Green Belt, would be less than if it was not taken. The crucial words are “to the community at large”. Paragraph 47(1) of the NPPF advises local authorities “to ensure that their local plans meet the full, objectively obsessed, needs for markets and affordable housing in the housing market area as far as is consistent with the policies set out in this framework”. As the Court of Appeal has made clear one cannot rely on objectively assessed needs without having regard to the policy constraints. The qualification in this clause “as far as is consistent with” is not qualifying housing need; it is qualifying the extent to which the local plan should go to meet those needs. It is quite clear from the precedents that exceptional circumstances will not exist unless the potential harm to the Green Belt has been shown to be clearly outweighed by other considerations. In other words harm to the Green Belt is included in the factors which the NPPF requires to be taken into account.

The NPPF further states that in their local plans local authorities are required to meet objectively assessed housing needs “as far as is consistent with the policies set out in this Framework”. The policies referred to include Section 9 - Protection of the Green Belt. The Court of Appeal has clarified the interpretation of this by stating categorically that there may be nothing very special about a housing shortfall in an area which has very little undeveloped land outside the Green Belt.

The key question is not “is there a shortfall in housing land supply?” You have to ask “have special circumstances been demonstrated to outweigh the Green Belt objection?” And such circumstances are not demonstrated simply because there is a less than five year supply of housing land. Special circumstances will not exist unless the potential harm to the Green Belt is clearly outweighed by other considerations. The draft plan has not begun to demonstrate that there are exceptional circumstances and indeed offers very little to suggest that the authors have even read what the Court of Appeal has said about the provisions in the NPPF.

It is noted that the Court of Appeal precedents have been ignored before by GBC, which appears to regard itself as over and above the law. GBC seems willing to expend residents’ funds on counsel’s advice, in support of what its client developers want to do, but cannot bring itself to get a QC’s opinion in order to guide it on understanding the case law that actually exists, which manifestly it does not understand.

Given the large amount of Green Belt in Guildford Borough, the council can legitimately argue that it does not have to match the housing targets of boroughs with less Green Belt. But if Guildford wants to match the housing target which would apply if it was not constrained by the Green Belt, it can still do so using brownfield land which is in plentiful supply. It is difficult to avoid the conclusion that it has not taken either of these legitimate routes because it finds the allure of developers’ propositions on green field sites more attractive. GBC should also note that the Green Belt was created not just for the benefit of local residents. It came to be known as the Metropolitan Green Belt because it was intended to be of
benefit to a much wider range of people, especially Londoners visiting open spaces outside but near to London. It is beyond the remit of GBC to arrogate to itself the power to override Parliament’s intention.

I OBJECT to any sort of diminution of Send’s Green Belt because it provides an essential buffer stopping Woking and Guildford becoming one conurbation. It has served this purpose effectively since its inception and should continue doing so for the benefit of subsequent generations living here. No group of councillors, especially without a mandate, has the authority to impose a different future on residents.

I OBJECT to any reduction in Send’s Green Belt because so much land in Send provides the setting for the beautiful Wey Navigation corridor, which is a conservation area that enhances biodiversity, is visually important, provides a valuable leisure facility and combined with the surrounding lakes an exceptional habitat for a wide range of bird species and other wildlife.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<tr>
<th>Comment ID:</th>
<th>PSLPP16/8002</th>
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<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to GBC withholding from residents their consultant’s and sub-consultant’s calculations of housing need, which is what is driving this whole issue. It would appear that even some individual councillors are not privy to the calculations or how the total has been reached but are blindly accepting a figure produced without workings or explanation. There are strong grounds for believing that GBC, aided and abetted by their consultants, have overstated by a wide margin what the figure should be. There are also grounds for believing that the numbers have been exaggerated as a result of pressure from developers. As the grabbing of Green Belt land is predicated on the need for a particular number of houses, a good starting point would have been to get the number right and to show transparently how it was reached.

Other submissions will provide supporting statistics and there are authoritative figures online to show the escalation of housing need in Guildford Borough has been about 0.5% per year for the last ten years. The draft plan provides no proper data which proves that it is increasing significantly more at the moment or that in future years it will rise by so much more. Guildford’s projected number in the last draft local plan was challenged by the Office of National Statistics which is a more reliable source since it is not driven by developers. Since the current set of figures was published other underlying data has changed; for example it was too late to take into account the effects on housing demand of changes to the population which could arise from Brexit. Nor has GBC applied the normal constraints to their maximum projections. For a proper professional assessment of housing numbers I refer the reader to the submission from Andrew Procter on behalf of the Save Send Action group.

I OBJECT to the combined total of 2000 (Wisley) + 485 (Send) + 2000 (Gosden Hill) + 1850 (Blackwell Farm) houses all alongside a short stretch of the A3 between the M25 and the university. To concentrate 6335 of the borough’s assessed need for housing of 13860, that is close to half of it, in such a small area of the borough is by any standards unreasonable. If GBC wants to build this number of houses, which has more to do with developer pressure than properly calculated need, it should spread them more evenly throughout the borough, which it is manifestly failing to do. This would help to alleviate excessive traffic congestion and pollution which is a certain consequence of GBC’s current proposals.
Applied specifically to Send, although it is the largest village in the borough it should not have to take a significantly higher proportion of new houses than the borough overall. It should also not have to take a significantly higher proportion of new houses on account of its current size which arises as a result of a disproportionate volume of housing previously being located in Send, Send Marsh and Burnt Common. When the Wimpy Estate of several hundred houses (Linden Road, Maple Road and all adjacent “tree” roads) was built in Send some 40 or more years ago it represented a massive increase in the size of Send Marsh which increase at the time was disproportionate to the size of the village and its amenities. A further massive increase now, which relates numbers proposed to numbers existing, compounds the offence. It would be more equitable to say that as Send accepted a very large number previously, it should not be expected to do so again.

The housing number calculations also have to take into account the constraints, in particular those resulting from the Green Belt. I therefore repeat the points made in paragraph 11 above which cannot be over emphasised. The NPPF states that in their local plans local authorities are required to meet objectively assessed housing needs “as far as is consistent with the policies set out in this Framework”. The policies referred to include Section 9 - Protection of the Green Belt. The Court of Appeal has clarified the interpretation of this by stating categorically that there may be nothing very special about a housing shortfall in an area which has very little undeveloped land outside the Green Belt.

The key question is not “is there a shortfall in housing land supply?” You have to ask “have special circumstances been demonstrated to outweigh the Green Belt objection?” And such circumstances are not demonstrated simply because there is a less than five year supply of housing land. Special circumstances will not exist unless the potential harm to the Green Belt is clearly outweighed by other considerations. Given the large amount of Green Belt in Guildford Borough, the council can legitimately argue that it does not have to match the housing targets of boroughs with less Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8065  Respondent: 8574369 / Douglas French  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT to the Local Plan because Guildford Borough Council (GBC) has no mandate to destroy areas of the Green. The overwhelming majority of Guildford Councillors who voted for the Local Plan reneged on specific promises they made when seeking election to preserve the Green Belt. Conservative Councillors stood in the name of the Conservative Party whose official policy was and still is to preserve the Green Belt. This policy has been reaffirmed regularly. Guildford Councillors are therefore acting both unethically and ultra vires.

1. I OBJECT to the Local Plan because it does not reflect "localism" or "local decision making". It begs the question why any self-respecting councillor would choose to vote for the Plan, still less support it through public statements, when they know full well that they are not representing the wishes or expectations of electors who put them into office, that is local. It is a dereliction of democratic duty to squander hundreds of thousands of pounds of residents’ money on such an ill conceived project which runs manifestly contrary to local opinion. Every councillor who voted for it should be considering their position and answerable for the money they have wasted.

1. I OBJECT to the Local Plan on procedural Two of the sites in Send, Garlicks's Arch and Send Hill, were not variations based on the earlier draft plan but completely new sites. Both should therefore have enjoyed a full new consultation under Regulation 18. This opportunity has been denied residents. In the case of Garlick’s Arch, which is a very large site, this was introduced into the Local Plan absolutely at the last minute. GBC effectively
sprung a surprise on everybody by producing it out of a hat having given no indication, as late as two weeks before publication, that it was even being considered. This quite definitely needed to go to a full Regulation 18 public consultation and GBC is in breach of administrative law in failing to do so.

1. I OBJECT to the Local Plan because on so many issues the evidence base is questionable, defective, or totally The many examples of this are set out in great detail in the submission from Andrew Procter on behalf of the Save Send Action Group to which the reader is referred.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<td>I object to the proposal to inset Send Business Park from the Green Belt altogether because it is already an inappropriate site for further development in an area of outstandingly beautiful countryside adjacent to the beautiful Wey Navigation. The access to the site is again along Tannery Lane which is narrow and twisting with few passing places and totally unsuitable for heavy duty vehicles and the many more cars which would be generated by developing this site.</td>
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<td>We hope that Guildford Councillors will see sense in the points put forward, and not seek to overdevelop our local villages, spoil Green Belt land and overwhelm the roads and lanes serving our well loved villages.</td>
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1.1 This is an objection under Regulation 19 to the Guildford Borough Council (GBC) Draft Local Plan 2017. I specifically request that my earlier objections to the 2014 and 2016 versions of the plan are also submitted to the Inspector. The change in reference numbers and the fact that sites have been brought in and taken out of the plan and then brought in again has caused unnecessary confusion. But the substance of earlier objections still applies even though in some cases to sites are now referred to differently, both by name, reference number and specification. The earlier objections remain relevant.

1.2 I would like an acknowledgement from GBC please confirming that the whole of this submission and my ones in 2016 and 2014 will be submitted to the Inspector.

Green Belt Policy 2 at paragraph 4.3.15 Send Business Park

2.1 I object to the proposal to inset Send Business Park from the Green Belt without any evidence being offered to justify it. Send Business Park is for historical reasons in an inappropriate location even for its existing operation and totally unsuited to become a “strategic employment site” as opposed to a “locally significant employment site”. It is an old non-conforming user in a Green Belt location adjacent to the beautiful Wey navigation, which is a conservation area. Any further development there is inappropriate and will detract from the openness of the Green Belt.

2.2 Although this proposal was included as part of site 67 in the 2014 draft plan, it was removed in 2016 following representations. It has now been put back in, which is a good example of why earlier objections are highly relevant and must be included in the material received by the Inspector. Since it was removed last year because it was considered to be in an area of high Green Belt sensitivity, it is difficult to fathom why, a year later, it is not regarded as being Green Belt sensitive at all.

2.3 I specifically object to the undeveloped field (currently separating the end unit at Send Business Park and the Narrowboat Basin Site currently under development) from losing its Green Belt status. Despite action over the last few years which has made it look steadily more derelict, by parking old vehicles on it and leaving them there for months, that Green Belt field still affords views over the Wey Navigation and the countryside beyond. The openness of the Green Belt would be severely damaged by further development on this site. It has also been noted by a frequent walker that over the last two years the car park has been stealthily increasing in size at the expense of another field. Such encroachment without planning permission is to be deprecated.

2.4 The site lacks adequate access for a strategic employment site because Tannery Lane is very narrow, twisty and dangerous, in parts single track and completely unsuited to commercial and industrial traffic. Given that there are many potential employment sites in Guildford Borough with good access it is to say the least perverse to try to promote one which in so many respects is manifestly unsuitable.

2.5 The Employment Land Needs Assessment 2015 recognised that Send Business Park has poor access for traffic and public transport and other serious shortcomings for an employment site. The volte-face shown in the 2017 ELNA, where without explanation completely opposite conclusions are reached, requires some explanation. Given that neither the site nor the attendant infrastructure has changed in that period how can “very poor access to public transport suddenly become “good” access to public transport when the available public transport has not changed?

Clockbarn Nursery, Tannery Lane, Policy A42

3.1 I object to the Policy 42 change at Clockbarn Nursery in Tannery Lane. It is regrettable that notwithstanding the hundreds of representations explaining to GBC why this site was unsuitable for 45 houses, they have chosen to increase the number by one third to 60 houses. All the reasons previously advanced against 45 are still relevant only more so. Building 60 houses would exacerbate even more than 45 the extremely dangerous road junction where Tannery Lane joins the A247 Send Road. The road is narrow, there are no pavements beyond the first 100 or so metres and pedestrians, cyclists and country ramblers are currently at considerable risk. Increasing the concentration of houses and therefore of cars would be contrary to common sense.

3.2 I object to 60 houses because it would erode the Green Belt in Send village even more than 45. Clockbarn is within sight of the conservation area of the Wey Navigation and no exceptional circumstances have been shown. Before Green Belt land is used for housing it is necessary to show that exceptional circumstances exist. As a series of Court of Appeal cases have shown it has to be demonstrated that the harm to the community at large by taking Green Belt for housing would be less than if it were not taken. The crucial words, which the last version of the local plan ignored and this one continues...
to ignore, are “to the community at large”. As the Court of Appeal has pointed out one cannot rely on objectively assessed needs for housing without at the same time having regard to the policy restraints. Exceptional circumstances will not exist unless the potential harm to the Green Belt has been shown to be outweighed by other considerations. Harm to the Green Belt is one of the factors which the NPPF requires to be taken into account.

3.3 I object to the building of 60 houses on this site because of the presence of common and soprano pipistrelle bats all over the site and their roosts on the adjacent plot. This would be in danger of breaching the Wildlife and Countryside Act 1981 (Section 5), the Conservation of Habitats and Species Regulations 2010 (Schedule 2)

3.4 The site is full of other wild life too including some rare birds. Since it is within 5 km of the Thames Basin Heaths Special Protection Area development on this site could be contrary to Guildford Council’s own SPA Avoidance Strategy. As such it should not be included in the local plan.

3.5 The NPPF makes it clear that “the planning system should contribute to and enhance the natural and local environment by… minimising impacts on biodiversity and providing net gains in biodiversity where possible” (Para 109).

Since this objective will be virtually impossible to realise on this site it should not be included in the local plan.

3.6 GBC must be aware that the recent Surrey Wildlife Survey of flora and fauna showed that Surrey has suffered a very much higher rate of loss in species than the UK as a whole – 12% as compared to a national loss of 2%. Of a total of 404 priority species almost 31% are already locally extinct in Surrey while 37% are threatened or in worrying decline. When considering developments GBC should have regard to their obligations in this direction. If they are prepared to ignore them they should be asking themselves whether they are acting responsibly.

3.7 We are asked under Regulation 19 to restrict our comments to changes in the local plan. My objection to 60 houses should not be interpreted as an acceptance of 45. As made clear in 2016 my objection is to any houses at all on what I consider to be an unsuitable site. So my comments this time should be read in conjunction with what I said in 2016 and 2014.

Objections relating to both Send Business Park, Green Belt Policy 2 at paragraph 4.3.15 and Clockbarn Nursery, Policy A42.

4.1 I object to both developments on the grounds of susceptibility to surface flooding. There is considerable surface water flooding risk in Tannery Lane, as residents know only too well from their experience almost every year. It does not appear from their evidence base that GBC has explored this adequately in the same way as they did not do so in respect of last year’s narrowboat basin application to which they could usefully refer. GBC’s level 2 Strategic Flood Risk Assessment 2016 makes no reference to Tannery Lane at all. It may be that they are relying on wet spots data from Surrey County Council but this is known to be inadequate. Primary sources, such as Envirocheck, whose work is based on the British Geographical Survey Flood Data, show ground water at 0.4 metres below ground level on the bend in the road near Maybankes. This is at the eastern corner of the Clockbarn site.

4.2 Local testimony asserts that some of the buildings at Send Business Park suffer from ground water flooding affecting their foundations which appears to be exacerbated by proximity to the Wey Navigation. This makes the site unstable and unsuitable for further development.

4.3 GBC’s Strategic Flood Risk Assessment needs updating. The aggregate effect on flood risk of the Narrowboat Basin, plus Clockbarn plus Send Business Park would contravene paragraph 100 of the NPPF, that inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk. At the very least all sources of flooding need to be correctly assessed which GBC has not done.

4.4 There is no recognition of the impact of these developments on sewage facilities which are already at full capacity.

Land at Garlick’s Arch, Send Marsh Policy A43

Now 6 travelling show people plots in addition to 400 houses
5.1 I object because there is no proven demand for travelling show people plots in this location and GBC has produced no tangible evidence to support their claim that there is. Such a site needs to have parking and turning for lorries and trailers, a service and cleaning area, on site storage and accommodation for show people and their families. Access for this from Kiln Lane or Burnt Common Lane would be very difficult, if not impossible.

5.2 By objecting to this, which I am permitted to do under Regulation 19, I am not implying that I prefer what was proposed before. I do not favour any development at Garlick’s Arch for all the reasons given.

5.3 I object to the policy change at Garlicks’ Arch which now includes some custom and self-build accommodation because:

5.4 The site is contaminated by lead shot which cannot easily be cleaned up because it has accumulated over 50 years

5.5 It is subject to frequent flooding (for which photographic evidence can be provided) and is in flood zone 2 making it an unsafe and unsuitable site choice.

5.6 It ignores the thousands of objections made previously to the previous proposals.

5.7 It is permanent Green Belt Land and no exceptional circumstances have been demonstrated.

5.8 It would destroy ancient woodland dating back to the time of Elizabeth 1

5.9 The site is not near any public transport so residents would be obliged to rely on their cars.

5.10 There are six rural businesses currently on the site and I object to the destruction of rural employment which would result from GBC’s proposals.

5.11 It passes belief that in the whole of Guildford Borough this inaccessible, contaminated, ancient woodland site in the Green Belt, largely unserved by public transport, is the best location that can be found for houses and travelling show people plots.

**Land at Burnt Common, London Road, Policy A58**

Now a new allocation for a minimum of 7000 sq metres of industrial or warehousing

6.1 The 2016 draft plan referred to a “maximum” of 7000 sq metres. This has been quietly changed to “minimum” in a period when the demand trend for industrial land has declined. This is serious over-provision.

6.2 It makes no sense to put industrial and/or warehouse development in the middle of the Green Belt when Slyfield Industrial Estate in Guildford still has plenty of unused capacity.

6.3 The potential inclusion of a waste management facility mentioned at paragraph 4.423a lacks enough detail for proper consultation but would appear to be completely inappropriate.

6.4 There can be no sensible basis for allocating almost 10 hectares of industrial and warehouse facilities in a small village like Send when the latest ELNA 2017 shows only 3.9 hectares are required for the whole borough. This can only be interpreted as a serious over concentration in one unsuitable place for which there has been no declared explanation.

**Objections relating to both Garlick’s Arch A43 and Burnt Common A58**

7.1 I object to both of these proposals separately but also to their combined effect.

7.2 They will join up Ripley and Send destroying the purpose of the Green Belt.

7.3 They will increase the totality of residential and commercial traffic on the small roads in our villages very substantially. It needs to be appreciated that the main road A247 is absolutely at capacity already and these developments added to those proposed at all the other sites in neighbouring villages will hugely impact on the traffic on Send Road, and also on side..
roads as people make attempts to avoid traffic gridlock on their way, for example, to Woking Station. A very much more
detailed analysis is needed of the traffic impact because the A247 at Send is the one place where nearly all of it will
converge.

7.4 Roads are but one of the infrastructure implications which the combined impact of all these developments will have.
Others are covered in my 2016 objection.

Conclusions

8.1 In aggregate the above proposals combined with the ones we are not allowed to comment about, amount to excessive
over-development in a small village.

8.2 I object to the mechanics of Regulation 19, restricting comments to new proposals only, as it is being applied by GBC.
In the context of GBC’s proposals, where site allocations have been changed and then changed back again, sometimes at
the last minute, there is a risk, of which GBC cannot be unaware, that an objection may be interpreted as a preference for
what was proposed before. It is almost as if some of the changes have been designed to garner positive feedback and skew
the numbers. The Inspector will no doubt be alert to this risk.

8.3 The proposals as they stand are intended to be a draft local plan for the whole of Guildford Borough. It is very
disconcerting therefore that somewhere around 40% of the development is contained within a geographical area of about
11% of the borough, all within less than five miles of Send village.

8.4 It is also disconcerting that in addition to the 8 travelling show people plots, Send has also been allocated 2 traveller
pitches, the only village in this position.

8.5 This looks like unjustified, unfair and unreasonable concentration in one area to the benefit of other areas which are
escaping almost completely. One can only speculate as to the reasons underlying this bias. The Inspector will no doubt
wish to make his own enquiries as to the reasons for the imbalance, although one does not have to look very far to find
them.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/1571  Respondent: 8574369 / Douglas French  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy A42

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally
Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the Policy A42 change at Clockbarn Nursery in Tannery Lane because the increase to 60 homes in place of 45
homes will overcrowd the site and result in even more traffic on Tannery Lane, which is a long, narrow and twisting lane
with few passing places and many blind corners. I do not understand why Guildford Councillors cannot see the dangers
that this poses to drivers, cyclists and pedestrians alike. The A247 junction with Tannery Lane is already a dangerous
crossroads with poor lines of sight which will become even busier.

Surface water flooding in the area is already bad, will be worsened by the concreting over of this land.

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4.3 GBC’s Strategic Flood Risk Assessment needs updating. The aggregate effect on flood risk of the Narrowboat Basin, plus Clockbarn plus Send Business Park would contravene paragraph 100 of the NPPF, that inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk. At the very least all sources of flooding need to be correctly assessed which GBC has not done.

4.4 There is no recognition of the impact of these developments on sewage facilities which are already at full capacity.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to the Policy A43 change at Garlick’s Arch because it is beautiful permanent Green Belt land which will be spoilt by the building of 400 homes and 6 Travelling Showpeople plots. It will join up Ripley and Send and defeat the key purpose of Green Belt land. The area is subject to frequent flooding and is contaminated by lead shot accumulated over fifty years. The local roads around Send and Ripley will be overwhelmed by the traffic generated by this development.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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<th>pslp172/3770</th>
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<td><strong>Answer (if comment is on questions 1-7 of the questionnaire):</strong> ()</td>
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**Land at Garlick’s Arch, Send Marsh Policy A43**

Now 6 travelling show people plots in addition to 400 houses

5.1 I object because there is no proven demand for travelling show people plots in this location and GBC has produced no tangible evidence to support their claim that there is. Such a site needs to have parking and turning for lorries and trailers, a service and cleaning area, on site storage and accommodation for show people and their families. Access for this from Kiln Lane or Burnt Common Lane would be very difficult, if not impossible.

5.2 By objecting to this, which I am permitted to do under Regulation 19, I am not implying that I prefer what was proposed before. I do not favour any development at Garlick’s Arch for all the reasons given.

5.3 I object to the policy change at Garlick’s Arch which now includes some custom and self-build accommodation because:

5.4 The site is contaminated by lead shot which cannot easily be cleaned up because it has accumulated over 50 years

5.5 It is subject to frequent flooding (for which photographic evidence can be provided) and is in flood zone 2 making it an unsafe and unsuitable site choice.

5.6 It ignores the thousands of objections made previously to the previous proposals.

5.7 It is permanent Green Belt Land and no exceptional circumstances have been demonstrated.

5.8 It would destroy ancient woodland dating back to the time of Elizabeth I

5.9 The site is not near any public transport so residents would be obliged to rely on their cars.

5.10 There are six rural businesses currently on the site and I object to the destruction of rural employment which would result from GBC’s proposals.

5.11 It passes belief that in the whole of Guildford Borough this inaccessible, contaminated, ancient woodland site in the Green Belt, largely unserved by public transport, is the best location that can be found for houses and travelling show people plots.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/1573  Respondent: 8574369 / Douglas French  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A58

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to Policy A58 at Burnt Common because it was deleted from the 2014 draft because of the many objections made previously and there is no proven need for so much industrial development locally. This is Green Belt land and should not be used for industrial development with no proven need when there is plenty of land available at the Slyfield site. Why would anyone build industrial units in the middle of a village when other sites are available? Again this development would join up the existing villages and clog up the local roads with heavy traffic.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/3771  Respondent: 8574369 / Douglas French  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A58

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Land at Burnt Common, London Road, Policy A58

Now a new allocation for a minimum of 7000 sq metres of industrial or warehousing

6.1 The 2016 draft plan referred to a “maximum” of 7000 sq metres. This has been quietly changed to “minimum” in a period when the demand trend for industrial land has declined. This is serious over-provision.

6.2 It makes no sense to put industrial and/or warehouse development in the middle of the Green Belt when Slyfield Industrial Estate in Guildford still has plenty of unused capacity.

6.3 The potential inclusion of a waste management facility mentioned at paragraph 4.423a lacks enough detail for proper consultation but would appear to be completely inappropriate.
6.4 There can be no sensible basis for allocating almost 10 hectares of industrial and warehouse facilities in a small village like Send when the latest ELNA 2017 shows only 3.9 hectares are required for the whole borough. This can only be interpreted as a serious over concentration in one unsuitable place for which there has been no declared explanation.

**Objections relating to both Garlick’s Arch A43 and Burnt Common A58**

7.1 I object to both of these proposals separately but also to their combined effect.

7.2 They will join up Ripley and Send destroying the purpose of the Green Belt.

7.3 They will increase the totality of residential and commercial traffic on the small roads in our villages very substantially. It needs to be appreciated that the main road A247 is absolutely at capacity already and these developments added to those proposed at all the other sites in neighbouring villages will hugely impact on the traffic on Send Road, and also on side roads as people make attempts to avoid traffic gridlock on their way, for example, to Woking Station. A very much more detailed analysis is needed of the traffic impact because the A247 at Send is the one place where nearly all of it will converge.

7.4 Roads are but one of the infrastructure implications which the combined impact of all these developments will have. Others are covered in my 2016 objection.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** pslp171/1916  **Respondent:** 8574369 / Douglas French  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

**Green Belt Policy 2 at paragraph 4.3.15 Send Business Park**

2.1 I object to the proposal to inset Send Business Park from the Green Belt without any evidence being offered to justify it. Send Business Park is for historical reasons in an inappropriate location even for its existing operation and totally unsuited to become a “strategic employment site” as opposed to a “locally significant employment site”. It is an old non-conforming user in a Green Belt location adjacent to the beautiful Wey navigation, which is a conservation area. Any further development there is inappropriate and will detract from the openness of the Green Belt.

2.2 Although this proposal was included as part of site 67 in the 2014 draft plan, it was removed in 2016 following representations. It has now been put back in, which is a good example of why earlier objections are highly relevant and must be included in the material received by the Inspector. Since it was removed last year because it was considered to be in an area of high Green Belt sensitivity, it is difficult to fathom why, a year later, it is not regarded as being Green Belt sensitive at all.

2.3 I specifically object to the undeveloped field (currently separating the end unit at Send Business Park and the Narrowboat Basin Site currently under development) from losing its Green Belt status. Despite action over the last few years which has made it look steadily more derelict, by parking old vehicles on it and leaving them there for months, that Green Belt field still affords views over the Wey Navigation and the countryside beyond. The openness of the Green Belt would be severely damaged by further development on this site. It has also been noted by a frequent walker that over the
last two years the car park has been stealthily increasing in size at the expense of another field. Such encroachment without planning permission is to be deprecated.

2.4 The site lacks adequate access for a strategic employment site because Tannery Lane is very narrow, twisty and dangerous, in parts single track and completely unsuited to commercial and industrial traffic. Given that there are many potential employment sites in Guildford Borough with good access it is to say the least perverse to try to promote one which in so many respects is manifestly unsuitable.

2.5 The Employment Land Needs Assessment 2015 recognised that Send Business Park has poor access for traffic and public transport and other serious shortcomings for an employment site. The volte-face shown in the 2017 ELNA, where without explanation completely opposite conclusions are reached, requires some explanation. Given that neither the site nor the attendant infrastructure has changed in that period how can “very poor access to public transport suddenly become “good” access to public transport when the available public transport has not changed?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Conclusions

8.1 In aggregate the above proposals combined with the ones we are not allowed to comment about, amount to excessive over-development in a small village.

8.2 I object to the mechanics of Regulation 19, restricting comments to new proposals only, as it is being applied by GBC. In the context of GBC’s proposals, where site allocations have been changed and then changed back again, sometimes at the last minute, there is a risk, of which GBC cannot be unaware, that an objection may be interpreted as a preference for what was proposed before. It is almost as if some of the changes have been designed to garner positive feedback and skew the numbers. The Inspector will no doubt be alert to this risk.

8.3 The proposals as they stand are intended to be a draft local plan for the whole of Guildford Borough. It is very disconcerting therefore that somewhere around 40% of the development is contained within a geographical area of about 11% of the borough, all within less than five miles of Send village.

8.4 It is also disconcerting that in addition to the 8 travelling show people plots, Send has also been allocated 2 traveller pitches, the only village in this position.

8.5 This looks like unjustified, unfair and unreasonable concentration in one area to the benefit of other areas which are escaping almost completely. One can only speculate as to the reasons underlying this bias. The Inspector will no doubt wish to make his own enquiries as to the reasons for the imbalance, although one does not have to look very far to find them.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
### Comment ID: PSLPS16/6585  Respondent: 8574689 / Mr David Hemmings  Agent:

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A44

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )

A44

I wish to object on a number of grounds to the propose development identified above, as the access will be via a narrow country road which despite being unsuitable is also part of a high amenity area set in beautiful countryside which would be ruined by such a development. It is also my understanding that the area is documented as unsafe landfill. Moreover, the proposed number of houses potentially could result in many extra cars in Send Hill which is already suffering from congestion, particularly at school run time. This proposal, taken together with the many other proposals, eg Clockbarn Nursery, Burnt Common, Garlick Arch are swamping the character and identity of the village and placing far too high demands on infrastructure, schools and amenities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

### Comment ID: PSLPA16/3861  Respondent: 8574881 / Melanie McLaren  Agent:

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - East Horsley

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )

- I object to the fact that air quality concerns have not been taken seriously – air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<td>• I object to the continued inclusion of a site (the former Wisley Airfield, now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC’s Planning Committee.</td>
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<tr>
<td>• I object to the detrimental impact on transport, local roads and road safety. I specifically object to:</td>
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<tr>
<td>1. The increased volume of car traffic.</td>
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<td>2. The congestion this traffic will cause on the narrow rural roads. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them)</td>
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<tr>
<td>3. The increase in the already severe congestion on the Strategic Road Network of the A3 and M25. The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity</td>
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- I object to the fact that air quality concerns have not been taken seriously – air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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- I object to the fact that insufficient consideration has been given to the environmental and ecological value of the nearby

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to an area that at present has only 0.3% of the population of GBC).

I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/1475  Respondent: 8575585 / Ian Macpherson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Appendix C: Infrastructure Schedule

SRN2 to 4 are highly relevant, but there is no detail to assess impact.

LRN1 is a major complex and untidy package of considerable significance to those of us who live near the town centre and have to cross it (there being no other way round) to go about our business. It presumably includes the consequences of whatever is decided about the "Town Centre and Hinterland Masterplan" of Allies and Morrison 2015.

Yet there is no detail. It is understood from the odd account, for example, that a major restructuring of the Gyratory is under consideration, with consequential significant or highly significant reduction in capacity --which will have a serious impact on my mobility { eg getting to my surgery or the RSCH or the M25}. I cannot accept this unseen, and would be grateful if you would take this as a formal objection to the present consultation procedure

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/1476  Respondent: 8575585 / Ian Macpherson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix G: Policy and monitoring
Appendix G: Policy and Monitoring

Following the Brexit Vote and substantial changes in the UK Government, we can expect a period of national economic and political uncertainty and change, and that this will impact on Local Plan Policies. For two obvious examples, there may be a period of financial retrenchment, and funding for works from Highways England, other grants and from developers, which will curtail or delay projected works. And there may well be a slow-up in immigration (tighter controls) and in the formation of new households (normally held to be dependent on rising incomes) which will reduce or alter demand for new houses.

It would now seem essential that the Local Plan establishes space for a series of deep, and in the early years frequent, reviews to assess what this impact might be and to make any necessary changes. The papers seem uncertain about this.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/2669  Respondent: 8575585 / Ian Macpherson  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

A1: The Plaza, Portsmouth Road

This is at the moment the subject of an unsuitable planning application. It has a planning approval for offices, and that would set a reasonable envelope for residential [of one form or another], which seems to be the presently preferred 'use'.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/2670  Respondent: 8575585 / Ian Macpherson  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
A2: Guildford Cinema, Bedford Road

This is potentially a major development site of some significance, more particularly because the owner of the 'Casino' building adjacent to Bridge Street is reportedly very interested in redevelopment also. The total site - Cinema, ground level car park, 'Casino', is of some significance in itself. More importantly, it bridges between the Railway Station and The Friary, which is an entry point to the town centre as a whole. Decades ago, the then planners identified the need for a high level route from the Station to the town, removing the pedestrian problems of Bridge Street and the at-grade flights crossing of Onslow Street. The opportunity to have a high level platform of size enough to be an attraction in its own right (shops, entertainment, and the luxury hotel that Guildford so badly needs) while providing a most attractive route into town [in contrast to so many walkways], is unique and should be seized. That does not emerge here.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/8312  Respondent: 8575585 / Ian Macpherson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A25

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

A25 : Gosden Hill Farm

This is a most unfortunate proposal, presumably initiated by developers who, I have been told, has been 'banking' the land for some decades, and now taken up by GBC.

There are a number of specific issues which have been, I read, identified by the local Residents Association, such as traffic flow into town.

However the key issue for me is a Green Belt issue - the potential change in nature of the entry into Guildford along the A3.

At the moment, it is open fields, with a long view up to the North Downs, as far as the Burpham Slip Road, where a tree line provides a hard edge to the town. The A3 itself then continues south in an artificial cutting, making a sharp contrast from open countryside to the urban character of a landscaped town road. Although the details of the urbanisation of the Farm are not yet available, it is difficult to see how the long view can be retained, and Guildford not be seen as building significantly further towards London. This would seem to cut across the principles of the NPPF, in loss of valued views and in gradual coalescence [ribbon development, if you like] towards London - a marked loss of openness.

Refer - NPPF 80-3, 80-4, 88 and 109, and appeals such as - Spurstow, Tarporley, Cheshire East,- Aylestone Hill, Hereford

The fact that the A3 is a notional highway, almost of the importance of a Motorway, carrying large numbers of people, from commuters to holidaymakers and country lovers, each day, compounds the significance of this proposal. While landscape appraisal normally gives a low rating to views from cars, the number of cars is so significant here that this becomes a very high and major 'material' matter.
It would be difficult to find a place where more damage would be done to the Green Belt environment.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/2674  Respondent: 8575585 / Ian Macpherson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

A26: Blackwell Farm

I note and appreciate major representations from others as to Green belt and AONB. Interestingly, while there are major landscape considerations, the site is visible but not very visible from the A3 at that point, nor from a number of other likely viewpoints. It has been observed that the most significant external viewpoint is the upper wards of the RSCH.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/2675  Respondent: 8575585 / Ian Macpherson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

A43 : Land at Garlick's Arch, Send Marsh/ Burnt Common

As this is Green Belt of high significance, any proposal here will need special justification and be wholly screened from the A3.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/2676  Respondent: 8575585 / Ian Macpherson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

A43a : Land for new north facing slip roads to/from A3

Functional, and a needed purpose. However it is important that the highest level of design and fit into the landscape be deployed, because of the great sensitivity at that point.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

A7 and at Guildford railway station,

This account is limp.

The major contribution to a key transport interchange appear to be the replacement of Walnut Tree river bridge. It is not entirely clear how necessary this is, since the present serves reasonably. The real problem on the route to town is the Onslow Street at-level-lights pedestrian crossing -see commentary on A2 above for resolution. Meanwhile, there is no discussion of the potential for interchange with the buses or kiss-and-ride. This is a once-for-all opportunity for serious benefit to the town, and needs positive planning.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>PSLPS16/2673</th>
<th>Respondent:</th>
<th>8575585 / Ian Macpherson</th>
<th>Agent:</th>
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<td><strong>Document:</strong></td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy A8</td>
<td></td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()
A8: Land west of Guildford railway station

This account is limp.

At the present moment, it is understood that comparably as many people exit from this side as the main side. Yet the station facilities are grossly inadequate for the traffic. In particular - and this does touch on matters within GBC control, there is grossly insufficient space along Guildford Park Road for the service buses to pick up or drop off, the taxis to wait for the passenger numbers, and the access to different routes from the main station, this facility should be substantially enhanced, and private cars to drop off or pick up. As a result, and with the best will, Park Road is frequently obstructed. As the long term proposals for the University, Science Park, and housing developments appear likely to generate a considerable increase in traffic this needs early addressing, regardless of the issue of expansion of railway operational facilities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/5959  Respondent: 8575585 / Ian Macpherson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy D2: Sustainable design, construction and energy

" - reasonably achievable - ".Building regulations uses the term 'reasonable' against requirements, as otherwise trouble can be caused, and it should be used here.

It would really be much more sensible and in line with Governmental thinking to aim at compliance with national legislation, Building Regulations [ and national and NH BC technical requirements as developed], and leave it there. This can be done by way of referencing such sources.

There is a sort-of 'arms race' between Local Authorities [ the 'Merton effect ' - though I understand that Merton has withdrawn from its extreme position] to demonstrate they are more 'sustainable' than their neighbours. The intention is wholly admirable. However a mass of experience is building up to show that premature or ill advised 'sustainable' works do not save the energy suggested in the original calculations and create expensive problems for the future. Solar electricity is now a well known example - the essential inverters tend to fail after about ten years [ eg through degradation of capacitors], 'spares' for that model of installation are then no longer available, and Fire Brigades are reportedly very cautious about entering to extinguish if such house do catchfire, due to the risk of roof collapse.

Another area fraught with disasters is dry lining of elderly houses.

GBC has insufficient expert scientific industry knowledge to evaluate highly technical schemes of this kind. Apart from disappointing performance, there is the side risk of GBC being sued over future failure if the works were installed as a result of formal requirement. Much better left to the Building Regulations Advisory Committee and et al, as the Government then carries the risk.

It should be noted that the Government is becoming uneasy about the over-enthusiastic application of European legislation, and we may see changes following Brexit.
I have commented to this effect in the last 2014 round of consultation, and see that no notice has been taken. Would it be helpful if I gave references to technical articles?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/5957  
Respondent: 8575585 / Ian Macpherson  
Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy E1: Meeting employment needs

One unlisted locally significant employment site uses and supplements former pig rearing sheds on Manor Farm alongside the old Portsmouth Road at Artington. It has achieved its present position by stealth. It is most unsightly [fly boards and other tat along the road, as well as the unattractive hoardings on the sheds] but occupies very high amenity land - Green Belt and River Valley. Now quite inappropriate. It would be good to have it removed or reverted to agriculture or used for car parking behind trees and hedges [as the existing Artington P&R, which now is quite well hidden and so not inappropriate for its placing].

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/5958  
Respondent: 8575585 / Ian Macpherson  
Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E6

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy E6: The leisure and visitor experience

Agree with the commentary. The existing hotel provision is neither sufficient in quantity or quality. There have been suggestions for a luxury hotel or hotels in the general vicinity of Bedford Road - Bridge Street. This could usefully be combined with a high level walkway -see later.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Comment ID: PSLPP16/5949  Respondent: 8575585 / Ian Macpherson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy H1: Homes for all

While homes for all is a worthy objective, it would be better if it were established in the context of the sub-region. Guildford, because of its inherent attractiveness and the quality of the countryside, can conveniently establish itself as a provider of high and very high value homes. The sub-regional housing market indicators suggest that Aldershot and places west such as Alton are already providing market affordable homes for the sub-region. A step towards this is indicated elsewhere in the draft by promised improvement of the rail service from Alton and from Farnborough to Guildford. This is not explored at all, due to arbitrary limitations to the SHMA Housing Market area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5950  Respondent: 8575585 / Ian Macpherson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy H2: Affordable Homes

The recent Government policy on affordable housing [ eg starter homes for first time buyers, and sale of Housing Association properties] is recognised by most commentators as a mess. However, there-it-is [ until amended] and this is not reflected in the commentary here, which seems to be based on previous practice. Perhaps it should be re-considered?

Viability calculations should be based on the latest SPD from Islington London Borough Council, which seems generally accepted as sensible by other LBs, and by reason of their position in the Development world have been up the forefront of the debate over viability.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Policy 11: Infrastructure and delivery

The issue of funding is supported in principle.

HOWEVER I am not at all clear how the issue of town centre infrastructure fits into this Local Plan. LRNI gives a listing of sorts, but no more.

Where is a consistent plan for the non-railway activities of the Railway Station? Surely here there should be some statement of policy related to transport interchange and its relationship with the town centre.

There is potentially a very major opportunity, more particularly because the owner of the 'Casino' building adjacent to Bridge Street is reportedly very interested in redevelopment also. The total site - Cinema, ground level car park, 'Casino: is of some significance in itself. More importantly, it bridges between the Railway Station and The Friary, which is an entry point to the town centre as a whole.

Decades ago, the then planners identified the need for a high level route from the Station Overbridge to the Friary Centre, removing the pedestrian problems of Bridge Street and the at-level-lights crossing of Onslow Street [which current leading proposals fail to do]. The opportunity to have a high level platform of size enough to be an attraction in its own right [shops, entertainment, and the luxury hotel that Guildford so badly needs] while providing a most attractive route into town [in contrast to so many walkways], is unique and should be seized. That does not emerge here.

The various proposals for the gyratory presumably will go out for consultation in another document. But it has to be said that the present favoured packages are unhelpful. The closing of Bridge Street to vehicles does nothing to tackle the Onslow Street Crossing, or open up the river, while reducing the capacity of the road system [from where I live, any journey going North, eg Woking or the M 25, will be greatly handicapped]. The same result in terms of pedestrian safety can be achieved by reducing Bridge Street to two lanes [a solution that was accidentally trialled when building work was recently undertaken], and it is uncertain why anyone should see Bridge Street [which is pretty tatty] as a prime candidate for full pedestrianisation. The visionary solution must be the high level platform!

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Policy 12: Supporting the Department for Transport's "Road Investment Strategy"

While the M25 proposals are of some interest, the A3 proposals are in principle of central importance to Guildford, as they will unlock much. But what are they? We are told in the vaguest terms, but either proffered alternative will affect much on the ground. To not have some detail does undermine the transport section of the draft Local Plan.

Note that one particular issue that arises is Compton. This is a pretty valuable Conservation Area, but the road through has become what is in effect a 'South Guildford By-pass '-a situation that will get worse with A3 improvements. How is this to be tackled -for tackled it must be!

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Policy 13: Sustainable transport for new developments

Presumably there is some threshold for some at least of the expectations set out in the list. The (legal) drafting of the policy makes the requirements absolute.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Policy 14: Green and blue infrastructure

I have not looked recently at the Water Framework Directive [blue infrastructure], but if it follows the normal pattern of Directives, then it is up to the member state to implement [mainly by way of national Regulation] and not directly by individuals. Revisit the drafting? In any case this will presumably be affected by Brexit?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/5951  Respondent: 8575585 / Ian Macpherson  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy P1: Surrey Hills Area of Outstanding Natural Beauty (AONB)
supported, particularly the re-examination of AGL Vs.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/5952  Respondent: 8575585 / Ian Macpherson  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy P2: Green Belt
This broadly reflects current national policy

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/5953  Respondent: 8575585 / Ian Macpherson  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P3
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy P3: Countryside

This worthy statement does not seem entirely to accord with current local practice. There is substantial development approved, applied for or planned in the broad 'countryside' by Ash/Tongham/Aldershot, and perhaps greater clarity is called for?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5954  Respondent: 8575585 / Ian Macpherson  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy P4: Flooding, flood risk and groundwater source production

This is really out of GBC's control - GBC acting effectively as an agent - no comment.

It would seem unlikely that current European requirements that act as drivers will be rescinded, as they seem fairly fundamental, though detail of national implementation might be trimmed?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5955  Respondent: 8575585 / Ian Macpherson  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Policy P5: Thames Basin Heath Special Protection Area

The driver here is the European Directives. The detailed rules are set by Natural England, which has its own interpretation of the Directive requirements. This is an area that has raised considerable question and so likely to be reviewed following Brexit, and the commentary should reflect this.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/5947  Respondent: 8575585 / Ian Macpherson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

- Strategic Policies

Policy S1: Presumption in favour of sustainable development

This effectively follows N PPF.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/5948  Respondent: 8575585 / Ian Macpherson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy S2: Planning for the borough - our spatial development strategy

This restates the 13K new homes target, for which see below.

This section also effectively gives an expansion target for the Research Park. This commentator understands that the Research Park is a very high value contributor to the economy, and this is to be supported.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Question 1 The evidence base and submission documents

Unfortunately the evidence used is not wholly adequate, up to date or relevant. This is as much the result of recent external events as matters within GBC’s control.

The key areas are * cooperation, * housing and * transport.

* COOPERATION

Set originally for reasons stretching far back into mediaeval history, the local authority boundaries do not any longer reflect real market boundaries. The Guildford work, shopping and housing areas stretch over the County boundary into Rushmore and far beyond. For one example, the ‘market’ pool of cheap housing for Guildford is in Aldershot. The draft shows signs of discussions with Waverley and Woking but little evidence of in-depth cooperation with Rushmore and beyond - instead, Rushmore and beyond authorities are cooperating with authorities to their west, but not to the east. THE ORIGINAL 1944 SPECIFICATION FOR GREEN BELT POSTULATED THAT EXPANSION WOULD LEAP THE GREEN BELT. That is Rushmore, not Gosden Hill Farm.

* HOUSING

That the Hearne calculations for housing demand are substantially flawed appears to be a common view, now apparently visibly based on an alternative expert calculation. However, since these original calculations were attached to the Plan documents there has been the major event of ‘Brexit’. It is expected that Brexit will lead to a considerable decline in immigration from the EU, and, since criteria are likely to be tightened, of some immigration from outside the EU. Not so much of a decline as a simple look at the crude national figures, or the relevant pages in Hearne might suggest, but nevertheless a considerable decline is said to be likely. At the same time it is expected that there will be a period of economic stagnation or low growth, which will lead to a decline in the setting up of new households. So it looks as if the Hearne figures will have to be re-visited, regard less of views as to their original validity. It is understood [ verbal] that GBC has this in hand. However it would seem to be demonstrably premature to proceed to acceptance in advance of re-visited and agreed figures.

It is customary in estimating work to publish conclusions that give a mean estimate with a sub estimate of upper and lower tolerances. The Hearne tables appear largely not to do this - instead to put forward a single integer estimate refined to the last digit [ as eg 693]. This is surprising, and a word of explanation as to the level of accuracy in the head line figures would be helpful.

TRANSPORT

The sections on transport are the most difficult. They are really quite vague, promising events that are not within the ability of GBC or SCC to deliver.
The lead promise is, of course, the improvement of the A3, where all is vague as to exactly what is to be done. It is not clear how much of the road and transport system can be sorted.

But there are many other examples, improvements and changes in the bus and rail services being one.

Bus and rail services are provided at the will of the relevant operators, and a service exists only where the operator anticipates a profit or, in the case of rail, is required by central government. There are a few exceptional bus services that are subsidised, but the relevant Authorities only have very limited funds for this purpose - funds that are being cut and will probably be cut further. Moreover, it seems possible that the Senior Bus Cards will be withdrawn or severely limited, which will reduce the profitability of the existing services further and lead to consequent substantial reductions in the services for all.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** SQLP16/962  **Respondent:** 8575585 / Ian Macpherson  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 2: Legal compliance

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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**Comment ID:** SQLP16/963  **Respondent:** 8575585 / Ian Macpherson  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Question 3: Soundness

The response following repeats the response to Question 1. If the evidence is not wholly satisfactory then it follows that the submission as a whole is not sound.

Unfortunately the evidence used is not wholly adequate, up to date or relevant. This is as much the result of recent external events as matters within GBC's control

The key areas are *cooperation, *housing and *transport.

* COOPERATION

Set originally for reasons stretching far back into medieval history, the local authority boundaries do not any longer reflect real market boundaries. The Guildford work, shopping and housing areas stretch over the County boundary into Rushmore and far beyond. For one example, the pool of cheap housing for Guildford is in Aldershot. The draft shows signs of discussions with Waverley and Woking but little evidence of in-depth cooperation with Rushmore and beyond - instead, Rushmore and beyond authorities are cooperating with authorities to their west, but not to the east.

THE ORIGINAL 1944 SPECIFICATION FOR GREEN BELT POSTULATED THAT EXPANSION WOULD LEAP THE GREEN BELT. That is Rushmore, not Gosden Hill Farm.

* HOUSING

That the Hearne calculations for housing demand are substantially flawed appears to be a common view, now visibly based on an alternative expert calculation. However, since these original calculations were attached to the Plan documents there has been the major event of 'Brexit'. It is expected that Brexit will lead to a considerable decline in immigration from the EU, and, since criteria are likely to be tightened, of some immigration from outside the EU. Not so much of a decline as a simple look at the crude national figures, or the relevant pages in Hearne, but nevertheless a considerable decline is said to be likely. At the same time it is expected that there will be a period of economic stagnation or low growth, which will lead to a decline in the setting up of new households.

So it looks as if the Hearne figures will have to be re-visited, regardless of views as to their original validity. It is understood [verbal] that GBC has this in hand. However it would seem to be demonstrably premature to proceed to acceptance in advance of re-visited and agreed figures.

It is customary in estimating work to publish conclusions that give a mean estimate with a sub estimate of upper and lower tolerances. The Hearne tables appear largely not to do this - instead to put forward a single integer estimate refined to the last digit [as eg 611]. This is surprising, and a word of explanation as to the level of accuracy would be helpful.

TRANSPORT

The sections on transport are the most difficult. They are really quite vague, promising events that are not within the ability of GBC or SCC to deliver.

The lead promise is, of course, the improvement of the A3, where all is vague as to exactly what is to be done. It is not clear how much of the road and transport system an be sorted

But there are many other examples, improvements and changes in the bus services being one. Bus services are provided at the will of the bus operators, and a service exists only where the operator anticipates a profit. There are a few exceptional services that are subsidised, but the relevant Authorities only have very limited funds for this purpose -funds that are being cut and will probably be cut further. Moreover, it seems possible that the Senior Bus Cards will be withdrawn or severely limited, which will reduce the profitability of the existing services further and lead to consequent reductions.
**Question 4: Duty to cooperate**

The response following repeats the relevant part response to Question 1.

* COOPERATION

Set originally for reasons stretching far back into mediaeval history, the local authority boundaries do not any longer reflect real market boundaries. The Guildford work, shopping and housing areas stretch over the County boundary into Rushmore and far beyond. For one example, the pool of cheap housing for Guildford is in Aldershot. The draft shows signs of discussions with Waverley and Woking but little evidence of in-depth cooperation with Rushmore and beyond - instead, Rushmore and beyond authorities are cooperating with authorities to their west, but not to the east.

**THE ORIGINAL 1944 SPECIFICATION FOR GREEN BELT POSTULATED THAT EXPANSION WOULD LEAP THE GREEN BELT. That means Rushmore, not Gosden Hill Farm.**

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** SQLP16/964  **Respondent:** 8575585 / Ian Macpherson  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 4: Duty to cooperate

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

---

**Question 4**

Duty to cooperate

The response following repeats the relevant part response to Question 1.

* COOPERATION

Set originally for reasons stretching far back into mediaeval history, the local authority boundaries do not any longer reflect real market boundaries. The Guildford work, shopping and housing areas stretch over the County boundary into Rushmore and far beyond. For one example, the pool of cheap housing for Guildford is in Aldershot. The draft shows signs of discussions with Waverley and Woking but little evidence of in-depth cooperation with Rushmore and beyond - instead, Rushmore and beyond authorities are cooperating with authorities to their west, but not to the east.

**THE ORIGINAL 1944 SPECIFICATION FOR GREEN BELT POSTULATED THAT EXPANSION WOULD LEAP THE GREEN BELT. That means Rushmore, not Gosden Hill Farm.**

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** SQLP16/965  **Respondent:** 8575585 / Ian Macpherson  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Question 5
Examination
For personal reasons I am unable to participate in the examination.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Respondent: 8575585 / Ian Macpherson</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 7: Any other comments?</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Question 7
Any other comments?

none

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: PSLPA16/1664</th>
<th>Respondent: 8575617 / Effingham Parish Council (Ian Symes)</th>
<th>Agent:</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base</td>
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</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Site Selections: in Effingham
EPC supports the sites selections in Effingham identified in the Land Availability Assessment (LAA):

1. The Barn (Site Ref 1040)
2. Church Street Field (Site Ref 99)
3. Orchard Walls, Beech Ave (Site Ref 1038)
4. Home Farm (A48)
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

**Comment ID:** PSLPA16/1663  **Respondent:** 8575617 / Effingham Parish Council (Ian Symes)  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Effingham

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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Effingham Parish Council (EPC) welcomes the fact that Effingham Lodge Farm (ELF) is no longer regarded as a strategic site in planning terms, as it was in the 2014 draft Local Plan.

Please also find, herewith, a map showing EPC’s requested amendments to the proposed inset boundary – Policy P2.

EPC’s comments on the June 2016 Proposed Submission Local Plan: strategy and sites are below in Policy order.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents: [Effingham-EPC-GB-Inset.pdf](#) (3.2 MB)

---

**Comment ID:** PSLPA16/1665  **Respondent:** 8575617 / Effingham Parish Council (Ian Symes)  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

---

A39 East Horsley

A38, A40, A41 West Horsley

Object

EPC objects to the over-development of our neighbouring parishes of East and West Horsley. These four proposed site selections will add approximately 445 housing units in what is presently Green Belt. We see this as over-development of these two neighbouring villages. There is also the impression that land is being inset from the Green Belt for the sole purpose of meeting housing targets, and not for the reasons allowable for insetting set out in the NPPF. If development of...
these areas of land is permitted it will lead to the increasing erosion of the Green Belt between the Effingham/Bookham boundary and Guildford.

There are over 120 Effingham residents who live within the East Horsley settlement area and these residents will be particularly impacted by the increased traffic these site selections will generate. Many residents believe the narrow rural roads in the area are inadequate to support, safely, the construction traffic that will use these roads over many years.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/3205  Respondent: 8575617 / Effingham Parish Council (Ian Symes)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

(A35) Wisley

Object

EPC objects to the approximately 2000 units proposed for the former Wisley Airfield. It is an over-development of the site and will adversely affect already heavily congested local roads and lead to much worse traffic congestion at the Forest Road, Effingham Common Road junction. Additionally, EPC is concerned about the usage of the car park at Effingham Junction station. This is already full, on most working days, with cars spilling out to park on Effingham Common Road, in contravention of highway regulations.

Many residents of Effingham commute to London to work. The extra pressure on rail services from the site allocation at Wisley will mean that Effingham residents may find there is only standing room on the Effingham Junction to Waterloo service during rush hours.

Effingham residents are also concerned about the inadequacies of the road infrastructure if Wisley were given planning permission. The route from the Forest Road, Effingham Common Road junction, via Old Lane, to the A3 is heavily used and any closure, or restriction, of this road during development of the site would have a severe effect on traffic through the area as well as causing great inconvenience and added pollution.

There are over 120 Effingham residents who live within the East Horsley settlement area and these residents will be particularly impacted by the increased traffic along Forest Road if Wisley were developed, especially in the morning rush hours when new Wisley residents would drive through the area to park at Horsley and Effingham Junction stations.

EPC has previously objected to the planning application at this site and maintains this objection.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/3279  Respondent: 8575617 / Effingham Parish Council (Ian Symes)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35
EPC objects to the over-development of our neighbouring parishes of East and West Horsley. These four proposed site selections will add approximately 445 housing units in what is presently Green Belt. We see this as overdevelopment of these two neighbouring villages. There is also the impression that land is being inset from the Green Belt for the sole
purpose of meeting housing targets, and not for the reasons allowable for insetting set out in the NPPF. If development of these areas of land is permitted it will lead to the increasing erosion of the Green Belt between the Effingham/Bookham boundary and Guildford.

There are over 120 Effingham residents who live within the East Horsley settlement area and these residents will be particularly impacted by the increased traffic these site selections will generate. Many residents believe the narrow rural roads in the area are inadequate to support, safely, the construction traffic that will use these roads over many years.

A48 Traveller Site (Effingham)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/3211  Respondent: 8575617 / Effingham Parish Council (Ian Symes)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A48

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (

A48 Traveller Site (Effingham)

EPC supports the Traveller site selection of 6 units for Home Farm on the condition it is for local people.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7019  Respondent: 8575617 / Effingham Parish Council (Ian Symes)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (

D1 Design– Making places better

Support

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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D4 Design - Development in urban areas and inset villages

Support

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7006  Respondent: 8575617 / Effingham Parish Council (Ian Symes)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

E1, E2, E3, E4, E7 Economy – No Comment

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7008  Respondent: 8575617 / Effingham Parish Council (Ian Symes)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

E5 Economy– Rural Economy

Support

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7010  Respondent: 8575617 / Effingham Parish Council (Ian Symes)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E6
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

E6 Economy– Leisure and visitor experience

Support

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7013  Respondent: 8575617 / Effingham Parish Council (Ian Symes)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E8

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

E8 Economy – District Centres

Support

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7016  Respondent: 8575617 / Effingham Parish Council (Ian Symes)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E9

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

E9 Economy– Local Centres

Support

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: PSLPP16/6977  Respondent: 8575617 / Effingham Parish Council (Ian Symes)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

H1 Housing– Homes for all

Support

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/6980  Respondent: 8575617 / Effingham Parish Council (Ian Symes)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

H2 Housing - Affordable Homes

EPC supports the principle that 40% of new homes should be affordable. It trusts that these affordable homes will include starter homes for purchase in the market (under new Government legislation) where the homes are for first time buyers who are under 40 years of age.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/7190  Respondent: 8575617 / Effingham Parish Council (Ian Symes)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
H2 Housing – Affordable Homes

EPC supports the principle that 40% of new homes should be affordable. It trusts that these affordable homes will include starter homes for purchase in the market (under new Government legislation) where the homes are for first time buyers who are under 40 years of age.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/6982  Respondent: 8575617 / Effingham Parish Council (Ian Symes)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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H3 Housing – Rural Exception Homes

Support

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/7030  Respondent: 8575617 / Effingham Parish Council (Ian Symes)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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I1 Infrastructure–Infrastructure and delivery

Support

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/7033  Respondent: 8575617 / Effingham Parish Council (Ian Symes)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID2
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Comment ID: PSLPP16/6984  Respondent: 8575617 / Effingham Parish Council (Ian Symes)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

P1 Protecting - Surrey Hills AONB

Support

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6990  Respondent: 8575617 / Effingham Parish Council (Ian Symes)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

P2 Protecting - Green Belt

Support (but on the condition that the proposed inset boundary for Effingham is amended.)

EPC supports the insetting of Effingham in so far as it is consistent with the NPPF and Effingham’s emerging Neighbourhood Plan. However, we believe that the insetting boundary shown in the LP is incorrect and should be amended. This applies to the inset boundary to both the east and west of the village.

Requested inset boundary change to the east of the village.

EPC propose the following amendments to the inset boundary to the east of the village. The requested inset boundary change starts at the A246/Browns Lane junction. Instead of turning into Browns Lane it continues down the A246 to the traffic lights and the junction with The Street. It then continues along The Street until Chapel Hill. It turns into Chapel Hill and at the junction of Chapel Hill and Church Street continues straight across the road (Church Street) onto footpath FP118. This footpath, which goes to the north of the St Lawrence Church, joins up with the LP proposed inset boundary at the north west of the KGV fields, where it also intersects with FP118.

EPC propose this amendment as it follows a more clearly defined and permanent boundary – based on roads and footpath FP118. It also excludes the historic centre of the village and removes and protects important historical buildings and assets:

- St Lawrence Church,
- Browns (a former residence of the Lord of the Manor),
- Browns Field which is used by the Rugby Club minis for sport and is also a field of historic importance,
- Dormers and Old Stantons on Church Street, two period and historically attractive houses
- Silver Jubilee Garden, the former village green – opposite the entrance to St Lawrence Church.
EPC sees this amended inset as a clearly defined and permanent boundary following roads and a footpath. It also protects a public amenity space (Silver Jubilee Garden on Church Street) and several historic buildings including St Lawrence Church.

The inset boundary proposed in the LP does not follow a clearly defined boundary. It goes straight through the centre of the Barnes Wallis Close development where there are no defined or permanent boundaries, and if this inset boundary were to be applied it would be likely to cause confusion in the future.

EPC attaches a map, herewith, that shows the amendments in detail.

Requested inset boundary change to the west of the village.

To the west EPC proposes the following change to the inset boundary. At the back of Middle Farm Place the inset follows the road edge in front of 37, 39 and 41 Middle Farm Place and then follows the back gardens of Wychelm, Lavender Hill and Woodstock on Orestan Lane. This removes Middle Farm Place field from the inset. This amended inset boundary provides a clear, defensible and permanent boundary.

In addition Middle Farm Place field is a public amenity space and should not be included in the inset. The map attached shows the requested amendment to the inset.

EPC request GBC to add a paragraph to page 122, Sites, that states that GBC will support, in principle, sites brought forward by Neighbourhood Plans.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<th>Comment ID: PSLPP16/7191</th>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

P2 Protecting Green Belt

Support (but on the condition that the proposed inset boundary for Effingham is amended.)

EPC supports the insetting of Effingham in so far as it is consistent with the NPPF and Effingham's emerging Neighbourhood Plan. However, we believe that the insetting boundary shown in the LP is incorrect and should be amended. This applies to the inset boundary to both the east and west of the village.

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EPC request GBC to add a paragraph to page 122, Sites, that states that GBC will support, in principle, sites brought forward by Neighbourhood Plans.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Page 637 of 3335
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

P4 Protecting– Flood Risk
Support

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6999  Respondent: 8575617 / Effingham Parish Council (Ian Symes)  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

P5 Protecting– Thames Basin Heaths SPA
Object

EPC strongly objects to a car park on Effingham Common. The proposed car park location would damage the ecology and habitat of the Common, and would be sited very close to one of the few parts of the Common where Skylarks (now on the Red List in the UK) breed.

EPC believes that the car park would be full of commuters’ vehicles, from early morning to late afternoon, whose owners would be using Effingham Junction Station.

Effingham Common is already very accessible from Effingham Junction station; and the popular Horsley Jubilee Trail, which crosses the Common, has a starting point at Horsley station. Many people use public transport to visit and enjoy the Common.

The Local Plan is proposing two additional SANGs in West Horsley and Wisley. If these are accepted there is no longer a requirement for the SANG at Effingham Common to have a car park situated on the Common.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7230  Respondent: 8575617 / Effingham Parish Council (Ian Symes)  Agent:
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Effingham Common is already very accessible from Effingham Junction station; and the popular Horsley Jubilee Trail, which crosses the Common, has a starting point at Horsley station. Many people use public transport to visit and enjoy the Common.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6975  Respondent: 8575617 / Effingham Parish Council (Ian Symes)  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

S1 Strategy–Presumption in favour of sustainable development.

Support.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6976  Respondent: 8575617 / Effingham Parish Council (Ian Symes)  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Object.

Over 80% of Guildford borough land is situated in the Green Belt and the Proposed Submission Local Plan (LP) housing numbers fail to take into account allowable constraints on new builds in the borough, caused by the green belt. Due to such a high housing target, over the plan period, the only way such large housing numbers can be accommodated is by taking too much land out of the Green Belt. A smaller housing target could have protected the Green Belt and been allowable under NPPF constraints based on the high proportion of Green Belt in the borough. Effingham Parish Council objects to the housing target – it is too high.

In addition, it is necessary to review the Strategic Housing Market Availability Assessment (SHMAA) concerning:

1. The part of the housing target driven by economic growth. Is this housing target still appropriate for the borough following the referendum result and the expected slower growth in the future? Given that an average of 125 new builds per year are due to economic growth this figure needs reviewing.
2. Whether student figures for the University of Surrey are still appropriate? Following the referendum result student numbers at the university are expected to decline as students from Europe are now expected to have to pay the full fee Russell Group universities are predicting a decline in student numbers from Europe in the future due to the higher fees.
3. EPC regards the 14% housing buffer to be higher than necessary and should be reduced. The 14% buffer is forcing GBC to identify sites in the green belt that would not be needed if there were no, or a lower, buffer.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
1. Whether student figures for the University of Surrey are still appropriate? Following the referendum result student numbers at the university are expected to decline as students from Europe are now expected to have to pay the full fees. Russell Group universities are predicting a decline in student numbers from Europe in the future due to the higher fees.

1. EPC regards the 14% housing buffer to be higher than necessary and should be reduced. The 14% buffer is forcing GBC to identify sites in the green belt that would not be needed if there were no, or a lower, buffer.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment ID: SQLP16/2120</th>
<th>Respondent: 8575617 / Effingham Parish Council (Ian Symes)</th>
<th>Agent:</th>
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</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents</td>
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</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

EPC supports the sites selections in Effingham identified in the Land Availability Assessment (LAA):

- The Bam (Site Ref 1040)
- Church Street Field (Site Ref 99)
- Orchard Walls, Beech Ave (Site Ref 1038)
- Home Farm (A48)

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment ID: PSLPS16/1655</th>
<th>Respondent: 8575649 / Ian Reeves</th>
<th>Agent:</th>
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<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I am writing to object to the latest Guilford Local Plan which is not sustainable. In particular I object to:

The late inclusion of the site A43 Garlick’s Arch opposite the Send Marsh Road. This is a Green Belt area covered by ancient woodland and prone to flooding. The industrial space planned of 7,000 sq. metres is not needed and mis-placed. If it were needed it should be at Slyfield. In addition the need to build 400 houses on this site is based on dubious calculations which the Council have refused to disclose. With proper use of Brownfield sites the building on this Green Belt site is not needed. There are no exceptional circumstances to build on this or any other Green Belt site in this area. Furthermore, these houses will generate more traffic for our already over busy roads and place even more pressure on local services such as Doctors and Schools especially with the other very large local developments included in the Local Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/1656  Respondent: 8575649 / Ian Reeves  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I also object to the new interchange with the A3 at Burnt Common, site A43a, which will add severe pressure to traffic in the Send and Send Marsh area. This area is already overloaded with traffic and would become gridlocked with the added pressure from the proposed 2,000 new houses at Wisley Airfield, 2,000 new houses at Gosden Hill, Burpham and 1,850 at Blackwell Farm. The local roads are incapable of taking this pressure and noise and pollution levels, already excessive, would become unbearable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3630  Respondent: 8575649 / Ian Reeves  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Send, Send Marsh and Ripley must be protected from the increasing pressures on our Green Belt, Roads, Surgeries, Schools, Local Amenities and the health and welfare of existing residents.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: PSLPP16/3629  Respondent: 8575649 / Ian Reeves  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

In overall terms I object to the disproportionate amount of planned development in this area of the Borough, the 'in-setting' of local villages from the Green Belt and the Councils complete lack of consideration for the local residents whose lives will be severely affected not just because of the scale of the problems listed above but also the building construction itself and the mayhem that would be associated with these large scale developments.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp173/307  Respondent: 8575649 / Ian Reeves  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Appendix H: Maps - Send

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Finally I object to the Green Belt Policy 2 paragraph 4.3.15 I object to the proposal to inset Send Business Park from the Green Belt because:- Further expansion or development at this location would not only detract from the openness of the Green Belt it would cause severe problems along the restricted vehicle access of Tannery Lane.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/2457  Respondent: 8575649 / Ian Reeves  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to the Policy A43 change at Garlicks's because:- It ignores my and thousands of other previous objections made by the local population.

How can you justify the need for Travelling Showpeople plots here?

This is Green Belt and Ancient woodland and no ‘ Exceptional Circumstances ’ exist.

It is over development of our villages and number of homes is excessive.

This will exacerbate the already problem of flooding in this location.

It will severely add to the already congested roads of Send and Ripley.

Furthermore I understand that it is contaminated with lead shot.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: pslp172/2458</th>
<th>Respondent: 8575649 / Ian Reeves</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A58</td>
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</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I also object to Policy A58 at Burnt Common because:- Having been taken out of the 2014 Draft Plan because of objections it has now reappeared with the word ‘ Minimum ’ replacing ‘ Maximum ’.

Why build commercial, industrial, warehouse development in the middle of the Green Belt when Slyfield still has empty sites. This will further add to gridlocking the local village roads which were never built to take this onslaught of even more heavy traffic.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPS16/160</th>
<th>Respondent: 8577729 / Ripley Court Educational Trust (Mr Andrew Gough)</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35</td>
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</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
1. I object to the fact that despite its earlier rejection, The Wisley Airfield site plan for 2000 homes is still in the plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/161  Respondent: 8577729 / Ripley Court Educational Trust (Mr Andrew Gough)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to the Garlick’s Arch plan to put 400 homes on a delicate site at the west of Ripley.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/287  Respondent: 8577729 / Ripley Court Educational Trust (Mr Andrew Gough)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to the lack of information on how additional medical services would be provided.
2. I object to the lack of information on how the very limited infrastructure improvements proposed would cope with the new housing developments. The A3 interchange at Burnt Common would provide little or no traffic alleviation, and the A23 is currently suffering almost daily tailbacks on the current traffic load.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/286  Respondent: 8577729 / Ripley Court Educational Trust (Mr Andrew Gough)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
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<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire):</td>
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</tr>
<tr>
<td>1.</td>
<td>I object to erosion of the green belt. This area is a set of lungs in between heavily built-up areas and development on this would be a disgraceful breaking of responsibilities to preserve our heritage.</td>
</tr>
<tr>
<td>2.</td>
<td>I object to “in-setting” (i.e. removal) of any of the local villages from the green belt.</td>
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</tbody>
</table>

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
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<tr>
<th>Comment ID:</th>
<th>pslp172/818  Respondent: 8579009 / I W Groden Agent:</th>
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<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2017 / Policy A42</td>
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<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire):</td>
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</tr>
<tr>
<td>1.</td>
<td>I object to the manner in which the borough intends to place a disproportionate amount of development in one area.</td>
</tr>
<tr>
<td>2.</td>
<td>I object to the very limited consultation period given for a document of some 1800 pages.</td>
</tr>
<tr>
<td>3.</td>
<td>I object to the last-minute inclusion of new sites.</td>
</tr>
<tr>
<td>4.</td>
<td>I object to the lack of any evidence for alleged local housing need numbers.</td>
</tr>
</tbody>
</table>

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
**Land at Clockbarn Nursery, Tannery Lane, Policy A42**

**Objection**

Send’s contribution has been increased at this site with no justification despite a reduction in overall housing numbers in the borough and the large number of previous objections.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

**Land at Burnt Common, London Road, Policy A58**

**Objections**

Why has the “up to” 7000 sq m of employment floorspace, which appears to have moved from Garlick’s Arch, been changed to “minimum of 7000 sq m with a potential for further industrial floorspace to meet borough needs”? I understand the 2017 Employment Land Need Assessment shows a reduction in demand to 3.9 hectares for Industrial land for the whole borough, not a huge over allocation of over 9 hectares potential development at Send in the Green Belt. The impact of substantial development on the surrounding roads, environment and life of the Residents would be serious and would virtually join up existing villages and defeat the purpose of the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** pslp172/819  **Respondent:** 8579009 / I W Groden  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy A58

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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**Comment ID:** PSLPS16/573  **Respondent:** 8579233 / Mrs Purrett  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to the disproportionate amount of development in one area of the borough. Garlick's Arch site at Burnt Common for at least 400 homes and an industrial site. I understand that this land was turned down earlier for a site for 25 homes as unsuitable. How can it now sustain 400. This land is an area of great natural beauty and is home to deer, badgers, many variety of birds and rare flora and fauna.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPS16/574</th>
<th>Respondent: 8579233 / Mrs Purrett</th>
<th>Agent:</th>
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<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a</td>
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<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ( )</td>
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</table>

I object to the projected plan for new north facing sl~ roads to/from Send March/Burnt Common. The A247 from Old Woking through to Clandon is already over crowded with cars, etc, and this can only be exacerbated by increased traffic from all the new projected housing areas, ie A25, A35, A43, A43 and A44 a total of 4,484 houses, the majority of which will have at least one car. The Send, Send Marsh, Burnt Common and Ripley along with the A3 and the M25 are already very heavily used by traffic coming to and from Woking and Guildford. When these become congested for whatever reason, the problem is greatly exacerbated. On a regular basis it can take me up to five minutes to get out of my small road. The A247 is not a road that can be widened due to the housing on both sides of the road and is already subject to severe gridlocks during rush hours and school times.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
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<tr>
<th>Comment ID: PSLPP16/1245</th>
<th>Respondent: 8579233 / Mrs Purrett</th>
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<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ( )</td>
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</tbody>
</table>

I object to the fact that the plans show no immediate provision for new schools, doctors' surgeries and ancillary needs. The infrastructure should be in place before any future development transpires.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I strongly object to the latest addition to the local plan for Send Marsh/Burnt Common and Ripley development for the following reasons:

I have lived for many years in the lovely Green Belt area of Surrey and am extremely concerned that you could be considering taking any of the Green Belt area away.

The definition of Green Belt is that it is a policy for controlling unreasonable urban growth. It should be a part of the countryside that will be sacrosanct for the foreseeable future, maintaining an area where agriculture, forestry and outdoor leisure should prevail. The fundamental aim of green belt policy is to prevent urban spreading by keeping land permanently open and consequently the most important aspect of green belts is the openness.

According to the NPPF there are five purposes of including land within the green belt:
To check the unrestricted sprawl of large built up areas
To prevent neighbouring towns to merge with each other
To assist in safeguarding the countryside from encroachment
To preserve the setting and special character of historic towns
To assist in urban regeneration by encouraging the recycling of derelict and other urban land.

It seems to me that if you remove the Green Belt label from all the local villages you have listed in your plans, this will give anyone ad hoc rights to build as and when they like. Once lost, green belt can never be got back.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
The A247 is not a road that can be widened due to the housing on both sides of the road and is already subject to severe gridlocks during rush hours and school times.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<td>Answer (if comment is on questions 1-7 of the questionnaire): ( )</td>
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</table>

I feel that little thought has been given to the preferences of local inhabitants and while I can understand that affordable housing is necessary for many people I do not feel that country villages with poor transport facilities, overfull schools, considerable lack of medical facilities and constant traffic problems is the right way forward.

I look forward to your comments.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID:</th>
<th>pslp172/1858</th>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ( )</td>
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</table>

5. POLICY A25 - Cosden Hill Farm
I object to this revised proposal as although the previous intention to construct 2000 homes on this site has been reduced to 1700 homes this does not reduce the appalling effect that the scheme would have on the surrounding local roads and the A3. I object that the number of house proposed is still far too high and unless the development is hidden from the A3 will once again affect the appearance of the borough as a predominantly rural area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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</table>
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

5. POLICY A25 - Gosden Hill Farm
I object to this revised proposal as although the previous intention to construct 2000 homes on this site has been reduced to 1700 homes this does not reduce the appalling effect that the scheme would have on the surrounding local roads and the A3. I object that the number of house proposed is still far too high and unless the development is hidden from the A3 will once again affect the appearance of the borough as a predominantly rural area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/1856  Respondent: 8579233 / Mrs Purrett  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

3. POLICY A 43— Garlick's Arch.
This policy would increase the population of the Send Marsh/Burnt common vilage by 49% and completely destroy its rural character. The new policy adds 8 travelling/show people pitches to this development making it even more inappropriate for the area. How can the Council incorporate this Policy into the plan when less than 3 years ago it refused a planning application from "Oldlands" to build only 25 houses in the same location. How can it then insist it that it applies consistent and good practice.
I therefore object to the revised proposal as:
* the village has no shops or infrastructure to support this development.
* there would be considerable additional extra traffic onto roads already congested throughout the villages of Send, Send Marsh/Burnt Common and Ripley.
* no exceptional circumstances have been informed to us that would exist to destroy this Green Belt area or the area of ancient woodlands.
* No proven demand has been shown for travelling/show people pitches in this area
* it would completely destroy the rural character of the area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/1855  Respondent: 8579233 / Mrs Purrett  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A58
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

2. NEW POLICY A58 - Land around Burnt Common warehouse, London Road, Send P&A58.
I objected to the original proposal to enclose large areas of Green Belt open space within inset boundaries around the villages of Send and Send Marsh/Burnt Common where there will be a presumption in favour of development. The new policy A58 increases the area of land to the extracted to a minimum of 7,000 square metres of "employment floorspace". I therefore object to this proposal as there is no proven need to allocate any Green Belt land within the Borough for industrial/warehouse development. This is particular location would have a severely adverse environmental effect not just on the two villages but all the surrounding area creating major traffic problems and overdevelopment of the local rural communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/565  Respondent: 8579233 / Mrs Purrett  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY S2 - The 654 homes per year (total 12,426) number of homes the Plan intends to provide over the 19' year period 2015— 2034. I understand that the target for housing has been reduced from 693 to 654 per year, but it is still much too high and does not take into account any of the constraints which should have been imposed due to the high proportion of the borough's designated Green Belt and the capacity of the roads, schools, doctors and other infrastructure to support such an increase in population. I object to the recalculation of assessed need for housing and other development and the grossly disproportionate impact of the Local plan's proposals on the more northerly communities of the borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/502  Respondent: 8579393 / Mr John Sweeting  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Introduction

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Re: Sites numbered:
A25 – Gosden Hill
A43 and A43a - Land at Burnt Common – known as Garlick's Arch
A35 – Former Wisley Airfield

in the revised draft local plan.

I would like to object to the inclusion of these sites in the draft local plan for the following reasons:

1. The number of houses needed in the Borough was changed between the first and second issues of the draft plan indicating that there is considerable uncertainty in this figure and the basis and method of calculation. In view of the recent EU referendum vote and its impact on future immigration, the number of houses required is likely to reduce further.
   With smaller house numbers the need for any loss of the Greenbelt should be reassessed as 'special circumstances' necessary for reclassification have not been established.
2. Sites 43 & 43a were introduced at the last minute and there has been insufficient time for consultation before its inclusion in the draft plan.
3. Wisley/Ripley/Send/Burnt Common/Send Marsh is a semi-rural area and development on this large scale will lead to urbanisation and permanently change the nature of the area. In particular this could provide the starting link in connecting Guildford to the M25.
4. These developments place a disproportionate burden on the north east of the Borough.
5. Traffic will increase significantly and the access and exit roads to and from the A3 are too narrow to cope with the resultant increase in traffic - particularly at peak hours.
6. Other infrastructure.
   Is there adequate power, drainage and sewage provision for industrial development and is there sufficient school, medical and similar provisions for domestic expansion?
7. Light and sound pollution.
   The area enjoys fairly dark skies for its proximity to London. Any additional development will add to the light pollution unless provisions are made to ensure strict control of any additional lighting. Please consult Guildford Astronomical Society.
   It already suffers from noise pollution from the A3. Traffic noise pollution seems inevitable if development proceeds

   If included in the plan, provision should be made for strict control of noise and light pollution emanating from the site – particularly at nighttime.
8. The sites contain a substantial number of trees many of which are quite mature and must make a significant contribution to the Borough's carbon reduction target. It seems perverse that planning permissions have been refused because of the impact on the individual trees whilst the wholesale destruction of woods seems inevitable if these sites are included.
   It seems difficult to reconcile these two extreme positions.

   If included in the plan preservation orders should be placed on appropriate trees as a minimum requirement.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I would like to object to the inclusion of this site in the draft local plan for the following reasons:

1. The number of houses needed in the Borough was changed between the first and second issues of the draft plan indicating that there is considerable uncertainty in this figure and the basis and method of calculation. In view of the recent EU referendum vote and its impact on future immigration, the number of houses required is likely to reduce further.
   With smaller house numbers the need for any loss of the Greenbelt should be reassessed as 'special circumstances' necessary for reclassification have not been established.
2. This site was introduced at the last minute and there has been insufficient time for consultation before its inclusion in the draft plan.
3. This development will add to the disproportionate burden on the north east of the Borough.
4. There is a question as to the suitability of the land for building purposes.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/503  Respondent: 8579393 / Mr John Sweeting  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A44

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Re: Site numbered A44 in the revised draft local plan.

I would like to object to the inclusion of this site in the draft local plan for the following reasons:

1. The number of houses needed in the Borough was changed between the first and second issues of the draft plan indicating that there is considerable uncertainty in this figure and the basis and method of calculation. In view of the recent EU referendum vote and its impact on future immigration, the number of houses required is likely to reduce further.
   With smaller house numbers the need for any loss of the Greenbelt should be reassessed as 'special circumstances' necessary for reclassification have not been established.
2. This site was introduced at the last minute and there has been insufficient time for consultation before its inclusion in the draft plan.
3. This development will add to the disproportionate burden on the north east of the Borough.
4. There is a question as to the suitability of the land for building purposes.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: PSLPP16/901  Respondent: 8579393 / Mr John Sweeting  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Re: Sites numbered:

A25 – Gosden Hill

A43 and A43a - Land at Burnt Common – known as Garlick's Arch

A35 – Former Wisley Airfield

in the revised draft local plan.

I would like to object to the inclusion of these sites in the draft local plan for the following reasons:

1. The number of houses needed in the Borough was changed between the first and second issues of the draft plan indicating that there is considerable uncertainty in this figure and the basis and method of calculation. In view of the recent EU referendum vote and its impact on future immigration, the number of houses required is likely to reduce further.
   With smaller house numbers the need for any loss of the Greenbelt should be reassessed as 'special circumstances' necessary for reclassification have not been established.

2. Sites 43 & 43a were introduced at the last minute and there has been insufficient time for consultation before its inclusion in the draft plan.

3. Wisley/Ripley/Send/Burnt Common/Send Marsh is a semi-rural area and development on this large scale will lead to urbanisation and permanently change the nature of the area. In particular this could provide the starting link in connecting Guildford to the M25.

4. These developments place a disproportionate burden on the north east of the Borough.

5. Traffic will increase significantly and the access and exit roads to and from the A3 are too narrow to cope with the resultant increase in traffic - particularly at peak hours.

6. Other infrastructure.
   Is there adequate power, drainage and sewage provision for industrial development and is there sufficient school, medical and similar provisions for domestic expansion?

7. Light and sound pollution.
   The area enjoys fairly dark skies for its proximity to London. Any additional development will add to the light pollution unless provisions are made to ensure strict control of any additional lighting. Please consult Guildford Astronomical Society.
   It already suffers from noise pollution from the A3. Traffic noise pollution seems inevitable if development proceeds
   If included in the plan, provision should be made for strict control of noise and light pollution emanating from the site – particularly at nighttime.

8. The sites contain a substantial number of trees many of which are quite mature and must make a significant contribution to the Borough's carbon reduction target. It seems perverse that planning permissions have been refused because of the impact on the individual trees whilst the wholesale destruction of woods seems inevitable if these sites are included.
   It seems difficult to reconcile these two extreme positions.
   If included in the plan preservation orders should be placed on appropriate trees as a minimum requirement.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp173/341  Respondent: 8579393 / Mr John Sweeting  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Appendix H: Maps - Send

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Re: Sites numbered:
A25 – Gosden Hill
A43 and A43a - Land at Burnt Common – known as Garlick's Arch
A58 Land around Burnt Common warehouse
A35 – Former Wisley Airfield

in the revised draft local plan.

I would like to object to the inclusion of these sites in the draft local plan for the following reasons:

1. There is considerable uncertainty in number of houses needed in the Borough. In view of the recent EU referendum vote and its impact on future immigration, the number of houses required is likely to reduce further.
2. Any loss of the Greenbelt should be reassessed as 'special circumstances' necessary for reclassification have not been established.
3. Wisley/Ripley/Send/Burnt Common/Send Marsh is a semi-rural area and development on this large scale will lead to urbanisation and permanently change the nature of the area. In particular this could provide the starting link in connecting Guildford to the M25.
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   If included in the plan, provision should be made for strict control of noise and light pollution emanating from the site – particularly at night time.
8. The sites contain a substantial number of trees many of which are quite mature and must make a significant contribution to the Borough's carbon reduction target. It seems perverse that planning permissions have been refused because of the impact on the individual trees whilst the wholesale destruction of woods seems inevitable if these sites are included.

It seems difficult to reconcile these two extreme positions.

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPP16/17330  **Respondent:** 8579649 / Home Builders Federation (Mr James Stevens)  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy D1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The part of the policy relating to Building for Life 12 is unsound because it is unjustified.

The policy requires applicants to demonstrate how they have had regard to Building for Life 12 (BfL12) and that they must show that they have performed positively against this. This is a condition of planning permission. This is unsound because it is unjustified. BfL12 was devised by the HBF and others as a tool to assist developers in helping to create better designed schemes. It was never intended to operate as a mandatory development management tool. BfL12 does not work as a scoring system since it is a collection of guiding principles. The Council can refer to BfL12 in the supporting text but it cannot make this a requirement of local policy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPP16/17331  **Respondent:** 8579649 / Home Builders Federation (Mr James Stevens)  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy D2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Parts of the policy conflict with national planning policy.

- Sustainability statements

The first paragraph of the policy is contrary to national policy set out in the Written Ministerial Statement of 25 March 2015. Applicants for planning permission are not required to provide ‘sustainability statements’ in terms of the construction, internal layout and performance of dwellings. Applicants now need only meet the Building Regulations and the three optional technical standards relating to water, access and space if these have been adopted by the council. As the WMS states:

“local planning authorities (will) also need to review their local information requirements to ensure that technical detail that is no longer necessary is not requested to support planning applications.”

As stated, applicants need only demonstrate to the Building Control department that they satisfy the Building Regulations. They do not need to do more than this. Other than the optional standard relating to space (the Nationally Described Space Standard) this is not a planning area and the council cannot intrude into this area.

There are many things wrong with the first part of the policy. For example (but not exhaustively), the Council cannot require that an applicant demonstrates that the “lowest level of carbon emissions” has been achieved since the applicant is only required to meet Part L 2013. Similarly, the applicant does not need to show how the highest levels of water efficiency have been achieved since the applicant is only required to meet the optional technical standard for water efficiency that the council has elected to adopt which is 110 litres per person per day (paragraph 4.5.20). The Council cannot require more than this because national policy in the WMS does not allow for this (“local planning authorities should not set out in their emerging Local Plans...any additional local technical standards or requirements relating to the construction, internal layout or performance of new dwellings”).

CHP

The policy also requires that all new developments must connect to (C)CHP distribution networks where they exist, or incorporate the necessary infrastructure for connection to future networks. We consider this to be contrary to national policy. The Government’s Productivity Plan (Fixing the Foundations, HM Treasury, July 2015) announced the government’s decision not to proceed with its zero carbon Allowable Solutions carbon offsetting scheme, or with its proposed 2016 increase in on-site energy efficiency standards (page 46). The purpose of this announcement was to reduce the burden of regulation on housebuilders which was “hindering competition by raising barriers to entry, adaptation and expansion” (page 43). The government is concerned that the growing burden of demand is inhibiting the growth of smaller housebuilders (page 46). It is the HBF’s view that having suspended the Allowable Solutions scheme and the 2016 increase in energy efficiency standards, developers are only required to meet Part L 2013 of the Building Regulations. This will not require provision of or connection to CHP systems. Generally, meeting Part L 2013 does not require providing or connecting to CHP systems or contributing to other offsite energy efficiency measures.

The announcement in the Government’s productivity plan post-dates the NPPF. We are aware that paragraph 96 of the NPPF allows local authorities adopt local policies for the support of decentralised energy schemes but we consider that the direction of Government policy has been set by the Productivity Plan. It would not be appropriate for the local authority to specify the manner by which developers achieve their energy requirements under the Building Regulations.

Aside from the question as to whether the Council’s approach accords with national policy, there are potentially viability implications associated with this policy requirement. The DCLG document Housing Standards Review: Cost Impacts (for the DCLG by EC Harris, September 2014) provides the latest costs associated with building to the new Part L 2013. We note that the Council’s Viability Assessment has modelled the cost of building to current Part L 2013 (see paragraph
5.3.20). However, it is hard to know whether this would cover the costs associated with building CHP systems, or connecting to these. The EC Harris report referred to above does conclude that there are costs associated with renewable technologies. Since this is a local plan policy requirement the Council should calculate what it might cost for all schemes to provide CHP systems or to connect up to these.

Carbon reduction

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The Council requires a reduction in carbon emissions of at least 15%. This is unclear. Firstly, it is unclear what the baseline measurement is. Secondly, and more importantly, the policy is unsound because applicants are only required to achieve Part L 2013. The Council is unable to set any other standards relating to the performance of new dwellings other than the three optional technical standards (WMS, 25 March 2015).

Applicants are not required to demonstrate how they have achieved Part L 2013 through energy statements. As the WMS states:

“local planning authorities (will) also need to review their local information requirements to ensure that technical detail that is no longer necessary is not requested to support planning applications.”

In paragraph 4.5.16 the Council refers to zero carbon development. The Government, however, has determined that zero carbon development is unfeasible for the time-being, hence its suspension of the 2016 zero carbon homes requirement. This reference should be deleted from the Local Plan.

Water efficiency

- 

We note paragraph 4.5.20. If the Council wishes to adopt the optional standard for water efficiency then it needs to put this in policy. It cannot introduce this via SPD. It will also need to address the tests set out in the NPPG. One of those tests is viability. It is unclear from the Viability Assessment that has been published (December 2014) whether the Council has assessed this cost.

Paragraph 4.5.21

The Council indicates within this paragraph that it may impose other requirements on developers, and lists what these might be. It proposes to decide these on a case-by-case basis. This is contrary to the NPPF in paragraphs 15, 17 and 154 and the underlying principle of the plan-led system. The Local Plan ought to provide clarity for applicants so that decisions can be made without delay. The local plan should not to be starting point for negotiation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
We consider that the first part of the policy is unsound in relation to allocated sites because it is unjustified, ineffective and contrary to national policy.

The first part of the policy places conditions on the residential development of sites in the urban areas of Guildford, Ash and Tongham. We consider that these conditions are unnecessary in connection with allocated sites since it is the function of the local plan to weigh-up whether development in these locations is appropriate. If development is inappropriate, or there is doubt as to whether it would be, then they should not be allocated. We are concerned that the vagaries of the policy will allow the principle of residential development in these locations to be revisited. This would not provide the certainty for applicants required under our plan-led system.

We appreciate that in the case of non-allocated sites it would be necessary to stipulate these conditions. Allocated sites – those which are deemed sustainable by virtue of being allocated in the local plan – should be able to come forward without delay (NPPF, paragraph 15).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17327  Respondent: 8579649 / Home Builders Federation (Mr James Stevens)  Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Traveller accommodation

- The Council must provide for the needs of the traveller community. To ensure that the needs of the traveller community can be met, we would question why this policy is proposed for development sites of 500 units and upwards and why the provision of traveller pitches should be allowed on smaller schemes. We note the wording to Policy H3: Rural exception homes. This allows for traveller pitches on rural exception sites but the wording in Policy H1 would appear to contradict this policy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17328  Respondent: 8579649 / Home Builders Federation (Mr James Stevens)  Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The policy is unsound because it does not accord with national policy.

The Council requires that all sites of five or more dwellings, or 0.17 hectares or more, should provide at least 40% affordable homes. The Council should amend the policy to reflect the national policy as set out in the Written Ministerial Statement of 28 November 2014. The Council may implement a lower threshold whereby schemes of six or more dwellings can contribute cash payments towards affordable housing and tariff style items, but only in designated rural areas under Section 157 of the Housing Act 1985. If the Council wishes to adopt this lower threshold in these areas it will need to specify which areas these are in the local plan.

These changes in national planning policy will not apply to Rural Exception Sites.

The policy should also be amended to refer to the Government’s intention to introduce Starter Homes. The tenure split that is proposed whereby 70% of the units would be provided as rented would probably not work alongside the Government’s stated intention that 20% of the affordable housing should be provided as Starter Homes on each qualifying site (see page 13 of the Starter Homes Regulations, Technical Consultation, DCLG March 2016). Schemes of 9 units and fewer and less than 0.5 ha will be exempt from making Starter Homes contributions (see page 12 of the DCLG paper).

The use of the words ‘at least’ is unjustified. It is unclear how an applicant should respond to this wording. This does not provide the precision required from development plan policies to enable applications to be determined quickly (NPPF paragraphs 15, 17 and 154).

The words “the tenure and size of affordable homes provided” should be amended to read instead: “the tenure and number of bedrooms in the affordable homes provided”. This is necessary to avoid the possibility of any confusion that the Council is intending to adopt the Nationally Described Space Standard. We note that the Council does not intend to adopt the Nationally Described Space Standard through this Local Plan. If it did mean to do so, it would need to ensure that it had meet the various tests set out in the NPPG. The Nationally Described Space Standard can only be adopted as policy through the Local Plan. It cannot be introduced via SPD.

Housing land supply

We note the composition of the housing trajectory on page 43 of the Housing Delivery Topic Paper. We understand the reasons for the stepped trajectory although we feel a flatter trajectory may be more prudent to ensure that the Council is not faced with needing to provide too many completions towards the end of the life of the plan.

5 or 20% buffer

The Plan is unsound with regard to the buffer because the Council’s approach is unjustified in terms of national policy.
We note the discussion on page 42 of the Housing Delivery Topic Paper. Unfortunately, it is not altogether clear which percentage rate the Council has determined that it is appropriate to apply. We think that the Council is arguing in paragraph 4.171 that it is unrealistic to apply a 20% buffer, even though its track-record has been a poor one if one chooses to measures performance against the SEP target of 422 dpa or the DCLG household projections.

We are not sure that the Council’s argument that expecting it to deliver the deficit and a buffer of 20% is ‘unreasonable’ should carry much weight, especially since we have already conceded that the Council may need to adopt a back-loaded trajectory (with the backlog accrued since 2013 being addressed over the full plan period) to reflect how in which its strategic sites will come to the market. The Council has been a poor performer in the past and it must do more to correct that failing and its consequences for those in housing need, by releasing more readily developable sites now.

Although the new local plan represents a much more positive strategy by the Council than had been its approach hitherto, to some extent the Council has forfeited its right to be a 5% authority owing to its poor track record. The purpose of the 20% buffer is to provide a realistic prospect of achieving the planned supply as well as providing more choice and competition in the housing and land market. Evidence from the past suggests that there is a risk that Guildford Council may default on delivery.

It is the HBF’s view that a 20% buffer should be applied in every local authority area in order to help boost housing delivery and to provide more competition in the short-term. Small housebuilders cannot wait. They need to be supported by the plan-led system now. We note that LPEG report recommends the universal application of a 20% buffer.

Dealing with the deficit

On the basis of the housing trajectory provided, we assume that the Council intends to address the deficit accrued to date over the life of the plan (Liverpool), rather than in the first five years (Sedgefield). It would be helpful if the Council clarified whether this is the case.

We assume that the five year supply will be calculated on the basis of the figures provided on page 43 of the Housing Delivery Topic Paper. We note that the Council will be providing fewer homes each year in the first four years following adoption than the annual average monitoring figure of 693 dpa. Only in year five does the trajectory show completions exceeding the annual average monitoring figure. The consequence of this is that completions will need to sharply escalate towards the end of the plan (back-loading). We have some reservation about this.

The Council considers that an emphasis on earlier delivery may compromise its highly sensitive green belt sites (see paragraph 4.171 of the Housing Delivery Topic Paper). We disagree. If a site is considered suitable for residential development and is allocated as such, then the question of insensitive development should not arise because the site has been assessed as being one suitable for development.

We consider that there is a case for providing more by way of a contingency by allocating some of the other green belt sites with low sustainability scorings. This would provide some lee-way for the Council: the more sites you have, across a wider number of areas, the greater is your chance of sustaining delivery in line with the trajectory. There is always a risk that some of the larger strategic sites may not yield all the units required. Identifying some additional sites would help avoid the risk of under-delivery.

Windfall

We consider that the Council’s windfall expectations are realistic. The Housing Delivery Topic Paper (June 2016) in paragraph 4.139 states that the allowance for windfall is 50 dpa for years 6-10 and 11-15 and only 25 in years 1-5. This is quite modest compared to many other south east authorities who typically operate allowances of 100 dpa upwards. We note that this relatively modest windfall reflects the national policy presumption against the development of residential gardens which the Council tells us had previously formed an important component of past supply (see paragraph 4.136).

The windfall allowance is realistic and the Council’s policy towards in-setting a number of villages from the green belt (Policy P2) will help to ensure that these windfalls will materialise.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/17329  Respondent: 8579649 / Home Builders Federation (Mr James Stevens)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The green belt review is unsound because it is unjustified.

Generally the HBF is very supportive of the Council’s approach to the green belt and its review to accommodate the OAN in full. The Council’s approach is very positive and we consider that the Local Plan provides a benchmark of good practice for other authorities in Surrey to follow, including Woking and Waverley Councils. We note the insetting from the green belt of several villages to allow for some limited infilling if appropriate sites can be located. This reflects national planning policy (NPPF, paragraph 86). This approach is necessary to ensure that the Council’s windfall expectations will materialise in sufficient number and it will also help to enable the required number of affordable homes (Policy H2) and rural exception homes that are needed to come forward (Policy H3).

However, while we applaud the decision to undertake a detailed green belt review we are concerned that the review is not entirely comprehensible in places and that there may be additional sites available that could contribute towards the housing land supply. The rationale as to why land in some locations will be removed from the green belt and not in others is not altogether clear.

We understand the rationale for the release of land around some of the settlements. These are sustainable locations for growth especially as some like Guildford and Normandy benefit from train connections which could help to reduce private car use. The concentration of housing development around transport hubs reflects emerging Government policy (Consultation on proposed changes to national planning policy, DCLG 2015). However, given this emphasis in national policy on existing settlements, it is unclear why some of the green belt options around the settlements were rejected when in terms of their contribution to the purposes of the green belt they appeared to perform no better that some of the selected sites.

We have noted the Volume 1 and 2 Green Belt studies. We note that the table showing the Achieving the Purposes of the Green Belt Designation scoring exercise in Volume 2 shows that some land parcels around Guildford have scored quite low (there are some 0s and 1s). It is unclear why these sites have been discounted in favour of the allocated sites.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/17326  Respondent: 8579649 / Home Builders Federation (Mr James Stevens)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

In terms of the housing requirement element of the policy we consider the figure to be unsound because it is unjustified. We are not persuaded that it fully reflects the objectively assessed need over the plan period.

The plan will make provision for 13,860 homes over the period 2013-2033. This is an average of 693 dwellings per annum (dpa) over the 20 year life of the plan.

We have considered the West Surrey SHMA of September 2015 and the Guildford SHMA Summary Report of October 2015. In general we consider this to provide a very robust assessment of the future housing needs of Guildford. The report very clearly explains the method that has been followed and the justification for the various adjustments. We would take issue on two aspects of the assessment. We concede, however, that the effects of these issues on the overall OAN may be quite limited. The overall conclusion that the OAN is 693 dpa seems reasonable.

We support the use of the DCLG 2012-based household projections as providing a sound starting point (see Key Messages on page 56 of the main SHMA report). This would be in keeping with the advice in the NPPG. Comparison with the latest DCLG 2014-based household projections which were published on the 12 July 2016 shows little movement in the underlying demographic component of the assessment.

We also agree that it would be sensible to adjust for the 2013 Mid-Year Estimates while retaining the 2012-based Headship Rates (see table 20 on page 66 of the main SHMA report).

This results in a starting point figure of 517 dpa for Guildford (table 20 of the main SHMA).

We note however, that the new 2014-based projections show that 12,000 households could form between 2013-2033 compared to 10,000 or so projected by the 2012-projections (see DCLG Live Table 406: Household projections by district, England, 1991-2039). This would suggest a new starting point of 600 households per annum. The difference may not be material since the adjustments made by the Council to the basic demographic projection would lift the level of supply to 693 dpa. Nevertheless, it is possible that the new 2014-based projections are suggesting a higher starting point for Guildford. This should be considered by the Council.

12 year migration trend

The HBF strongly endorses the decision not to apply a 12 year migration trend. We are becoming very concerned by the growing use of a 12 year migration trend elsewhere in the wider south east of England. As the SHMA Summary Report for Guildford argues on page 5, the problem with this scenario is that it would fail to account for changes in the age structure over time. These are changes captured by the latest 2011 Census and reflected in the new projections produced by the ONS and DCLG. The 2012 SNPP is likely to be more robust.

Unattributable Population Change (UPC)

We strongly support the decision not to adjust for UPC (page 6 of the summary SHMA for Guildford). It is unclear if UPC is related to migration, and the discrepancy may be because the way that the ONS measured migration was less robust in the past than now. A UPC adjustment for more recent data would be inappropriate.

London Migration
We welcome very much the Council’s acknowledgement of the potential impact of migration from and into London, including the Mayor of London’s own migration assumptions underpinning the new London Plan (adopted in 2015). As the SHMA explains the new London Plan was based on the 2011-interim household projections but assumed a 5% increase in out-migration and 3% decrease in inward migration (i.e. fewer younger people moving to London).

The Council has modelled a scenario that reflects these assumptions and this results in a starting point figure of 568 households per annum. While we accept that there is great uncertainty associated with the migration dynamics with London (see paragraph 2.9 of the SHMA summary), we consider that this will exert an effect on Guildford owing to the affordability problems in London. Relatively affluent households will be able to buy more space in Guildford than they can afford in London. Housing delivery in London is also averaging at only half of what is needed, and while Guildford is not responsible for this poor performance, the fact is that the dearth of supply may increase an outward migratory tendency that Guildford would be wise to prepare for.

For this reason we consider that it would be sensible to plan on the basis of the London migration scenario set out in Table 25 of the main SHMA: namely 568 dwellings per annum (table 25, page 72). We consider that the London migration scenario should be used as the basis for the demographic starting point to which the other adjustments should be made (affordable housing need, students, market signals).

It is interesting that this London migration scenario is closer to the new 2014-based household projection of 600 hpa. This suggests that the baseline demographic need before any other adjustments are made, may well be about 570-600 dpa.

Economic needs

- As recommended by the NPPG we support the modelling by the Council to ensure that its new housing supply aligns with the employment needs of the Borough. This is a welcome and necessary measure. We note that the analysis has concluded that to support the projected growth in jobs in Guildford would require a housing supply of 637 dpa compared to the 517 dpa indicative figure in the trend-based projections (see paragraph 3.7 of the summary SHMA). The Council has concluded that the demographic need is around 120 dwellings lower than the forecast economic need and so has increased the housing need to 637 dpa (paragraph 3.7 of the SHMA summary).

We note that the adjusted figure of 637 dpa corresponds more closely to the new 2014-based household projection of 600 hpa. This suggests that an OAN figure that was any lower than the 600 dpa suggested by the DCLG 2014 projections would probably be flawed.

Affordable housing need

- We support the uplift that has been made to cater for the affordable housing needs of the HMA. This results in an uplift of 59 dpa for the HMA, of which 20 dpa would be required in Guildford (paragraph 3.16 of the SHMA summary).

Student housing

- The assessment of student needs is a very welcome and valuable part of the OAN assessment. The HBF has become very concerned by the failure of many authorities with higher education institutions to assess the projected growth of student bodies. This is because institutional needs are generally assumed to remain constant by the DCLG household projections. Therefore, a failure to account for a planned expansion of the student body could result in an under-counting of future housing needs. The SHMA avoids this by including an allowance for the growth of student numbers and a calculation of how this may impact on the need for C3 homes.
This is a most welcome and necessary adjustment. We support the approach taken and the adjustment that has been made to account for the growth of the student body. The adjustment adds a further 25 dpa to the demographic projection (paragraph 3.20 of the summary SHMA).

We refer to the Local Plans Expert Group’s discussion of this issue following the Government’s announcement in 2012 that C2 use class dwellings could be counted towards the housing completions. It invites the Government to clarify its advice on assessing institutional needs.

**Market signals**

We observe and support the adjustment for market signals. An adjustment for market signals is warranted in Guilford where the affordability to earnings ratios are extreme. The Council has made this adjustment by adjusting the household formation rates for the 25-34 age group. This results in a further addition of 11 dwellings per year. This is one way of accounting for market signals. The LPEG report has recommended an alternative approach, which if followed in Guildford, would require a 25% uplift to be made the baseline demographic projections because the lower quartile house price to lower quartile income ratio is 10.92 (paragraph 3.33 of the SHMA summary). However, the LPEG recommendation is made in the context of a far more simplified approach to the calculation of the OAN which removes the need for many of the adjustments currently suggested by the NPPG. In the case of Guildford we note that effect of the other adjustments made by the Council for employment, affordable housing, and for students would cancel out the effect of the 25% uplift which if applied to the base need of 517 dpa would only add 129 more dwellings per annum. This would result in a figure of just 646 dpa which is lower than the recommended OAN of 693 dpa.

**Backlog**

The NPPG invites local authorities to consider how past performance will have affected the household projections. As the NPPG states “formation rates may have been suppressed historically by under-supply and worsening affordability of housing” (NPPG, ID 2a-015-20140306).

Page 19 of the Viability Study illustrates the number of net completions achieved since 2006/7. Net completions in the period prior to this new Local Plan (2006 – 2013) were generally poor compared to the South East Plan’s annual average monitoring figure of 422 dpa. The SEP figure was achieved only once in 2007/2008. Although we recognise that the green belt review implicit in the SEP figure was the subject of a legal challenge and subsequently deleted, this was not necessarily the case with the SEP housing target for Guildford. In any case, this is the only benchmark available against which to assess performance unless one used whichever DCLG household projection was current at the time (all of which would have pointed to much higher levels of need). Table 3.1 shows that the average figure for the period was 250 completions per year. This figure is very much lower than any of the DCLG household projections so it is possible to infer that had completions been in line with the SEP then the DCLG household projections may have been higher.

The purpose of drawing attention to this is to lend further weight to our argument that the Council would be wise to plan on the basis of its London migration scenario since the baseline DCLG projections is likely to provide an under-estimation of future needs.

**Conclusion**

The HBF is broadly very supportive of the assessment made. We consider this to provide a realistic assessment of the future housing needs of the Borough. The only quibble we have is in the treatment of migration with London. We consider that there is a good case to substitute the London Migration scenario figure of 568 dpa instead of the 2012 SNPP based figure of 517 dpa as the initial starting point figure. This results in a difference of 51 dpa (see also paragraph 4.33 of the
Duty to Cooperate Topic Paper). This should be rounded down to 50 dpa. After factoring in the other adjustments, the overall OAN should be increased by 50 dpa to 743 dpa. A requirement of 740 dpa (rounded down) should be considered.

We recognise that in using this increased initial starting point this would not necessarily that has require the same increase for employment that has been made (120 dpa) except that it would be sensible to keep the same upward adjustment for employment as people moving from London to Guildford will probably still be employed in London – i.e. the adjustment for employment is necessary for those who will need to live and work in Guildford, not necessarily to cater for those living in the borough but commuting to London.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Thank you for consulting with the Home Builders Federation (HBF) on the submission version of the Guildford Local Plan.

The HBF is the principal representative body of the house-building industry in England and Wales. Our representations reflect the views of our membership which includes multi-national PLC’s, regional developers and small, local builders. In any one year, our members account for over 80% of all new “for sale” market housing built in England and Wales as well as a large proportion of newly built affordable housing.

We would like to submit the following representations on the Local Plan and we would welcome, in due course, participating in hearings of the Examination in Public.

Paragraph 1.9, page 9: Duty to Cooperate

The HBF has some concerns that the Guildford Local Plan is unclear about how any potential unmet housing needs in the Housing Market Area arising in Waverley and Woking will be accommodated. As such the Local Plan is not positively prepared.

There are many very positive aspects to the new Local Plan that are supported by the HBF. However, we feel the Local Plan could say more about the cross-boundary strategic question of housing. It would have been useful, for example, to know whether an unmet housing need is expected to arise in either Waverley or Woking and how this situation is going to be dealt with. It would be helpful to know whether it is anticipated if the three HMA authorities will collaborate to address any unmet need. We have noted the Duty to Cooperate Topic Paper of June 2016. Even though Guildford is to be applauded for planning to meet its own OAN in full, it is possible that the other two authorities of the Housing Market Area (HMA) – namely Waverley and Woking – may be faced by a shortfall in supply. While the collaboration on a joint SHMA is strong evidence of effective cooperation, the paper does not say much about the housing land supply situation in either Waverley or Woking.
It seems highly likely in the case of the borough of Woking that Woking will not be able to address its OAN in full. We say this because Woking’s current Core Strategy – examined and found sound back in 2012 (Woking was one of the first authorities in the country to have a local plan found sound under the new NPPF-based regime) – did have an identified undersupply of potentially circa 300 dwellings per annum (dpa). It is difficult to be conclusive about the size of the unmet need since the provisions of the NPPF were not strictly applied in the case of Woking since the plan was devised under the auspices of the South East Plan and submitted prior to the publication of the new national policy. Nevertheless, on the basis of the evidence that was available, it was judged that the plan did not meet its OAN in full: the OAN was judged to be potentially about 594 dpa. This was not a conclusive verdict, as explained in paragraph 81 of the inspector’s report (dated 26 July 2012), but it seemed likely on the basis of the evidence that had been submitted. As the inspector concluded:

“Whilst the submitted CS does not plan to meet the objectively assessed housing needs of the Borough, I am mindful that the NPPF indicates that the aspiration to meet housing need is dependent upon consistency with other parts of the Framework. With this in mind and as evidenced by the SA, the Council has considered alternative levels of housing provision, for example, its Option 3[1] which considered the provision of 594 new dwellings per year.”

Furthermore, the affordable housing need in Woking was assessed to be 499 dpa (see paragraph 78 of the inspector’s report). Provision was made in the Core Strategy for only 292 dpa. This figure was derived from the South East Plan target. Therefore, whatever the OAN figure might have been, it was likely that Woking was not be able to meet its OAN in full. There is, consequently, a question about the unmet need that has accumulated in Woking since 2011 (the difference between the possible OAN of 594 dpa and the supply of 292 dpa) as well as the ability of Woking to accommodate its newly assessed OAN figure of 517 dpa.

We are concerned that despite the assurances made at the time by Woking Council, little concrete action has been taken to resolve the problem of this shortfall. When Woking’s Core Strategy was assessed by the examining inspector back in 2011, the inspector had concluded that the other authorities of the HMA, would quickly come to the assistance of Woking. As the inspector commented:

“It will be incumbent upon the Borough and its neighbours to ensure that the processes and outcomes related to the Duty to Cooperate are honed further to maximise the sustainable delivery of suitable housing.” (paragraph 82).

For various reasons this did not happen. While it is possible that Woking may be able to recycle sufficient previously developed land to accommodate the new figures contained in the SHMA September 2015 study, this seems unlikely. We note that the new OAN figure for Woking of 517 dpa is more-or-less similar to the potential OAN figure of 594 dpa of the current Core Strategy. This would suggest that Woking will still be confronted by a problem which is at least comparable to the one it faced back in 2011. The difference is that while parties were assured that the problem of the unmet need would be addressed in the subsequent two years, this did not occur.

Woking’s ability to address its OAN in full probably depends on a green belt review. This is what the SEP envisaged and what the examining inspector referred to in his report. These are matters that may have a bearing on the Guildford Local Plan.

Ideally a joint or aligned plans for all three authorities would be produced, setting out a strategy for addressing the unmet need in either Waverley or Woking (assuming there is one) and probably incorporating a coordinated green belt review. We recognise, however, the difficulties associated with preparing plans and coordinated efforts with other authorities. This is not necessarily a cooperation failing of the Guildford Local Plan but we are concerned that there is potentially an issue in Woking that the Guildford Local Plan will not be able to help resolve.

We have noted the discussion on pages 11 and 12 of the Duty to Cooperate Topic Paper about the housing situation. We note that a memorandum of understanding (MoU) has been agreed and signed committing the three councils of the HMA to reviewing the SHMA in three years. We note that the review of the SHMA is linked to a review of the local plans, but only if such a review is deemed necessary. We feel that the intentions of the three authorities on this question needs to be clarified better. An early review may become necessary if there is an unmet need in the HMA is discovered that needs to be accommodated. We have considered the MoU in appendix 4. The key thing that is missing from this document is any confirmation that there is an unmet need that might need addressing. We accept that it may be too soon to confirm this, because Waverley and Woking are still doing work on their own local plans which will include identifying housing land
capacity within their own areas. Nevertheless, a commitment by all three authorities to finding a way to accommodate a potential unmet need would have been welcome. We feel this would have demonstrated full compliance with the duty to cooperate. The MoU is a too vague on this question.

[1] SA Appendix 5

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Saved but not superseded 2003 Plan policies

Paragraph 1.3 of the ‘Proposed Submission Local Plan: strategy and sites’ states that the Plan contains overarching planning policies. Appendix E of the Plan lists the policies and against most of them gives corresponding policies in the 2003 Plan. It is thus clear that the policies listed in Appendix E are the overarching policies, and that they will supersede the given corresponding policies in the 2003 Plan.

What is not so clear is the fate of the 2003 policies which are not superseded. Paragraph 1.3 referred to above states that the Submission Local Plan will be followed by the ‘Local Plan: Development Management Policies’, which will include detailed development control policies. It does not relate these policies to the 2003 policies which are not superseded.

It is not clear that all the ‘saved’ 2003 policies which are not superseded will be covered by policies in the ‘Development Management Policies’?

Some help is given by Appendix 1 of the ‘Guildford Local Development Scheme 2015’, which is given on the ‘New Local Plan’ page of the GBC website. The Appendix 1 states: “The Local Plan: strategy and sites will include a list of the extant Local Plan policies identifying which policies are to be replaced by the Local Plan: strategy and sites DPD and which will continue to be applied alongside the Local Plan: strategy and sites DPD”. Unfortunately the Proposed Submission Local Plan does not give a list of all the extant 2003 Local Plan policies and does not identify the 2003 policies which will continue to be applied alongside the ‘Local Plan: strategy and sites’. Thus there is a double inconsistency between the current LDS and the Executive draft Plan.

This inconsistency should be removed. The neatest way of doing this may be for the new Plan to have a further Appendix giving the 2003 policies which have been saved but not superseded and a note they will be included in the ‘Development Management Policies’. The above Appendix 1 states that the ‘Management Policies’ ”will supersede any remaining policies in the Local Plan 2003”. The remaining ones are presumably those which have been saved but not superseded.

This matter is important because decisions by Councillors and Officers on planning applications are usually justified by reference to specific planning policies. I would like to be able to cross check that in this regard the strengths of the 2003 Plan have been carried through to the new Plan

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/157  Respondent: 8579905 / John Baylis  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (Yes)

By and large the evidence base is sufficient.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (Yes)

Yes, but there are some risks. See my letter to the Surrey Advertiser of 10.6.16 attached below.

Except I think it is not attached. I have sent a message to your help facility.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents: Surrey Ad Plan letter_1.docx (14 KB)

Surrey Ad Plan letter_.docx (14 KB)
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )

In addition Surrey Heath Borough Council is concerned that no other land designation appears to be given to the areas to be removed from the Green Belt. The sites are described as major previously developed sites inset from the Green Belt in Paragraph 4.3.15 of the Submission Local Plan. This leaves the status of these sites quite unclear with no policy direction as to how they could be developed in the future. Pirbright is a large site and sits immediately adjacent to the Council’s strategic housing site at Deepcut. Keogh Barracks abuts Surrey Heath.

In light of the above concern, Surrey Heath objects to the Local Plan as currently drafted.

The Council would welcome the opportunity to engage with Guildford via the duty to co-operate processes with a view to resolving these concerns and thus facilitating sound and effective plan making.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/1148  Respondent: 8580065 / Surreyheath borough council (Jane Ireland)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 4: Duty to cooperate

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )

Surrey Heath Borough Council does raises and objection regarding the lack of duty to co-operate with respect of removing both Pirbright Barracks and Keogh Barracks from the Green Belt. As set out in our 2014 response Surrey Heath indicated that it is important that the plan-making process of both Surrey Heath and Guildford recognise these sites and that engagement and dialogue in relation to them is constructive and on-going.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/5673  Respondent: 8580225 / planit consulting (janet long)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A41

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )
Proposed Submission Local Plan: strategy and sites 2016

Site A41 – Land South of West Horsley

SUPPORT FOR LAND ALLOCATION

It is considered the site allocation meets the requirement of the National Planning Policy Guidance (NPPG) in that the Council undertook a Land Availability Assessment (LAA) which assessed land available for housing development. The LAA assessed sites in terms of suitability and sustainability. Site (A41) was identified as part of that exercise, and therefore was fully explored in terms of its suitability. The assessment and ultimate inclusion in the LAA 2016 illustrates that the site is suitably located for development.

In terms of availability, the land is open grass land with no impediment to development. Furthermore, in terms of ownership it is immediately available and in this respect also meets the requirements of NPPG.

It is recognised that the site lies outside the identified West Horsley settlement boundary and within the Green Belt. However, within the Councils ‘Green Belt and Countryside Study’ the site is identified as a potential development area under reference C14-D. The findings of the study indicate that the land scores ‘One’ against the purposes of the Green Belt. Accordingly Volume 4 of the Green Belt and Countryside Study suggests that this land could be inset from the Green Belt.

The site is categorised in the Landscape Character Assessment as falling within Rural Character Area E2 – ‘Wooded Rolling Claylands’. This requires that new development needs to respect the landscape and townscape character and local distinctiveness of the area. Given the allocated site area of 4.8 hectares, there will be sufficient space to develop the land for both housing whilst also providing sufficient landscaping, (tree and shrub planting) appropriate to the identified character area.

In all respects I support this proposal as Site A41 is able to meet all the requirements of the NPPG in respect of allocations and, and can be appropriately developed to meet the Councils identified housing shortfall.

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

A 37, 38, 39 and 40

I object to these policies. No exceptional circumstances are cited to justify the removal of these sites from the Green Belt. None of these developments is large enough to provide infrastructure to ease the strain on existing facilities such as the primary school, medical facilities and congested narrow rural roads. A small scheme (£1m to include environmental improvements) appears in the Infrastructure Schedule for improvements to roads in the area but there are no details of this small scheme and no details of funding, so its implementation is unlikely.

These policies involve a 35% increase in the number of houses in the characterful village of West Horsley, a quite disproportionate increase which will irretrievably compromise its character.
Both A38 and A39 have areas in flood zone 3, in the case of A39 around one third. A sequential test would suggest that there are more suitable sites in the Borough for development than these.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/8325  Respondent: 8581089 / Jenny Wicks  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A25

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Site policies

A25

I object to this policy. No evidence is put forward to justify ‘exceptional circumstances’ for removing it from the Green Belt.

Gosden Hill currently defines the edge of the urban area and prevents the coalescence of Guildford with the village of West Clandon. It also checks the unrestricted sprawl of urban Guildford into what is quite clearly the rural area beyond and safeguards the countryside from encroachment.

Development here will represent undesirable ribbon development along the A3 and will add significantly to traffic flows on the A3 at this point.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/8326  Respondent: 8581089 / Jenny Wicks  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to this policy. Again no evidence is out forward of exceptional circumstances to justify its removal from the Green Belt.

In fact, of all the sites proposed in the Plan, this is the one which most contributes to checking the outward sprawl of the London conurbation.

It is difficult to see how a sustainable development could be built here. Narrow, unlit, rural roads lie between the site and the nearest two railway stations (which have no spare parking capacity), so walking and cycling to public transport are extremely unlikely and the new settlement would be predominantly car dependent at the already over-trafficked junction of the A3 and M25.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/8328  Respondent: 8581089 / Jenny Wicks  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A41

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

A 41

I object to this policy. Added only at the Regulation 19 consultation stage, (so without the early and meaningful engagement and collaboration with neighbourhoods required as essential by the NPPF) inclusion of this site produces a strange bump in the smooth line of the settlement boundary. It does not have natural, defensible boundaries. It lies in a part of the village where open, sweeping views along this side of East Lane define its character.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/8329  Respondent: 8581089 / Jenny Wicks  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
A43 and 43A

I object to these policies

These sites are remote from transport links except the A3, so the business activity and the residential units will add to the traffic on this congested route. Traffic from Woking which currently finds a number of different ways to access the A3 and M25 will now all be channelled through the unsuitable narrow road through Send to Burnt Common which already has long queues in the rush hour, which will be exacerbated when the new primary school building, which has its entrance on this road, is completed soon. Similarly traffic from Albury, Shere and Gomshall, Chilworth and Shalford will now be channelled along the A247 through West Clandon to access the A3 at Burnt Common. The A247 is a most unsuitable narrow road for heavy traffic, too narrow in places for two wide vehicles like HGVs to pass each other without routinely mounting the narrow pavement which runs on one side of the road only. Pedestrians have to cross and re-cross the road as the footpath is not continuous on one side of the road.

These sites were introduced at a late stage (Regulation 19) as a very late addition to the draft plan. This does not accord with para 155 of the NPPF which requires ‘early and meaningful engagement and collaboration with neighbourhoods………A wide section of the community should be proactively engaged’. This clearly did not happen in relation to these sites.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/18723  Respondent: 8581089 / Jenny Wicks  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy E2

I object to this policy because revision of the SHMA to take account of flaws identified in it and the post-Brexit economy will reduce the need for new employment floorspace.

I also object to the inclusion of Garlick’s Arch as a strategic employment site. It is remote from any facilities and has very poor public transport links. Employees are likely to travel by car, adding to congestion on local roads and the A3. It has been described as an ‘enabling development’ for construction of A3 slip roads, but it is not at all clear that Highways England want more junctions on the already very congested A3, or who is going to pay for the road construction.

I also object to Gosden Hill Farm being a strategic employment site. Such sites should be sited in more sustainable locations with good transport links. This proposal will lead to additional congestion in Burpham and on the A3.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Policy E7

I object to this policy because it should be possible to build higher numbers of homes in the town centre than this. Amenities and infrastructure already exist and it is a very sustainable location. In an age of increasing internet use it would be sensible to reduce somewhat the retail and office elements and increase the residential element. It should also be possible, with good design, to have a modest increase in the height of buildings in this area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/18719  Respondent: 8581089 / Jenny Wicks  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Policy H1

I object to this policy

Students occupy a significant amount of accommodation which could be used by others. 60% of students on campus is too low an aspiration, especially in view of the slow pace of building out existing planning permissions for student accommodation. GBC should look at policies in for example Oxford, which relate expansion of student numbers to delivery of new student accommodation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/18720  Respondent: 8581089 / Jenny Wicks  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Policy H3
I object to this policy because it should define ‘small’ to provide clarity.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Attached documents:

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Policy I1
Much of the infrastructure in Guildford Borough is already overstretched. Developments in villages will not be large enough to bring any significant infrastructure and so adding to housing in villages such as the Horsleys (where there is inclusion of a small, £1m, road improvement scheme of unknown financing and no detail) will only add to existing pressures. The local road network, at least in the east of the Borough, has not been given adequate consideration. Nor have the effects of village developments on schools and medical facilities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Attached documents:

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Policy I2
I object to this policy since it is too vague and optimistic. Action by Highways England on improving the strategic road network is a long way off and, apart from schemes already identified for funding, is unlikely to happen. The building of a tunnel is so unlikely it hardly merits mention.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Policy P2

I object to this policy.

I do not consider that it gives the protection to the Green Belt intended by the NPPF. When 65% of the new development is proposed to be on land in the Green Belt it is not credible to claim that this is justified by ‘exceptional circumstances, not including housing need alone.’ No exceptional circumstances are specified.

The introductory text for this policy asserts it is required that exceptional circumstances should exist to promote sustainable patterns of development, whilst in truth the proposed new settlements at both Wisley and Gosden Hill would be dormitory settlements largely dependent on the car. Neither of these locations is near to where jobs growth has been in recent years, which is largely to the west of the Borough.

The Green Belt and Countryside Study which underlies this policy is a flawed document which rests on subjective judgements and not precise scientific evidence. The rating of areas depends on which boundaries you choose to give to the plots under consideration- alter the boundary even slightly and you can get a different assessment. The scale used in the assessment process is small, so that small differences in judgement can have a radical impact on the final assessment. A scale from 1-10 would have had much more sensitive results.

I consider that each of the Green Belt sites should be assessed individually for whether there are exceptional circumstances to justify their removal from the Green Belt.

I think the statement in 4.3.17 that the ‘the general extent of the Green Belt has been retained’ is highly misleading. In my ward the proposed development of Gosden Hill Farm(78 hectares) for 2,000+ houses and other development removes a very large area of Green Belt. Within a few hundred yards of the ward boundary the building of 400 houses plus an industrial estate at Garlick’s arch(34.5 hectares) and the development of 2,000+ houses at Former Wisley Airfield(93 hectares) , together with sites for 600 houses in the Horsleys(30 hectares) means a very large (235 hectares), and completely disproportionate, loss of Green Belt in this part of the Borough. All this development and loss of Green Belt is near the A3, the length of which is only six miles from Burpham to Wisley.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
**Policy P3**

I object to this policy. The NPPF gives no special protection to this area, this policy effectively gives more protection to this area than to the Green Belt, which, according to the NPPF, is supposed to be protected against development. The NPPF says that new Green Belt should only be established in exceptional circumstances, for example when planning for larger scale development such as new settlements or major urban extensions. Neither of these forms of development is planned for the Ash and Tongham area, whilst the areas of Green Belt in the east of the Borough proposed for removal in fact protect against the ever sprawling London conurbation and the encroachment of urban Guildford into the countryside.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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<th>Comment ID:</th>
<th>PSLPP16/18717  Respondent: 8581089 / Jenny Wicks  Agent:</th>
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<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy S1</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

In summary I object to the proposed Submission Local Plan because

- The housing target is too high, based on a flawed SHMA
- The number has not been reduced to take account of Green Belt and infrastructure constraints
- Green Belt has been treated as a bank of developable land rather than given the protection expected under the NPPF- 65% of proposed housing is on Green Belt and only 35% on urban and brownfield land
- The number of houses (over 5,000) proposed for a small area in the east of the Borough, around six linear miles between Burpham and Wisley, is disproportionate and will radically change the character of this part of the Borough.

In more detail-

**Policy S1**

I object to this policy as its wording is too vague. It provides no guidance on how conflicts between economic, social and environmental considerations (conflicts between economic and environmental issues are frequent in Guildford Borough) are to be resolved, and which factors have priority.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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<th>PSLPP16/18718  Respondent: 8581089 / Jenny Wicks  Agent:</th>
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<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
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</table>

In summary I object to the proposed Submission Local Plan because

- The housing target is too high, based on a flawed SHMA
- The number has not been reduced to take account of Green Belt and infrastructure constraints
- Green Belt has been treated as a bank of developable land rather than given the protection expected under the NPPF- 65% of proposed housing is on Green Belt and only 35% on urban and brownfield land
- The number of houses (over 5,000) proposed for a small area in the east of the Borough, around six linear miles between Burpham and Wisley, is disproportionate and will radically change the character of this part of the Borough.

In more detail-
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy S2

I object to this policy. The housing number of 13,860 homes is excessive and the SHMA, from which the number is derived, seriously flawed, as demonstrated by critiques submitted by Guildford Residents Association and by Cllr David Reeve. In any event housing numbers and the employment land requirement need to be revised in the light of Brexit which reliable forecasters show will slow economic activity below levels previously expected.

The OAN has become the housing target because it is regarded as deliverable because, contrary to the NPPF, Green Belt (other than AONB) has not been regarded as a constraint, but rather as a bank of developable land, with 65% of the proposed homes being on Green Belt. The NPPF requires that established Green Belt boundaries should be changed only in exceptional circumstances and recommends, in the interests of sustainability, chanelling development towards urban areas inside the Green Belt boundary, towards towns and villages inset within the Green Belt or towards locations beyond the outer Green Belt boundary. Proposing 65% of housing on the Green Belt is not consistent with this.

Also, it is clear that the lack of infrastructure, especially in the villages where individual developments will not be large enough to generate significant infrastructure, has not been properly taken into account in assessing the housing target.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/3249  Respondent: 8581089 / Jenny Wicks  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The revised OAN is too high. The proposed 22% increase in housing stock is double the 10.4% ONS projection for population growth over the plan period. The provision for students still seems unrealistically high as most will not stay in the Borough after graduation and the economic growth assumptions post-Brexit seem over optimistic.

No account has been taken of the special status of the Metropolitan Green Belt in limiting the ability of Guildford to meet its OAN. The Green Belt land proposed for development is predominantly in the land closest to London, in the north east of the Borough, of crucial importance in limiting the sprawl of the London conurbation.

The development proposed is proportionately (around 50%) too much concentrated on Green Belt sites in a small area in the north east of the Borough. Brownfield sites, particularly in the town centre, should take a greater proportion of the housing. With the growth of on-line sales, some of the area proposed for retail in the town centre should be used for housing

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
My objection is to the density of housing and employment use planned for this site. The traffic generated by the proposed buildings will enormously increase the present congestion in this area and in the village of Ripley where parking space is at a premium. Traffic on narrow roads in the surrounding area, already used as 'rat runs' will increase, and there will be great pressure on the local schools and doctor's surgeries.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

This refers to a map disassociated with this document and fails to provide a version number, location or name of the file. There are, at least, 220 separate documents associated with this plan. There should be an electronic link to this map. Either within the main document, or leading to a website where it can be found (see above in section 4).

The ‘Green Belt Boundary’ on the assumed map, at Local Plan Appendix 7, fails to identify the ‘prime’ boundary of Guildford Town itself. By implication there is no ‘Green Belt boundary’ around the Guildford urban area. Thus making this map incomplete and unsound.

The base map fails to identify with any accuracy where these lines are, and fails to provide hyperlinks to the associated Policies (areas) identified on the map. Reference A25 bears no resemblance to Sites C1 and C2 on the Green Belt Traffic Light map provided at Reg. 18.

The map fails to identify the Site of Archeological Interest behind Pimm’s Cottages, Burpham Lane in Burpham, which is a registered historic site and also designated Local Green Space Land in the Burpham Neighbourhood Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/7944  Respondent: 8581505 / Burpham Neighbourhood Forum (Jim Allen)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A24

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

A poorly thought-out project in its current form. The site has no indicated main access point to provide for the proposed 2000 vehicles coming on or off the site daily.

This entrance should be displayed in this Plan. The Project is moving forward without the community involvement of a Local Plan Process. Moving on a whim the sewage treatment works, which is the most important piece of infrastructure in the whole community, to build houses fails basic logic and soundness tests.

It is noted that a highly sensitive Green Belt is adjacent to this site, bounding Clay Lane. In the infrastructure aspirations the non-essential Link Road is proposed to cross this area. This Link Road aspiration, being non-essential, should be removed in total from the Plan, as it is against the flood plain requirement that only ESSENTIAL INFRASTRUCTURE should be built on any Zone 3B Active flood plain. The fact that this road was never essential means that it should be removed from the Plan.
A key consideration is missing, namely ‘Contaminated Land’. No borehole information has been released for this site, all such information being labelled ‘confidential.’ As the land owner, it is assumed that GBC has these records, but GBC has chosen not to make them public during this Plan process. It is known from local evidence (malformed premature lambs) that the land is contaminated.

This project is therefore unsound in its current format.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/7945  Respondent: 8581505 / Burpham Neighbourhood Forum (Jim Allen)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A25

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

This Policy is unsound as it proposes land usage policies of park and ride, railway station and housing.

It is the potential site for the suggested tunnel under Guildford. If the tunnel is accepted as the cure for the traffic problems through Guildford, then this site is in effect sanitised against housing until that decision is made.

Note: There are previous comments in full earlier in our representation [Section 7].

As it stands the timing and proposal for this site are unsound.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/7946  Respondent: 8581505 / Burpham Neighbourhood Forum (Jim Allen)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
This site has been turned down for development in the past three to six months.

It is difficult to follow the historic logic of this site as Surrey County Council want to use it as a waste ‘transfer site’ in their plan, whilst Guildford want housing, and the residents wish it to remain as is.

The pollution levels [CO2 NOx] at this site exceed acceptable levels for asthma sufferers. On health considerations (air pollution) and being so close to the overloaded M25 can, or should, this site be considered for residential use?

This Policy must be considered as unsustainable and unsound in respect of healthy residential use.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/7947  Respondent: 8581505 / Burpham Neighbourhood Forum (Jim Allen)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

This site has appeared only at Reg. 19 stage. It was not been disclosed previously at Reg. 18. There has been little time to assess and comment on this proposal. In fact the Policy simply offers Green Belt land for ‘development’ which could mean, if accepted, anything from a sewage farm, refuse tip, office buildings, housing, warehousing with vast numbers of HGV’s onto a B road to even a scrap yard.

The policy is so ‘open’ and ‘vague’ it simply cannot be judged on its merits. It is currently open land which also happens to be Green Belt land. No mention of this is included in the Policy. It is of major concern that it is extremely close to the Policy A25 site (Gosden Hill), also Green Belt land. The removal of both sites from the Green Belt destroys the very basic principles of the Green Belt purpose by permitting ribbon development alongside the A3.

Thus the inclusion of this site is unsound as it destroys Green Belt principles of openness and separation of communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/7948  Respondent: 8581505 / Burpham Neighbourhood Forum (Jim Allen)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a
The Policy A43a has been slipped into the Plan at Reg. 19 stage, with:-

- no previous public consultation at Reg. 18
- no official documented consultees’ consultation
- no apparent traffic modelling to discover its effects on local traffic patterns. No consideration has been given to:-
- south of this proposed junction. The south bound ‘on’ directly affects the south ‘off’ at the Policy A25 site, which is less than 2km from the Policy A43a site. One or other will need to be dropped from the plan.
- in respect of potential four way just north of Policy A25 site, this will be in direct conflict with Policy A43a site.
- the only village to benefit from this proposal is Ripley. All other villages will see an increase in traffic. The A3 traffic route changes, as proposed, are detrimental to remaining routes to the A25 and Woking areas.
- No solution to the traffic south of this location would be found by building these slip roads determined by Policy A43a. An expensive waste! The money could be used to solve 5 villages’ traffic problems, if the four way is built south of the current north off exit to Burnt Common as per Policy A25.

It is therefore a non starter for the community, interfering with traffic flows in a detrimental way and will increase traffic in West Clandon. The ‘ability’ to miss out Guildford for large commercial vehicles will lead to West Clandon on the A247 becoming a rat run for vehicles heading to the A25 and A246.

The increasing pollution would cause distress to the residents.

The proposal solves nothing, therefore is illogical and unsound.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** PSLPP16/17564  **Respondent:** 8581505 / Burpham Neighbourhood Forum (Jim Allen)  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy D1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Residential developments ‘of 25 or more dwellings’ fail to make mention of suitable space ‘off road’ for parking of all vehicles.

The ‘over 25 homes sites’ are all some distance from the main employment centres. As there can be no provision for multi location destination public transport, personal transport is a must to get to work.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/17565  **Respondent:** 8581505 / Burpham Neighbourhood Forum (Jim Allen)  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy D2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

This policy contains a FLA (4 letter acronym) (C)CHP, which is indecipherable.

This is a thirty year document so FLA’s and TLA’s should be spelt out early in the text so in 25 years time it is still understandable on the first read.

“Combined Cooling, Heat and Power (CCHP)
Combined Cooling, Heat and Power (CCHP), or trigeneration as it is also known, is the most economical and environmentally sound way to generate electricity, heat and cooling, making it the ideal solution for organisations which have significant cooling requirements.

CCHP energy schemes integrate Combined Heat and Power (CHP) systems with absorption chillers.

Waste heat provides energy to produce chilled water which is then used for cooling.”

While this policy is ‘admirable’ in thought, in ‘UK practice’ the proposal would work in large factories and barracks style / student accommodation where one central supplier has a responsibility for the whole operation.

For domestic houses (owner occupied) - this ‘communist style’ communal power and heating process is highly contentious. This type of system requires a central ‘boiler/engine/generator’ to feed a number of properties and thus requires a central service provider ‘on site’. We do not believe the policy itself is ‘sustainable’ as it will require the setting up of an ‘independent’ power station with associated company and staff. None of this is mentioned within the overall plan.

As there is no Plan Policy, Proposal, or Aspiration within the plan for such CCHP infrastructure this Policy fails the basic soundness test of being integrated with the rest of the Plan or in fact being deliverable in the life of the Plan.

CCHP for commercial premises is a sound policy, and is welcomed. However for disconnected owner occupied properties, the implications are a challenge. The distribution of hot and cold(chilled) water is unsustainable over wider ranges.

Web research has shown that this ‘new version’ of the old idea has less than 1,000 units worldwide. It is an unproven project notwithstanding the principles are excellent.

This policy needs seriously re-wording to make development sustainable and energy efficient, but not overly onerous on developers never mind the owner occupiers.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/17566  Respondent: 8581505 / Burpham Neighbourhood Forum (Jim Allen)  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

This Policy fails to encompass ‘artefacts’ and fails to provide ongoing a location where artefacts are stored and made available to the public.

The Plan is lacking inclusion of an Archaeology Policy in respect of these virgin Green Belt development sites. Noting that Gosden Hill, while having been ploughed in recent times is the second hill and adjacent hill to where the Simian Pot was found in 1892 implying potential archaeological remains could exist on this site.

This is a short coming in the Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/17567  Respondent: 8581505 / Burpham Neighbourhood Forum (Jim Allen)  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

No comment.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/17555  Respondent: 8581505 / Burpham Neighbourhood Forum (Jim Allen)  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

This policy is another indication of illogical thinking. The only ‘Sustainable Employment’ is in the food supply chain, no other jobs can be considered ‘sustainable’ – they are simply here for the present and gone in the future.

Stagecoach manufacture, busy in the 1700’s, vanished in the 1800’s, when trains arrived. These were destroyed in the 1960’s by Beeching. Now we have the motor car.

This policy should have the wording changed to reflect the transitory nature of the work place over the next 20 years. The word ‘Sustainable’ should be removed from its title

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The allocation of potential work places is an admirable aspiration.

As can be seen in Walnut Tree Close – the allocation of the land for employment and the building of the units lasted around a decade before they were demolished. Since no company has asked for new land, it is presumptuous to guess the need for work floor space, until it is asked for and type determined. It is also illogical to demolish ‘in use’ work space simply to build workers’ housing on the land. Such process destroys current jobs without creating or replacing the jobs destroyed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<td>Document:</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
We thank the LPA for copying the Burpham Neighbourhood Plan on Employment land policy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17558  Respondent: 8581505 / Burpham Neighbourhood Forum (Jim Allen)  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The policy should seek to enhance research and innovation aspects restricting the Site to B1b only with and Article 4 direction on this site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17559  Respondent: 8581505 / Burpham Neighbourhood Forum (Jim Allen)  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy acceptable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17560  Respondent: 8581505 / Burpham Neighbourhood Forum (Jim Allen)  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E6

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
Answer (if comment is on questions 1-7 of the questionnaire): ()

**Bullet point 4:** The wording of this paragraph fails to include the statement “..................recreational resource whilst preventing further erosion of the size of the flood plain or its function to prevent flooding elsewhere.”

The monitoring indicator (Target) states “increase in the number of visitor/bed spaces”; yet there is only one mention in the plan of a ‘hotel’ - and that is in Policy A36 which requires the existing hotel to be demolished to provide space for 48 homes. No site has been allocated for visitor beds, be it caravan/motor home sites or fixed bed, motel or hotel sites.

The target is not achievable, rendering the plan unsound.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The commercial side of the policy is also unsound as it fails to provide a rational approach to change in shopping habits of buying from the internet, with home delivery and collections of multiple parcels from central hubs.

The housing number needs to be consistent with all other documents and specifically the Town Centre Master Plan and Inclusion of Hotels to ensure other policies are achievable.

This policy fails to take ‘change of patterns’ into account.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
No comment.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17563  Respondent: 8581505 / Burpham Neighbourhood Forum (Jim Allen)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E9

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

No overall comment.

Burpham: King Post Parade is only half the Local Centre, the other half is London Road Parade.

It is noted that Jacobs Well is missing as a Local Centre from the Plan, as are the proposed Local Centres at Wisley, Gosden Hill and Blackwell Farm.

A provision should be included for any Local Centre in new developments.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17548  Respondent: 8581505 / Burpham Neighbourhood Forum (Jim Allen)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

This policy is misguided in that expecting one place of education (University of Surrey) to provide 60% of its own accommodation while failing to require a similar proportion for the other degree level education establishments in the town. It promotes segregation of students from town life and no one can be “forced” to live anywhere. Even if 100% of accommodation were provided on campus there will always be students who do not wish to live there! The student problem needs to be revisited. The policy should require all education establishments to provide affordable (low cost) accommodation for all non-local students such that during their educational period they do not automatically by default ‘absorb’ local housing stock.

This section of the policy is unsound
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17549  Respondent: 8581505 / Burpham Neighbourhood Forum (Jim Allen)  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The sentence “Developers will be expected to provide land for affordable homes at nil value” should read ‘Developers shall provide’ as it is a requirement not a request.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17550  Respondent: 8581505 / Burpham Neighbourhood Forum (Jim Allen)  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

This policy does not ‘explain’ why an exception exists. This must be defined to ensure this policy is sound.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17568  Respondent: 8581505 / Burpham Neighbourhood Forum (Jim Allen)  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
The wording is weak, in this policy. The first line text “.........Infrastructure needed to support development should be provided...........” needs re-wording to read ‘.........Infrastructure needed to support development MUST be provided...........’.

In respect of CIL in Burpham and other Neighbourhood Plan areas it is a requirement that 25% of the CIL is allotted to the Ward or Parish, whilst non Neighbourhood Plan areas get only 15%. Therefore the third paragraph is incorrect in its terminology and definition.

In the last paragraph it implies that the Thames Basin is the ‘be all and end all of legal responsibilities’. In fact air pollution and noise pollution are also legal responsibilities of GBC.

This must be re-worded.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>PSLPP16/17569  Respondent: 8581505 / Burpham Neighbourhood Forum (Jim Allen)  Agent:</th>
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<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy ID2</td>
</tr>
</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Supporting Highways England’s Road policy is actually a legal responsibility.

It should be noted their [Highways England] time scale for meeting infrastructure requirements does not start until 2020. Any development alongside the A3 cannot (due to lack of infrastructure) start until or after that time.

Thus this Plan is undeliverable within the time schedules laid out.

It should also be noted that road intersections deemed as a requirement at the numerically lower traffic levels of the late 1970’s / early 1980’s have not been included within the plan. Those deemed as a requirement were:

- A320 south bound on and off the A3. [Ref. Documents Surrey History Centre for completion of the Burpham Ladymead bypass 1978-1982]
- Four way inter section A3 with Gosden Hill [see document Gosden Hill plan 1982.]
- Link Road from the bullet point immediately above to the A25. [see document Gosden Hill plan 1982.]

Target for Policy I2
Note: There is currently a £1.5 billion Surrey Infrastructure budget deficit prior to these proposals.

The Target actually reads: ‘the three schemes on the strategic road network (locations not identified) within Guildford Borough as identified in the 2015-2020 period to be implemented by 2033!!!’

That means 28,000 vehicles, with 30% increased pollution level, will be on the roads of Guildford before the roads needed to serve the new homes are even planned to be built.

THIS IS UNSUSTAINABLE UNSOUND and UNTENABLE.

Note: Pollution level taken from the EA Spread sheet giving base level pollution calculations for given local traffic levels, speed and composition of vehicles

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** PSLPP16/17570  **Respondent:** 8581505 / Burpham Neighbourhood Forum (Jim Allen)  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

**Policy I3: Sustainable transport for New Developments**

As no new road completions are planned for any development until post 2030 – nothing can be considered sustainable, as all roads are currently running above capacity.

This policy also fails to understand that the average travel to work distance is 14 miles to over 50 locations. The only sustainable method to get people to work is push bikes or motorised low capacity transport utilising free running roads.

Road obstructions and little used bus lanes, buses which fail to follow routes required by people travelling to work and journeys with higher per mile costs than a private vehicle are unsustainable. This has been proved in Liverpool where bus lanes have now been removed, reducing pollution and traffic queues.

None of the proposed housing sites are within walking distances, even in good weather, to or from places of employment, shopping or major transport hubs. A walking distance criterion is irrational for normal people’s lives.

**The policy is unsound because of the existence of policy I2.**

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** PSLPP16/17571  **Respondent:** 8581505 / Burpham Neighbourhood Forum (Jim Allen)  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy ID4
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

This policy is in direct conflict with the Slyfield re-generation site situated in the 1901 flood plain. It is intended to ‘directly affect’ and cause material harm to the nature conservation interests of local sites (Riverside Nature Reserve). There can be no justification clear or otherwise to install 10 metre high lamp standards and disturb a landfill site or to move a waterworks which has been situated on ‘the perfect’ site for over 100 years to a location of ‘made land’.

Thus while commendable it fails the soundness test and is in conflict with other policies within the Plan.

Open Space

There is little point in saving 500 sq metres in the Town Centre when multiple 100’s of hectares are removed from the Green Belt.

SANG’s

Suitable Alternative Natural Green Spaces, these are ‘irresponsible’ designations of land. These paper designations do not physically change the sites from that of pre-designation and, save for the odd fence, gate and walk way, does nothing other than rename a location and become effectively Green Belt or Local Green Space by another name.

If an enclosed site is 100 hectares it is madness to label 50% SANG and 50% not SANG. It is only a designation on paper that changes rather than the sustainability of the site within Mother Nature. If the site was returned to Mother Nature from a farm yard or industrial site – this is fair designation. Designating open fields as SANGS is a meaningless paper exercise.

An unsound practice in the real world.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/17551</th>
<th>Respondent: 8581505 / Burpham Neighbourhood Forum (Jim Allen)</th>
<th>Agent:</th>
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</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P1</td>
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</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Contains several abbreviations which are not defined such as ‘AGLV’. To avoid confusion and doubt these should be either expanded in the text or identified in a note below on the same page and in the glossary.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

| Comment ID: PSLPP16/17552 | Respondent: 8581505 / Burpham Neighbourhood Forum (Jim Allen) | Agent: |
### Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy 9. Protecting Green Belt land

…The Government attaches great importance to Green Belts. The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence….

We are concerned that any change to the current 1940’s Green Belt line destroys its very purpose and refer to GBC High Court Action to successfully remove this site from the South East Plan. See extract from item 11, 18th June 2009

The Plan wording is weak:

Extensions and alterations:
Should have a specific sizing as the word ‘disproportionate’ could mean anything.

Replacement buildings:
Should only be within the footprint of the original building.

Limited infilling
Should only be within the building line of the nearest adjacent existing properties within the development line confines of the village.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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### Comment ID: PSLPP16/17553  **Respondent:** 8581505 / Burpham Neighbourhood Forum (Jim Allen) **Agent:**

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

From the NPPF:

The policy P4 is far too wordy and long – it grants permission for anything in ‘a Zone 3b flood plain’ contrary to the NPPF.

The second paragraph is unsound, irrational and illogical.

No development should be contemplated in the ‘Wey Valley Flood Plain’ as its’ area has been reduced by nearly 50%, since the flood of 1902 swept the Guildford town bridge away. The policy should positively prevent development under these circumstances.
Introducing further reduction of land area in times of climate change is unsound.

The Policy should not include the word ‘Permitted’ within it.

It should be worded

“NO New Development will be permitted within the Zone 3b flood plain which is bounded by the ‘flood line (Zone 3b)’ on the 2009 generated flooding maps of the River Wey.” Except in accordance with the NPPF.

Repairs to structures already within the Zone 3b Flood Plain will be permitted for maintenance.

Should replacement or rebuilding of the structure be required - every effort should be made to remove it from the Zone 3b flood plain.

Whilst this will not compensate for the loss of the flood plain since 1902 it should prevent further disasters.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPP16/17554  **Respondent:** 8581505 / Burpham Neighbourhood Forum (Jim Allen)  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

This policy, while welcome, demonstrates the irrational approach to this plan and its policies. Policy P4 permits development in a flood plain – which in the worst case means that people could die – yet this policy is protecting (quite rightly) the SPA.

Policy P4 is therefore unsound and irrational.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPP16/17547  **Respondent:** 8581505 / Burpham Neighbourhood Forum (Jim Allen)  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
We object to this policy on the basis that the strategic numbers vary from the calculations in Appendix 3, indicating that additional and independent calculations need to be completed. This is needed to confirm that such a large discrepancy above the national average is conclusively proven prior to acceptance of these figures.

It is also identified in Appendix 4 that there are insufficient skilled tradesmen in the area to complete the task of meeting housing numbers in this and adjoining Boroughs.

This policy is unsound as a basic Principle.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SLP16/1184  Respondent: 8581505 / Burpham Neighbourhood Forum (Jim Allen)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Personal representations in Respect of the Guildford Local plan submission at Reg. 19 Stage

Dear Sirs

1. I object to the Suite of documents identified in General as ‘A Guildford Local Plan’ in that there has never (as required Reg 17 of the Town and Country Planning act ) been a survey of the peoples of Guildford, asking them what they wanted in ‘their’ local plan – thus the whole suite of documents are legislatively ‘unsound’ from its inception

1. The LPA has failed to observe or act on any representations made by the community in response to the Reg. 18 submission for comment, merely continued their trajectory no matter what logical legal and common sense points have been put forward by highly qualified members of the Borough community.

1. They have acted in Secrecy while constructing the suite of documents – only disclosing ‘after the fact’ agreements with developers for the developers owned land to become part of the housing allotted land. They have failed to act in a manner which demonstrates Open Government and Localism – failing to consult in a meaningful way, merely going through the motions ignoring rational and sensible comments.

1. They have attempted to plan for the goal of rapid development max Houses, no matter the detrimental effects on the existing community, rather than planning for the future, no infrastructure has been included as a ‘must or Shall’ merely a ‘should or maybe’- this is totally unacceptable. To me and from comments across the Borough unacceptable to literally everyone who has actually thought through the Process.

1. Ignored ‘history’ in respect of known requirements in respect to transport infrastructure, while trying to bring in previously undisclosed schemes which are to the detriment of the community being poorly thought out and failing to consult with the communities affected. They have Ignored the need for always junctions at Potters lane and the A320 and link road to the A25, yet attempted to include a road across a flood plain without numeric or logical justification while failing to identify a sensible and rational route to Exit the site (Slyfield)
1. They have produced documents without proper consultation with the community, thus reaching proposals and conclusions which would not have been reached had the community been consulted and their views taken into account. Thus Failing Reg. 18 Process

1. The Document suite is not indexed despite it consisting of over 220 plus documents many duplicate documents with differing names. Some unfinished some clearly not changed since reg 18 despite notification of errors within them.

1. Thus the ability to comment on the plan is like fishing for Iron with a magnet in 50,000 Fathoms... you never quite know if the document you have found is the ‘latest document’ or a previous one, or simply a renamed identical document. – This makes the whole consultation process unsound.

1. Knowing many residents and Community organisations have commented at length – I formerly support their concerns objections and comments, and reserve all their submission at Reg 18 within the Reg.19 process such that the whole process can be challenged and assessed for its weakness of approach to this extremely serious requirement of having a Local plan for the Next 20 years.

I make no observations on the actually documents, as the actual process used to generate them fails the test of following legislative procedure (in respect of involvement of the community) and Soundness. The process has been development based not community based and at Reg.19 they have introduced documents and policies which would have been soundly rejected at Reg. 18 stage due to content and proposals, using half finished ideas and lacking in Numerical or Studious detail expected of such a plan.

I thus consider the plan unsound and failing to follow legislative procedures and formerly request it is sent back to Reg 17 stage for correct method of process namely Asking the community what they want, drawing up a plan to meet those requirements, submitting that plan to the public for comment, taking notice of those comments prior to pacing the plan before and inspector.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment ID: pslp173/693</th>
<th>Respondent: 8581505 / Burpham Neighbourhood Forum (Jim Allen)</th>
<th>Agent:</th>
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</thead>
<tbody>
<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2017 / Appendix C: Infrastructure Schedule</td>
<td></td>
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</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Considering concerns across the communities of Guildford, little has in reality changed since 2014: For instance, the proposals for Garlick Arch and the two slip roads to nowhere have not been assessed as viable by way of infrastructure or effects on traffic movement through the north of Guildford. The LPA’s declared position in 1984, which identified traffic requirements essential to make C1 C2 (B25 – now policy A 25) viable, are now simply dismissed and cheaper, less rational mitigation measures are put forward. In reality will destroy the existing communities of Ripley, West Clandon, Send, Merrow and Burpham, by virtue of increased of pollution and traffic levels. An opportunity to access the B2234 is a case in point. There is no legal access from Gosden Hill to the B2234 and no land has been set aside for such a link. Thus while implying this site will not be a giant cul-de-sac, in reality it can be nothing less without the land being set aside.
Railway

In respect of the proposed Merrow railway station, the current Wessex Route Study Final report of 21st August 2015 [para 2.7.5 page 22], while mentioning that there ‘were proposals’ [Park Barn and Merrow] takes the matter no further than that, and certainly not before 2045. Therefore there is no evidence before the inspector to suggest Merrow railway station will occur in the life of this Local Plan, with corresponding consequences for the Gosden Hill allocation, namely a further lack of required sustainable infrastructure to make the development viable.

Further, the Wessex route study proposes an extra platform to the town side of the station and elsewhere on the line, flyovers for the railway tracks. No land has been set aside for these proposals by the Guildford Local plan, thus suggesting any land within 100 metres or more of rail tracks that is built on, could hamper the efficiency of a major infrastructure improvement.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp173/599  Respondent: 8581505 / Burpham Neighbourhood Forum (Jim Allen)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Addendum documents

Addendum to SHAR 2016 (June 2017)

This document is fundamentally flawed in its conclusion as was the original document in that the conclusion first bullet point claims there will not be a severe impact on the local and strategic highway network. This statement is flawed for the following reason:

“For simplicity numbers are rounded up in this example. If the lane capacity before severe impact occurs is 2,000 cph per lane, then if the lane is currently running at 1000cph an additional 20% will mean 1200 cph and no serious or severe impact will occur. If on the other hand the road is running at 1900cph and 20% is added then 2280cph will cause over capacity problems – the SHAR which fails to display current traffic levels in any rational sense, makes it impossible to assess effect of traffic flow increases. It simply displays increase (and alleged decrease in flows) while failing to accept that during the rush hour the A3 is running at approx 5800cph on a three lane road”

ANY increase in traffic as it is so near to capacity will have a severe and detrimental effect on the traffic flow! The Aldi site is a clear and recent example it was ‘only’ a 2% increase in traffic – but the roads were already at 100% thus severe delays occur at this location. SCC and Qualified Roads data specialist regularly and monotonously fail to take this fact into account during this planning process.

[Image]

Strategic Highway assessment report

[Image]

This road is ‘at capacity’ and ignored by the Aldi planning application and appeal. The additional pressure will cause grid lock and raise pollution levels in the process

[Image - Figure 4.7]
The map/graphic following clearly shows that the only option to solve the congestion problems is as laid out in the History of the A3 north of the A320 in that a Tunnel (providing a total of four lanes south and four north is in reality the only option to cure the traffic congestion and pollution accepted as existing in and around North Guildford

Conclusion statement 5.1.6 is irrational and totally unfounded each home brings with it 1.8 cars on average 10,000 homes is 21,000 vehicles with roads currently exceeding capacity there can be nothing but a ‘severe impact’ both congestion and air pollution.

Note: in the 101 pages of this document there is no calculation of the increase of North bound traffic going south into Burpham to access the North bound Lane of the A3 or its affect on Traffic heading East on Clay lane delayed by the large increase in traffic from The gosden Hill Park and ride departing in the evening.

[Image]

From the Borough Economy and infrastructure document:

Note changes go beyond being minor in nature – but still fail to take any notice of Burpham resident’s comments. Noting on page 17 the display of the corridor to Gosden Hill right through the middle of Burpham (without consultation with Burpham) when the logical corridor for the park and ride buses would be onto the A3 and down to the A320 and into the town centre – for ‘Park and ride’ do not stop on the way thus do not need to be in Burpham at all, should a rational always junction sit on the A3 allowing rational access to Gosden Hill.

Charging for documents: During the Burpham Neighbourhood Plan the examiner ‘complained’ in his report that we could not charge £5.00 yet Guildford Borough want to charge over £300.00 for their local plan – is this disenfranchising the community?

Housing Numbers

The SHMA position within Surrey is clearly indicated by the diagram below – the Council was not elected on a ‘manifesto’ to build more than double that of any other borough in the county. The current ‘rational calculated level’ should be 404 per year which moves the rational number over 19 years of the plan to 7,676 which is still the highest level within Surrey! Noting this number is the raw number prior to reduction for ‘considerations’ in the process e.g. Green Belt and flood plain etc allowed for within the NPPF and NPPG. None of which have been included within the final number.

The SHMA document is the basis for all arguments on both housing and Industrial land allocation – this number must be rational and reasonable. The current document is well out of the statistical probability (standard deviation) summation of the whole of Surrey and on this point alone simply cannot stand unchallenged.

From the opengovernment.org.uk web site:-

“Priority 1: Extending the principles of openness and transparency

The public must be provided with easy access to accurate, credible, high value information in a format that can be easily read and understood, so as to ensure that key actors across the public, private and voluntary sectors can be held to account. Open government has three parts:
1. Transparency – opening up of government data and information on areas such as public spending, government contracts, lobbying activity, the development and impact of policy, and public service performance.
2. Participation – support for a strong and independent civil society, the involvement of citizens and other stakeholders in decision making processes, and protection for whistleblowers and others who highlight waste, negligence or corruption in government.
3. Accountability – rules, laws and mechanisms that ensure government listens, learns, responds and changes when it needs to.”
The current SHMA fails on these aspects of openness and accountability

**Topic Papers**

There is no indication that ‘topic papers’ form part of the Local Plan or simple additional pieces of speculative paperwork. Nor indication this information has been supplied to the public ‘as a component part’ of the local plan.

The Green Belt and countryside topic paper attempts to justify Exceptional circumstances as laid out in the NPPF stating ‘in general terms’ there are exceptional circumstances’

*General definition: “considering or including only the main features or elements of something; not exact or detailed.”*

*Exceptional definition: unusual; not typical. This alone displays a misinterpretation of the word ‘exceptional’*

How can justification for change of Green Belt lines for ‘unusual atypical’ reasons be claimed by stating ‘there is no exact reason or detail’.

[Image - ‘Exceptional circumstances’ 4.73]

From the 2014 Pegasus report vol II Addendum 17 04 2014 clearly states such exceptional circumstances WILL NOT EXIST. Thus fundamentally undermining claims to move the current Green Belt Line

[Image]

[Image]

[Image]

Clearly the process is not being followed as it clearly states these are not the finalised documents to be submitted. Thus this plan fails in the requirement to provide a set of completed documents to the community for comment and they leave themselves open to make changes beyond the sight of the community again failing the open government test.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

*Attached documents: [BNF comments Local Plan 19 07 17 23 25 table.pdf](https://example.com) (5.3 MB)*

**Comment ID:** pslp173/697  **Respondent:** 8581505 / Burpham Neighbourhood Forum (Jim Allen)  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

*Answer (if comment is on questions 1-7 of the questionnaire): ()*

We also have concerns regarding the manner in which evidence based documents have been updated throughout the local plan process. For instance, the Green Belt and countryside study was subject to a number of updates, leading to a disjointed document, which in any case is no longer up to date given the changes to the local plan prior to the current restricted consultation at REG19, E.g. Appendix 8: Potential Development Areas, being a case in point fails to include the extended site at Gosden Hill. This chaotic content in excess of 200MB plus (greater than 1000 pages) of documentation with addendums to previous documents, means trying to access and assess the up to date text being used in the final plan is impossible, for both the local plan team and members of the public. A total re-cataloguing of the suite of evidence based documents used to create and support the final plan is required to make this Plan sound and justifiable. At this very basic
level an Index of Documents is required complete with web site address where they can be found. A requirement for proportional evidence has not been met.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/2155  Respondent: 8581505 / Burpham Neighbourhood Forum (Jim Allen)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Introduction

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Front cover
- typo small ‘b’ in Borough
- No plan period given on front cover

Page 5, Foreword
(1) It is necessary to have justified statements of fact within the opening comments. The Council Leader’s statement is not justified, for instance in Para 3 the comment is not evidence-based; rather it is a subjective statement, not yet justified.
(2) We welcome the firm commitment that infrastructure should be in place before development, but would add a half sentence break into the last sentence. A reword is required to include “infrastructure prior to occupation of the development”.

1.13 Neighbourhood Planning
This paragraph and its heading are misleading as it appears to refer to the development plan in its normal meaning, rather than neighbourhood planning. This should be re-worded if it is intended to refer specifically to neighbourhood plans. For instance the following could be considered “This means that the neighbourhood plan is the first consideration in determining planning applications....”

1.15 Key diagram
- It is not clear from this paragraph where to find this diagram; by name or web location

1.16 Evidence Base
We are concerned that not all new evidence has been taken into account as some documents in the evidence base are greater than 10 years old: eg. Sites of Nature Conservation Importance Evidence 2004-7, referring back to 1997, 20 years ago.

Another example is that of the Green Belt Purposes Schedule with the Green Belt and countryside study, which was identified as flawed in 2014 and has not been amended or corrected since that time. Despite the additional volumes added to that document, we have been unable to find any text in Appendices 3 through 8, in the Green Belt and Countryside Study, Vol ii Addendum of April 2014, nor does it indicate that any sub documents should be consulted.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents: BNF comments Local Plan 19 07 17 23 25 table.pdf (5.3 MB)

Comment ID: pslp171/2156  Respondent: 8581505 / Burpham Neighbourhood Forum (Jim Allen)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Key facts
2.3
These population predictions pre-date the EU referendum and were based on potential immigration figures continually increasing due to free movement. These predictions are no longer valid and must reflect the likely situation post 2016. Taking the averages from the National Statistical Office, population predictions over 20 years will only actually rise by 1.006% giving a projected total of 146,388 over the twenty year period; An increase of just over 1,000 in Guildford population. Taking the population census last growth figure [2001 -2011] of 5.8% [over 10 years] the number is 153,577 or an increase of 16,377, yet the GBC prediction is 21,653. Again GBC figures are way outside statistical probability. With no supporting evidence provided for the GBC calculations, one cannot tell how they arrived at such a high figure. Noting all figures quoted within the Local Plan are higher than the statistical probability of them occurring at this high level. We are happy to debate this matter further at the examination in public.

Employment
2.8
The wording of this paragraph suggests that there are 95,000 job vacancies not 95,000 employed persons. The wording ‘opportunities’ is incorrect.

2.10
The reference to skills shortage is a pejorative statement.

2.10a
Clearly this is a statement of admission of currently inadequate infrastructure [on many levels] thus this statement should make it very clear that the Local Plan must prioritise the provision of infrastructure, and planning permission must clearly state and prove it needs prioritising.

2.11
We suggest the following change: A3 replace ‘trunk’ with ‘primary route’ which is a more definitive description of this road.

2.14a
This statement needs clarifying: Guildford and urban areas: Burpham is not congested just at peak times, but generally due to the two lane funnel south towards the A320/A3 intersection. This statement should recognise this as a separate problem which will increase with current development proposals. This statement infers problems only exist on the A3 heading north when in reality the problem is as complex heading south on the A3 and through London Road and Clay Lane in Burpham, which are used as traffic congestion relief roads for the A3.

As a result there are corresponding problems with air pollution in Burpham, which has more traffic than Ripley village [which has the results of a 3 month study, demonstrating pollution levels in excess of internationally acceptable levels]. Therefore this should be monitored prior to any further ‘strategic’ development in the Burpham area.

2.14b
Previous representations have set out the importance of local buses stopping at Guildford main railway station. Despite this item being raised on numerous occasions, nowhere in the Plan is there a reference to a specific intention to ensure buses
from all areas of the Borough visit the railway station as part of their standard routing; thus, fundamentally, failing to provide a sustainable integrated transport system.

**Housing**

2.18

As already discussed, existing evidence of housing need does not support the housing aims of the plan. The document calculations and background evidence sources have been hidden from view. Statistical assessment in comparison with other SHMAs around the country suggests that this document is fundamentally flawed. [See Local Plan summary at end of this document.]

2.21

Financial values become meaningless at the end of a 20 year plan period; we recommend that values are expressed as a percentage of national house prices rather than actual value so that this statement is always current.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents: 📄 BNF comments Local Plan 19 07 17 23 25 table.pdf (5.3 MB)

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**Comment ID:** pslp172/4089  **Respondent:** 8581505 / Burpham Neighbourhood Forum (Jim Allen)  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy A25

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( No )

Answer (if comment is on questions 1-7 of the questionnaire): ()

**Sub section 2**

Gypsies are traditionally roamers. Will these sites be very short term lease or errantly taken by one family as a permanent home? If they are permanently taken what will happen to the travellers who want a temporary space? Additional wording as to longevity of tenure should be included in Policy A25.

**Infrastructure**

An all movement junction is essential as roads in Burpham are already over capacity. Anything less is an abdication of responsibility in respect of reducing pollution and easing traffic congestion within the Ward.

**Subsection (1)** should be wholly removed as this is unsustainable and fails to even ‘try’ to mitigate or solve the traffic problems already in existence and the problems this development at Gosden Hill will cause the community of Burpham. A single sided A3 access fails to provide a sustainable park and ride system, fails to provide access to the site from the south, fails to provide a departure route to the M25 and fails to acknowledge that a four way was regarded as essential in 1984 whereas traffic in the past 20 years has increased by over 40%. Since the traffic estimate in 1979 [see estimate below in relation the construction of the A3 in 1979], when the growth was predicted at 65% up until 1995, and since that time has increased a further 40% (May 20th 2016), it is irrational in the extreme to make a claim that a single sided access is now acceptable here at this site.

[Image]
Sub section (3) sets out requirements for a park and ride facility. This requires an all ways junction to make the proposal sustainable, as any ‘park and ride user’ will want to return in the same direction as arrival, i.e. towards the M25. No provision has been made for the un-quantified number of cars [possibly now in excess of 1,000 vehicles as max number not specified nor land area required]. Furthermore the rational route for any park and ride bus would be out onto the A3 down to the A320 and the same route in reverse. Introducing buses into Burpham as part of this park and ride project, which do not pick up along the route, will simply increase pollution within the London Road corridor. There is no opportunity to widen the road to accommodate a ‘third and fourth lane’ to allow free movement of public transport.

Subsection (8) The use of the word ‘mitigation’ in (8) is weaker than the word ‘cure’ and implies a predilection to a reduction in viability and sustainability of the existing community of Burpham, forcing it to suffer from the vagaries of legal and political argument, rather than a practical and sound planning resolution to the problems created on the infrastructure by the selection of this site as an extension of Burpham.

Sub section (9) The use of the word ‘mitigation’ in (9) is weaker than the word ‘cure’ and implies a preference to a reduction in viability and sustainability of the existing community of Burpham, forcing it to suffer from the vagaries of legal and political argument rather than a practical resolution of the problems created within the infrastructure by the selection of this site as an extension of Burpham. The wording is seriously weak and provides no protection for the community of Burpham from cost saving exercises to allow this development to go ahead, in the full knowledge that the community of Burpham is left naked to this intrusion of vehicles, low water pressure and overflowing sewers. This policy fails to comply with section 152 of the NPPF, which states;

152. Local planning authorities should seek opportunities to achieve each of the economic, social and environmental dimensions of sustainable development, and net gains across all three. Significant adverse impacts on any of these dimensions should be avoided and, wherever possible, alternative options which reduce or eliminate such impacts should be pursued. Where adverse impacts are unavoidable, measures to mitigate the impact should be considered. Where adequate mitigation measures are not possible, compensatory measures may be appropriate.

The item(3) in the opportunities section of the policy is suggesting that land is required to be set aside to allow for such a route to occur, yet no land has been set aside for access at this point.

https://issuu.com/broadwaymalyan7/docs/gosden_hill_village_guildford - vi

This very late addition to this policy was not included in the Reg 18 documentation and fails to identify where this link road should be introduced. [Noting no traffic study has been completed on this proposal and unlike Blackwell Farm no new junction layout has been displayed]. No legal access currently exists between the site and Merrow Lane, save at the current farm entrance. This would mean that the local Green Space recently designated in the Burpham Neighbourhood Plan would be substantially affected by such a proposal, contrary to the wishes of the community of Burpham.

In general terms the policy as currently worded is deficient for the following reasons:
(1) the Gosden Hill site is separated from the community of Burpham by common land, Ancient woodland and Local Green Space, as designated in the Neighbourhood Plan, along its full length from London Road to New Inn Lane. At no point will this site merge with the community of Burpham, thus it will be a cul-de-sac village on the outskirts of Guildford, not really part of the urban area. Eg it will be similar to Jacobs Well – adjacent to but separate from the urban area. There are question marks over its sustainability if developed along the terms set out in this policy.

(2) We are concerned by the lack of reference to the need to provide adequate drainage at an early stage of planning, preferably by setting out minimum drainage requirements within the wording of the policy. This is strongly advised due to access to sewers being restricted by the current system, which is subject to hydraulic lock on the gravity section of the Burpham sewer precluding connection to the Burpham sewer system (which carries Merrow sewage as well. Thus the site assessment is substantially flawed see page 72 at web site https://issuu.com/broadwaymalyan7/docs/gosden_hill_village_guildford - vi
(3) 1/3 of the site is subject to the Burpham Neighbourhood Plan, which is not mentioned in the above policy and it should be in the Key Evidence.

(4) The site is currently designated Green Belt and has a strong defensible boundary with Burpham. Changing this boundary to an indefensible fence line endangers the very principle of the Green Belt.

NPPF Para 80. Green Belt serves five purposes:
- to check the unrestricted sprawl of large built-up areas
- to prevent neighbouring towns merging into one another

- to assist in safeguarding the countryside from encroachment
- to assist in urban regeneration, by encouraging the recycling of derelict and other urban land

Moving the Green Belt line from the current solid line to its new proposed location fails to meet requirements of bullet point 3.

[Image]

Existing defensible boundary [above]

[Image]

Indefensible boundary

There has been no demonstration of exceptional circumstances as required by section 82 of the NPPF to move the Green Belt line at this location.

83. Local planning authorities with Green Belts in their area should establish Green Belt boundaries in their Local Plans which set the framework for Green Belt and settlement policy. Once established, Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan. At that time, authorities should consider the Green Belt boundaries having regard to their intended permanence in the long term, so that they should be capable of enduring beyond the plan period. Does the map below suggest that the new line is safe?

The proposed boundary line fails to ensure ‘their intended permanence’. The current Green Belt line established during the original Green Belt exercise has worked well for over 60 years. Moving that line will destroy its principles. As displayed in page 100 of the developer’s promotion document where the new line is to be fundamentally destroyed by harvesting the trees on this site.

https://issuu.com/broadwaymalyan7/docs/gosden_hill_village_guildford_-_vi

[Image]

[Image]

Potential air quality issues – this is incorrect as the word ‘potential’ suggests that mitigation and obfuscation might make the problem go away. The reality is that the site alongside the A3 (the old C2) is subject to air pollution and also fails to record the noise constraints alongside the A3 noting this was ‘tested’ alongside existing homes. Introduction of new homes would mean the area would be extended north east.

This site is within a noise and air pollution action area designated by DEFRA.

The claim to be any ‘grade’ of farm land is spurious as there is no detailed land study of this farm available from MAFF using the 1988 criteria. – noting sections are Grade 2 farmland taken from the adjoining Dodswell farmland assessment. Yet the document Gosden Hill Village Vision and Development framework document claims it is Grade 2 farmland – the question arises “should we be using Grade 2 and 3a farm land (our food source land) for housing developments such as
Claiming it is sustainable to build on prime farm land is an anathema.

Changes not made, that should have been made by now - without instigation of the residents' comments but ignored by the Guildford Borough Council.

(1) The refusal to make public the raw data and formulae used to calculate the SHMA addendum suggests that it is fundamentally flawed.

(2) No exceptional circumstances have been publicised to justify movement of the Green Belt boundary from the current urban development line in Burpham.

(3) Correction of statements in the transport documents, which fail to accept that a road is running at capacity, according to the documents “Road Capacities by John Van Rijn of Indevelopment” or of the Ministry of Transport document design manual for Roads and Bridges Volume 5 Section 1 part 3 Traffic Capacity Urban roads. If the road capacity is being exceeded or greater than 75% then there is a clear requirement to solve the current problem prior to agreeing to add more traffic to that road. For example Clay Lane is running one car every 3 seconds westward during the rush hour, exceeding capacity of 1020 vph with a 60/40 split on road type UAP2. The total both ways is exceeded by a single line of traffic in excess of 1020vph going west. Clearly any proposal to increase this traffic level is unacceptable and, as the current problems are ‘severe’, they can only deteriorate to ‘very severe’. This alone provides the exceptional circumstances for not building in the Green Belt.

(4) Withdrawal of this Burpham road scheme “south on / off mitigation” for traffic problems caused by Policy A25: as it was pre-designated inadequate in 1984 to solve the traffic problems of this site when it was half the proposed size of A25.

(5) Removal of claimed ‘junctions improvements’ through Burpham. They are a fundamentally flawed proposal, because journeys through this area will increase, from the current 13 right turns for 11 routes to this proposal, which increases to 20 right turns for an improvement to 13 routes. While an all-way junction with link to the A25 would reduce the number of right turns to 11 and provide 18 new routes through the area, this would decreasing traffic congestion throughout the north of the borough; through Ripley, Send, Burnt Common, West Clandon, Merrow and Burpham.

(6) The correction of the Green Belt study, to ensure a rational balance to the traffic-light study, is achieved.

(7) The ‘walk to’ distances of the old C1 C2 site, now Policy A25, should be re-assessed because of the assumptions, as all access is now displayed as entering and exiting the A3 side of the site and it has been extended north east towards Send and West Clandon. Thus any assumption of ‘walk to’ distances via Merrow Lane, are fundamentally flawed and scores achieved are incorrect.

(8) No account has been taken of the grade of farmland as identified in Policy A25 which, although untested by the Min Ag&Fish, is highly likely to come out Grade 2 as it was part designated with this status some years ago, when an adjacent farm was designated with Grade 2 [Plot C3 and part of C2]. It is irrational to use up quality farmland when lower Grade 4 is available to the west of the Borough.

Notwithstanding our specific comments on wording and detail within this confined and incomplete REG 19 non-statutory consultation we find we need to make more general comments following research on the overall Guildford Borough Local Plan. The following section must be considered in the light of this compromised Reg 19 public consultation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Comment ID: pslp171/2233  Respondent: 8581505 / Burpham Neighbourhood Forum (Jim Allen)  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy D1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Place shaping: This is not a good title as it implies coercion.

Policy D1
Sub section (2) should contain “must” as opposed to “should”.
A statement should be inserted stating that the terms of adopted Neighbourhood Plans must be complied with. Furthermore there is a need for an air impact assessment policy.

4.5.8
Should be retained.

Key Evidence: some documents are out of date. E.g. the Residential Design Guide SPG evidence reference document.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/2234  Respondent: 8581505 / Burpham Neighbourhood Forum (Jim Allen)  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy D2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Sustainable design, Construction and Energy – Inappropriate heading
Subsection (1) too vague – delete.

4.5.19
Why has this statement been removed? Reinstate. This statement displays serious concern for water supplies; removing it attempts to hide reality.
4.5.30a
Should be removed in full.

**Key Evidence**
The community has not been consulted on the evidence at Reg 18.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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<th>pslp171/2235</th>
<th>Respondent: 8581505 / Burpham Neighbourhood Forum (Jim Allen)</th>
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<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2017 / Policy D3</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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</table>

4.5.42
Historical Environment: fine.

4.5.42a
Neighbourhood Plans invariably provide a good reference of historical design standards and should be used.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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<th>Comment ID:</th>
<th>pslp171/2194</th>
<th>Respondent: 8581505 / Burpham Neighbourhood Forum (Jim Allen)</th>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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4.0 Policy E1

4.4 Economy Policies

4.4.3a
Insert “Due to failure of transport Infrastructure” after ‘Locations’

[Page 70, paragraph 4.4.2]
Reinstate full description of EM3 MEP.
Note: Too many unfamiliar TLA’s confuse the reader throughout the document; it should be a policy of the documents layout to use no abbreviations unless they are in common use.

[Page 70, paragraph 4.4.3a]

4.4.5
Industrial expansion figures are miscalculated with knock on effect to employment and housing, etc. The SHMA, as previously stated, is incorrect so industrial requirements are also mismatched.

4.4.6
Retain definition of ‘ELNA’ at least once.

Policy E1
As the SHMA housing figure is excessive by 30%, consideration needs to be made to the resultant change in the required level of industrial floor space and subsequent jobs ‘needed’ to create ‘full’ employment. A rough calculation would indicate a reduction in employment requirements to 3,200 jobs.

Item ‘D’ does not make sense.

[Page 71, paragraph Policy E1 (5)]

Within this policy, SCC depot was planned to be moving to the Slyfield Industrial Estate extension. No mention is made of this in this policy. In previous iterations of the Plan this proposal was included. Is this proposal still current? Is it no longer proposed that SCC would move sites? Furthermore, what is the knock on effect to the expansion of Slyfield Industrial Estate, which was primarily based on both GBC and SCC effectively amalgamating onto the extension site?

4.4.7
‘ELNA’ should be left expanded for ease of reading in all cases specifically within the definitions section.

4.4.8
There is no safe-guarded land for infrastructure: with both Burnt Common and Gosden Hill identified for some industrial use a strong infrastructure link to the A3 is a basic requirement. However no rational provision has been made for northbound (A3) access to Gosden Hill or southbound Burnt Common, nor access to Gosden Hill from Burnt Common.

Thus, should a company decide for whatever reason to take up opportunities on both sites they are unable to access one from the other without considerable mileage in both directions for what is less than a quarter of a mile as the crow flies. Does the statement below tally with the current SCC waste management plan considering that SCC is apparently not moving from Merrow Business Park? Currently the waste management plan is under review, thus item 10 is ambiguous.

[Page 73, paragraph (10)]

4.4.7 The figure for meeting employment needs is one third higher than required as homes needed is approximatly 7,000 not 10,000.

4.4.8 Reviewed every 3 years.

4.4.11a
Habitat Regulation Assessment: has this been defined? Yet another tla to remember...

BDES 2013 – 2031 (old dates) (3) enterprise M3 2014;

The document has not been publically scrutinised by the community and is not available under that description on the GBC Local Plan website. The document promote’s Guildford as a ‘growth town’, yet there is no mention of this growth town in the Local Plan; nor have the residents of the Borough been consulted about this status. Does this document fundamentally affect the Local Plan? If so why is it not more widely published within the evidence base? There is no mention of what these ‘improvements’ mean in respect of the Local Plan provisions.
This document is promoting rail infrastructure with no cooperation with Network Rail. This misleads the LPA in that no station is planned at Gosden Hill within the life of the Local Plan.

No other mention of these proposals is included within the rail report, yet specific mention is made of other projects including CrossRail and Heathrow southern link, suggesting Network Rail give the proposal little merit.

Enterprise M3 statements referring to Guildford; Not one aspect of the strategic package has been consulted on with the community of Guildford and the document is not available on GBC web site. This organisation appears to have undue influence on the Local Plan while being totally unaccountable to the community which will be affected.

The alleged Interchange improvements are not going to happen until post 2030 according to Highways England and their commitments schedule. No details exist in the public forum to allow them to be studied in detail.

Again, this document is supporting a non-existent, non-achievable goal [see above]. Clearly the writer of this M3 document has little knowledge off the situation in Guildford, as they refer to corridor improvements ‘near’ Guildford when in reality the improvement is needed to be ‘along the length of the A3 through Guildford.

So the unaccountable Enterprise M3 can ask for road improvements to be accelerated yet, when the community ask for the same improvements, they are ignored.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**  BNF comments Local Plan 19 07 17 23 25 table.pdf (5.3 MB)
4.4.14
Burnt Common/ Gosden Hill road access non-existent.

Addition: delete as it contradicts policy E1 and implies that the town centre offers most business opportunities. It adds nothing to the Plan.

Recommendation: add “subject to other policies in this plan” because this is too loosely worded at present and could lead to other uses in residential areas.

[Page 75, Policy E2, (6)]

4.4.16
Two new stations Merrow and Park Barn are not in Wessex Network Rail Plan to 2043. While one paragraph mentions that there was a ‘suggestion’ of new stations, it is ignored throughout both this and all other relevant documents concerning the railway, and can therefore only be considered Aspirational at best.

4.4.22
Estimated ground space subject to change in SHMA -

4.4.23a
Surrey waste management plan is in process of being re-written in 2018. This will be a fundamental change of waste handling as it is being contracted out by adjoining boroughs that use GBC sites during the Plan period. Thus site capacity needed throughout the Borough is subject to change in the next three years.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents: BNF comments Local Plan 19 07 17 23 25 table.pdf (5.3 MB)

Comment ID: pslp171/2199  Respondent: 8581505 / Burpham Neighbourhood Forum (Jim Allen)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy E3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

4.4.25
Where are these lost floor spaces recorded / reported?

4.4.26a
Insert “Appendix A2 forms part of this policy” at the end of the line.

4.4.24
We recommend the insertion of “with due regard to adopted Neighbourhood Plans” after the word “impacts”.

4.4.31
There is no employer-based evidence, other than from the university, thus any future need cannot be reliably predicted from the data presented; thus there is no informed and reasoned justification.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents: BNF comments Local Plan 19 07 17 23 25 table.pdf (5.3 MB)

Comment ID: pslp171/2200  Respondent: 8581505 / Burpham Neighbourhood Forum (Jim Allen)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy E4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

4.4.40

The current Surrey Research Park boundary expands into Blackwell Farm (site A26). The Research Park boundary needs to be re-defined to keep the special nature of the area; the map should be re-drawn to show the changes.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/2201  Respondent: 8581505 / Burpham Neighbourhood Forum (Jim Allen)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy E5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Incubation centre; needs defining and “subject to other policies in this Plan” should be added to the policy.

[Page 86, paragraph Policy E5, (2)]

4.4.48a

Link to Appendix 2 should be annotated “Appendix 2 forms part of this policy”

4.4.51a

We question the validity of the Rural Economic Strategy as a background document as it has not been subject to public scrutiny and has been inserted into this Plan post-Regulation 19 stage. The Document has been formulated to match the Local Plan already in existence rather than researched and the information used to form the solid foundation of this Plan. The Plan ignores areas both to the east and west viz Mole Valley and Rushmoor and makes no mention of Neighbourhood Plans.
4.4.52
Enterprise M3 LEP is not a statutory body but a quango, based some considerable distance from the Borough in Winchester, with no publicly visible ties to the Borough. None of their reports and suggestions are open to public scrutiny.


What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents: BNF comments Local Plan 19 07 17 23 25 table.pdf (5.3 MB)

Comment ID: pslp171/2202  Respondent: 8581505 / Burpham Neighbourhood Forum (Jim Allen)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy E6

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

4.4.56a
The leisure and visitor experience, insert “Appendix 2 forms part of this policy”

4.4.59
Please add “and enhanced” after “preserved”.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/2203  Respondent: 8581505 / Burpham Neighbourhood Forum (Jim Allen)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy E7

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

4.4.71
The first sentence irrelevant as it includes all time periods of the day. We welcome mention / acknowledgement of parking and traffic problems and request definition of ‘spatial vision’ and source of this document.

4.4.78
ONS 2014 projections are incorrect; overseas student numbers have been double counted.
4.483
Study 2014 is out of date.

4.4.68
The first two sentences of this statement should be left in. The statement is actually referring to flood zone 3b, where there should not be building in any respect. This should be accepted as a severe constraint within the Local Plan. We noting no constraint of any kind have been applied in this Plan, merely ‘Mitigation’ where it is known to cause potential damage will be done by the policy. The NPPG refers to essential infrastructure only. This does not cover business or domestic buildings. No attempt to build in Zone 3b should be supported by this Plan. The implication that the Council is attempting to prevent flooding in a natural flood plain is worrying as speeding water through a natural river course will seriously erode the banks.

4.4.87
Guildford Town Centre regeneration strategy: the relationship between the TCRP and the LP statement should be defined here. The GTCRP Document has not had scrutiny at Reg 18. It is unknown what ‘SPD’ means, and the relationship between it and the Local Plan and the GTCRP’s Aspirational Plan is unclear, as the regeneration strategy is unavailable to comment on.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp171/2231  Respondent: 8581505 / Burpham Neighbourhood Forum (Jim Allen)  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy E9

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

3c King Post Parade, London Road Parade, Aldi. A more defined map is required. The Local Plan and the Neighbourhood Plan conflict with regard to change of use conditions with reference to local centres. Clarification as to the differing requirements needs documenting.

4.4.92a
Note: National definition includes casinos and these need to be ‘excluded’ specifically if this is the intention.

4.4.92f
Insert “Appendix 2 forms part of this policy”. The terms of the Burpham Neighbourhood Plan need to be carried forward in the Local Plan to prevent conflict with town centre policies.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp171/2178  Respondent: 8581505 / Burpham Neighbourhood Forum (Jim Allen)  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy H1
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<td>Student accommodation; university students cannot be forced to live on site’ noting the university is not the only education centre in Guildford, [e.g. There is The University of Law, and the Academy of Contemporary Music.] The university should not be singled out in this policy (sub section 5) Student accommodation should be re-worded “<strong>Educational centres with students from outside the Borough and requiring student accommodation should provide at least 60% on site or in purpose built units</strong>”</td>
</tr>
</tbody>
</table>

4.2.1a

Page 35 Key Evidence Housing Policies 4.2

Should include the text “Appendix 2 forms part of Policy H1 Homes for all.”

4.2.3

The addendum to the SHMA did not comply with central government guidance concerning openness of calculations and raw data. The exact raw data and formulae used have been claimed to be commercially confidential, contrary to open government principles. Statistical analysis by bodies other than GBC suggest that the raw data used and the resulting calculations are not comparable with other similar SHMA exercises across the country, suggesting that the housing number is considerably higher than is statistically rational or mathematically correct.

4.2.4

The requirement of 15% to meet M4 Standards is commendable but this needs re-wording so that the 15% is across the borough. If less than 7 homes on any one site were proposed, it is unclear how the 15% would be captured. It would be better worded as “15% of all planned/completed new homes in the Borough in any one year must be M4 compliant.”

4.2.16

Student accommodation: Guildford College has more students on the books (distance learning) and more students will be living at Guildford College following a recent planning application for student accommodation on site. Perhaps re-wording would better explain the student overnight accommodation needs.

4.2.18

The total of student accommodation should logically be removed from the SHMA and treated as a separate calculation and separate need [Similar to how a hotel chain would calculate need in a location]. Only the final number should be translated into policy as ‘beds needed’ across the Borough. The separation should be clearly shown in any calculation. This is because the type and style of accommodation, and nature of occupation, are different than for family homes. The requirement for student beds is ‘yearly’ or even ‘seasonal’. They are not permanent Borough residents across the life of the Plan (20 years). As many as 60 students could be sleeping in the same ‘bed space’ over 20 years if they are attending one term per year, thus numbers for students cannot be aligned with their lecturers who could occupy the same bed space for the full 20 years. A statistical error of 60% plus could be introduced if the calculations are incorrect and remain unchecked by an independent auditor.

Page 41 Key Evidence.

- SHMA Guildford addendum report 2017-06-17

- Land availability assessment GBC 2016

Both of these documents have been developed outside the envelope of public scrutiny due to claims of commercial confidentiality, thus raw data and formulae used in their preparation have not been open to scrutiny. This totally contradicts the Council’s own executive statement of openness and the principles of open government. The Council acknowledges its duty to cooperate; however while preparing the Local Plan at no stage has the LPA communicated with the Burpham Neighbourhood Forum in respect of their intentions within the ward of Burpham, seriously undermining the purposes and
spirit of neighbourhood planning. This is a flagship government initiative. In paragraph 2.13 of their topic paper on their Duty to Cooperate, neighbourhood planning groups do not fall within the Council’s interpretation of groups with whom it should cooperate, while the DCLG take a different approach and state “Where a neighbourhood plan is brought forward before an up-to-date Local Plan is in place the local planning authority should take a proactive and positive approach, working collaboratively with a qualifying body. This could include sharing evidence and seeking to resolve any issues to ensure the draft Neighbourhood plan has the greatest chance of success at independent examination” [https://www.gov.uk/guidance/neighbourhood-planning-2 Paragraph: 009 Reference ID: 41-009-20160211] GBC has failed to share the SHMA evidence (raw data and formulae) with the Neighbourhood Forum and thus failed in both their duty to cooperate and show the openness requirement of the process.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

BNF comments Local Plan 19 07 17 23 25 table.pdf (5.3 MB)

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Comment ID: pslp171/2181  Respondent: 8581505 / Burpham Neighbourhood Forum (Jim Allen)  Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy H2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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A certificate of ultimate ownership should be considered within this policy so that they remain ‘affordable’ within the life of the building.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp171/2237  Respondent: 8581505 / Burpham Neighbourhood Forum (Jim Allen)  Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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4.6.7

Within the Policy please clarify relationship between Parish and Neighbourhood Forum for CIL.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
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<th>Comment ID: pslp171/2239</th>
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<td><strong>Answer (if comment is on questions 1-7 of the questionnaire):</strong> ( )</td>
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</table>

4.6.21
We recommend the addition of “Adding appropriate planning conditions accordingly to achieve the required goal.”

*Subsection 2(d)* Deletions have made this meaningless.

4 not definitive subsection 5 too weak needs to refer to Due regard to Neighbourhood plans Car club Not defined
(8) Wording not strong enough Must supply the infrastructure
Add Clause (12) having due regards to compliance with the Neighbourhood Plans

4.6.28
How do we know mitigation will work – the word mitigation implies problems are known to be caused by this proposal and it acknowledges an absolute increase in Traffic yet no guarantees have been put in place and since 2014 proposals which are known to be totally inadequate and unsustainable are being supported by this plan.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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<td><strong>Answer (if comment is on questions 1-7 of the questionnaire):</strong> ( )</td>
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</table>

We are concerned that plans to divert the Wey Navigation to permit non-essential development within the flood plain are being hidden behind these changes. Noting the EA has not prevented excessive erosion along the Wey between Stoke Lock and Bowers Lock since 2014. Over 150 trees are endangered by this policy.

A section in this policy referring to Local Green Spaces is required, as it is notably missing throughout this Plan.

[Image of writing]

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

BNF comments Local Plan 19 07 17 23 25 table.pdf (5.3 MB)

| Comment ID: pslp171/2185 | Respondent: 8581505 / Burpham Neighbourhood Forum (Jim Allen) | Agent: |
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

4.3.17 Page 5.54 Policy Green Belt

[Maps]

The statement 4.3.17 seems irregular and counter intuitive in that while Green Belt has been introduced ‘to prevent coalescence’ between Ash Green village, Ash and Tongham [the Executive Council leaders own patch!], this protection has been removed along the A3. The A25 Gosden Hill site [formerly C1/C2 plus extension into C3 north] has been extended outwards from the urban boundary, while Burnt Common has been removed from the Green Belt adjacent to Send, meaning Send is coalescing with the urban boundary of Guildford [A section of the Council political opposition’s ‘patch’] forming a ribbon development along the A3, something which the Green Belt designation is meant to prevent.

Noting in the Green Belt study of 2014, site B8 is considered highly sensitivity yet C1, C2 and C3 (owned by a developer) are not, when in fact C1, C2, B6 and B7 should have been given the same weighting in this study as D1. It would be rational to conclude that this assessment was based on the commercial confidentiality of the land owner’s intentions, as opposed to the public interest assessment of the genuine purpose of the Green Belt as supported by the Council’s previous actions in:

- 1949: Tree Preservation Order on boundary of development line and the old and original Green Belt line.
- 1984: Refusal for inclusion in Local Plan of that time.
- 2003: Local Plan the site was not included for residential or commercial development.
- 2011: South East Plan High Court decision to exclude this site from the Local Plan.

The only differences between sites D1 and C1,C2,C3 are that they are separated by a railway line and D is owned by the National Trust and ‘Cs’ are owned by a property developer.

Nowhere in any legislation is the “defensible Green Belt line” permitted to be designated or defined by the land ownership.

[Planning Practice Guidance issued by Government in March 2014 aims to make clear that unmet housing needs (including for traveller sites) is unlikely to outweigh the harm to the Green Belt and other harm to constitute the “very special circumstances” justifying inappropriate development on a site within the Green Belt]

4.3.20

This document under Regulation 19 is meant to be ‘the completed Local Plan’ yet in this paragraph it clearly states the ‘forthcoming’ Green Belt Supplementary Planning Document. This is yet another document referred to in this Plan which actually doesn’t exist in this time frame [up until 24th July 2017] and thus cannot be assessed by the public.

4.3.24

As villages have now been proposed to be inset in the Green Belt does this statement refer to ‘inset’ or ‘washed over’ habitation?

Key Evidence page 58

Refers to the Green Belt and Countryside Study; this is flawed evidence as identified in previous public consultations since 2014.

Maps displays inset villages within the green belt while the ‘principle’ of inset is sound the boundary lines are not for example Ash Green boundary instead of following the tree line a ‘defensible line’ as required by the NPPF/NPPG, it chops through an area of wood land with no strong defensible line thus it fails this requirement “define boundaries clearly,
using physical features that are readily recognisable and likely to be permanent”
Page 24 fails to identify Local Green spaces, Ancient woodland and Suitable alternative local green spaces,
Page 61 paints an imaginary line through the middle of the Ripley Green far more rational to follow garden line, it appears
the amendment 2 actually includes the north side of the high street for no benefit to the Green Belt or to Insetting – this line
should be agreed with each parish ...
Page 82 has an identified settlement boundary with ‘numerous’ residential properties outside the boundary suggesting
irrational thought patterns
Page 84 also has a strange delineation between countryside Green belt and inset village suggesting these areas are strategic
employment sites with no strategic highway access and introducing business premises into a residential area without logical
or rational reasoning of boundary delineation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents: BNF comments Local Plan 19 07 17 23 25 table.pdf (5.3 MB)

Comment ID: pslp171/2186  Respondent: 8581505 / Burpham Neighbourhood Forum (Jim Allen)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally
Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

4.3.39

There should be no change to flow routes; the Council’s amendment has a fundamentally different meaning from the
Environment Agency response [see below], while the EA stated “All other land surrounding this important flow routes [sic]
is important and should be retained”, whereas the Council refers to “changes to flow routes”.

Policy P4 Flooding
This policy should be negatively worded, for example; ‘Will not be permitted unless A-F” due to severity of flood risk in an
active flood plain categorised zone 3b areas.
Note: (4) Essential infrastructure is not defined.

[Page 62, Policy P4:Flooding, Paragraph (2)]

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents: BNF comments Local Plan 19 07 17 23 25 table.pdf (5.3 MB)

Comment ID: pslp171/2187  Respondent: 8581505 / Burpham Neighbourhood Forum (Jim Allen)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P5
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Clarification of this paragraph is needed viz remove “set out in this policy” and insert “set out in Policy P5.”

[Page 67, 4.3.56]

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<td>This statement could benefit from a case law example.</td>
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<tr>
<td>[Page 67, Paragraph 4.3.56]</td>
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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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4.1.2
The plan makes multiple references to sustainable development. However most development put forward appears to need mitigating. ‘Actual adverse impacts’ are singularly missing from any commentary or policy. When considering noise, air pollution or lack of infrastructure, on 53 occasions ‘mitigation’ is used to claim an improvement in sustainability of the Plan’s proposals.

There are multiple references to ‘should’ but never ‘shall’ when referring to the provision of infrastructure. In short these policies are not future proof and strongly suggest sustainability problems, 57 in all, with only 4 providing sustainable solutions. For, ‘to mitigate’ strongly suggests something has failed during the planning process: if it had not failed no mitigation would be required.

Page 27 4.1.1a
The definition below is not recognised. The Minister’s statement is more definitive.

[Quote from the Minister reads “Development means growth. We must accommodate the new ways by which we will earn our living in a competitive world. We must house a rising population, which is living longer and wants to make new choises. We must respond to the change.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents: BNF comments Local Plan 19 07 17 23 25 table.pdf (5.3 MB)

Comment ID: pslp171/2254  Respondent: 8581505 / Burpham Neighbourhood Forum (Jim Allen)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

It is our assessment that the plan, in the round, presents a level of development for the borough that is unsustainable in its present format. Specifically, the plan fails to provide sufficient infrastructure to deal, in a sustainable manner, with Traffic, Water, Sewage, Air and Noise Pollution requirements. In broad terms when infrastructure is addressed in the plan the relevant references make such provision ‘generally optional’, encouraging mitigation measures as opposed to requiring the provision of specifically identified infrastructure, which is required to provide a realistic solution to the problems caused by the level of development set out in the Plan.

For instance, in relation to highways requirements associated with specific land allocations, road proposals in the plan have not been properly tested by or to Highways England requirements as set out in the Design Manual for Roads and Bridges. A specific example of this can be found in respect of the Gosden Hill land allocation: An allocation for development was been turned down in the 1980s on this site, due to chronic lack of infrastructure, noting as an example [left] an extract from the GBC objection to the Gosden Site proposal, in which the council specifically noted the offer of a four way intersection but still found the allocation of a smaller section of the current proposed allocation unacceptable. This decision was supported by the local plan inspector at that time, and again in 2003. It would be reasonable to conclude that traffic levels have increased somewhat since 1984 and yet the current proposals for the Gosden Hill allocation makes only a passing reference to junction improvements south bound and make no provision or requirement for the all ways junction proposed in 1984, leaving all north bound traffic to travel south through the community of Burpham. NPPG paragraph 152 states “Local planning authorities should seek opportunities to achieve each of the economic, social and environmental dimensions of sustainable development, and net gains across all three. Significant adverse impacts on any of these
dimensions should be avoided and, wherever possible, alternative options which reduce or eliminate such impacts should be pursued.” The failure to provide an all ways junction fails this basic principle. It is also worth noting the Council successfully challenged the Gosden Hill allocation in the former the South East Plan on sustainability grounds in the High Court. There is nothing within the current proposals to suggest adequate levels of infrastructure will now be provided [see our separate detailed comments on Policy A25]. Therefore the proposal remains unsustainable and should be removed.

Notwithstanding the lack of sustainability, the plan’s ‘trajectory’ has failed to follow statutory process in that the introduction of new policies and background documents has occurred after closure of Regulation 18 and the Regulation 19 stages. No completed draft plan has ever been displayed to the public for consultation at Reg 19.

[Figure 1] Martin Grant proposal August 1984 (appeal against local plan)

[Page 30 4.1.9a]

The housing number within the table above, 450x2 + 500x3 + 550+600+700x3+800+810+850x3 does not calculate to 12,426 but 9,810 another indication that the Housing Numbers are fundamentally flawed. Raw SHMA data has not been displayed to the public, contrary to the principles of open government [see closing comments at the base of this document]. The numerical data are not statistically sustainable. We therefore question the final figures in this policy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents: BNF comments Local Plan 19 07 17 23 25 table.pdf (5.3 MB)
Air pollution is currently exceeding national and international annual daily average guideline levels of 40μ/m3 along the A3, Ripley Parish Council has the full set of data for Ripley as a base indication of Levels in the Borough.

**Roads**

Highways England has stated by letter to the Council dated 5th October 2016 that none of the roads proposals mentioned in the local plan have been tested to meet the Design Manual for Bridges and Roads, for the simple reason that there are no firm proposals for any of this road infrastructure at the current time. It is disingenuous for a local plan to be presented to the Secretary of State that makes reference to infrastructure that won’t be provided in the plan period, if at all. The Highways England response supports other statements made indicating their desire to prioritise the Smart M25 then M25 J10 A3 and then the A320 – A31 improvements. Thus, the required infrastructure for Garlick Arch, Gosden Hill and Wisley airfield will not and cannot be constructed within the time frame of the Local Plan, without a complete ‘about turn’ by Highways England. In addition, some early targeted small improvement schemes referenced by the local plan are not committed proposals and cannot be relied upon to be delivered within the plan period [see Highways England letter 5th October 2016]

**Our response to other representations made.**

*NPPG 155. Early and meaningful engagement and collaboration with neighbourhoods, local organisations and businesses is essential. A wide section of the community should be proactively engaged, so that Local Plans, as far as possible, reflect a collective vision and a set of agreed priorities for the sustainable development of the area, including those contained in any neighbourhood plans that have been made.*

The Plan is not future proof in respect of Infrastructure, has been produced in a flawed statutory process using a closed “this is what you are getting approach” with little notice being taken of restrictions to potential proposals, suggesting inadequate infrastructure which simply cannot be supplied within the life of the plan. (Under current funding)
- Highways England from their public statements clearly have no intention of solving traffic problems or providing completed solutions through Guildford within the life of the plan
- Network Rail have no intention of introducing new railway stations –
- Thames Water will struggle to supply water or treat sewage without major and as yet unfound finances.
- The statutory procedure has not been followed. No ‘complete’ plan with catalogue or index document of associated documents exists for members of the public to scrutinise.
- Consultation with the general public has been substantially flawed in that no document has been corrected, no change of planned policies have occurred which reflect responses from the community especially and specifically from the submissions from Burpham residents. Highlighting Traffic lack of infrastructure and pollution effects from Gosden Hill site – GBC Claiming under FOI this detailed information is commercially confidential’ as opposed to the Blackwell Farm and Wisley proposals which have been clearly aired in the public domain.

Thus this plan is fundamentally flawed in its statutory and central government policy approach, its assumptions to sustainability are flawed and will fundamentally reduce the quality of life of those already living in the Borough. This can only be cured by a projected £2 billion (Tunnel, Sewer, Drinking water, General road widening) injection of cash into the infrastructure to provide a sound basis for the next two plan periods up to 2050. Such is the mismatched infrastructure failings to policy proposals.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents: [BNF_comments_Local_Plan_19_07_17__23_25_table.pdf](BNF_comments_Local_Plan_19_07_17__23_25_table.pdf) (5.3 MB)
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The proposal is to construct approaching 14,000 new homes in the Plan period. This seems to us a very large number proposed by the Strategic Housing Market Assessment which should be subject to rigorous scrutiny. However the methodology used in arriving at this figure has not been generally revealed or even revealed to Guildford Borough Council. This seems extraordinary and indeed undemocratic to us as it is the basis of much of the Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The proposal to build over 2000 new homes together with other facilities, particularly employment facilities, will have a huge impact on the area including East and West Horsley. It is not reasonable to expect local roads to be able to cope with the increased volume of traffic eg those driving from the development to Horsley Station and shops. Apart from the roads East Horsley Medical Centre is full, the Howard of Effingham Secondary school (the main school for the area) is oversubscribed while parking space is already under pressure in the East Horsley Station Parade area. Infrastructure is earmarked for the Wisley site but it is highly likely that new homes would be constructed before new infrastructure. In any event there would still be considerable pressure on the East Horsley area from this development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
The designation of Horsley Station as a transport interchange also means that there is likely to be unsuitable out-of-character development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Station Parade, East Horsley is to be designated a Rural Development Centre which opens the possibility of substantial and out-of-character development. The Parade is made up entirely of small businesses apart from Budgens supermarket which in any event is small enough to count as premises not restricted in terms of Sunday opening hours ie East Horsley is a village and not an embryo small town.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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the scale of additional development proposed for East and West Horsley, particularly West Horsley, will of course only add to the infrastructure problems outlined above.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Answer (if comment is on questions 1-7 of the questionnaire): ()

We are also very concerned at the proposed encroachment on the Green Belt. The Green Belt is there to guarantee areas of countryside adjacent to London and to take villages in the Bough out of the Green Belt would seem drastic action to take to allow the development of new homes. Surely additional consideration should be given to making further use of brownfield sites in Guildford and elsewhere which together with infilling and limited local development could provide a satisfactory way forward without a significant impact on the Green Belt.

To remove areas from the Green Belt ‘exceptional circumstances’ need to be demonstrated but such circumstances have not been set out in the Plan particularly with regard to East and West Horsley.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/7489  Respondent: 8581633 / Mrs J Cohen  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The town is already congested and transport evidence is not yet fit for use - another river crossing, a central bus facility?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/7488  Respondent: 8581633 / Mrs J Cohen  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I support the response made by the Guildford Residents’ Association and object to Guildford expanding by a quarter. It is unacceptable that, unlike other places, Guildford is choosing not to constrain its overall housing growth.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<td>I object as GBC have not followed the correct process</td>
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<tr>
<td>Policy A43 and Policy A44 are new proposals which were not included in the Regulation 18 draft and should therefore be subject to another full consultation</td>
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<td>I object that there is no demonstrated need for the additional houses on these sites beyond the 13,860 already planned for the Borough</td>
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<td>I object that there is no need for the 7000 sq m industrial development under Policy A43, given that the latest ELNA shows a reduction of 80% in the required employment floor space compared with the previous draft plan</td>
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<td>I object that no case has been made under Policy P2 to demonstrate exceptional circumstances to justify the removal of Send and these sites under A44 and A44 from the Green Belt</td>
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<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): (Yes)</td>
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I object as GBC have not provided sound evidence on the Employment Land Needs Assessment. The number of foreign students has been wrongly used to inflate the need. The housing need of 13860 houses is exaggerated since if the population grows by 20,000 we would need around 8,000 homes.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>SQLP16/2</th>
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<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Question 2: Legal Compliance</td>
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The plan for Burnt Common and Send has been changed at the last moment. These are significant changes which would require another full consultation under regulation 18, not Regulation 19 as proposed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<tr>
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<td>Document:</td>
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</table>

I object that Send is to be removed from the Green Belt under policy P2. Send provides a buffer between Woking and Guildford and no exceptional circumstances have been identified that would justify removal from the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<tr>
<td>I object to policy A43. There is no need for 400 new houses in Garlick's arch addition to the 13,860 already proposed in the Borough. This is a new site which was not included in the Regulation 18 draft and has not been consulted on previously. It is on Green Belt which should prevent the merging of settlements</td>
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<td>There is no need for the 7000sq m industrial development at Garlick's arch as the latest ELNA assessment shows a reduction of 80% in employment floor space from the previous draft plan. Industrial development could be based at Slyfield</td>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A43</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<td>I object to policy A44. This proposal for 40 homes and 2 travellers pitches at Winds Ridge and Send Hill is new and was not included in the regulation 18 draft. It is on Green Belt land and has not been consulted on previously</td>
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</table>
Land at Garlick’s Arch, Send Marsh, Policy A43.

Now 400 homes and 6 Travelling Show people plots

I object to the Policy A43 change at Garlick’s Arch because:

It is permanent green belt and no exceptional circumstances exist

It ignores all the thousands of previous objections made by local people

It will cause over-development of our village and the number of homes is excessive

It will join up Ripley and Send and defeat the key purpose of Green Belt

It is subject to frequent flooding and is currently a flood zone 2 allocation

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/1778  Respondent: 8581729 / Jeffrey Gargan  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A58

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Land at Burnt Common, London Road, Policy A58.

Now a new allocation for a minimum of 7,000 sq m of industrial or warehousing

I object to Policy A 58 at Burnt Common because:

1. It was deleted from the 2014 draft because of all the objections made previously
2. The word “minimum” is a change from the previous “maximum” in the 2016 plan and since that time there has been a decline in demand for industrial land
3. There is no need to build industrial or warehouse development in the middle of the Green Belt when Slyfield and Guildford still have empty sites and industrial units
4. The 2017 Employment Land Need Assessment shows a reduction in demand to 3.9 hectares for industrial land for the whole borough not a huge over allocation of 10 hectares at Send in the Green Belt
5. The impact on small surrounding roads will create traffic gridlock
6. It will join up existing villages and defeat the purpose of the Green Belt

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
**Comment ID:** pslp171/513  **Respondent:** 8581729 / Jeffrey Gargan  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

**Green Belt, Policy 2 at paragraph 4.3.15**

*Send Business Park now taken out of the Green Belt altogether*

I object to the proposal to inset Send Business Park from the Green Belt because:

1. It is effectively an old non-conforming user in an area of outstanding countryside adjacent to the beautiful Wey Navigation
2. There is highly restricted vehicular access along Tannery Lane in both directions
3. Further expansion or development at this location detracts from the openess of the Green Belt and is inappropriate

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** PSLPS16/2056  **Respondent:** 8581889 / Joan Barnett  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A25

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The proposed area of Gosden Hill Farm is part of the Green Belt which acts as a buffer to prevent sprawling development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** PSLPP16/4348  **Respondent:** 8581889 / Joan Barnett  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object strongly to Guildford Borough Council's Draft Local Plan June 2016.

I support all objections, reservations and relevant comments submitted by Burpham Community Association with regard to the Draft Local Plan and the devastating affect it will have on Burpham.

Adding another 2000 houses will double the size of Burpham without sufficient consideration to the infrastructure and traffic which will cause more air pollution

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: SQLP16/383</th>
<th>Respondent: 8581921 / Joan Garcia</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (No)

While the report recognises the problems already faced by residents in negotiating their way through excessive traffic, it does not make proposals for improving this situation for those of us who live outside Guildford. More traffic will arise from excessive building proposals, making life ever more difficult for those of us trying to access Guildford town, or simply trying to get out of our own villages in rush hour periods.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 7: Any other comments?</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (Yes)
The traffic problems raised by those of us who responded to the previous consultation have been insufficiently addressed. You have made proposals for major road changes, and some new park and ride facilities. However, the volume of traffic is already problematic, and for those of us who live in the villages surrounding Guildford, I see no proposals for improvement. In Chilworth, the main road running through the village is used as a 'Guildford by-pass' by large volumes of vehicles daily, and I do not see how this will be improved. It is extremely difficult to get out of Chilworth village in the mornings and other busy periods, due to traffic heading into Guildford from the Wonersh directions, and in the evenings due to traffic in the other direction.

More widely outside my own village, the traffic in the roads around Guildford is very heavy, and quality of life does not appear to have been considered in proposing large amounts of new homes in the area. This has all been said before, and apparently ignored.

I do not believe that proposals cater only for housing requirements in the area, but for people wanting to move into the area. The more houses that are built, the more people will move into the area, from London in particular.

I, and many others, commented in the last consultation against proposals to inset (i.e. remove) some villages from the Green Belt. These comments have been ignored, and the new document still shows a list of villages (including Chilworth) which be removed. In Chilworth, the eastern half of the village has an open character which surely 'contributes to the openness of the Green Belt'. It has views up to St Martha's Hill and to the Heathland on the southern side of the main road running through the village. I strongly object to proposals to remove this village from the Green Belt. The proposal would no doubt then offer opportunities for future building on the northern side of the main road, adding to ever increasing traffic, and consequent noise, and further spoiling the quality of life here.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/385  Respondent: 8581921 / Joan Garcia  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 7: Any other comments?

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (Yes)

I, and many others, protested in the last consultation against your proposal to remove some of the villages from the Green Belt. This included Chilworth, where I live. Our views have been ignored, and still you plan to go ahead with this proposal. Our village sits within the Green belt, and the eastern half of it has an open character, with buildings on only one side of the road. It also sits within the Surrey Hills AONB. It has open views up to St Martha's Hill, and opens out onto heathland on the southern side of the main road. wish to protest again that removal of the village from the Green Belt, as this will clearly open up the possibility of further construction within its boundaries. This would lessen its open aspect, and would give rise to further traffic, congestion and noise. You do not appear to have had any regard to the quality of life experienced by residents within Chilworth and similar villages.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/2928  Respondent: 8582017 / The Clandon Society (J Wright)  Agent:
I OBJECT to the proposed Infrastructure Schedule (Appendix C)

The Infrastructure Schedule sets out the key infrastructure requirements on which the delivery of the plan depends. For each of the Key Allocated Sites in the borough it identifies infrastructure projects that are required, except for Garlick’s Arch (A43) which is not mentioned. It is clear that the Plan takes no account of the infrastructure required for this site and is therefore not fit for purpose.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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I OBJECT to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)

- The “objectively assessed need” figure of 693 homes a year is too high.
- A professional review by NMSS has concluded that, even basing the calculations on a period of stronger economic and student growth, the housing need figure should be revised down to 510 homes a year and the method changed to consider student housing need separately due to the distorting effects.
- The current SHMA inflates the proposed housing figure due to
  - failure to correct for errors in the historical data for international migration flows,
  - issues with the way it considers students and affordability and
  - flaws in the method for estimating the number of homes needed to support job growth.
- It is unacceptable that demographic and economic model assumptions have been withheld and cannot be checked making the process unaccountable.

The Plan’s proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the borough, it is over double the previous figure of 322 used in previous plans. The SHMA report methodology is I believe inaccurate; it inflates the needs of the borough by distorted student numbers. However, it is based on commercially confidential modelling assumptions that cannot be checked or reviewed. There is no transparency to this evidence base and it is therefore impossible to assess its accuracy. This is not democratic and is not appropriate for consultation of the Plan.

The National Planning Policy Framework allows the overall housing target to be reduced to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/5995  Respondent: 8582017 / The Clandon Society (J Wright)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A25

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy A25 with proposals for Gosden Hill Farm.

The Green Belt at this point serves the important function of separating West Clandon from the edge of urban Guildford. Development here will cause the two to coalesce defeating one of the objectives of the Green Belt. If this development proceeds I believe the narrow strip of Green Belt remaining between Guildford and Clandon at this point will be too narrow and will come under further pressure.

It will represent an undesirable ribbon development along the A3. It will be highly visible from the A3 when approaching Guildford and will, in conjunction with A43a at Garlick’s Arch give the appearance of almost continuous development from Send through to Guildford.

The Plan does not put forward any evidence that exceptional circumstances exist to justify removing this site from the Green Belt.

The development will overburden the local road network and increase congestion on the A3 and A247 through the centre of West Clandon. This is already very heavily used whilst being unsuitable for designation as an A road. In places it is too narrow for two lorries to pass causing them to mount the pavement.

Note the following accident data:

2010 –2014 from Crashmap data

- Clandon Cross Roads Area to Bulls Head - 17 incidents
- Bulls Heads Head to Bennett Way - 8 incidents
- Bennett Way to Highcotts Lane - 15 incidents
- Tithebarn Lane to Portsmouth Road Birch Close - 8 incidents

2015

- 21 Oct 2015 – A247 near shell garage - Three vehicles collided causing delays
  
  Surrey Fire and Rescue deployed.

2016

- 15 April 2016 12 year old boy injured in The Street – A247 closed in both directions
Attempts have been made over many years to reduce traffic, traffic speeds and accident risks through West Clandon, however little has been achieved as the road cannot be widened and SCC is reluctant to impose further speed limits as congestion is already very high.

I object most strongly to the proposal for a link road to bring traffic from the Gosden Hill development to the proposed 4 way junction at Burnt Common. This has the potential to generate large volumes of traffic (including commercial vehicles) on the A247 through West Clandon - a road which is already under traffic stress (see below).

The land in Gosden Hill does exactly what the Greenbelt was designed to achieve. It provides a green buffer between the Guildford Urban Area and West Clandon, gives Burpham a defined green boundary and breathing space and it hides Guildford town from visitors until they pass the off-slip to Burpham.

No exceptional circumstances have been demonstrated for building on this site and therefore it does not comply with paragraphs 87-89 of the NPPF. It stops the sprawl of Guildford town, assists in safeguarding the countryside from encroachment and assists in urban regeneration by encouraging the recycling of derelict and other urban land. All of these are requirements of the NPPF.

The scale of Gosden Hill is out of proportion to West Clandon. It would have four times the amount of housing plus shops, offices/factories, GP surgery, schools. Development on this scale would blight a historic village with a history going back to the doomsday book and beyond.

Gosden Hill is the most obvious location for the north end of an A3 tunnel. It has rising ground and is situated just before the urban area. If it is built on, it will be very difficult to construct a tunnel.

The development will generate in the region of 6,000 vehicles which will pour on to the A3 which is stationary every day during rush hours. The linking of the A3100, B2215 and A247 would channel thousands of cars through the narrow, winding road through West Clandon, a road where large lorries mount the pavement virtually every day and through Send and Ripley which are also severely constrained.

The volume of traffic will greatly increase air pollution which is particularly critical given the proposal to build two schools.

Currently, a two way junction at the site would require vehicles wanting to go north on the A3 to go through Burpham which is grid-locked every day.

Burpham’s sewers are at capacity. Sewage would have to be pumped to Slyfield for processing, a project of enormous cost.

There is inadequate fresh water in Guildford and current supplies could not meet the needs of a development of this size.

Electricity supply is also inadequate and would require a big infrastructure development.

The railway station was rejected by Guildford Borough Council in 1984 because it feared Gosden Hill would become a dormitory estate for London.

The wording of the Local Plan with regard to Gosden Hill is so loose that the developer could virtually do whatever it wants.

The remaining agricultural land between Gosden Hill and West Clandon is so small that it is highly likely to be uneconomic and therefore a prime candidate for further development which would roll the Guildford Urban Area over West Clandon towards East Clandon and Wisley.

If the Strategic Sites are developed, the north of Guildford will deliver 36%, 5,036 houses towards the total of around 14,000. The infrastructures of the existing villages and the A3 will be overwhelmed by the scale of development.
A new on-slip at Burpham would only be 1.8km from the on-slip at Burnt Common which is against Highway England’s requirement of 2km.

Development of the A3 at best will not start until after 2020 and the building of a tunnel, which is only an “aspiration” in the Local Plan, is likely to be many years after. In the meantime given that developers build houses to provide cash-flow for infrastructure, Gosden Hill will have a crippling effect on villages like West Clandon and the A3.

Gosden Hill already has surface water problems. Merrow Stream crosses the site. No hydrological survey has been carried out to assess the implications. Electricity pylons run through the centre of Gosden Hill which have health and safety issues.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy A43</td>
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**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ( )**

**I OBJECT to Policy A43 and A43a on Garlick’s Arch.**

The site was only inserted in the draft plan at a late stage just before publication of the consultation draft which is a shabby way for the Council to proceed. The site is not a sustainable site being far from any infrastructure facilities and transport links. The bus service is infrequent and it is almost certain any future residents will rely almost entirely on cars for journeys. Similarly any employees at the employment areas will almost undoubtedly arrive and leave by car.

The site is susceptible to flooding and will not make a suitable site.

The Green Belt at this point serves the important function of separating West Clandon from Send. Building here will cause the two to coalesce defeating one of the objectives of the Green Belt.

I have seen no evidence that exceptional circumstances exist to justify removing this site from the Green Belt or that this important issue has been addressed. The Green Belt and Countryside study did not even consider this site.

It is understood the Council's eyes may have been turned by the possibility of receiving for free the land which might be used for new A3 slip roads in return for allowing this development, thus justifying it as some form of enabling development. However the slip road land if needed could be safeguarded in the plan and acquired by compulsory purchase when required. Lack of current funding for the slip road is not a justification for allowing the development of this site. If the slip road is genuinely needed then government funding will be available for it. (One of the reasons for turning down the so called enabling development proposal intended to fund the rebuilding of the Howard of Effingham School was that the redevelopment of the school was not essential. As and when it became essential Government funding would become available. Accordingly enabling development was not necessary. The same principle applies here.)

The A247 running south past this site through the centre of West Clandon is already very heavily used whilst being unsuitable for designation as an A road. In places it is too narrow for two lorries to pass causing them to mount the pavement- often at speed. It has narrow bends with poor sight lines, an infants school and a hump-backed bridge concealing the entrance road to the station for southward traffic. In addition, there are no continuous footpaths which forces
pedestrians to cross and re-cross the road. Development at Garlick’s Arch will only exacerbate the problem and make the road even more congested and unsafe for pedestrians.

The development will cause harm to the ancient woodland on and by the site.

Taken together with the Gosden Hill site, there will be a ribbon of development along the A3 in contrast to the current “soft” edge approach to Guildford.

Garlick’s Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8). There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).

The Plan states the preference is to making the best use of previously developed land. Yet at the 11th hour a perfectly acceptable brown field site at Burnt Common, capable of accommodating approximately 100 houses, was removed from the Plan and replaced with the Garlick’s Arch site. There was no proper consultation in relation to the inclusion of this site. Why was a brownfield site removed and replaced with a Greenfield site? There is no evidence that Section 18 of the Planning and Compulsory Purchase Act 2004, which requires local planning authorities to produce a Statement of Community Involvement, has been complied with for this site. This only came to light for local residents following a Council meeting on 11th May 2016.

Moreover, Guildford Borough Council’s own Green Belt & Countryside Report does not address Garlick’s Arch at all, so there is no evidence base to support the inclusion of this site.

National Planning Policy promotes sustainable developments, with sustainable transport. With ever reducing bus services in the area and no train station within reasonable walking distance it is impossible for any development on this site to offer a sustainable transport solution. Development on this site is wholly inappropriate (Policy I3).

The stream, which runs through the site, is identified as having a high risk of flooding by the Environment Agency. There are other sites that do not flood that can be developed and therefore this site should be removed from the Plan (Policy P4).

This site is bordered by Ancient Woodland and within it a number of trees are protected by Tree Preservation Orders (Policy D3).

The site has an abundance of wildlife, some of which are protected. It is home to many types of owls and bats, with the woods having cuckoos and woodpeckers. In addition there are regular sightings of badgers, deer and red kites. The development of the site will result in the loss of habitat. No wildlife report has been conducted on the site. (Policy I4)

It is clear that with this site being added at the 11th hours no infrastructure planning has been undertaken. The Infrastructure Schedule makes no provision for any infrastructure improvements for this site. How will the local services such as schools and doctors cope, many of which are already at capacity? (Policy I1)

Furthermore, several electricity pylon runs through the site, which will have the potential to be a health hazard for any residents.

I OBJECT to the inclusion of the land for new on/off ramps at Burnt Common (A43a)

The addition north facing ramps to the A3 at Burnt Common would be a disaster for local communities. There is no requirement for local traffic to access the A3 to the north, but the addition will draw in a huge amount of ‘through’ traffic.

The route from London/M25 to Woking or would now be through Burnt Common and Send. Equally traffic from the east of Guildford (Merrow etc) and the A25 will now go through West Clandon and Burnt Common. This will cause immense damage to those areas on small roads which cannot be improved.

This Plan does not address the needs of local communities or the Borough in this regard. There has again been no Section 18 consultation on this.
[Table]

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<th>Comment ID: PSLPP16/12172</th>
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I OBJECT to the damage to the historic environment as a result of the scale of the proposed development (Policy D3)

I OBJECT to the local plan based on the impact it will have on the special countryside of the borough.

The proposed development at Garlick’s Arch (A43) will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

[Table]

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<th>Comment ID: PSLPP16/12181</th>
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I OBJECT to Policy D3 - Historic environment

I object to this policy as it is very weak and I do not think it is clear enough in its support for the conservation of the historic environment. It provides for development which will “enhance” heritage assets which I fear is a developer’s charter as it leaves plenty of room for abuse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?
I OBJECT to Policy D4 - Development in urban areas and inset villages

The policy should place much greater emphasis on residential development in the existing urban centres. In this way housing needs can be met without resorting to large developments in the Green Belt. There are urban areas in need of regeneration but these are ignored in favour of Green Belt development.

The policy should not be applied to the villages which should remain in the Green Belt. Unrestricted application of this policy to the villages intended to be inset will change their characters radically and for the worse. The development it encourages will increase traffic and congestion disproportionately.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

I OBJECT to the sustainable employment policy (Policy E1)

I object to the inclusion of a strategic employment site at Gosden Hill Farm. Employment sites should be concentrated on previously developed land in more sustainable locations with good transport links where the infrastructure can support development. Warehousing, distribution and industrial premises cause considerable commercial traffic, noise, pollution and general disruption. They are not good neighbours for schools and 2000 houses. Many of the jobs will be taken by people outside the area leading to additional congestion in Burpham and on the A3.

I object to the inclusion of a strategic employment site at Garlick’s Arch. It is in a non-sustainable location remote from any facilities of any kind and with poor public transport links. It is unlikely jobs there will be taken by local residents and it is likely all travel to and from work will be by car adding to local congestion. Employment sites should be concentrated on previously developed land in more sustainable location with good transport links where the infrastructure can support development.

The site is in any event subject to frequent flooding and unsuitable for development.

If developed, the new employment site at Garlick’s Arch, Send Marsh/Burnt Common (A43), would be treated as a Strategic Employment Site.

The proposed development of up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8) at Garlick’s Arch (A43) is in the scheme of industrial development relatively small. Just to the
south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m. The Garlick’s Arch site which is in the Green Belt should not be developed as a Strategic Employment Site when there is a suitable alternative brownfield site very close by, which is far more sustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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I OBJECT to the location for new employment floorspace (Policy E2)

I object to this policy. It would be more sensible to confine new office and research and development floor space to the urban Guildford area. I also oppose the policy of expanding the Research Park onto Blackwell Farm. No exceptional circumstances, as defined under the NPPF, have been advanced to justify incursion into this permanent and high-quality area of Green Belt.

Proposals for new industrial, warehousing and storage (use Class B1c, B2 and B8) floorspace will be directed to the Industrial Strategic Employment Sites.

There is no need for the new employment floorspace to be located at Garlick’s Arch or Gosden Hill Farm, when near to these sites at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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I OBJECT to the loss of rural employment (Policy E5)

Policy E5 supports the retention and development of local services and community facilities in our inset and identified villages. Yet the development at Garlick’s Arch (A43) would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises. The Plan does not promote rural employment; rather it will result in the loss of existing local rural businesses.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12188  Respondent: 8582017 / The Clandon Society (J Wright)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E6

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy E6 - The leisure and visitor experience.

The policy should acknowledge that whilst in some areas new and enhanced leisure facilities are valuable (for example the new Opera House at West Horsley Place Towers), much tourism depends on the undeveloped nature of Green Belt areas surrounding Guildford. Accordingly the policy should recognize that in many rural areas new and enhanced visitor facilities may be unnecessary and counterproductive, particularly away from existing buildings and development. For example the attraction of Newlands Corner is its undeveloped nature. Significant development of visitor facilities there is likely to diminish rather than increase its attractions. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment. Heritage sites and the Green Belt are particularly vulnerable to harm.

Tourism and visitors do not depend on new visitor “attractions” and could actually be damaged by them, as compellingly argued in the current debate over Newlands Corner. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment/“Disneyfication”. Heritage sites and the Green Belt are particularly vulnerable to harm.

Guildford has many “leisure and visitor attractions” already. The case for creating more is not made and no examples are given. Instead, the plan’s explicit priorities should be:

1. To protect the borough’s prime leisure and tourism asset, its countryside, from inappropriate development. This is all the more valuable because of its accessibility from London, the rest of Britain and the Continent, in that order. Rural residents are its custodians and require no Council interference. Economically, the most valuable forms of tourism, such as walking and cycling, require no new development. In the overcrowded South-East of England, lack of development is a leisure and tourism asset, not a liability.

2. To help make Guildford’s river landscape less off-putting and support town-break packages for high-value tourists. To achieve this, the policy needs to define what leverage, if any, Council planners have to influence normal tourism market mechanisms.

3. To help private providers market local tourism. This need not involve extra spending. The Council could, for instance, help co-ordinate ready-made, local tourism packages under a distinctive brand at an all-in price. An “English town break” (including B&B accommodation, a walking tour of Guildford, a pub lunch in the Surrey Hills, a visit to Wisley Gardens and a National Trust property and a Southwest Trains travelcard for a day out in...
London) would be highly attractive to many European visitors who currently by-pass Guildford to go to Bath, Oxford or Cambridge instead.

4. To rule out the redevelopment of scarce rural hotel sites (e.g. Thatchers, East Horsley, earmarked for 40 new houses under Site A37 of the plan yet just a short walk from the new opera house).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12178  Respondent: 8582017 / The Clandon Society (J Wright)  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E7

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy E7 Guildford Town Centre

The policy “vision” describes protecting the Guildford’s unique setting and historical character and sets out some of the ways this will be done. However none of this is included in the formal Policy wording in the blue box. I suspect the Vision wording is effectively of little or any force. These principles should be included in the formal policy.

There should be a much greater focus on residential use of the town centre where many people would like to live and where the necessary amenities and infrastructure exist. The policy misses the opportunity to propose forward looking sustainable residential development plans in, for example the Walnut Tree Close area, where very significant numbers of new homes could be provided. Such town centre sites could meet much of the housing need over the plan period without harming the countryside.

There is an urgent need for a strategy to focus on brownfield redevelopment before considering development outside the existing urban area.

The policy does not address any of the major issues raised by the Council’s own Town Centre Master Plan, the Guildford Vision Group’s proposal for new river and rail crossings or plans for the redevelopment of Guildford Station, all of which are already the subject of public discussion.

The policy also fails to provide guidance on design requirements, as required by the NPPF.

The policy and surrounding text concentrates too much on shopping without regard to its nature which risks a proliferation of dull high-street chain stores. The policy should seek to enhance Guildford’s character and encourage a wider variety of small shops including locally owned businesses and shops of use to consumers. (For example there is no butcher in Guildford.)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12176  Respondent: 8582017 / The Clandon Society (J Wright)  Agent:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy H1 – Homes for all. Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan period. It fails to set rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions.

The housing mix is based on out-of-date, pre-Brexit projections and on assumptions set out in a flawed SHMA that has not been scrutinised or evaluated.

I support higher density development in the urban area, without resorting to dehumanising, high-rise buildings that developers commonly claim are necessary for financial viability. Much of Guildford town could usefully be regenerated with 4-5 storey blocks with landscaping and underground parking, as often seen on the Continent and, recently, in London.

Student accommodation should provided for 100% of new students and more than 60% of existing students, which would free up ideal family accommodation in the urban area. Other university cities (e.g. Oxford) insist on higher percentages than those proposed in the plan. In my view, the Council’s timidity is a case of “regulatory capture” by Surrey University, which has failed to use its existing planning permissions (dating from 2004) to accommodate 3,000 students or to improve the efficient development of its campus (e.g. by building on its extensive and under-used surface car parks). If all students were accommodated in this way, 2,000 homes would be freed up in town and there would be no need to build on the Hog’s Back.

It is not appropriate to release Green Belt land to house students who could be accommodated on the Surrey campus or other university sites. The plan should take account of the university’s ability to house its own students and reduce the housing number accordingly.

Guildford borough has already a higher proportion of traveller sites than most comparable boroughs. Over-provision is inappropriate given other constraints.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12177  Respondent: 8582017 / The Clandon Society (J Wright)  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I OBJECT to this policy on affordable homes (Policy H2) on the grounds of feasibility and that it should be more firm and explicit on unviability in paragraph 4.2.40.

In particular a scheme is only unviable if the value of developing the land (including some allowance for development risk and a normal level of profit) falls below the sale vale of the land for alternative non-premium uses such as agriculture. The price paid for the land is not relevant. The possibility of avoiding the affordable housing obligation through use of unviability arguments only serves to inflate land values. It will become clear that developments are unviable when developers start selling land for alternative non-development uses.

It should be noted in the plan that because of Guildford's relative popularity as a place to live combined with its location close to others towns and within the London Commuter belt no amount of building will meet demand. Similarly no amount of affordable housing will ever meet demand.

In addition the definition of an ‘affordable home’ is 80% of market value. With even a 2 bedroom flat in Guildford now having a market value of +£360,000 the discounted price is still not going to be affordable to anyone on a normal income.

And at what point will ‘affordable homes’ be able to go onto the market at full market price?

As we have seen with council houses it is not long before the discounted property is sold at full market value with the original owner simply pocketing the profit.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12185  Respondent: 8582017 / The Clandon Society (J Wright)  Agent:  

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy H3 – Rural Exception Homes as this Trojan horse policy. It says that homes can be built anywhere near a settlement of any form (including agricultural land and the AONB). These homes are meant for people with a village connection, but they could be for anyone on the Guildford borough housing list. To make the housing viable, or to improve the “mix” this can include “market” housing (i.e. normal commercial development which in Guildford usually means large executive homes). This policy means building anywhere, and ignoring all historic planning restrictions.

The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove “exceptional circumstances.”

The wording of the policy is far too wide and drives a coach and horses though all other aspects of planning policy. As drafted the planning authority could be obliged to grant permission for inappropriate and unsuitable developments.

The wording provides no ability to balance the desirability of the development against other considerations including harm to the Green Belt or the AONB. (If the housing would meet identified need and adjoins a settlement under this policy wording permission would have to be granted even in the most sensitive AONB location, even if more suitable locations are available.) The policy should include the need for a balancing exercise including consideration whether more suitable locations exist.
The policy wording should not allow market housing. The ability to include market housing is likely to inflate land values, leading to a self-perpetuating need to include market housing. It may lead to spurious developer led proposals which will be difficult to resist.

The policy wording should define small, either in land size or number of units. I am concerned that if small is left undefined the policy could be used to justify significant developments. In the context of the plan a development of 150 homes might be argued as small. (If Wisley at 2,500 homes is a big development then 500 homes might be a medium development and 150 could be small.)

The policy wording should be restricted to adjoining sites or define the concept of being "closely related". In particular I believe adding the concept of safe and easy walking distance extends the potential radius within which sites will be argued to be “closely related” Many people would regard a mile or so as an easy walking distance. (School children are expected to walk further than that before being eligible for free school travel.)

The wording of the policy itself does not require the local connection requirement for tenants to be secured in perpetuity - only the affordability must be secured in perpetuity. (For example housing could be built for retired Cabinet Ministers under this policy so long as the first tenant was required to have a local connection.) The introduction to the policy mentions this point, but it is not part of the policy itself and may carry little weight at appeal.

The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove “exceptional circumstances.” The size and location of sites should be better defined and it should be clear market housing cannot be included.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/12173  **Respondent:** 8582017 / The Clandon Society (J Wright)  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire):**

I OBJECT, due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1)

Our villages are already suffering from severe congestion for much of the day, for example the Newark Road & Rose Lane junction in the centre of Ripley and the A247 through West Clandon. The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.

Furthermore, many of the country lanes around the villages of Ripley, Send and Clandon are narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition.

I OBJECT to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces.
Many of the affected villages, such as West Clandon, already suffer from traffic congestion. Further development around these villages will only result in more traffic and more parking problems.

With some 5,000 houses being proposed close to the village of Ripley, the roads serving the village will become even more congested. Cycling has become an ever popular past time, particularly at weekends hundreds of cyclists past through the villages on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road accidents involving cyclists as a result of the development proposed under the local plan.

The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the road becoming ever more dangerous for pedestrians.

The council has a statutory obligation to protect the public and the additional traffic flows will bring added accidents, noise, pollution and injury of the public. In the case of West Clandon the Street often only has a narrow footpath on one side of the road making it very dangerous, especially when vehicles mount the pavements.

This policy as it is inappropriate and inadequate and fails to respond to the challenges raised by the proposed significant Green belt developments. The borough’s infrastructure is already heavily strained. However the plan’s determination to build large housing estates across the Guildford countryside significantly increases the need for infrastructure investment without securing the means for its provision. Placing housing in the established urban areas would reduce the need for enhanced infrastructure as would a more realistic housing number.

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Adequate infrastructure provision is a pre-condition of sustainable development. But in this plan it is an afterthought buried away in Policy I1. By prioritizing greenfield over urban, brownfield regeneration, the plan creates insurmountable (and unnecessary) obstacles for itself. Common sense suggests a local plan should first assess the borough’s infrastructure capacity for sustainable development, and then tailor development accordingly. This plan, however, assumes infrastructure will follow on the heels of housebuilding as if by magic. It makes implementation critically dependent on providers outside the Council’s control and on the vagaries of CIL income. Instead of recognizing this as a key constraint, the plan is based on hope. It is also highly likely that developers faced with the imposition of large infrastructure requirements will go to court to invoke the NPPF provision that prevents authorities from imposing conditions that make a development non-viable.

Policy I1 requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.

Despite the Garlick’s Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents’ in the locality will see their quality of life significantly deteriorate in many ways.

Many of the utilities in the Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers. No plans to improve these services should mean no development of the Garlick’s Arch site.

Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are already at capacity and suffering from funding cuts or freezes. Any further development without funding will place further stress upon existing health services.

Police services are seeing funding reduced. The development of the proposed 13,860 homes during the plan period will stretch the police services further and is unsustainable.
There is no provision of the increased capacity of Guildford hospital, where is this assessed and remedied?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/12174  Respondent: 8582017 / The Clandon Society (J Wright)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2)

I object to this policy as it is too vague and optimistic. Significant improvements to the road infrastructure are like to be many years away even if they ever happen. The draft plan, however, commits to building massive housing estates in the countryside before any of these road improvements are in place. This is inappropriate and will lead to massive traffic disruption during the construction phase and will add permanently to an already congested network (about 3,000 private cars from the 2,100 new homes at Wisley Airfield alone).

Road infrastructure represents a major constraint that should have been applied to the housing target at a much earlier stage in the plan process and not left as an unresolved difficulty in the draft plan.

There is no certainty that either the A3 or M25 in the borough will be improved to increase capacity and reduce congestion during the Plan period. Highways England has no plans to even examine improving the A3 before 2020. I have considerable concerns that development of the large residential sites identified at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), will take place before any improvements are made to the trunk road network. The A3 & M25 are already at capacity during peak hours and any development prior to improvement of these roads will only make the situations worse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/12175  Respondent: 8582017 / The Clandon Society (J Wright)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I OBJECT to poor air quality concerns (Policy I3)

Paragraph 4.6.27 of the Plan states that “Development must also mitigate its traffic impacts, including its environmental impacts and impacts on amenity and health.” The significant level of development being proposed, particularly in the north east of the borough will lead to considerable further congestion, despite any attempts to mitigate this through travel plans. This will be particularly acute in built up residential areas and will only lead to greater levels of air pollution, which will have a detrimental effect on local residents and their health and can result in early death.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/12167  Respondent: 8582017 / The Clandon Society (J Wright)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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I OBJECT to not protecting the Green Belt (Policy P2)

This policy does not sufficiently safeguard the Green Belt even though Green Belt constitutes 89% of the borough and should be the cornerstone of all local planning policy. The Green Belt is not the Council’s to give away and once it is gone it is gone forever. Sacrificing areas of the Green Belt to a developer influenced growth agenda is a betrayal of future generations and does not constitute sustainable development.

The Green Belt should be protected in perpetuity, but Policy P2 seeks to justify excessive development in supposedly protected areas. This is in breach of party manifesto commitments and contrary to previous responses to public consultation. It is disreputable to argue, as the Council does, that the Plan would involve the loss of “only” 1.6% of the borough’s Green Belt. Leaving aside the reliability of that statistic, the NPPF does not set an “acceptable” percentage. The fact remains that the plan proposes that 65% of the housing plus industrial development be built on land to be taken out of the Green Belt

Paragraph 4.3.16 is seriously deficient in simply stating that the Council considers that exceptional circumstances exist to justify amendment of Green Belt boundaries. The exceptional circumstances are not identified. It is clear from national guidance that unmet housing need is not on its own an exceptional circumstance. Even to the extent that exceptional circumstances exist, these have to be balanced against the harm to the Green Belt in the specific sites proposed to be taken out of the Green Belt. This balancing exercise appears not to have been done.

The Countryside Study which the Council may argue fulfilled the need to demonstrate the exceptional circumstances required to justify removal of areas from the Green Belt was a simplistic tick box exercise. Within limits it may have answered certain questions about different attributes of different areas of Green Belt but it did not carry out the balancing exercise needed to determine whether specific exceptional circumstances justified removal of specific areas of land from the Green Belt. I believe that each of the identified Green Belt site proposed to be removed from the Green Belt should be carefully assessed against any exceptional circumstances in deciding whether it should be removed from the Green Belt in the final plan. This exercise should bear in mind that housing need in itself is not an exceptional circumstance and nor is the Council’s growth aspiration. An important consideration is that more housing need could be met on urban sites than is currently planned. The Plan has fallen into the developers’ hands and developers prefer building on undeveloped land rather than brown field sites.
I note that the Summer 2016 edition of "About Guildford" (published by the Council) on page 5 states that "... the Plan rejects any schemes that would have a detrimental impact on the Green Belt." This is demonstrably untrue and I consider this to be a deliberate untruth which compromises the consultation process. I would ask that this untruth be corrected and the consultation period restarted after the correction has been given the same distribution as the original statement. (I assume the document was delivered to most houses in the Borough.) I reserve the right to argue before the inspector that the consultation process was flawed and ineffective because of this.

I object to the “insetting” of 14 villages from the Green Belt. Contrary to assertions made in the Plan process many of these villages do contribute to the openness of the Green Belt and there is no need to inset them.

I also object to the wholesale extensions to the settlement boundaries in many villages to allow for infilling and that infilling is also proposed outside the settlement boundaries of 11 further villages. Many Guildford villages are linear. It is all too easy to square off boundaries by including countryside bounded on only one or two sides by existing development, claiming it contributes nothing to the “openness” of the Green Belt, a term which neither the plan nor the NPPF defines. The NPPF’s other 4 tests of Green Belt status, including the prevention of urban sprawl, are ignored. Effectively, this policy makes all villages within the Green Belt vulnerable to large blocks of new development and seems almost calculated to secure the rejection of the plan as a whole.

To “inset” two-thirds of the borough’s rural villages on the grounds that they no longer contribute to the purposes of the Green Belt is extreme and inherently implausible, given the borough’s location on the edge of Metropolitan London. I cannot see how such extensive areas fail to contribute to the purposes of the Green Belt under the NPPF, but this could quickly be the case if the proposed “insetting” and boundary extensions go ahead.

This policy is wildly disproportionate in terms of any foreseeable development need and has caused tidal waves of opposition from residents. It flies in the face of NPPF paragraph 17’s aim of “empowering local people to shape their surroundings” and other NPPF provisions.

Paragraph 4.3.17 states that “the general extent of the Green Belt has been retained.” I believe this should be deleted as an untruth.

In addition I OBJECT to the proposals to remove from the Green Belt the so called ‘strategic sites’ of Wisley Airfield (A35), Gosden Hill Farm (A25) and Garlick’s Arch (A43) and all other strategic sites. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these sites and villages (as mere housing need does not constitute a ‘special circumstance’) to be taken from the Green Belt. Once taken from the green belt they will be lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached.

GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site.

Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
I OBJECT to development in areas which are at risk of flooding (Policy P4)

National Planning Policy states that Local Plans should take account of climate change over the longer term, including factors such as flood risk. It goes on to say that new development should be planned to avoid increased vulnerability to the range of impacts arising from climate change.

The Plan states that in accordance with national planning practice guidance, the Level 1 SFRA has been used to guide development towards areas at the lowest risk of flooding and identify areas unsuitable for development. However, the document concludes that land outside of the area of flood risk is not capable of accommodating all of the borough’s identified development needs. A Level 2 SFRA has therefore also been produced and will help the Council apply the exceptions test (as described in the NPPG) as necessary to development proposals in areas at risk of flooding.

The site at Garlick’s Arch (A43) is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. Knowing the area well I am aware that this site often floods during the winter months and the flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12165  Respondent: 8582017 / The Clandon Society (J Wright)  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to this Policy as the development proposed will not be sustainable (Policy S1)

The NPPF states that the presumption in favour of sustainable development “should be seen as a golden thread running through both plan-making and decision-taking.” As the first policy in the Plan, Policy S1 ought to set a clear framework. Instead, no definition of “sustainable development” is given. The policy also fails to set out any principles for applying sustainable development in practice to local planning decisions, which often have serious long-term impacts.

The policy states that it aims “to secure development that secures the economic, social and environmental conditions in the area”. This fails to recognize that economic growth, social justice and environmental protection often conflict. The policy does not say how each element is to be weighted or conflicts resolved. As a practical guide to the planning decision to be taken in the Plan period it is seriously deficient. The policy is likely to be used by developers to justify inappropriate developments on economic grounds. Under this policy, virtually any development will qualify as “sustainable”, in breach of the NPPF’s most important guideline.
Policy S1 is also seriously deficient in making no mention of the Green Belt. The Green Belt is a long term Government policy enshrined in primary legislation to protect green areas in perpetuity. The Green Belt is a living example of sustainable development in practice and is one of the most important factors affecting sustainable development in the area covered by the Plan and should be acknowledged in this policy. Policy S1 should include a commitment to protect the Green Belt from inappropriate development and to uphold Green Belt boundaries and protections. This would set at least one clear boundary to planning decisions. The Plan and the Council have treated the Green Belt as a developable land bank rather than as a constraint to development.

The commitment to approve planning applications “wherever possible” and “without delay” reveals the pro-development bias of the plan. Countervailing references to sustainability are so vague that the NPPF presumption in favour of sustainable development becomes a presumption in favour of any development at all.

This policy also ignores, as if they are inconvenient constraints, most of the 12 Core Planning Principles set out in NPPF paragraph 17.

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill Farm (A25) are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are also unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick’s Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12166  Respondent: 8582017 / The Clandon Society (J Wright)  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I OBJECT to the Borough Wide Strategy (Policy S2)

The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

The housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.

The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guilford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

The assumptions and calculations in the SHMA are widely regarded as flawed and even before Brexit, produced an inflated housing needs number. The figure of 13,860 new homes is completely unsubstantiated. It has not been scrutinized by Councillors despite repeated requests for debate. The assumptions and calculations underlying the model are hidden, protected by a claim to intellectual property by a commercial sub-contractor used in preparing the SHMA. I have serious doubts about the objectivity of the SHMA because it has been produced by consultants whose website openly proclaims their pro-development agenda leading to reasonable suspicion that the figures are inflated. Guildford’s OAN is not transparent but has been taken on trust by the authors of the plan. Given that almost every element of the plan is predicated on this OAN, the plan as a whole cannot be considered “sound”.

The status of the 13,860 figure is ambiguous. The Council has said that the housing number and the OAN are identical because the OAN is “deliverable” and is by definition objective and cannot be contradicted. The OAN is only deliverable because of the Council’s cavalier approach to the Green Belt in contravention of the NPPF, ministerial statements and local and national Conservative Party manifesto commitments. The plan also states that infrastructure or other constraints may in due course affect deliverability. It is also unlikely that the number of houses can be built at the rate proposed. In recent years, housing starts have on average been less than half the proposed rate. This is not because developers do not have the land or cannot get planning permission. Constraints in the supply chain and maintaining profit levels have been more important.

The plan cannot be considered “deliverable”. In addition, the number of homes proposed, plus existing planning permissions, plus expected “windfall” sites, exceeds the total of 13,860. So how many homes (taking account of these adjustments) do the Council want built? The plan does not say. Without this figure it is hard to see how anything else can be planned. This undermines the validity of the whole consultation. It is unreasonable to ask the public to approve a “plan” that fails to propose a target number that takes all the standard constraints and adjustments realistically into account, leaving the Council to set one without further consultation. Even if the OAN is not flawed, it is at best only a baseline figure and should not be passed off as a policy proposal.

It is unreasonable to embark on a radical transformation of the borough on the basis of an unclear housing target. Most of Guildford Borough is highly protected from development (89% Green Belt, 44% AONB and about 75% protected by SPA). Whether or not increasing the number of dwellings by up to a quarter is desirable, it would be a major and irreversible
change, arguably turning a largely rural borough into a mainly urban or suburban one like Woking. The scale of the housing number increases the onus for it to be seen to be sound. A substantially lower number, on the other hand, would remove the need to build on Green Belt or open countryside, and instantly meet the single biggest public objection to the plan as a whole.

The Plan in general and this policy in particular does not address the point that Guildford exists as part of London's commuter belt. Any increase in supply of housing in Guildford, particularly if the increase is proportionately greater than elsewhere in the commuter belt, will simply result in a shift of population into the area. It will not reduce prices or increase availability except imperceptibly. The Plan also ignores the point that many of those working in the area live elsewhere. Accordingly in considering the housing number the Plan should take into account that in this part of London’s commuter belt, demand for housing is, in practical terms, unlimited.

This policy does not take proper accounts of the constraints to development which exist, principally posed by the Green Belt and by infrastructure limitations. I believe the Council is under a duty to properly consider applying these constraints. It is clear the Council has failed to do this. This approach differs from all the other boroughs in Surrey. The Plan appears to have deliberately been manipulated towards a growth agenda without disclosing why this is being done. The housing that is needed should be concentrated on urban brown field sites and through increasing the housing density of existing built up urban areas.

The development of 13,860 homes in the Plan period with 65% in the Green Belt does not constitute sustainable development. It will have a permanently detrimental impact on the Borough in general and on West Clandon and surrounding area in particular. The developments at Garlick’s Arch and Gosden Hill Farm do not meet the needs of the local communities. The road infrastructure in and around West Clandon will be unable to cope with additional demand. The edge of urban Guildford will creep that much closer to West Clandon, thus negating the purposes of the Green Belt in the area which include safeguarding the countryside from encroachment, checking the unrestricted sprawl of large built up areas and preventing neighboring towns merging into one another.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill Farm (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I OBJECT to all strategic sites proposed in the draft Plan to be built in the Green Belt.

1. I object to the identification and allocation of sites in this plan without regard to Green Belt, infrastructure or other constraints. The plan says that “allocating these sites does not grant planning permission for development.” However, each of the sites will be removed from the Green Belt and will be available in principle for development and non-Green Belt uses. The inclusion of these sites without detailed site by site justification shows contempt for the thousands of detailed comments the Council have received about individual sites ever since the Issues and Options consultation in 2013. The plan has hardly changed since the Council received 20,000 objections to its first draft plan in 2014. The Inspector considering the plan may conclude that the consultation has not been properly conducted.

2. The housing needs assessment is flawed in various respects and overstates housing need. In addition since it was produced, the referendum Brexit decision has almost certainly reduced future housing need and rendered the previous assessment seriously out of date. As a result any assessment of Green Belt sites which took place to consider whether “exceptional circumstances” existed to outweigh the harm to the Green Belt was based on false premises and should be reconsidered.

3. Having determined housing need the Council was entitled to consider constraints before determining the housing number. I believe that as Ill as being entitled to do this the Council was required to give proper consideration to constraints. The scarcity of sites outside the Green Belt as Ill as infrastructure (most notable roads) considerations all represented constraints which should have been taken into account in determining the final housing number. Accordingly in this regard our objection to the allocation of Green Belt sites is twofold. First I believe constraints should have been applied. Secondly I believe the Council did not properly consider constraints and that their decision making process was flawed and thus subject to being set aside by the Inspector.

4. Even if having properly applied constraints there is a need to develop in the Green Belt then specific Green Belt sites should not be included in the plan unless “exceptional circumstances” for development are proven in relation to that specific site, as stipulated repeatedly in the NPPF. The Green Belt should trump short-term considerations such as perceived housing need, as case law has established. There needs to be a specific balancing exercise conducted on each Green Belt site weighing the harm to the Green Belt against the very special circumstances which are argued in favour of development at that particular site. There is no evidence this has been done. Instead the council have appeared to say that having chosen a housing needs figure and decided it cannot be met without building on Green Belt then there is no need for any further consideration and any convenient Green Belt site can be allocated for building at will.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
1. An excessive ambition to expand the local economy which is neither warranted nor wanted by the local population. Guildford is already one of the highest ‘value creation’ areas in the country and has one of the lowest unemployment rates. There is no evidence that massive and accelerated expansion is required.

1. SHMA figures which are neither transparent nor justifiable, especially in view of previous figures set. Independent assessments of the SHMA (eg from Guildford Residents’ Association and David Reeve) show it is set far too high and so cannot be said to be adequate, up to date or relevant.

In addition the recent vote to leave the EU and the impact this will have on the economy and migration have not been taken into account.

The Plan should be re-assessed and the methodology for arriving at housing need figures should be fully transparent.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/1437  Respondent: 8582017 / The Clandon Society (J Wright)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 2: Legal compliance

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (No)

I do not consider the Proposed Submission Local Plan: strategy and sites as a whole to be legally compliant because it mainly ignores the consultation process for the 2014 draft Plan it is claimed to be based on.

That consultation process was absolutely clear by some +20,000 responses that that Plan was flawed and no development should be carried out on Green Belt land.

Instead this 2016 draft Plan actually increases the number of dwellings being built on the Green Belt, in direct contradiction to the consultation process, yet is stated to be a Regulation 19 proposal.

As a result I do not see how the 2016 draft Plan can be Legally Compliant.

The 2016 draft Plan should be re-assessed and should take into account the views of the majority of responses from the consultation process for the 2014 draft Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/1438  Respondent: 8582017 / The Clandon Society (J Wright)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (No)

I do not consider the Proposed Submission Local Plan: strategy and sites as a whole to be sound, because, but not limited to, the following reasons:

1. “Only sites that propose sustainable solutions have been included in the Plan and the Plan rejects any schemes that would have a detrimental effect on the green belt.” Summer 2016 edition of "About Guildford" (published by the Council) on page 5. This is demonstrably untrue and appears designed to bias the consultation process.

2. The housing OAN figure has been calculated by a process which is not transparent. It has not been properly examined by Councillors before being adopted.

3. The OAN has been adopted as the housing number without the application of any constraints to take account of Guildford's circumstances, including in particular the Green Belt, AONB and road infrastructure. National policy permits such constraints to be applied and it is inappropriate not to consider the need to do this.

4. The draft Plan does not accord with the NPPF policies on protecting the Green Belt.

Exceptional circumstances need to be shown to justify removing areas from the Green Belt and this has not been done. The housing need number is not justification in itself according to published ministerial statements Having properly calculated an OAN, constraints should be applied to it to reflect the Green Belt, AONB and infrastructure. Each proposed Green Belt site then needs to be justified on its own merits. The benefits of the proposed development need to be identified together with the harm to the Green Belt. Only if there are exceptional circumstances and following a proper balancing exercise demonstrating that these exceptional circumstances outweigh the harm to the Green Belt can the proposal proceed. The draft Plan does not demonstrate that this has been done. The housing number has been used as a blanket justification for all Green Belt sites-which amount to 65% of the proposed housing number.

1. Whatever the justification for the assumptions made in calculating the OAN, those assumptions are now almost certainly incorrect following the referendum.

2. The housing number is at least twice the achieved rate of building in the Borough over the last few years. There is no evidence in the Plan to show that this rate is achievable and sustainable.

3. Much of the infrastructure required to support the level of development proposed is outside the Council’s control. The Infrastructure Plan is long on possibilities and aspirations and very short on commitments. The infrastructure requirements placed on developers are supposed to be in place before development commences. This is utterly unrealistic and indicates a lack of knowledge of developer’s business models which depend on positive cash flow. It seems very clear that at best, infrastructure provision will seriously lag development and leave higher levels of congestion than now. This will reduce the quality of life for residents through congestion and disruption.

4. The 40-45% requirement for affordable homes together with infrastructure such as railway stations, park and ride facilities, schools and roads is highly likely to be challenged on a site by site basis by developers using the NPPF provision that Councils cannot impose conditions which make development non-viable.

1. GBC has not included details of its Town Centre Master Plan and urban development proposals in time for and as a part of the Guildford Local Plan consultation
2. GBC has failed to provide an Infrastructure Report in time for and as a part of the Guildford Local Plan consultation
3. GBC has proposed an OAN of 693 houses per annum in the GL Hearn West Surrey Strategic Housing Market Assessment (SHMA) which many, including independent assessors, consider unsound
4. Highways England will not start to consider what it intends to do as regards the A3 in the vicinity of Guildford until 2018
5. Network Rail have not made available for the public consultation any plans for a new railway station at Merrow with an adjacent Park & Ride for 1,000 cars
6. The GBC proposals for Gosden Hill Farm do not appear to be in coordination with the Neighbourhood Plan for Burpham
7. The draft Local Plan will cause further linear development along the A3 between Burpham and West Clandon PC and encroachment onto open Green Belt countryside in clear conflict with the National Planning Policy Framework.

8. The proposal for Garlick’s Arch was added to the draft Local Plan without any prior consultation under Regulation 18.

9. The Land Availability Assessment (LAA) indicates a range of planning difficulties for Gosden Hill Farm and Burpham which have to be met by the developer involved. These include Electricity Grid supply problems and foul sewage and surface water issues that suggest the development proposed cannot easily be implemented both technically and financially.

10. No adequate explanation is given as to how the aspirational proposal for a tunnel will be used to overcome traffic issues relating to the quality of life and amenity of Burpham, West Clandon, Send and Ripley citizens.

11. In common with many others I do not believe the housing figure has been properly calculated and I believe it overstates housing need. The Council has prevented councilors or others from properly considering the SHMA by refusing to make public the basis on which it was drawn up.

12. The housing figure, when properly recalculated, should be subject to constraints to reflect Guildford’s circumstances, including in particular the Green Belt and road infrastructure. National policy permits such constraints to be applied and it is inappropriate not to consider the need to do this.

13. Even once a housing number has been calculated it cannot be used to justify taking land out of the Green Belt on a wholesale basis.

14. Cast iron commitment should be included in the plan that development can only commence when required infrastructure improvements have been secured.

15. The status of the text which accompanies each policy box is not clear. If the accompanying text does not have the force of policy a number of the policies (i.e. the text in blue) are so vague and general that they commit the Council to very little.

The draft Plan should be re-assessed with housing on brownfield sites made a priority over commercial development and Greenfield sites and each of the above points addressed.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** SQLP16/1439  **Respondent:** 8582017 / The Clandon Society (J Wright)  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 4: Duty to cooperate

**Do you consider this section of the document; complies with the Duty to Cooperate?** ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** (No)

I do not consider the Proposed Submission Local Plan: strategy and sites as a whole has complied with the Duty to cooperate.

This 2016 draft of the Local Plan clearly demonstrates Guildford Borough Council’s refusal to co-operate with the wishes and requirements of the vast majority of the residents in its Borough.

The Council has failed to co-operate with the results of the consultation process for the 2014 draft Plan which was meant to inform and guide this 2016 draft Plan.
Despite campaigning on a clear statement ‘Conservatives Say Green Belt To Stay’, the ruling party on GBC is now intent on pushing through a Plan which will devastate Green Belt land and extend the Guildford Urban Area to further merge into surrounding rural villages.

This is not cooperation by any definition.

In addition the Council has failed to cooperate in providing any transparency to the housing need figures commissioned by the Council from GL Hearn.

The 2016 draft Local Plan should be reassessed with a reviewed and transparent SHMA and revised to reflect the views of the residents of the Borough, who pay for Guildford Borough Council to act in their interests, and not those of developers and central government.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/10  Respondent: 8582177 / John Green  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A34

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I would like to confirm my support for the GBC plan for the redevelopment from this site, the current modern offices are extremely obtrusive on the local landscape, especially from the River and the former Wharf area. Ideally any domestic housing will try and reflect the history of this area. It will lead to the greater use local public houses/shops & restaurants.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp172/5133  Respondent: 8582465 / Mr John Empringham  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E
- and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPA16/3308  **Respondent:** 8582977 / Guildford Environment Forum (John Bannister)  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

**APPENDIX C**

I OBJECT to the proposed Infrastructure Schedule (Appendix C)

The Infrastructure Schedule sets out the key infrastructure requirements on which the delivery of the plan depends. For each of the Key Allocated Sites in the borough it identifies infrastructure projects that are required, except for Garlick’s Arch (A43) which is not mentioned. It is clear that the Plan takes no account of the infrastructure required for this site and is therefore not fit for purpose.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPA16/3310  **Respondent:** 8582977 / Guildford Environment Forum (John Bannister)  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()
APPENDIX D

I OBJECT to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)

- The “objectively assessed need” figure of 693 homes a year is too high.
- A professional review by NMSS has concluded that, even basing the calculations on a period of stronger economic and student growth, the housing need figure should be revised down to 510 homes a year and the method changed to consider student housing need separately due to the distorting effects.
- The current SHMA inflates the proposed housing figure due to
  - failure to correct for errors in the historical data for international migration flows,
  - issues with the way it considers students and affordability and
  - flaws in the method for estimating the number of homes needed to support job growth.
- It is unacceptable that demographic and economic model assumptions have been withheld and cannot be checked making the process unaccountable.

The Plan’s proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the borough, it is over double the previous figure of 322 used in previous plans. The SHMA report methodology is I believe inaccurate; it inflates the needs of the borough by distorted student numbers. However, it is based on commercially confidential modelling assumptions that cannot be checked or reviewed. There is no transparency to this evidence base and it is therefore impossible to assess its accuracy. This is not democratic and is not appropriate for consultation of the Plan.

The National Planning Policy Framework allows the overall housing target to be reduced to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/3306  Respondent: 8582977 / Guildford Environment Forum (John Bannister)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix F: Policies overview map

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

SITES - POLICIES A1 TO A57

I OBJECT to all strategic sites proposed in the draft Plan to be built in the Green Belt.

1. I object to the identification and allocation of sites in this plan without regard to Green Belt, infrastructure or other constraints. The plan says that “allocating these sites does not grant planning permission for development.” However, each of the sites will be removed from the Green Belt and will be available in principle for development and non-Green Belt uses. The inclusion of these sites without detailed site by site justification shows contempt for the thousands of detailed comments the Council have received about individual sites ever since the Issues and Options consultation in 2013. The plan has hardly changed since the Council received 20,000 objections to its first draft plan in 2014. The Inspector considering the plan may conclude that the consultation has not been properly conducted.
2. The housing needs assessment is flawed in various respects and overstates housing need. In addition since it was produced, the referendum Brexit decision has almost certainly reduced future housing need and rendered the previous assessment seriously out of date. As a result any assessment of Green Belt sites which took place to consider whether “exceptional circumstances” existed to outweigh the harm to the Green Belt was based on false premises and should be reconsidered.

3. Having determined housing need the Council was entitled to consider constraints before determining the housing number. I believe that as Ill as being entitled to do this the Council was required to give proper consideration to constraints. The scarcity of sites outside the Green Belt as Ill as infrastructure (most notable roads) considerations all represented constraints which should have been taken into account in determining the final housing number. Accordingly in this regard our objection to the allocation of Green Belt sites is twofold. First I believe constraints should have been applied. Secondly I believe the Council did not properly consider constraints and that their decision making process was flawed and thus subject to being set aside by the Inspector.

4. Even if having properly applied constraints there is a need to develop in the Green Belt then specific Green Belt sites should not be included in the plan unless “exceptional circumstances” for development are proven in relation to that specific site, as stipulated repeatedly in the NPPF. The Green Belt should trump short-term considerations such as perceived housing need, as case law has established. There needs to be a specific balancing exercise conducted on each Green Belt site weighing the harm to the Green Belt against the very special circumstances which are argued in favour of development at that particular site. There is no evidence this has been done. Instead the council have appeared to say that having chosen a housing needs figure and decided it cannot be met without building on Green Belt then there is no need for any further consideration and any convenient Green Belt site can be allocated for building at will.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/6450  Respondent: 8582977 / Guildford Environment Forum (John Bannister)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A25

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY A25 - Gosden Hill Farm

I OBJECT to Policy A25 with proposals for Gosden Hill Farm.

The Green Belt at this point serves the important function of separating West Clandon from the edge of urban Guildford. Development here will cause the two to coalesce defeating one of the objectives of the Green Belt. If this development proceeds I believe the narrow strip of Green Belt remaining between Guildford and Clandon at this point will be too narrow and will come under further pressure.

It will represent an undesirable ribbon development along the A3. It will be highly visible from the A3 when approaching Guildford and will, in conjunction with A43a at Garlick’s Arch give the appearance of almost continuous development from Send through to Guildford.

The Plan does not put forward any evidence that exceptional circumstances exist to justify removing this site from the Green Belt.
The development will overburden the local road network and increase congestion on the A3 and A247 through the centre of West Clandon. This is already very heavily used whilst being unsuitable for designation as an A road. In places it is too narrow for two lorries to pass causing them to mount the pavement.

Note the following accident data:

2010 –2014 from Crashmap data

- Clandon Cross Roads Area to Bulls Head - 17 incidents
- Bulls Heads Head to Bennett Way - 8 incidents
- Bennett Way to Highcotts Lane - 15 incidents
- Tithebarn Lane to Portsmouth Road Birch Close - 8 incidents

2015

- 21 Oct 2015 – A247 near shell garage - Three vehicles collided causing delays
  Surrey Fire and Rescue deployed.

2016

- 15 April 2016 12 year old boy injured in The Street – A247 closed in both directions
- 28 April 2016 A3 West Clandon London bound between A247 Tythebarns Lane (Burntcommon and M25J10 (Wisley Interchange) congestion on A3 to A3100 Clay Lane Burpham
- 30 6 2016 Motorcyclists with injuries airlifted to hospital Send Marsh Road

Attempts have been made over many years to reduce traffic, traffic speeds and accident risks through West Clandon, however little has been achieved as the road cannot be widened and SCC is reluctant to impose further speed limits as congestion is already very high.

I object most strongly to the proposal for a link road to bring traffic from the Gosden Hill development to the proposed 4 way junction at Burnt Common. This has the potential to generate large volumes of traffic (including commercial vehicles) on the A247 through West Clandon - a road which is already under traffic stress (see below).

The land in Gosden Hill does exactly what the Greenbelt was designed to achieve. It provides a green buffer between the Guildford Urban Area and West Clandon, gives Burpham a defined green boundary and breathing space and it hides Guildford town from visitors until they pass the off-slip to Burpham.

No exceptional circumstances have been demonstrated for building on this site and therefore it does not comply with paragraphs 87-89 of the NPPF. It stops the sprawl of Guildford town, assists in safeguarding the countryside from encroachment and assists in urban regeneration by encouraging the recycling of derelict and other urban land. All of these are requirements of the NPPF.

The scale of Gosden Hill is out of proportion to West Clandon. It would have four times the amount of housing plus shops, offices/factories, GP surgery, schools. Development on this scale would blight a historic village with a history going back to the doomsday book and beyond.

Gosden Hill is the most obvious location for the north end of an A3 tunnel. It has rising ground and is situated just before the urban area. If it is built on, it will be very difficult to construct a tunnel.

The development will generate in the region of 6,000 vehicles which will pour on to the A3 which is stationary every day during rush hours. The linking of the A3100, B2215 and A247 would channel thousands of cars through the narrow, winding road through West Clandon, a road where large lorries mount the pavement virtually every day and through Send and Ripley which are also severely constrained.

The volume of traffic will greatly increase air pollution which is particularly critical given the proposal to build two schools.
Currently, a two way junction at the site would require vehicles wanting to go north on the A3 to go through Burpham which is grid-locked every day.

Burpham’s sewers are at capacity. Sewage would have to be pumped to Slyfield for processing, a project of enormous cost.

There is inadequate fresh water in Guildford and current supplies could not meet the needs of a development of this size.

Electricity supply is also inadequate and would require a big infrastructure development.

The railway station was rejected by Guildford Borough Council in 1984 because it feared Gosden Hill would become a dormitory estate for London.

The wording of the Local Plan with regard to Gosden Hill is so loose that the developer could virtually do whatever it wants.

The remaining agricultural land between Gosden Hill and West Clandon is so small that it is highly likely to be uneconomic and therefore a prime candidate for further development which would roll the Guildford Urban Area over West Clandon towards East Clandon and Wisley.

If the Strategic Sites are developed, the north of Guildford will deliver 36%, 5,036 houses towards the total of around 14,000. The infrastructures of the existing villages and the A3 will be overwhelmed by the scale of development.

A new on-slip at Burpham would only be 1.8km from the on-slip at Burnt Common which is against Highway England’s requirement of 2km.

Development of the A3 at best will not start until after 2020 and the building of a tunnel, which is only an “aspiration” in the Local Plan, is likely to be many years after. In the meantime given that developers build houses to provide cash-flow for infrastructure, Gosden Hill will have a crippling effect on villages like West Clandon and the A3.

Gosden Hill already has surface water problems. Merrow Stream crosses the site. No hydrological survey has been carried out to assess the implications. Electricity pylons run through the centre of Gosden Hill which have health and safety issues.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/6452  Respondent: 8582977 / Guildford Environment Forum (John Bannister)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY A43 AND A43a – Garlick’s Arch

I OBJECT to Policy A43 and A43a on Garlick’s Arch.

The site was only inserted in the draft plan at a late stage just before publication of the consultation draft which is a shabby way for the Council to proceed. The site is not a sustainable site being far from any infrastructure facilities and transport links. The bus service is infrequent and it is almost certain any future residents will rely almost entirely on cars for journeys. Similarly any employees at the employment areas will almost undoubtedly arrive and leave by car.
The site is susceptible to flooding and will not make a suitable site.

The Green Belt at this point serves the important function of separating West Clandon from Send. Building here will cause the two to coalesce defeating one of the objectives of the Green Belt.

I have seen no evidence that exceptional circumstances exist to justify removing this site from the Green Belt or that this important issue has been addressed. The Green Belt and Countryside study did not even consider this site.

It is understood the Council's eyes may have been turned by the possibility of receiving for free the land which might be used for new A3 slip roads in return for allowing this development, thus justifying it as some form of enabling development. However the slip road land if needed could be safeguarded in the plan and acquired by compulsory purchase when required. Lack of current funding for the slip road is not a justification for allowing the development of this site. If the slip road is genuinely needed then government funding will be available for it. (One of the reasons for turning down the so called enabling development proposal intended to fund the rebuilding of the Howard of Effingham School was that the redevelopment of the school was not essential. As and when it became essential Government funding would become available. Accordingly enabling development was not necessary. The same principle applies here.)

The A247 running south past this site through the centre of West Clandon is already very heavily used whilst being unsuitable for designation as an A road. In places it is too narrow for two lorries to pass causing them to mount the pavement- often at speed. It has narrow bends with poor sight lines, an infants school and a hump-backed bridge concealing the entrance road to the station for southward traffic. In addition, there are no continuous footpaths which forces pedestrians to cross and re-cross the road. Development at Garlick’s Arch will only exacerbate the problem and make the road even more congested and unsafe for pedestrians.

The development will cause harm to the ancient woodland on and by the site.

Taken together with the Gosden Hill site, there will be a ribbon of development along the A3 in contrast to the current “soft” edge approach to Guildford.

Garlick’s Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8). There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).

The Plan states the preference is to making the best use of previously developed land. Yet at the 11th hour a perfectly acceptable brownfield site at Burnt Common, capable of accommodating approximately 100 houses, was removed from the Plan and replaced with the Garlick’s Arch site. There was no proper consultation in relation to the inclusion of this site. Why was a brownfield site removed and replaced with a Greenfield site? There is no evidence that Section 18 of the Planning and Compulsory Purchase Act 2004, which requires local planning authorities to produce a Statement of Community Involvement, has been complied with for this site. This only came to light for local residents following a Council meeting on 11th May 2016.

Moreover, Guildford Borough Council’s own Green Belt & Countryside Report does not address Garlick’s Arch at all, so there is no evidence base to support the inclusion of this site.

National Planning Policy promotes sustainable developments, with sustainable transport. With ever reducing bus services in the area and no train station within reasonable walking distance it is impossible for any development on this site to offer a sustainable transport solution. Development on this site is wholly inappropriate (Policy I3).

The stream, which runs through the site, is identified as having a high risk of flooding by the Environment Agency. There are other sites that do not flood that can be developed and therefore this site should be removed from the Plan (Policy P4).

This site is bordered by Ancient Woodland and within it a number of trees are protected by Tree Preservation Orders (Policy D3).
The site has an abundance of wildlife, some of which are protected. It is home to many types of owls and bats, with the woods having cuckoos and woodpeckers. In addition there are regular sightings of badgers, deer and red kites. The development of the site will result in the loss of habitat. No wildlife report has been conducted on the site. (Policy I4)

It is clear that with this site being added at the 11th hours no infrastructure planning has been undertaken. The Infrastructure Schedule makes no provision for any infrastructure improvements for this site. How will the local services such as schools and doctors cope, many of which are already at capacity? (Policy I1)

Furthermore, several electricity pylon runs through the site, which will have the potential to be a health hazard for any residents.

I OBJECT to the inclusion of the land for new on/off ramps at Burnt Common (A43a)

The addition north facing ramps to the A3 at Burnt Common would be a disaster for local communities. There is no requirement for local traffic to access the A3 to the north, but the addition will draw in a huge amount of ‘through’ traffic.

The route from London/M25 to Woking or would now be through Burnt Common and Send. Equally traffic from the east of Guildford (Merrow etc) and the A25 will now go through West Clandon and Burnt Common. This will cause immense damage to those areas on small roads which cannot be improved.

This Plan does not address the needs of local communities or the Borough in this regard. There has again been no Section 18 consultation on this.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13501  Respondent: 8582977 / Guildford Environment Forum (John Bannister)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY D3

I OBJECT to the damage to the historic environment as a result of the scale of the proposed development (Policy D3)

I OBJECT to the local plan based on the impact it will have on the special countryside of the borough.

The proposed development at Garlick’s Arch (A43) will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13520  Respondent: 8582977 / Guildford Environment Forum (John Bannister)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3
**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

Answer (if comment is on questions 1-7 of the questionnaire): ()

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**POLICY D3**

I OBJECT to Policy D3 - Historic environment

I object to this policy as it is very weak and I do not think it is clear enough in its support for the conservation of the historic environment. It provides for development which will “enhance” heritage assets which I fear is a developer’s charter as it leaves plenty of room for abuse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

Answer (if comment is on questions 1-7 of the questionnaire): ()

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**POLICY D4**

I OBJECT to Policy D4 - Development in urban areas and inset villages

The policy should place much greater emphasis on residential development in the existing urban centres. In this way housing needs can be met without resorting to large developments in the Green Belt. There are urban areas in need of regeneration but these are ignored in favour of Green Belt development.

The policy should not be applied to the villages which should remain in the Green Belt. Unrestricted application of this policy to the villages intended to be inset will change their characters radically and for the worse. The development it encourages will increase traffic and congestion disproportionately.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

**POLICY E1**

I OBJECT to the sustainable employment policy (Policy E1)

I object to the inclusion of a strategic employment site at Gosden Hill Farm. Employment sites should be concentrated on previously developed land in more sustainable locations with good transport links where the infrastructure can support development. Warehousing, distribution and industrial premises cause considerable commercial traffic, noise, pollution and general disruption. They are not good neighbours for schools and 2000 houses. Many of the jobs will be taken by people outside the area leading to additional congestion in Burpham and on the A3.

I object to the inclusion of a strategic employment site at Garlick’s Arch. It is in a non-sustainable location remote from any facilities of any kind and with poor public transport links. It is unlikely jobs there will be taken by local residents and it is likely all travel to and from work will be by car adding to local congestion. Employment sites should be concentrated on previously developed land in more sustainable location with good transport links where the infrastructure can support development.

The site is in any event subject to frequent flooding and unsuitable for development.

If developed, the new employment site at Garlick’s Arch, Send Marsh/Burnt Common (A43), would be treated as a Strategic Employment Site.

The proposed development of up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8) at Garlick’s Arch (A43) is in the scheme of industrial development relatively small. Just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m. The Garlick’s Arch site which is in the Green Belt should not be developed as a Strategic Employment Site when there is a suitable alternative brownfield site very close by, which is far more sustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
POLICY E2

I OBJECT to the location for new employment floorspace (Policy E2)

I object to this policy. It would be more sensible to confine new office and research and development floor space to the urban Guildford area. I also oppose the policy of expanding the Research Park onto Blackwell Farm. No exceptional circumstances, as defined under the NPPF, have been advanced to justify incursion into this permanent and high-quality area of Green Belt.

Proposals for new industrial, warehousing and storage (use Class B1c, B2 and B8) floorspace will be directed to the Industrial Strategic Employment Sites.

There is no need for the new employment floorspace to be located at Garlick’s Arch or Gosden Hill Farm, when near to these sites at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13499  Respondent: 8582977 / Guildford Environment Forum (John Bannister)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY E5

I OBJECT to the loss of rural employment (Policy E5)

Policy E5 supports the retention and development of local services and community facilities in our inset and identified villages. Yet the development at Garlick’s Arch (A43) would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises. The Plan does not promote rural employment; rather it will result in the loss of existing local rural businesses.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13526  Respondent: 8582977 / Guildford Environment Forum (John Bannister)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E6

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY E6

I OBJECT to Policy E6 - The leisure and visitor experience.

The policy should acknowledge that whilst in some areas new and enhanced leisure facilities are valuable (for example the new Opera House at West Horsley Place Towers), much tourism depends on the undeveloped nature of Green Belt areas surrounding Guildford. Accordingly the policy should recognize that in many rural areas new and enhanced visitor facilities may be unnecessary and counterproductive, particularly away from existing buildings and development. For example the attraction of Newlands Corner is its undeveloped nature. Significant development of visitor facilities there is likely to diminish rather than increase its attractions. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment. Heritage sites and the Green Belt are particularly vulnerable to harm.

Tourism and visitors do not depend on new visitor “attractions” and could actually be damaged by them, as compellingly argued in the current debate over Newlands Corner. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment”/Disneyfication”. Heritage sites and the Green Belt are particularly vulnerable to harm.

Guildford has many “leisure and visitor attractions” already. The case for creating more is not made and no examples are given. Instead, the plan’s explicit priorities should be:

1. To protect the borough’s prime leisure and tourism asset, its countryside, from inappropriate development. This is all the more valuable because of its accessibility from London, the rest of Britain and the Continent, in that order. Rural residents are its custodians and require no Council interference. Economically, the most valuable forms of tourism, such as walking and cycling, require no new development. In the overcrowded South-East of England, lack of development is a leisure and tourism asset, not a liability.

2. To help make Guildford’s river landscape less off-putting and support town-break packages for high-value tourists. To achieve this, the policy needs to define what leverage, if any, Council planners have to influence normal tourism market mechanisms.

3. To help private providers market local tourism. This need not involve extra spending. The Council could, for instance, help co-ordinate ready-made, local tourism packages under a distinctive brand at an all-in price. An “English town break” (including B&B accommodation, a walking tour of Guildford, a pub lunch in the Surrey Hills, a visit to Wisley Gardens and a National Trust property and a Southwest Trains travelcard for a day out in London) would be highly attractive to many European visitors who currently by-pass Guildford to go to Bath, Oxford or Cambridge instead.

4. To rule out the redevelopment of scarce rural hotel sites (e.g. Thatchers, East Horsley, earmarked for 40 new houses under Site A37 of the plan yet just a short walk from the new opera house).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13518   Respondent: 8582977 / Guildford Environment Forum (John Bannister)   Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E7

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
POLICY E7

I OBJECT to Policy E7 Guildford Town Centre

The policy “vision” describes protecting the Guildford’s unique setting and historical character and sets out some of the ways this will be done. However none of this is included in the formal Policy wording in the blue box. I suspect the Vision wording is effectively of little or any force. These principles should be included in the formal policy.

There should be a much greater focus on residential use of the town centre where many people would like to live and where the necessary amenities and infrastructure exist. The policy misses the opportunity to propose forward looking sustainable residential development plans in, for example the Walnut Tree Close area, where very significant numbers of new homes could be provided. Such town centre sites could meet much of the housing need over the plan period without harming the countryside.

There is an urgent need for a strategy to focus on brownfield redevelopment before considering development outside the existing urban area.

The policy does not address any of the major issues raised by the Council’s own Town Centre Master Plan, the Guildford Vision Group’s proposal for new river and rail crossings or plans for the redevelopment of Guildford Station, all of which are already the subject of public discussion.

The policy also fails to provide guidance on design requirements, as required by the NPPF.

The policy and surrounding text concentrates too much on shopping without regard to its nature which risks a proliferation of dull high-street chain stores. The policy should seek to enhance Guildford’s character and encourage a wider variety of small shops including locally owned businesses and shops of use to consumers. (For example there is no butcher in Guildford.)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13514  Respondent: 8582977 / Guildford Environment Forum (John Bannister)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY H1

I OBJECT to Policy H1 – Homes for all. Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan period. It fails to set rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions.
The housing mix is based on out-of-date, pre-Brexit projections and on assumptions set out in a flawed SHMA that has not been scrutinised or evaluated.

I support higher density development in the urban area, without resorting to dehumanising, high-rise buildings that developers commonly claim are necessary for financial viability. Much of Guildford town could usefully be regenerated with 4-5 storey blocks with landscaping and underground parking, as often seen on the Continent and, recently, in London.

Student accommodation should be provided for 100% of new students and more than 60% of existing students, which would free up ideal family accommodation in the urban area. Other university cities (e.g. Oxford) insist on higher percentages than those proposed in the plan. In my view, the Council’s timidity is a case of “regulatory capture” by Surrey University, which has failed to use its existing planning permissions (dating from 2004) to accommodate 3,000 students or to improve the efficient development of its campus (e.g. by building on its extensive and under-used surface car parks). If all students were accommodated in this way, 2,000 homes would be freed up in town and there would be no need to build on the Hog’s Back.

It is not appropriate to release Green Belt land to house students who could be accommodated on the Surrey campus or other university sites. The plan should take account of the university's ability to house its own students and reduce the housing number accordingly.

Guildford borough has already a higher proportion of traveller sites than most comparable boroughs. Over-provision is inappropriate given other constraints.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>PSLPP16/13516</th>
<th>Respondent: 8582977 / Guildford Environment Forum (John Bannister)</th>
<th>Agent:</th>
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<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy H2</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY H2

I OBJECT to this policy on affordable homes (Policy H2) on the grounds of feasibility and that it should be more firm and explicit on unviability in paragraph 4.2.40.

In particular a scheme is only unviable if the value of developing the land (including some allowance for development risk and a normal level of profit) falls below the sale value of the land for alternative non-premium uses such as agriculture. The price paid for the land is not relevant. The possibility of avoiding the affordable housing obligation through use of unviability arguments only serves to inflate land values. It will become clear that developments are unviable when developers start selling land for alternative non-development uses.

It should be noted in the plan that because of Guildford's relative popularity as a place to live combined with its location close to others towns and within the London Commuter belt no amount of building will meet demand. Similarly no amount of affordable housing will ever meet demand.

In addition the definition of an ‘affordable home’ is 80% of market value. With even a 2 bedroom flat in Guildford now having a market value of +£360,000 the discounted price is still not going to be affordable to anyone on a normal income.
And at what point will ‘affordable homes’ be able to go onto the market at full market price?

As we have seen with council houses it is not long before the discounted property is sold at full market value with the original owner simply pocketing the profit.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPP16/13524  **Respondent:** 8582977 / Guildford Environment Forum (John Bannister)  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy H3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )

**POLICY H3**

I OBJECT to Policy H3 – Rural Exception Homes as this Trojan horse policy. It says that homes can be built anywhere near a settlement of any form (including agricultural land and the AONB). These homes are meant for people with a village connection, but they could be for anyone on the Guildford borough housing list. To make the housing viable, or to improve the “mix” this can include “market” housing (i.e. normal commercial development which in Guildford usually means large executive homes). This policy means building anywhere, and ignoring all historic planning restrictions.

The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove “exceptional circumstances.”

The wording of the policy is far too wide and drives a coach and horses though all other aspects of planning policy. As drafted the planning authority could be obliged to grant permission for inappropriate and unsuitable developments.

The wording provides no ability to balance the desirability of the development against other considerations including harm to the Green Belt or the AONB. (If the housing would meet identified need and adjoins a settlement under this policy wording permission would have to be granted even in the most sensitive AONB location, even if more suitable locations are available.) The policy should include the need for a balancing exercise including consideration whether more suitable locations exist.

The policy wording should not allow market housing. The ability to include market housing is likely to inflate land values, leading to a self-perpetuating need to include market housing. It may lead to spurious developer led proposals which will be difficult to resist.

The policy wording should define small, either in land size or number of units. I am concerned that if small is left undefined the policy could be used to justify significant developments. In the context of the plan a development of 150 homes might be argued as small. (If Wisley at 2,500 homes is a big development then 500 homes might be a medium development and 150 could be small.)

The policy wording should be restricted to adjoining sites or define the concept of being "closely related". In particular I believe adding the concept of safe and easy walking distance extends the potential radius within which sites will be argued to be “closely related”. Many people would regard a mile or so as an easy walking distance. (School children are expected to walk further than that before being eligible for free school travel.)
The wording of the policy itself does not require the local connection requirement for tenants to be secured in perpetuity - only the affordability must be secured in perpetuity. (For example housing could be built for retired Cabinet Ministers under this policy so long as the first tenant was required to have a local connection.) The introduction to the policy mentions this point, but it is not part of the policy itself and may carry little weight at appeal.

The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove “exceptional circumstances.” The size and location of sites should be better defined and it should be clear market housing cannot be included.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/13504  **Respondent:** 8582977 / Guildford Environment Forum (John Bannister)  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ( )**

**POLICY II**

I OBJECT, due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy II)

Our villages are already suffering from severe congestion for much of the day, for example the Newark Road & Rose Lane junction in the centre of Ripley and the A247 through West Clandon. The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.

Furthermore, many of the country lanes around the villages of Ripley, Send and Clandon are narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition.

I OBJECT to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces.

Many of the affected villages, such as West Clandon, already suffer from traffic congestion. Further development around these villages will only result in more traffic and more parking problems.

With some 5,000 houses being proposed close to the village of Ripley, the roads serving the village will become even more congested. Cycling has become an ever popular past time, particularly at weekends hundreds of cyclists past through the villages on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road accidents involving cyclists as a result of the development proposed under the local plan.

The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the road becoming ever more dangerous for pedestrians.
The council has a statutory obligation to protect the public and the additional traffic flows will bring added accidents, noise, pollution and injury of the public. In the case of West Clandon the street often only has a narrow footpath on one side of the road making it very dangerous, especially when vehicles mount the pavements.

This policy as it is inappropriate and inadequate and fails to respond to the challenges raised by the proposed significant Green belt developments. The borough’s infrastructure is already heavily strained. However the plan’s determination to build large housing estates across the Guildford countryside significantly increases the need for infrastructure investment without securing the means for its provision. Placing housing in the established urban areas would reduce the need for enhanced infrastructure as would a more realistic housing number.

The policy wording says nothing about roads and traffic. The Council’s methodology for assessing traffic congestion - averaging it over periods of several hours and ignoring the effects of junctions - simply hides the problem, which will get worse as development proceeds. The schemes referred to in this policy will not solve existing congestion and the local road network has not been given sufficient consideration. Some proposed development locations would require highway schemes that are unlikely ever to happen.

Adequate infrastructure provision is a pre-condition of sustainable development. But in this plan it is an afterthought buried away in Policy 11. By prioritizing greenfield over urban, brownfield regeneration, the plan creates insurmountable (and unnecessary) obstacles for itself. Common sense suggests a local plan should first assess the borough’s infrastructure capacity for sustainable development, and then tailor development accordingly. This plan, however, assumes infrastructure will follow on the heels of housebuilding as if by magic. It makes implementation critically dependent on providers outside the Council’s control and on the vagaries of CIL income. Instead of recognizing this as a key constraint, the plan is based on hope. It is also highly likely that developers faced with the imposition of large infrastructure requirements will go to court to invoke the NPPF provision that prevents authorities from imposing conditions that make a development non-viable.

Policy 11 requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.

Despite the Garlick’s Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents’ in the locality will see their quality of life significantly deteriorate in many ways.

Many of the utilities in the Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers. No plans to improve these services should mean no development of the Garlick’s Arch site.

Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are already at capacity and suffering from funding cuts or freezes. Any further development without funding will place further stress upon existing health services.

Police services are seeing funding reduced. The development of the proposed 13,860 homes during the plan period will stretch the police services further and is unsustainable.

There is no provision of the increased capacity of Guildford hospital, where is this assessed and remedied?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

### POLICY I2

I OBJECT due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2)

I object to this policy as it is too vague and optimistic. Significant improvements to the road infrastructure are like to be many years away even if they ever happen. The draft plan, however, commits to building massive housing estates in the countryside before any of these road improvements are in place. This is inappropriate and will lead to massive traffic disruption during the construction phase and will add permanently to an already congested network (about 3,000 private cars from the 2,100 new homes at Wisley Airfield alone).

Road infrastructure represents a major constraint that should have been applied to the housing target at a much earlier stage in the plan process and not left as an unresolved difficulty in the draft plan.

There is no certainty that either the A3 or M25 in the borough will be improved to increase capacity and reduce congestion during the Plan period. Highways England has no plans to even examine improving the A3 before 2020. I have considerable concerns that development of the large residential sites identified at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), will take place before any improvements are made to the trunk road network. The A3 & M25 are already at capacity during peak hours and any development prior to improvement of these roads will only make the situations worse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/13511  Respondent: 8582977 / Guildford Environment Forum (John Bannister)  Agent:  

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

### POLICY I3

I OBJECT to poor air quality concerns (Policy I3)

Paragraph 4.6.27 of the Plan states that “Development must also mitigate its traffic impacts, including its environmental impacts and impacts on amenity and health.” The significant level of development being proposed, particularly in the north east of the borough will lead to considerable further congestion, despite any attempts to mitigate this through travel plans. This will be particularly acute in built up residential areas and will only lead to greater levels of air pollution, which will have a detrimental effect on local residents and their health and can result in early death.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
POLICY P2

I OBJECT to not protecting the Green Belt (Policy P2)

This policy does not sufficiently safeguard the Green Belt even though Green Belt constitutes 89% of the borough and should be the cornerstone of all local planning policy. The Green Belt is not the Council’s to give away and once it is gone it is gone forever. Sacrificing areas of the Green Belt to a developer influenced growth agenda is a betrayal of future generations and does not constitute sustainable development.

The Green Belt should be protected in perpetuity, but Policy P2 seeks to justify excessive development in supposedly protected areas. This is in breach of party manifesto commitments and contrary to previous responses to public consultation. It is disreputable to argue, as the Council does, that the Plan would involve the loss of “only” 1.6% of the borough’s Green Belt. Leaving aside the reliability of that statistic, the NPPF does not set an “acceptable” percentage. The fact remains that the plan proposes that 65% of the housing plus industrial development be built on land to be taken out of the Green Belt.

Paragraph 4.3.16 is seriously deficient in simply stating that the Council considers that exceptional circumstances exist to justify amendment of Green Belt boundaries. The exceptional circumstances are not identified. It is clear from national guidance that unmet housing need is not on its own an exceptional circumstance. Even to the extent that exceptional circumstances exist, these have to be balanced against the harm to the Green Belt in the specific sites proposed to be taken out of the Green Belt. This balancing exercise appears not to have been done.

The Countryside Study which the Council may argue fulfilled the need to demonstrate the exceptional circumstances required to justify removal of areas from the Green Belt was a simplistic tick box exercise. Within limits it may have answered certain questions about different attributes of different areas of Green Belt but it did not carry out the balancing exercise needed to determine whether specific exceptional circumstances justified removal of specific areas of land from the Green Belt. I believe that each of the identified Green Belt site proposed to be removed from the Green Belt should be carefully assessed against any exceptional circumstances in deciding whether it should be removed from the Green Belt in the final plan. This exercise should bear in mind that housing need in itself is not an exceptional circumstance and nor is the Council’s growth aspiration. An important consideration is that more housing need could be met on urban sites than is currently planned. The Plan has fallen into the developers’ hands and developers prefer building on undeveloped land rather than brown field sites.

I note that the Summer 2016 edition of "About Guildford" (published by the Council) on page 5 states that "... the Plan rejects any schemes that would have a detrimental impact on the Green Belt." This is demonstrably untrue and I consider this to be a deliberate untruth which compromises the consultation process. I would ask that this untruth be corrected and the consultation period restarted after the correction has been given the same distribution as the original statement. (I
assume the document was delivered to most houses in the Borough.) I reserve the right to argue before the inspector that the consultation process was flawed and ineffective because of this.

I object to the “insetting” of 14 villages from the Green Belt. Contrary to assertions made in the Plan process many of these villages do contribute to the openness of the Green Belt and there is no need to inset them.

I also object to the wholesale extensions to the settlement boundaries in many villages to allow for infilling and that infilling is also proposed outside the settlement boundaries of 11 further villages. Many Guildford villages are linear. It is all too easy to square off boundaries by including countryside bounded on only one or two sides by existing development, claiming it contributes nothing to the “openness” of the Green Belt, a term which neither the plan nor the NPPF defines. The NPPF’s other 4 tests of Green Belt status, including the prevention of urban sprawl, are ignored. Effectively, this policy makes all villages within the Green Belt vulnerable to large blocks of new development and seems almost calculated to secure the rejection of the plan as a whole.

To “inset” two-thirds of the borough’s rural villages on the grounds that they no longer contribute to the purposes of the Green Belt is extreme and inherently implausible, given the borough’s location on the edge of Metropolitan London. I cannot see how such extensive areas fail to contribute to the purposes of the Green Belt under the NPPF, but this could quickly be the case if the proposed “insetting” and boundary extensions go ahead.

This policy is wildly disproportionate in terms of any foreseeable development need and has caused tidal waves of opposition from residents. It flies in the face of NPPF paragraph 17’s aim of “empowering local people to shape their surroundings” and other NPPF provisions.

Paragraph 4.3.17 states that “the general extent of the Green Belt has been retained.” I believe this should be deleted as an untruth.

In addition I OBJECT to the proposals to remove from the Green Belt the so called ‘strategic sites’ of Wisley Airfield (A35), Gosden Hill Farm (A25) and Garlick’s Arch (A43) and all other strategic sites. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these sites and villages (as mere housing need does not constitute a ‘special circumstance’) to be taken from the Green Belt. Once taken from the green belt they will be lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached.

GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site.

Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
POLICY P4

I OBJECT to development in areas which are at risk of flooding (Policy P4)

National Planning Policy states that Local Plans should take account of climate change over the longer term, including factors such as flood risk. It goes on to say that new development should be planned to avoid increased vulnerability to the range of impacts arising from climate change.

The Plan states that in accordance with national planning practice guidance, the Level 1 SFRA has been used to guide development towards areas at the lowest risk of flooding and identify areas unsuitable for development. However, the document concludes that land outside of the area of flood risk is not capable of accommodating all of the borough’s identified development needs. A Level 2 SFRA has therefore also been produced and will help the Council apply the exceptions test (as described in the NPPG) as necessary to development proposals in areas at risk of flooding.

The site at Garlick’s Arch (A43) is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. Knowing the area well I am aware that this site often floods during the winter months and the flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13485  Respondent: 8582977 / Guildford Environment Forum (John Bannister)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY S1

I OBJECT to this Policy as the development proposed will not be sustainable (Policy S1)

The NPPF states that the presumption in favour of sustainable development “should be seen as a golden thread running through both plan-making and decision-taking.” As the first policy in the Plan, Policy S1 ought to set a clear framework. Instead, no definition of “sustainable development” is given. The policy also fails to set out any principles for applying sustainable development in practice to local planning decisions, which often have serious long-term impacts.

The policy states that it aims “to secure development that secures the economic, social and environmental conditions in the area”. This fails to recognize that economic growth, social justice and environmental protection often conflict. The policy does not say how each element is to be weighted or conflicts resolved. As a practical guide to the planning decision to be taken in the Plan period it is seriously deficient. The policy is likely to be used by developers to justify inappropriate developments on economic grounds. Under this policy, virtually any development will qualify as “sustainable”, in breach of the NPPF’s most important guideline.

Policy S1 is also seriously deficient in making no mention of the Green Belt. The Green Belt is a long term Government policy enshrined in primary legislation to protect green areas in perpetuity. The Green Belt is a living example of
sustainable development in practice and is one of the most important factors affecting sustainable development in the area covered by the Plan and should be acknowledged in this policy. Policy S1 should include a commitment to protect the Green Belt from inappropriate development and to uphold Green Belt boundaries and protections. This would set at least one clear boundary to planning decisions. The Plan and the Council have treated the Green Belt as a developable land bank rather than as a constraint to development.

The commitment to approve planning applications “wherever possible” and “without delay” reveals the pro-development bias of the plan. Countervailing references to sustainability are so vague that the NPPF presumption in favour of sustainable development becomes a presumption in favour of any development at all.

This policy also ignores, as if they are inconvenient constraints, most of the 12 Core Planning Principles set out in NPPF paragraph 17.

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill Farm (A25) are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are also unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. The same is true of Guildford itself with all approach roads grid-locked at certain times of day. The cost to business of congestion is huge with the adverse consequences impacting residents through health damaging air quality and road accidents. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result. No one is asking for a 40% increase in retail in Guildford, except maybe Retailers, yet that will exacerbate the adverse effect of more traffic coming to Guildford. Car parking charges must be increased in line with cities like Cambridge if GBC is serious about reducing congestion. A tunnel under the A3 will be hugely expensive and the money would be better spent improving rail travel between Portsmouth and London and the rail and bus links to adjacent locations.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
POLICY S2

I OBJECT to the Borough Wide Strategy (Policy S2)

The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

The housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.

The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”.

Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guilford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

The assumptions and calculations in the SHMA are widely regarded as flawed and even before Brexit, produced an inflated housing needs number. The figure of 13,860 new homes is completely unsubstantiated. It has not been scrutinized by Councillors despite repeated requests for debate. The assumptions and calculations underlying the model are hidden, protected by a claim to intellectual property by a commercial sub-contractor used in preparing the SHMA. I have serious doubts about the objectivity of the SHMA because it has been produced by consultants whose website openly proclaims their pro-development agenda leading to reasonable suspicion that the figures are inflated. Guildford’s OAN is not transparent but has been taken on trust by the authors of the plan. Given that almost every element of the plan is predicated on this OAN, the plan as a whole cannot be considered “sound”.

The status of the 13,860 figure is ambiguous. The Council has said that the housing number and the OAN are identical because the OAN is “deliverable” and is by definition objective and cannot be contradicted. The OAN is only deliverable because of the Council’s cavalier approach to the Green Belt in contravention of the NPPF, ministerial statements and local and national Conservative Party manifesto commitments. The plan also states that infrastructure or other constraints may in due course affect deliverability. It is also unlikely that the number of houses can be built at the rate proposed. In recent years, housing starts have on average been less than half the proposed rate. This is not because developers do not have the land or cannot get planning permission. Constraints in the supply chain and maintaining profit levels have been more important.

The plan cannot be considered “deliverable”. In addition, the number of homes proposed, plus existing planning permissions, plus expected “windfall” sites, exceeds the total of 13,860. So how many homes (taking account of these adjustments) do the Council want built? The plan does not say. Without this figure it is hard to see how anything else can be planned. This undermines the validity of the whole consultation. It is unreasonable to ask the public to approve a “plan” that fails to propose a target number that takes all the standard constraints and adjustments realistically into account, leaving the Council to set one without further consultation. Even if the OAN is not flawed, it is at best only a baseline figure and should not be passed off as a policy proposal.
It is unreasonable to embark on a radical transformation of the borough on the basis of an unclear housing target. Most of Guildford Borough is highly protected from development (89% Green Belt, 44% AONB and about 75% protected by SPA). Whether or not increasing the number of dwellings by up to a quarter is desirable, it would be a major and irreversible change, arguably turning a largely rural borough into a mainly urban or suburban one like Woking. The scale of the housing number increases the onus for it to be seen to be sound. A substantially lower number, on the other hand, would remove the need to build on Green Belt or open countryside, and instantly meet the single biggest public objection to the plan as a whole.

The Plan in general and this policy in particular does not address the point that Guildford exists as part of London’s commuter belt. Any increase in supply of housing in Guildford, particularly if the increase is proportionately greater than elsewhere in the commuter belt, will simply result in a shift of population into the area. It will not reduce prices or increase availability except imperceptibly. The Plan also ignores the point that many of those working in the area live elsewhere. Accordingly in considering the housing number the Plan should take into account that in this part of London’s commuter belt, demand for housing is, in practical terms, unlimited.

This policy does not take proper accounts of the constraints to development which exist, principally posed by the Green Belt and by infrastructure limitations. I believe the Council is under a duty to properly consider applying these constraints. It is clear the Council has failed to do this. This approach differs from all the other boroughs in Surrey. The Plan appears to have deliberately been manipulated towards a growth agenda without disclosing why this is being done. The housing that is needed should be concentrated on urban brown field sites and through increasing the housing density of existing built up urban areas.

The development of 13,860 homes in the Plan period with 65% in the Green Belt does not constitute sustainable development. It will have a permanently detrimental impact on the Borough in general and on West Clandon and surrounding area in particular. The developments at Garlick’s Arch and Gosden Hill Farm do not meet the needs of the local communities. The road infrastructure in and around West Clandon will be unable to cope with additional demand. The edge of urban Guildford will creep that much closer to West Clandon, thus negating the purposes of the Green Belt in the area which include safeguarding the countryside from encroachment, checking the unrestricted sprawl of large built up areas and preventing neighboring towns merging into one another.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill Farm (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

**Comment ID:** SQLP16/1591  **Respondent:** 8582977 / Guildford Environment Forum (John Bannister)  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents
I do not agree that the evidence used for the Proposed Submission Local Plan Strategy and Sites is adequate, up-to-date and relevant.

The fundamental driving forces for much of the development proposed in the Plan (particularly that on Green Belt land) are based on:

1. An excessive ambition to expand the local economy which is neither warranted nor wanted by the local population. Guildford is already one of the highest ‘value creation’ areas in the country and has one of the lowest unemployment rates. There is no evidence that massive and accelerated expansion is required.

2. SHMA figures which are neither transparent nor justifiable, especially in view of previous figures set. Independent assessments of the SHMA (eg from Guildford Residents’ Association and David Reeve) show it is set far too high and so cannot be said to be adequate, up to date or relevant.

In addition the recent vote to leave the EU and the impact this will have on the economy and migration have not been taken into account.

The Plan should be re-assessed and the methodology for arriving at housing need figures should be fully transparent.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** SQLP16/1595  **Respondent:** 8582977 / Guildford Environment Forum (John Bannister)  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

I do not consider the Proposed Submission Local Plan: strategy and sites as a whole to be sound, because, but not limited to, the following reasons:

1. "Only sites that propose sustainable solutions have been included in the Plan and the Plan rejects any schemes that would have a detrimental effect on the green belt." Summer 2016 edition of "About Guildford" (published by the Council) on page 5. This is demonstrably untrue and appears designed to bias the consultation process.
2. The housing OAN figure has been calculated by a process which is not transparent. It has not been properly examined by Councillors before being adopted.
3. The OAN has been adopted as the housing number without the application of any constraints to take account of Guildford's circumstances, including in particular the Green Belt, AONB and road infrastructure. National policy permits such constraints to be applied and it is inappropriate not to consider the need to do this.
4. The draft Plan does not accord with the NPPF policies on protecting the Green Belt.

Exceptional circumstances need to be shown to justify removing areas from the Green Belt and this has not been done. The housing need number is not justification in itself according to published ministerial statements. Having properly calculated an OAN, constraints should be applied to it to reflect the Green Belt, AONB and infrastructure. Each proposed Green Belt site then needs to be justified on its own merits. The benefits of the proposed development need to be identified together with the harm to the Green Belt. Only if there are exceptional circumstances and following a proper balancing exercise demonstrating that these exceptional circumstances outweigh the harm to the Green Belt can the proposal proceed. The draft Plan does not demonstrate that this has been done. The housing number has been used as a blanket justification for all Green Belt sites—which amount to 65% of the proposed housing number.

1. Whatever the justification for the assumptions made in calculating the OAN, those assumptions are now almost certainly incorrect following the referendum.
2. The housing number is at least twice the achieved rate of building in the Borough over the last few years. There is no evidence in the Plan to show that this rate is achievable and sustainable.
3. Much of the infrastructure required to support the level of development proposed is outside the Council’s control. The Infrastructure Plan is long on possibilities and aspirations and very short on commitments. The infrastructure requirements placed on developers are supposed to be in place before development commences. This is utterly unrealistic and indicates a lack of knowledge of developer’s business models which depend on positive cash flow. It seems very clear that at best, infrastructure provision will seriously lag development and leave higher levels of congestion than now. This will reduce the quality of life for residents through congestion and disruption.
4. The 40-45% requirement for affordable homes together with infrastructure such as railway stations, park and ride facilities, schools and roads is highly likely to be challenged on a site by site basis by developers using the NPPF provision that Councils cannot impose conditions which make development non-viable.
1. GBC has not included details of its Town Centre Master Plan and urban development proposals in time for and as a part of the Guildford Local Plan consultation
2. GBC has failed to provide an Infrastructure Report in time for and as a part of the Guildford Local Plan consultation
3. GBC has proposed an OAN of 693 houses per annum in the GL Hearn West Surrey Strategic Housing Market Assessment (SHMA) which many, including independent assessors, consider unsound
4. Highways England will not start to consider what it intends to do as regards the A3 in the vicinity of Guildford until 2018
5. Network Rail have not made available for the public consultation any plans for a new railway station at Merrow with an adjacent Park & Ride for 1,000 cars
6. The GBC proposals for Gosden Hill Farm do not appear to be in coordination with the Neighbourhood Plan for Burpham
7. The draft Local Plan will cause further linear development along the A3 between Burpham and West Clandon PC and encroachment onto open Green Belt countryside in clear conflict with the National Planning Policy Framework
8. The proposal for Garlick’s Arch was added to the draft Local Plan without any prior consultation under Regulation 18.
9. The Land Availability Assessment (LAA) indicates a range of planning difficulties for Gosden Hill Farm and Burpham which have to be met by the developer involved. These include Electricity Grid supply problems and foul sewage and surface water issues that suggest the development proposed cannot easily be implemented both technically and financially.
10. No adequate explanation is given as to how the aspirational proposal for a tunnel will be used to overcome traffic issues relating to the quality of life and amenity of Burpham, West Clandon, Send and Ripley citizens
11. In common with many others I do not believe the housing figure has been properly calculated and I believe it overstates housing need. The Council has prevented councillors or others from properly considering the SHMA by refusing to make public the basis on which it was drawn up.
12. The housing figure, when properly recalculated, should be subject to constraints to reflect Guildford's circumstances, including in particular the Green Belt and road infrastructure. National policy permits such constraints to be applied and it is inappropriate not to consider the need to do this.
13. Even once a housing number has been calculated it cannot be used to justify taking land out of the Green Belt on a wholesale basis.
14. Cast iron commitment should be included in the plan that development can only commence when required infrastructure improvements have been secured.
15. The status of the text which accompanies each policy box is not clear. If the accompanying text does not have the force of policy a number of the policies (i.e. the text in blue) are so vague and general that they commit the Council to very little.

The draft Plan should be re-assessed with housing on brownfield sites made a priority over commercial development and Greenfield sites and each of the above points addressed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I do not consider the Proposed Submission Local Plan: strategy and sites as a whole has complied with the Duty to cooperate.

This 2016 draft of the Local Plan clearly demonstrates Guildford Borough Council’s refusal to co-operate with the wishes and requirements of the vast majority of the residents in its Borough.

The Council has failed to co-operate with the results of the consultation process for the 2014 draft Plan which was meant to inform and guide this 2016 draft Plan.

Despite campaigning on a clear statement ‘Conservatives Say Green Belt To Stay’, the ruling party on GBC is now intent on pushing through a Plan which will devastate Green Belt land and extend the Guildford Urban Area to further merge into surrounding rural villages.

This is not cooperation by any definition.

In addition the Council has failed to cooperate in providing any transparency to the housing need figures commissioned by the Council from GL Hearn.

The 2016 draft Local Plan should be reassessed with a reviewed and transparent SHMA and revised to reflect the views of the residents of the Borough, who pay for Guildford Borough Council to act in their interests, and not those of developers and central government.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<tr>
<th>Comment ID:</th>
<th>PSLPA16/1287</th>
<th>Respondent:</th>
<th>8583137 / The House of Commons (Mr Jonathan Lord MP)</th>
<th>Agent:</th>
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<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Normandy and Flexford</td>
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I have received many thoughtful and well-argued representations from local residents objecting to GBC’s draft plan in relation to Normandy, and specifically with regard to the site allocation 46 and 47.

I would ask GBC to weigh very carefully all responses to the consultation from Normandy residents and also from important local organisations such as the Parish Council (and its elected Councillors) and the Normandy Action Group (and its Chairman and leading Officers). I have a very high regard for the two local Councillors in Normandy, David Bilbe (GBC) and Keith Withan (SCC), and I would like to express my full support for both their representations and, in particular, the key points that Cllr Witham has discussed in detail with me (below).

Response to GBC Draft Local Plan Consultation

GBC Draft Borough Plan re Normandy - Site Allocation 46 and 47

SECONDARY SCHOOL AT NORMANDY (SITE 46-47 GBC DRAFT PLAN):
The proposed site of Normandy/Flexford for a new Secondary School should be rejected as the need for such a school in that location has not been proven.

In its last submission to GBC (July 2014) Surrey County Council, in its official response, said: "A site within the proposed urban extension at Blackwell Farm, with all necessary access infrastructure built in and a catchment surrounding the site, would be a more sustainable location in transport terms for a new secondary school to serve the western side of Guildford."

If GBC wishes to proceed with this proposal, SCC Education Officers need to demonstrate a clear, and undisputed need for such a school at this location, given the current under-subscription of all the neighbouring local secondary schools surrounding Normandy.

The birthrate in Guildford has fallen over the past two years. And whilst it is too early to know if that trend will continue, it is another factor to urge caution, and not to proceed at this time.

The case for a new secondary school in Normandy is therefore not proven. If there is such a need elsewhere in Guildford Borough, I don't believe it is needed in the location proposed at Normandy.

TRANSPORT AND ROADS:

In terms of transport, site 46 is located well beyond the existing confines of any urban area restricting the potential for sustainable travel. The existence of Wanborough Railway Station is only of a marginal benefit. The area is bounded by the D60 (Glaziers Lane); the C16 (Wanborough Hill and Westwood Lane) and the A323 (Guildford/Aldershot Road). I cannot envisage any so called "highways improvements" that could be undertaken, particularly on the C16 or D60 that would enable those roads to cope with the increased traffic from 1,100 homes and a Secondary School.

The A323 is already a busy major route, and scope for "improvements" to this road are also limited.

Although I suggest that in any case Highways should consider installing a passing lane, Guildford bound at the junction with Frog Grove Lane, Wood Street Village, to ease the congestion caused by commuter traffic turning right and causing considerable tailbacks. But that is a current, existing problem.

There would be access issues relating to visibility and safety for pedestrians and cyclists, which could be difficult to resolve given that the roads are fundamentally rural roads, and the existing structures of the Westwood Lane railway bridge and the Glaziers Lane railway road bridge.

The restricted headroom of the Westwood Lane bridge would also prohibit double decker buses from accessing the proposed school.

Rushmore Borough Council - Aldershot development

Local Authorities have a duty to co-operate in making their local plans and I do not believe this has happened. In 2013 the development of 3,850 dwellings (population of approx. 9,000) in Aldershot was approved by Rushmoor Borough Council and is situated about 4 miles from Normandy. The development, over a 15 year period, includes two primary schools, and the provision of a SANG and many other provisions.

The first of these new houses, part of the first phase of 228 dwellings, are now on sale. The land belonged to the Ministry of Defence's former Aldershot Garrison known as Wellesley, Aldershot Urban Extension. Guildford BC responded to the plan in 2013 (ref: 13/P/00108) and in that said that GBC objected to the application on the grounds that insufficient information had been provided to allow a full assessment on the impact of that development on the highways network and said "the impact on Surrey's network and mitigation required has not been established" It its response to that planning application, Hampshire County Council, dealing with Highways and Transport issues, hardly referred to the A323. Copies of those responses are attached for reference.

ENVIRONMENTAL CONSIDERATIONS:
A development of this scale, in such proximity to the Thames Basin Heaths Special Protection Area, should not be supported.

This is an environmentally sensitive location next to one of the component SSSIs of the Thames Basin Heaths Special Protection Area for birds. The Thames Basin Heaths mitigation plan seeks to zone development away from these sites. This results in a 400m buffer zone where no residential development is permitted. A developer-led proposal driven by commercial considerations does not take account of the damage it would cause to the local environment and the strain it will place on the local infrastructure.

The Green Belt and Countryside Study referring to the importance of the openness of the land between Normandy and Flexford, has been ignored. The current version of the Plan treats Normandy and Flexford as separate settlements for the purposes of Green Belt ‘sensitivity’ but as one settlement for the purposes of ‘sustainability’. This is a double standard.

There are many vitally important ecological networks (green infrastructure corridors) that surround the proposed development area (namely Ancient and Semi-natural Woodland, Veteran Trees, Hedgerows, Semi-improved Grassland, Farmland and a Stream) and connect to other important and protected sites within Normandy Parish and the wider countryside (namely Wanborough and Normandy Woods Site of Nature Conservation Importance (SNCI), Normandy Pond SNCI, Normandy Common SNCI (put forward by the Surrey Local Nature Partnership in 2015), Wyke Churchyard SNCI, Little Flexford SNCI, and even more importantly Thames Basin Heaths Special Protection Area (TBH SPA)).

This proposed development would destroy a number of these habitats including Semi-natural Woodland, Veteran and Mature Trees, Hedgerows, Farmland and Semi-improved Grassland, plus would have indirect effects on Ancient Woodland habitat and the Stream through pollution (light, noise, litter and diffuse land and road runoff), predation and disturbance by increased number of cats and dogs (187 cats (cat ownership being 17/100 households) and 264 dogs (dog ownership being 24/100 households) and by people (potential fires and vandalism of trees). The proposed SANG is only 10ha and will be on land that will be muddy in wet weather and during the winter. Whereas the TBH SPA of Ash Ranges is dry during wet weather and during the winter, plus is either 5 minutes away by car or 20 minutes by foot.

All the habitats within or adjoining the proposed development site are Priority Habitats of Principal Importance under the NERC Act, plus a number of protected species (European Protected Species, Species of Principal Importance and those protected under The Wildlife and Countryside Act (1981) as amended) have been recorded within either the proposed development site or 500m to 1km of the proposed development site. These include Hedgehogs, Dormice, Great Crested Newts, Barn Owls, Stag Beetles, Skylarks, Common Toads, Common Lizards, Grass Snakes, Adders, Slow Worms, Badgers and Bats (including potential roosts within a number of veteran and mature oaks and other trees across the proposed development site and within the woodland blocks).

Light pollution from this proposed development on this scale would be starkly visible from Surrey Hills Area of Outstanding Natural Beauty (AONB). Effect on surrounding woodland and stream habitats that adjoin these roads including the SNCIs of Normandy Common, Normandy Pond and Wyke Churchyard. Potential adverse impacts on the SPA could result from noise and disturbance during construction and through usage of the playing fields when, in addition, external lighting could cause disturbance to the feeding and roosting patterns of the SPA bird species.

There could also be impacts on hydrology affecting the open water and wet heathland of the SPA/SSSI and from increased traffic on Westwood Lane, Glaziers Lane and Guildford Road. Traffic pollution is a major source of nitrogen pollution that changes heathland into grassland and many journeys to a new Secondary School could be expected to be by car.

Prior to any allocation of the site it will be necessary for the borough council to be able to conclude, beyond reasonable doubt, that there would be no adverse impact on the integrity of the SPA as a consequence of the proposed development of
the site. Further work is needed by the borough council to provide the evidence needed to be able to reach that conclusion in respect of the use of the site as a secondary school. The site will require archaeological assessment in advance of any application for development being submitted. I am grateful to Danial Winchester a professional ecologist who lives in Flexford for much of the above information.

**IMPORTANCE OF THE GREEN BELT:**

It is Surrey County Council policy (March 2013) by a Motion agreed at a Full Council meeting of Surrey County Council about the Green Belt:

**Surrey County Council, March 2013 RESOLVED (unanimously):**

Council notes:

1. Surrey County Council has a proud history as the creator of the Green Belt. The County’s Countryside Estate founded by the Surrey County Council Act of 1931 was the basis of the London County Council's Green Belt Act of 1938.

2. The Coalition Agreement states:

    ‘We will maintain the Green Belt, Sites of Special Scientific Interest (SSSIs) and other environmental protections, and create a new designation – similar to SSSIs –to protect green areas of particular importance to local communities.’

Council believes: Surrey’s Green Belt, Countryside Estate, SSSIs and other green spaces are vital, not only for the county’s environment but also for maintaining a “green lung” around London.

Council resolves:

1. To use its power to protect Surrey’s Green Belt.

2. To support the National Planning Policy Framework (section 9 – paragraphs 79 to 92) and the Government’s policy of protecting the Green Belt.

3. To make Surrey’s MPs and the County’s Districts and Boroughs aware of this resolution.

4. That any Green Belt development in the County is in line with the needs and wishes of Surrey residents

**JONATHAN LORD MP SUMMARY:**

In summary, I cannot see any substantive justification for taking the very attractive Green Belt land of site 46/47 out of the Green Belt and I can see many solid arguments against such a retrograde step. I would therefore urge GBC to maintain and protect the Green Belt status of this site so that its natural beauty and its important contribution to the local habitat and landscape can continue to be enjoyed by future generations.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:
The Guildford Infrastructure Baseline 2013 sets out the position with regard to Primary Health care Facilities. It refers to the Surrey NHS Transformation Plan 2010 to 2015 which includes the key objective of reducing health inequalities through the provision of GP-led Health Centres and acknowledges that primary healthcare services are generally the first point of contact service, offering frontline services. All GP practices are now required to belong to a CCG. There are six CCGs covering Surrey, all within the Surrey and Sussex Local Area team (LAT). Three CCGs cover different parts of the Guildford Borough including Guildford and Waverley CCP. Guildford and Waverley CCG is a group of 21 local GPS surgeries in Guildford and Waverley. It controls a £223 million annual healthcare budget responsibility for the approximately 220,000 people living in the two boroughs. There are currently a total of 99 GPs currently practising in 11 partnerships across the Guildford borough with a total of 154,998 patients on their registers. The existing provision equates to one GP for every 1,565 residents. However, provision is not spread equally across the Borough and when examining local list sizes per GP some existing under provision is apparent on surgery- by-surgery basis. Figure J shows the data on a settlement basis. However this list does not include the Binscombe Medical Centre. This presumably, is because it’s not actually located within the borough. Nevertheless, it serves patients from Guildford and should therefore be considered within the Guildford context. This is a key cross boundary issue that does not appear to have been adequately considered.

The Guildford draft Infrastructure Delivery Plan 2016 confirms but does not update the Infrastructure Baseline. It states at paragraph 6.2 that GBC officers have met with representatives of Guildford and Waverley CCG, GPs from across the borough, NHS England, and the Royal Surrey County Hospital chief officers to discuss future health needs of the borough’s population. It goes on to confirm that such work is ongoing and, as clarity is given to proposals, further input is anticipated from Guildford and Waverley CCG and from the GPs practices that will be impacted by the planned housing development. Paragraph 6.7 of the draft IDP states that: “We will continue to work with NHS England and the relevant CCGs, particularly Guildford and Waverley CCG, the GP Practices, and the Royal Surrey County Hospital, to ensure that health facilities in the borough will meet the health needs of future population, and will continue to work on ensuring that funding and delivery is secured when needed.”

This statement is gratifying and is supported. However, as stated above, it is considered that the cross boundary issues between Guildford and Waverley have not been adequately addressed. A new Centre for Health is required to serve the cross boundary area around Farncombe as set out at Question 6 of this form and an additional allocation should therefore be made to facilitate this. The plan on page 63 of the IDP shows the GP surgeries within Guildford Borough. This should be renamed as ‘GP surgeries serving patients within Guildford Borough’. That said, one GP surgery is indicated on the borough boundary with Waverley – GP Surgery 10 which is referenced New Inn Surgery. This is incorrect and we believe that what should be shown is the Binscombe Medical Practice

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
As currently drafted, the Plan is not sound in relation to the provision of primary health care facilities, in particular in the Farncombe area. This is because no account has been taken to assess the current or future clinical needs of the community and no additional capacity has been built in to the plan for the increase in population or NHS England’s changing health strategy. In so far as the Farncombe area is concerned, the additional site allocation for a Centre of Health should be made.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** SQLP16/1413  **Respondent:** 8583649 / Bell Cornwell LLP (Jane Terry)  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 4: Duty to cooperate

Insufficient consultation has taken place with health providers as to how the health needs of the local community will be addressed throughout the Plan period. This includes the strategic cross boundary provision of GP services taking on board the NHS England nationwide goal of providing more hospital consultant outpatient appointments in a community setting. Following more extensive consultation with clinical providers, make a to the Plan to include an additional site allocation at New Pond Road, Farncombe for a Centre for Health.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPS16/419  **Respondent:** 8584865 / Mr Keith Lawrence  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A21

Insufficient consultation has taken place with health providers as to how the health needs of the local community will be addressed throughout the Plan period. This includes the strategic cross boundary provision of GP services taking on board the NHS England nationwide goal of providing more hospital consultant outpatient appointments in a community setting. Following more extensive consultation with clinical providers, make a to the Plan to include an additional site allocation at New Pond Road, Farncombe for a Centre for Health.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
In this modern and increasingly overcrowded world it would seem logical to retain as much open space as possible for the benefit of the population.

There are many reasons for this, most based on health such as sports and recreational areas for the more active, countryside walks for those with naturalist interests and areas such as allotments where people can not only grow their own produce, but can also engage on a social level with other like minded people and keep physically active at the same time.

It is for these reasons (among others) that I strongly support POLICY A21 (Westborough allotments) as this is a site with strong social bonds, an educational program for the local school and with woodlands to the south a variety of interesting wildlife. The site is also supported by the local population who like having a small green area in the midst or their community if only for the sense of freedom that it conveys.

I would also like to point out that although this site is earmarked for continual use as allotments there are plans to utilise the former car showroom to the north for housing/specialist housing and as this is where the most important vehicular entrance lies, any long term disruption to or loss of this entrance or indeed any existing part of the site could cause closure of the site altogether.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Policy A22: Land to the North of Keens Lane

The proposal to increase the number of dwellings from 140 to 150 (Site Allocation A22) will add to the traffic congestions in this area. It will also increase the footfall on Whitmoor Common putting this SSI under even more strain. It is not uncommon for the existing parking areas on the edge of the common to be full, local people using the area for recreation such as dog walking frequently seem to prefer driving to the common rather than walking. I assume that in part this is because the roads abutting the common, namely the A322 and Salt Box Road have no provision for pedestrians to cross them and the flow of traffic on these roads is such that crossing on foot requires a fleetness of foot and mind that we do not all have.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/652  Respondent: 8584929 / Keith Stainer  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Policy A26: Blackwell Farm, Hogs Back

I have previously objected to the inclusion of this site in the local plan and now object to the addition of a secondary school (Allocation 9) on the grounds that there is already overprovision by in excess of 700 places at the secondary schools serving the western parishes and I fail to see why land should be taken out of green belt to add to this over provision.

I also object to the additional proposed access to the site via Egerton Road (Requirements 1). The existing infrastructure in the A3, Egerton Road and Gill Avenue area cannot cope with existing peak time traffic flows with delays and long queues frequently forming in all three roads, the queues off the east bound A3 carriageway are particularly worrying given the potential for accidents, similarly the access slip road to the A3 is wholly inadequate with those joining the east bound carriageway often having to risk life and limb to join the main carriageway from a very short slip road which severely limits the time available to check for a suitable gap in traffic. I also note that the access is stated to be "preferably via Gill Avenue". This statement lacks the precision required for an objective comment. If not Gill Avenue how else?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15529  Respondent: 8585601 / Jennie Kyte  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy D3: Historic environment

Para. 4.5.38: The sentence in this paragraph: “We will seek to ensure that there is an imaginative approach to ensuring that heritage assets are kept in use and do not fall into disrepair.” is so important that it should be included in Policy D3 policy box. It would be considerably strengthened if the words “seek to” were deleted.

Para. 4/5/42, bullet point 4: I fully support the sentence: “identify heritage assets that make an important contribution to the local character of the area and update our local list on a regular basis.” In any supporting document, Guildford’s Victorian heritage should be protected. Bright Hill close to the town centre is proposed to be developed with housing. Over-looking the site is a magnificent example of a Victorian school. It is a landmark building and locally listed. Also within the site is a locally listed public house. These two buildings should be preserved and the development sensitively designed with regard to these buildings. The views from the site over an AONB, as well as to Guildford Cathedral, should be protected for those walkers and drivers descending Bright Hill.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy E4: Surrey Research Park

The Surrey Research Park should be reserved for research purposes only and not for normal businesses. It should not expand onto Blackwell Farm.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy E6: The leisure and visitor experience

E6 Policy Box, para. 1, bullet point 4: It is important that the river is kept as a green finger of countryside coming into Guildford town, and that river banks and scenery are kept as natural as possible. Much of Guildford’s character stems from its countryside views and closeness of countryside. For example, the river area by the town lock consists of trees and grass, and is extremely popular with visitors and residents. Hard paved banks, unnaturally high built up banks and hard paved paths spoil the natural character of riversides. The River Wey is a narrow river and needs careful planning so that it does not lose its character or degenerates into outlets for take away cafes. Environmental factors need to be considered as well as social and economic factors.

E6 Policy Box, para 3, bullet point 2: It is important to keep a mix of cultural venues in the town to cater for different leisure needs, particularly as Guildford Borough grows in population. This needs to be taken into account when assessing the economic viability of cultural establishments, such as theatres and museums. Social factors besides economic factors need to be taken into account.

Para. 4.4.66: I support the policy in the paragraph. However, a much used launderette on local authority land in Sydenham Rd in a central position opposite a large car park and serving nearby residential areas on the east of the town, which contains families, students and the elderly, has recently closed, causing those who formerly used it to drive across town. It also served as a community centre. It would be of benefit to many if it could be rebuilt with dwellings above.

Para 4.4.74: Vision Box. Comment on retail as in Policy E7 Box

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15528  Respondent: 8585601 / Jennie Kyte  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E7

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy E7: Guildford Town Centre

Guildford town centre lacks a butcher, grocer, greengrocer and baker, and a way needs to be found to establish these. Independent shops add interest and character to a town and these should also be encouraged.
Policy E7 Box: Guildford Town Centre

**Bullet point 1:** It is written: “A new retail-led, mixed-use development of 45,000 sq m (gross) of additional comparison goods floorspace on the North Street regeneration site within its primary shopping area”

This is based on a Retail Assessment which is weak, and based on flawed and dated concepts. It is apparent that shops are closing and online shopping is growing in popularity, while town centre shopping is decreasing.

The Assessment needs reviewing for soundness and whether the land in the proposed North St development area would now be better used to regenerate the town centre with mainly housing which would bring vibrancy to the town and contribute towards rather than compete with the High St.

**Bullet point 4:** The riverside needs to be carefully planned, so that it is not over-taken by over noisy night life which is magnified beside water. River banks and scenery should be kept as natural as possible. Environmental factors need to be considered as well as social and economic factors. (See comment on Policy E4 box, bullet point 4)

**Bullet point 7:** Care needs to be taken that modern built public squares are not windswept and isolated areas with no defined character. Long established squares usually have a focal point, such as a beautiful building, a church or town hall, and smaller squares are often surrounded by smaller old buildings of character. Large trees bring much character to a town and a large tree could be appropriate in a square.

Para. 4.4.89: The two scenarios in the Town Centre Masterplan (TCM) were not clearly outlined in the Masterplan, so their impacts were not apparent. Scenario 2 has been chosen and its impact on the High St, its setting, views and listed building need more analysis. Both scenarios depend on a very large reduction in traffic and were rated higher for bad traffic impacts than the present gyratory system in a separate traffic study.

The Town Centre Masterplan will depend on a round town bus service. As the town is pedestrianised and car parks accordingly are situated further from the centre and not necessarily near a venue to be visited. For those living in villages, distances to be walked on arriving in Guildford will be further, and to visit different locations and venues in the town, a ‘hop on, hop off’ bus will be essential. At present buses from the bus station at the bottom of North St (adjacent to the High St) carry people up the steep gradient of the High St and North St. An assessment is also needed on the impact of ‘pedestrianisation’ of the town centre on residential roads.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** PSLPP16/15520  **Respondent:** 8585601 / Jennie Kyte  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Policy H1: Homes for all

The condition of 60% of students at the University of Surrey living on campus in the 2003 Local Plan has not been met. If used efficiently, land could be used to house a larger number of students on campus, which would ‘free up’ houses for families.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Policy H3: Rural Exception Homes

Rural Exception Homes should be restricted to those with a connection to the village, rather than those on the Guildford Housing List, who consequently can find themselves isolated in a village with no employment and limited public transport.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Policy I2: Supporting the Department for Transports “Road Investment Strategy”

4.6.18: It is written in this paragraph: “…the scheme could either be the widening of the existing A3 carriageways or a tunnel option”. For the tunnel to be possible land needs reserving for a tunnel entrance.

Land should also be reserved for a bridge over the river and railway to unite the two sides of Guildford and take the pressure of the gyratory system.
Policy 13: Sustainable transport for new developments

Policy 13 box, 3rd para: The new developments proposed and the proposed building of 13,860 houses will have a simply huge impact on the road system in Guildford Borough, both on major roads, and country roads and lanes.

Major roads, particularly the A3, which cuts through the middle of Guildford, and if widened, will bring more traffic, noise pollution (which is a serious environmental problem in Guildford) and air pollution over the Plan period.

Country lanes are narrow and winding, and cannot be widened without demolishing houses and ruining ancient landscape. Park and Ride parks will not alleviate traffic on country lanes, and will not address the problems mentioned above. It needs to be written into the Local Plan how the impacts of the enormous amount of traffic can be alleviated in such a heavily populated borough as Guildford. Without such assurances based on evidence and careful analysis, traffic must be a constraint on the housing figure for Guildford.

At the same time as when sustainable travel is being promoted, Guildford is to lose its bus station. The bus station is in the heart of the town centre, close to the High St, and serves not only Guildford but the surrounding villages. Buses radiate out from the town in all directions and the bus station is heavily used. Buses also run every 10 minutes to the back entrance of the railway station en route to the hospital or university. **No new bus station/exchange is written into the Draft Local Plan.**

There appears to be no overall plan to enlarge Guildford railway station and to increase access to it.

A Sustainable Corridor is proposed (para.2, bullet point 8) with land to be reserved, but without further details it is not known how it will work on the narrow parts of the road on the route proposed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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**Policy P1: Surrey Hills Area of Outstanding Natural Beauty (AONB)**

The first sentence in **Policy P1 box** should be concerned with conserving the **natural beauty** of the AONB, which is the prime purpose of the AONB, and the wording should follow the wording in the Act as given in paragraph 4.3.1 as follows:

“Areas of Outstanding Natural Beauty (AONB) were originally identified via the National Parks and Access to the Countryside Act 1949, with the primary purpose to conserve the **natural beauty** of the landscape” (para.4.3.1).

**Policy Box P1:**

**Paragraph 1, bullet point 3:** It is written in this bullet point: “promote its enjoyment by the community and visitors to the area”. The enjoyment should come from ‘natural beauty’ and landscape.

**Paragraph 4:** The AGLV should be strongly protected in line with protection given to AONBs as the forthcoming AONB/AGLV review by Natural England is awaited.

**In Para. 4.3.6,** it is written: “Applications for major development in the AONB will be refused unless **exceptional circumstances** are demonstrated and the development is proven to be in the public interest.” Exceptional circumstances in the Draft Local Plan 2016 have been weakened to allow proposed large-scale developments in the Green Belt. Should the same ‘Exceptional circumstances’ apply to the AONB, its protection will also be considerably weakened.

**Para. 4.3.9:** It is written that: “The current Surrey Hills AONB Management Plan (2014-2019) acknowledges these wider values and interprets the AONB as a ‘living landscape’, which constantly changes across seasons and in response to the many social and economic forces placed upon it.” Environmental considerations should also be considered, such as the protection of the **natural** beauty of the AONB, and
similar wording should be added to this paragraph.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/15523  Respondent: 8585601 / Jennie Kyte  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy P2: Green Belt

Policy P2 Box: The policy box ignores the Green Belt as a constraint as set
out in NPPF policy, paragraph 14 and footnote 9.

It does not mention how the Green Belt is protected from boundary changes under
Exceptional Circumstances during the Local Plan process and that it normally should
only be changed for a rare or specific purpose, with care being taken not to
infringe the principle of permanence of the Green Belt as set out in NPFF policy,
paragraph 79. It does not give the five purposes of the Green Belt set out in NPFF
policy, para 80, any one of which serves as a reason for the Green Belt.

Releasing Green Belt to fund infrastructure does not constitute ‘Exceptional
Circumstances’.

The protection given to the Green Belt in these policies has been ignored as there
seems to an interpretation that because Exceptional Circumstances can apply to a
local situation that a Local Authority can take as much Green Belt as it wants through
boundary changes, thereby destroying the permanence principle of the Green Belt and
the true meaning of Exceptional Circumstances.

4.3.11 to 4.3.23: There is no mention of the Green Belt as a constraint in these
accompanying paragraphs
4.3.11: This paragraph does not mention the five purposes of the Green Belt as set out in NPPF policy, paragraph 80.

4.3.16: In this paragraph it is stated: “We consider that exceptional circumstances exist to justify the amendment of Green Belt boundaries in order to facilitate the development that is needed and promote sustainable patterns of development.” No justification is given for this statement and the Sustainability Appraisal does not reach any conclusion as to whether this is sustainable. It states in para. 10.19.2: “It is not possible to conclude on whether or not the draft plan is sustainable”

4.3.17: The words in this paragraph “Whilst the general extent of the Green Belt has been retained” is misleading as with the removal of villages from the Green Belt, 6% of the Green Belt has been removed, rather than the 1.9% repeatedly given by the Council in public statements.

4.3.12, 4.3.17 and 4.3.19: Such an enormous change as changing the boundaries of the Green Belt and insetting 14 villages from the Green Belt should not just be casually referred to in accompanying paragraphs to the policy box, but highlighted with a suitable heading or headings. This part of the policy of the Green Belt of insetting needs to be transparent and justified.

This change will have a huge impact on village and landscape scenery, and ignores the NPPF’s purposes of the Green Belt in para.80. Villages instead of being washed over by the Green Belt and protected will be susceptible to developments of large blocks of housing; to sprawl and to joining up with other developments. To give a few examples, Shamley village is extremely close to Guildford and Bramley in neighbouring Waverly District. Effingham is in danger of merging with Little Bookham and East Horsley. Flexford/Normandy and the Horsleys will be transformed from rural environments and susceptible to sprawl, etc. (Just a few large executive houses, favoured by developers, on the entry to a village or on a space within the village, could ruin its entire character and the visual landscape of the countryside surrounding it).

Opposition to this change has been huge and yet the NPPF’s intention of
“empowering local people to shape their surroundings” has been ignored.

Guildford has an ancient Parish heritage presiding over a network of villages linked by footpaths and country lanes, which follow the ancient field lay-out. This has been preserved in spite of Surrey (and Guildford District in particular) being the most populated county in England and in the top three of the most populated areas in Europe. The Green Belt in Guildford Borough is heavily populated with villages, the villages being set so close together that it is easy to walk through countryside from village to village. (A third of the borough’s residents live in rural areas.) The strongest protection possible is needed to protect the outstanding landscape of this ancient heritage and to prevent the whole area with its scenic and narrow lanes from being destroyed by traffic.

The Green Belt and its villages provide views into and out of the AONB and development will encroach on these views and bring light pollution to night skies.

The landscape value of the Green Belt as a whole should be recognised. The Local Plan should strongly protect this heritage with Green Belt policies for future generations and for those living in London.

Para. 4.3.15: This paragraph lists major previously developed sites which in addition to the villages to be inset, further encroaches into the Green Belt. Two nationally important areas of AONB are included.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P3</td>
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Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy P3: Countryside

The same protection being given to Ash and Tongham (formerly ‘Countryside beyond the Green Belt’) should be given to other villages losing their Green Belt protection, and which have higher status within the wider Green Belt. They also need protection from sprawl and their intrinsic character needs protection too.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15524  Respondent: 8585601 / Jennie Kyte  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy P5: Thames Basin Heath Special Protection Area

In Policy P5, 2nd bullet point, it is written: “Measures will be based on a combination of Strategic Access Management and Monitoring (SAMM) and the provision, improvement and/or maintenance of Suitable Alternative Natural Greenspace (SANG)” The word “improvement” should not be interpreted as recreational facilities which urbanise and harm AONBs which are often chosen as SANGs.

4.3.64: In this paragraph it is written: “Bespoke SANGs may be required to include a combination of benefits, including biodiversity enhancement, green infrastructure and potentially, new recreational facilities in line with the Council’s adopted green infrastructure policies. AONBs are often chosen as SANGs and its needs to be remembered that the prime reason for their existence is their natural beauty as given in the following Act:

“Areas of Outstanding Natural Beauty (AONB) were originally identified via the National Parks and Access to the Countryside Act 1949, with the primary purpose to conserve the natural beauty of the landscape.”

Recreational facilities such as buildings and equipment harm natural beauty and are strongly opposed by residents and visitors. The large amount of money channelled from developers into SANGs should not be used for this purpose, and has no connection with the SPA policy of attracting dog walkers to SANGs.

Wording is needed in Policy Box P5 and paragraph 4.3.64 which ensures that AONBs are protected from harmful recreational facilities, and are enjoyed for their natural beauty and landscape.

SANGs are not appropriate on agricultural land.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15518  Respondent: 8585601 / Jennie Kyte  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy SI: Presumption in favour of sustainable development

Policy Box SI and paragraphs 4.1.1 to 4.1.4: The term ‘Presumption in Favour of Sustainable Development’ is ill-defined and difficult for planning officers to interpret. Consequently, some extremely unsuitable developments are reaching planning application stage. Even if voted against unanimously by councillors on the Planning Committee, the developer using the policy ‘Presumption in Favour of Sustainable Development’ is in a stronger position to appeal.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15519  Respondent: 8585601 / Jennie Kyte  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy S2: Planning for the borough – our spatial development strategy

Policy Box S2: Borough Wide Strategy: Housing is needed, but the housing figure of 13,860 produced in the Strategic Housing Market Assessment (SHMA) is too high. The SHMA has been shown in several authoritative reports to be flawed and unsound. It has not been objectively assessed using consistent data, or scrutinised for flaws and double counting. It has not been produced in a transparent form with openness about the data used by the Guildford Borough SHMA consultant, G L Hearn, and sub-consultants used. It needs separate reports for issues in the SHMA which are relevant for Guildford only, such as the large number of international students attending the University of Surrey. The housing figure needs to be based on sound evidence. Constraints need to be applied which are appropriate for Guildford.
Para. 4.1.5: It is written in this paragraph: “Our development strategy for the plan period is based on national planning policy, with recognition of environmental constraints and the availability and viability of land for development.”

However, environmental constraints have not been applied as given in NPPF para.14 and footnote 9 as follows: “…sites protected under the Birds and Habitats Directives and/or designated as Sites of Special Scientific Interest; land designated as Green Belt, Local Green Space, an Area of assets; and locations at risk of flooding or coastal erosion”.

The housing figure has not been adjusted to allow for constraints. Indeed avoidance of development on areas prone to flooding, for example, has meant instead more housing in the Green Belt, which is in itself a constraint.

The Minister of State, Brandon Lewis has stated: “We have repeatedly made clear that demand for housing alone will not change Green Belt boundaries.”

Guildford is a congested gap town with steep hills rising up on either side and surrounded on three sides by AONB and Green Belt. Its many villages are served by narrow country lanes. Traffic is a serious environmental constraint for Guildford because of its topography, setting and heritage. Expensive infrastructure to widen the A3 will bring further environmental impacts such as noise and over the plan period yet more traffic to cope with the extra 13,860 houses. Narrow lanes cannot be widened without demolishing homes, destroying landscape and the character of village settings.

Constraints should be properly applied to lower the housing figure.

Para. 4.1.6: An over-abundance of retail on land which could be developed with housing is being proposed, in spite of the decline in retail and its uncertain future. Some housing is needed in villages, but policies which in effect allow unlimited growth are destructive to the Green Belt and to the character of villages.

Para. 4.1.7: Wording is needed in this paragraph and in the Local Plan to ensure that Rural Exception housing is for those with a connection to the village who need affordable housing.

Para. 4.1.8 Constraints should be taken into account in this paragraph.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** SQLP16/1726  **Respondent:** 8585601 / Jennie Kyte  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

**Predetermination of the Draft Local Plan 2016**

Before the first Draft Local Plan was produced the Leader of the Council and the Executive Member in charge of the Local Plan talked about their aim “to roll back the Green Belt.”
Residents objected, but this continued to be strongly promoted and consequently NPPF policies were misinterpreted to allow this to be achieved, and evidence such as the **Strategic Housing Market Assessment (SHMA)**, on which the whole Plan was based and in which a high housing need figure (OAN) was needed to “roll back the Green Belt” was not scrutinised or transparent.

Meanwhile, the **Green Belt and Countryside Study (GB&CS)** was based on a traffic light system and updated with a sensitivity map, which has no connection with NPPF policies, and was produced to value the Green Belt, and justify and enable it to be built upon. It ignores the five purposes of the Green Belt given in the National Planning Policy Framework (NPPF) para. 80 and the Green Belt as a constraint in the NPPF para. 14, footnote 9.

The spirit and meaning of the term ‘Exceptional Circumstances’ has subsequently been misinterpreted and weakened to allow wholesale Green Belt boundary changes. It has been applied in a way which was not intended and ignores the principle of permanence of the Green Belt. NPPF para.79 states that “the fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence.”

Normally during the Local Plan process the Green Belt can only be changed in ‘Exceptional Circumstances’. (Under the last Plan process one piece of land was released under Exceptional Circumstances with conditions attached.) The Minister of State, Brandon Lewis, has stated: “The Framework makes it clear that inappropriate development may be allowed only where there are very special circumstances and that Green Belt boundaries should be adjusted only in exceptional circumstances through the Local Plan process and with the support of local people. We have repeatedly made clear that demand for housing alone will not change Green Belt boundaries.”

Other ways of providing housing, such as brown field sites were not pursued with any vigour, while those who were consulted and sent in 20,000 responses to the Regulation 18 (2014) consultation were ignored. Furthermore, constraints applied to lower the flawed OAN number, as is allowed, were promised, but have not been applied.

Elections 2015 intervened in the Local Plan process and councillors across Guildford Borough promised in their election leaflets to protect the Green Belt. It seemed that the Green Belt was going to be protected after all and voters voted accordingly. But after the election, the very early political decision to “roll back the Green Belt” was renewed and pursued with the same determination.

**The Draft Local Plan was predetermined and is unsound.**

**The Strategic Housing Market Assessment (SHMA)**

The Strategic Housing Market Assessment (SHMA) has been shown in several authoritative reports to be flawed and **unsound**. It has not been objectively assessed using consistent data, or scrutinised for flaws and double counting. It has not been produced in a transparent form with openness about the data used by the Guildford Borough SHMA consultant, G L Hearn, and sub-consultants used. It needs separate reports or sections for issues in the SHMA which are relevant for Guildford only and which could distort the SHMA findings.

- **Transport Evidence**

Residents’ concerns about the huge increase in traffic have been ignored and Transport Evidence was produced during the consultation period, too late for scrutiny or review, or for decisions based on evidence to be included in the Draft Local Plan. This is **unsound** practice.

- **Consultation: Draft Local Plan 2016**

Significant changes have taken place after the Regulation 18 consultation with new developments in the Green Belt being proposed in the Draft Local Plan 2016 without public consultation. This is **unsound**.

- **Special Protection Area (SPA)**

The Special Protection Area (SPA) policy has been misinterpreted by turning existing open spaces into SANGs, instead of providing new open spaces. (This risks land chosen as SANGs in long-established Areas of Outstanding Natural Beauty
AONBs) often at impractical distances from the SPA it is protecting, being harmed by an excess of added infrastructure, contrary to one of the prime purposes of conserving the natural beauty of AONBs.)

- **Sustainability Appraisal June 2016**

There is no proper balance in the Sustainability Appraisal June 2016 between economic, environmental and social issues. Throughout the Appraisal it is written that the Council is confident that it can mitigate damage to landscape, but no details are given as to how it can mitigate damage to landscape, countryside and views with proposed developments totalling 13,860 dwellings, nor how it can mitigate the extra traffic congestion and noise of traffic.

The Appraisal’s statement on air quality para.10.71 “There are no designated air quality management areas within Guildford Borough and whilst there are recognised air quality issues at Guildford Town Centre and at Wisley, it is not possible to conclude that negative impacts will result from growth” is an inadequate statement to cover this plan period without further investigation.

Noise pollution which is a serious environmental problem for Guildford is not dealt with in this Sustainability Appraisal. The A3 with fast moving traffic goes through Guildford, cutting the town into two halves, causing whole swathes of residential areas across Guildford to suffer from traffic noise. Evidence is needed as to how this can be mitigated and what the impact of even greater amounts of traffic from the proposed developments, which may entail the widening of the A3, would be. The noise impact of increased traffic on rural areas also needs investigation.

In paragraph 10.11.10 of the Sustainability Appraisal (SA of the Guildford Borough Local Plan), it is written: “Given the extent to which landscape has been applied as a constraint and recognising that the baseline situation would be one whereby development will come forward in an unplanned way, it is appropriate to conclude significant positive effects.” In a baseline situation the Green Belt would be a significant constraint in itself. This is an illogical, erroneous and **unsound** conclusion.

In para. 10.19.2, it specifically states that it is “Not possible to conclude whether or not the Draft Plan is sustainable.” The specific recommendations which follow this statement have no real significance.

- **Retail Assessment**

The Retail Assessment is weak, and based on flawed and dated concepts. It is apparent that shops are closing and online shopping is growing in popularity, while town centre shopping is decreasing.

The Assessment needs reviewing for **soundness** and whether the land in the proposed North St development area would now be better used to regenerate the town centre with mainly housing which would bring vibrancy to the town and contribute towards rather than compete with the High St. (For 30 years North St has been run down and from time to time sold or offered to a developer, but no developer has yet snapped up the opportunity to develop this area with retail, which makes one question whether retail is actually needed or would be viable, particularly in these changing times).

- **Safeguarding future options**

Land needs to be reserved for an A3 tunnel entrance and for a bridge over the railway and river in order to secure these options for the future. It is **unsound** practice to close down options with such huge potential benefits for Guildford.

- **Bus station/exchange**

A bus station needed for a transport shift to sustainable travel has not been included in the Plan rendering its sustainable transport policy **unsound**.

- **Green Belt Policy P2**
The Green Belt policy P2 of insetting villages needs to be transparent and justified. The evidence in the Green Belt and Countryside Study (GB&CS) appears weak. This should be reviewed to ensure the Plan is sound.

**BREXIT**

BREXIT is now an important consideration, but any adjustment made for it, must not be allowed to disguise the underlying flaws in the SHMA. Account needs to be taken of BREXIT for soundness.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** SQLP16/1727  **Respondent:** 8585601 / Jennie Kyte  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 4: Duty to cooperate

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Under the Duty to Cooperate policy the area under consideration has narrowed and the wider area has been overlooked. The Green Belt is also the Metropolitan Green Belt and is of great importance as an amenity which serves London.

London in effect reaches to Leatherhead and without the principle of permanence of the Green Belt being adhered to, the city will spread and urbanise the protected ring of countryside surrounding it, engulfing Guildford and its villages in the process.

The Mayor of London, Sadiq Khan, stated on 22 June 2016:

“I am determined to oppose building on the Green Belt, which is now even more important than when it was created.”

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** pslp172/4188  **Respondent:** 8585601 / Jennie Kyte  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy A12

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
POLICY A12: Bright Hill Car Park, Sydenham Rd, Guildford

While the retention of the view of the cathedral is to be retained, I object to the loss of the important view from Bright Hill of the historic Area of Outstanding Natural Beauty (AONB) over the Hogs Back. The number of houses to be built on this site has been reduced from 60 to 40. This reduction should allow the two important views from Bright Hill of (1) Guildford Cathedral and (2) the historic Area of Outstanding Natural Beauty (AONB) over the Hogs Back to be preserved. Bright Hill is used by many residents as a walking route to the Town Centre and these views are an established part of the walk. The uplifting experience of the walk encourages residents to master the steep hill and walk rather than drive into town.

There is a lack of open space within the town and the magnificent country view in this town walk is a way of bringing the countryside into the town.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/4189  Respondent: 8585601 / Jennie Kyte  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A25

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY A25: Gosden Hill Farm, Merrow Lane, Guildford

The number of houses has been reduced from 2000 to 1,700 for this plan period, but the same amount of land has been allocated and further development is indicated. This is a very large development which will impact on local roads in Burpham where traffic is heavy during peak hours. The roads were not built to carry heavy volumes of traffic.

I object to this development for the reason above and for the reason set out in my submission to the 2016 Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/4190  Respondent: 8585601 / Jennie Kyte  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
POLICY A26: Blackwell Farm

I object to this development. The number of houses has been reduced by 300 for this plan period, but the same amount of land has been allocated and further development is indicated. A sixth form secondary school is now proposed and this will increase peak hour traffic on already over-full roads. The addition of a school is a circular argument. Without the development the school would not be needed on Blackwell Farm and school places for the wider area could be provided within existing schools or on urban sites within Guildford.

An independent study shows that a part of Blackwell Farm site is equivalent in status to an Area of Outstanding Natural Beauty and may well be upgraded after Natural England’s boundary review has taken place.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

POLICY A35: Former Wisley Airfield, Ockham

The description of the Wisley site, which is in the Green Belt, has been changed from “Land at former Wisley airfield, Ockham” to ‘Former Wisley airfield, Ockham’. This is misleading. The airfield only takes up a small fraction of the site. Much of the site is agricultural.

Beginning with land at the former Wisley airfield there will be continuous development from the M25 along the A3 to Guildford. Prime reasons for the Green Belt are its openness and to prevent urban sprawl, and yet these reasons are being ignored in the Local Plan, even though the Green Belt is land which is given protection from development in the NPPF.

I object to the change in name of “Land at former Wisley airfield, Ockham” to “Former Wisley Airfield, Ockham”, for the above reasons.

I object to: Requirements: Infrastructure (3)(d) Mitigating Highways Performance Issues. This opens the way to damaging rural roads and lanes, and the character and landscape which they provide. The straightening and widening of such roads and lanes would leave this area bereft of countryside and village character.

As stated in my original submission to the 2016 Local Plan consultation, I object to this development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: pslp171/2460  Respondent: 8585601 / Jennie Kyte  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy D2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY D2: Sustainable design, construction and energy

4.5.30 I object to the addition of the words: “New buildings, except retail developments in Guildford Town Centre must achieve a reasonable reduction in carbon emissions through the provision of appropriate low and zero carbon technologies in the locality of the development.”

It will not be possible to meet carbon reduction targets, if such exceptions are made. The proposed retail development in North St with housing above should install low carbon technology, such as Combined Heat and Power (CHP).

4.5.37a The retail development in North St is not just a retail development but also a housing development. The carbon emission reduction requirement should be applied to this site. If this is not viable, the development should not go ahead.

I object to the weakening of the carbon emission reduction requirement in para. 4.5.37a

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/2461  Respondent: 8585601 / Jennie Kyte  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY D3: Historic environment

4.5.42 The addition of the words: “Historic landscapes are also undesignated heritage assets and their local distinctiveness can be considered through the Guildford and Surrey Landscape Character Assessments.” is welcomed.

I support the above

4.5.42a The added paragraph is welcomed.

4.5.43 The addition of the word ‘must’ is welcomed.

I support the two paragraphs above

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Attached documents:

Comment ID: pslp171/2462  Respondent: 8585601 / Jennie Kyte  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy D4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY D4 : Character and design of new development

Introduction

4.5.45a This added paragraph is welcomed.

POLICY D4 is welcomed as applying to all new development

I support Policy D4 and paragraph 4.5.45a

4.5.49a, 1st sentence

It is written: “We will expect development to respond to local character and history reflecting the identity of its context whilst allowing for innovative and forward thinking design.” The addition of the words ‘where appropriate’ at the end of this sentence would allow more flexibility. Whereas an innovative modern design can be a wonderful addition, it can also be a disaster in the wrong place. Modern designs which quickly deteriorate need to be avoided.

I object to the lack of flexibility in the sentence above

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/2456  Respondent: 8585601 / Jennie Kyte  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy E4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
POLICY E4: Surrey Research Park

4.4.41 Surrey Research Park is built with low density and has not made efficient use of land.

I object to this development

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/2457  Respondent: 8585601 / Jennie Kyte  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy E6

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY E6: The leisure and visitor centre

4.4.54 The Yvonne Arnaud and G.Live have been added to this paragraph as entertainment and cultural facilities. The Electric Theatre, a town centre theatre in a historic building, should also be added.

I support the addition of the Yvonne Arnaud theatre and GLive, but object to the omission of the Electric Theatre.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/2458  Respondent: 8585601 / Jennie Kyte  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy E7

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
**POLICY E7 Box  Guildford Town Centre**

(a) The large amount of retail has been reduced by a comparatively small amount of 9% to 41,000 sq.m. Evidence as to the need for this amount of retail needs analysing carefully and the data used checked, particularly as retail is being adversely affected by the fast moving and increasing trend for online shopping. Consequently reports by consultants can be out of date.

I object to Policy E7 as further analysis on retail is needed

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<thead>
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<th>Comment ID:</th>
<th>pslp171/2453</th>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

<table>
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<th>POLICY H1 Box:</th>
<th>Homes for all</th>
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<td>(2) Density</td>
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The deleted paragraph regarding density should be re-instated. Density should be flexible and defined by Local Authorities who know the density which is suitable in a particular area taking into account local character and distinctiveness.

I object to the paragraph regarding density being deleted in Policy H1

**Student Accommodation**

(5) 2nd sentence: The word ‘about’ weakens this sentence and makes it less likely that 60% of eligible students will be provided with accommodation on campus. A larger requirement for 80% student accommodation on the University of Surrey campus would free up more homes for families which are at present occupied by students. The campus is also taken up with large areas of surface car parks, land which could be used more efficiently.

I object to the word ‘about’ and the lack of a stronger policy regarding student accommodation provided on campus in Policy H1 (5)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID:</th>
<th>pslp171/2454</th>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY H3 Box: Rural Exception homes

(1)(c) The original wording: “the homes are all secured as affordable homes in perpetuity” is clearer than the revised wording “affordable homes are all secured in perpetuity”.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/2463  Respondent: 8585601 / Jennie Kyte  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy ID2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY 2DI: Infrastructure and delivery

4.6.18 I object to the A3 tunnel option being deleted. The A3 cuts Guildford into two halves despoiling its attractiveness as a scenic heritage town, and causing noise pollution from very heavy traffic which impacts upon swathes of residential areas, lowering the quality of life for many residents. The Government says it wants to spend on infrastructure; Guildford should begin to lobby for a tunnel with a widened A3 for future generations. Tunnels are a way of life for other European countries, even though they are less crowded and have more space. Even junctions are built underground.

Land should be safeguarded to allow for tunnel entrances.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/2464  Respondent: 8585601 / Jennie Kyte  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy ID4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
POLICY ID4: Green and blue infrastructure

Blue infrastructure 4.6.40, 2nd sentence

I object to the deletion of the words: “having natural river banks as habitat”

Natural river banks not only enhance the habitat, but the landscape of the river. Hard concreted river banks destroy the natural appearance of rivers. Banks, in particular, raised above the level of the river are unnatural alongside a narrow river, such as the River Wey. Natural river banks are a way of bringing natural open space into towns and the countryside appearance of the River Way as it passes through the town has always been a feature of Guildford, contrasted by the Town Wharf and Bedford Wharf areas with the cinema and Electric Theatre.

4.6.45, 3rd sentence

The addition of this sentence is welcome. It is important that Areas of Outstanding Natural Beauty used as SANGS should keep their natural beauty (the reason why they were designated as AONBs) and not be urbanised by man-made structures and additions.

Paragraph (4.6.45) would benefit from being worded more strongly to protect AONB land used as SANGS from urbanization and unnecessary car parks, which spoil their natural beauty.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/2455  Respondent: 8585601 / Jennie Kyte  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy P1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY P1 Box: Surrey Hills of Outstanding Natural Beauty and Area of Great Landscape Value

The addition of the words: “and Area of Great Landscape Value” is welcomed.

(3) It is written “High priority will be given to the conservation and enhancement of the natural beauty of the AONB and development proposals must have regard to its setting.”

The words ‘and views into and out of the AONB should be protected’ should be added to this sentence.

It has been a long established policy to protect views into and out of the AONB. In Policy RE5 Area of Outstanding Natural Beauty of the 2003 Local Plan, it was written that: “Important views to and from the Area of Outstanding Natural Beauty should be retained.”

This was further emphasized in para.10.25 with the words: “Development should not result in the loss of important views to and from the AONB.”
G5 Design Code in the 2003 Local Plan strongly protected established views.

Guildford is made up of hills and views, and views into and out of the AONB is one of the foremost reasons why Guildford is so attractive. Such views are important for the quality of life of residents and for tourists visiting Guildford.

I support the sentence in P1 (3) above, but object to the omission of the words ‘views into and out of the AONB’.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/2452  Respondent: 8585601 / Jennie Kyte  Agent: 8585601

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY S1: Presumption in favour of sustainable development

Introduction

4.1.1 The following words have been added:

“…..unless any adverse impacts of doing so would significantly outweigh the benefits or specific policies in the NPPF suggest that development should be restricted.”

The word ‘suggest’ is an interpretation of the NPPF. The word ‘indicate’ is used in the NPPF (14) and in this context it is stronger than the word ‘suggest’.

I support the addition of this sentence, but object to the word ‘suggest’.

Reasoned Justification

4.1.4 While it is welcome that protected sites listed in the NPPF are acknowledged, the word ‘automatically’ in the added sentence: "In accordance with the NPPF the presumption will not automatically apply to policies relating to sites protected under the Birds and Habitats Directives and/or designated as Sites of Special Scientific Interest (SSSIs,) land designated as Green Belt, Local Green Space, the Surrey Hills Area of Outstanding Natural Beauty, designated heritage assets and locations identified as at risk of floods” weakens the sentence and the protection given to these protected sites. It implies that the presumption policy applies, but not automatically. It should be that the presumption does not apply to restricted areas except in exceptional circumstances.

Sites listed in the NPPF where development should be restricted should be listed in Policy S1 box.

The Area of Great Landscape Value should also be listed as restricted in Policy S1 box.
I support the sentence in 4.1.4 above, but object to the word ‘automatically’.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/2451  Respondent: 8585601 / Jennie Kyte  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

3.1 SPATIAL VISION

3rd para

The reduction in housing units for this plan period still necessitates three large developments to be built on the Green Belt, plus an increase to 2,000 houses within and around villages, some now inset from the Green Belt, based on a housing figure using flawed data.

The huge increase in traffic that will be caused by these developments on main roads which have reached full capacity and on local roads and lanes not built for heavy traffic, has been acknowledged, but the infrastructure solutions proposed in the Local Plan 2016 will not be sufficient to prevent congestion at peak periods. (SCC Traffic model – SHAR 2031 traffic forecast).

I object to the housing figure in the Local Plan for the above reasons

8th para, 2nd sentence

The large amount of retail has been reduced by a comparatively small amount of 9% to 41,000 sq.m. with some extra housing units added. Evidence as to the need for this amount of retail needs analysing carefully and the data used checked, particularly as retail is being adversely affected by the fast moving and increasing trend for online shopping. Consequently reports by consultants can be out of date.

Instead the Town Centre could be regenerated with housing, which would bring vibrancy to the town, stimulating Guildford’s economy by supporting leisure and eating places, and also the shops in the High St, the primary shopping street, along with its connecting passages.

I object to the over-large amount of retail proposed for the reasons above.

9th para

It is written that: “The transport strategy and Local Plan policies will be aligned to encourage residents, employees and visitors to use alternative modes of transport especially through the town.”

It has been found that residents living in the town, 23% (GTAMS March 2015), were the largest group crossing the town, (ie from residential areas to hospitals, clinics, schools, after school activities, evening classes, leisure centre, sports grounds, University of Surrey, Surrey Research Park, cathedral, churches, colleges, out of town shopping, supermarkets, offices, railway stations, parks and so on.) It needs to be outlined whether public transport can be provided for residents and
how they can be persuaded to use it. Some residential areas do not have a bus service and others have an infrequent service. (Buses are also an extra expense for those who own cars.)

I object to the loss of a central bus station, which gives the option of crossing town by changing buses.

A round town ‘Hop on, Hop off’ bus travelling to all sides of the town centre, stopping at the railway and bus station, would make all parts of the town centre more accessible. Such a bus would benefit residents, visitors and shops.

For the reasons above and to be taken in conjunction with my response to the 2016 Local Plan consultation, I object to the Spatial Vision.

POLICY S2 Box: Planning for the borough – our spatial development strategy

(1) The data used by G L Hearn Consultants to produce the 2017 Objectively Assessed Need (OAN) figure in the West Surrey Strategic Housing Market Assessment (SHMA) has not taken into account the report by Neil McDonald, an independent expert, which shows that the majority of students of the University of Surrey do not stay and live in Guildford, and do not raise families in Guildford, but move elsewhere to live.

The latest OAN figure written in the 2017 Local Plan is based on unsound data.

The revised figure does not apply constraints to the lower the housing number. Applying constraints to individual sites, means that if one site is restricted for flood reasons, etc, to fulfil the housing number, housing to replace it may be built in another restricted area such as the Green Belt, which is no longer being protected under Exceptional Circumstances from development.

See comment under Spatial Vision 8th para, 2nd sentence regarding retail expansion in the town centre.

I object to Policy S2 for the reasons above

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
**Comment ID:** PSLPS16/3061  **Respondent:** 8585697 / Laurence Edwards  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A22

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

Land north of Keens Lane – 140 homes and a care home with approximately 60 beds OBJECT as there is a current lack of infrastructure, including waste water infrastructure, to support development on this site. The narrow road cannot be widened due to the house called “Timbers” (of local heritage interest). Impact on the Grade II listed building called “Pitch Place House”. Proximity to Whitmoor Common SPA/SSSI. Bats, owls, moths. I object to the proposed relocation of the urban boundary at this point.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** PSLPS16/3062  **Respondent:** 8585697 / Laurence Edwards  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

Blackwell Farm, Hogs Back – Mixed use 1,800 homes, 6 Traveller pitches, employment, Local Centre, school etc. OBJECT the majority of this land should be designated AONB

- Most of Blackwell Farm and the land in its vicinity is of a landscape and scenic quality, character and condition that should merit inclusion within a revised AONB boundary.
- The landscape is critical to the setting of the Hog’s Back ridge and in the conservation of rural views to the north of equal, if not greater importance, than land to the west of Down Place, which has been included in the boundary proposed by the Surrey Hills AONB Board.
- the existing AONB and the loss of landscape which is of a character and quality which merits inclusion within a revised AONB boundary.

Lack of infrastructure and increased surface water run-off would affect Wood Street Village (particularly Pound Lane/Baird Drive) and Fairlands. The proposed accesses from the A31 and Gill Avenue would be inadequate to support such a development. Indeed access onto the A31 would be in the AONB. In addition there would be an adverse impact on the following Ancient Woodland, Strawberry Grove, Dean Bottom, Manor Copse and a strip of Ancient woodland at Wildfield Copse. The Infrastructure Study para 3.10 states there is insufficient waste water infrastructure for this site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** PSLPP16/6623  **Respondent:** 8585697 / Laurence Edwards  **Agent:**
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Infrastructure and Delivery OBJECT unless the following amendments are made:

1st paragraph Delete – “and available when 1st needed to serve the occupants and users of the development” and replace with “prior to the development being first occupied.”

3rd paragraph – 2nd line – delete the word “most”.

Comment – The Infrastructure schedule is not adequate to deliver the appropriate level of mitigation and infrastructure improvement needed to support the level of proposed development contained within the Local Plan

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6614  Respondent: 8585697 / Laurence Edwards  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Locally to Worplesdon the following infrastructure improvements would be required:

• Pedestrian facilities to meet proposed development, including a pedestrian crossing on the A323 near Hunts Farm.

• Improved cycling facilities throughout the parish and improved junctions to have the capacity to cater for existing and future traffic levels.

• I support the upgrade of the pedestrian bridge between the railway station and the town to fully integrate the station with the town

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6615  Respondent: 8585697 / Laurence Edwards  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID4
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )  

Answer (if comment is on questions 1-7 of the questionnaire): () 

The inclusion of Russell Place Farm as a SANG in the Local Plan on page 296, in my opinion amounts to pre-determination of planning application no: 13/P/01453, which has not yet been decided by the Borough Council despite the application being submitted almost three years ago.  

A site visit was undertaken on 16 June 2016 after the s19 public consultation period has commenced.  

With respect to all Traveller pitches I would expect DCLG Planning Policy for Traveller Sites August 2015 to apply.  

The inset map for Wood Street Village is incorrect as it does not show the common land on Oak Hill.  

What changes (2016)/further amendments (2017) do you suggest should be made to the document?  

Attached documents:

Comment ID: PSLPP16/6621  
Respondent: 8585697 / Laurence Edwards  
Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2  

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )  

Answer (if comment is on questions 1-7 of the questionnaire): () 

Green Belt and Limited Infilling The coalescence between the urban area of Guildford and the surrounding villages and also Guildford with the surrounding boroughs should be strenuously resisted. This policy should be expanded as per paragraph 80 of the NPPF  

What changes (2016)/further amendments (2017) do you suggest should be made to the document?  

Attached documents:

Comment ID: PSLPP16/6622  
Respondent: 8585697 / Laurence Edwards  
Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4  

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )  

Answer (if comment is on questions 1-7 of the questionnaire): ()
Flood Risk and Water source protection Whilst requested by the Worplesdon Flood Forum, Wood Street Village has not been included within the Guildford Surface Water Management Plan. Development at Blackwell Farm is likely to increase the risk of surface water flooding at Wood Street Village and Fairlands.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Improved sewage works, enhanced transport infrastructure and improved air quality are a prerequisite to any future development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/6620</th>
<th>Respondent: 8585697 / Laurence Edwards</th>
<th>Agent:</th>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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</table>

Planning for the Borough – Our Spatial Development Strategy OBJECT to the proposed SHMA figures – which have been challenged in “A Review of the West Surrey SHMA as it relate to the Objectively Assessed Housing Needs of Guildford” by Neil McDonald. In the dwelling stock estimates by local authority district: 2001 – 2015 (DCLG) the amount of new houses in Guildford has increased on average 250 per year far shorter than the figures contained in this document.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPA16/4229</th>
<th>Respondent: 8585921 / Hampshire County Council (Pete Errington)</th>
<th>Agent:</th>
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<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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</table>
Hampshire County Council welcomes the opportunity to comment on the draft Guildford Borough Council Local Plan and supporting documentation. As an adjoining Highway Authority the County Council wishes to comment on the transport implications arising out of the Local Plan Strategy as set out in the Transport Evidence Base; comprising of both the Guildford Borough Transport Strategy 2016 (Guildford Borough Council, June 2016) and the Strategic Highway Assessment Report (Surrey County Council, June 2016).

The Strategic Highway Assessment report acknowledges that it is likely that a reasonable proportion of traffic will travel into the neighbouring borough of Rushmoor. The potential developments set out in the Local Plan have been modelled using Surrey County Council’s Strategic Transport Model SINTRAM. The modelling results show that the potential developments could lead to an increase in traffic on roads leading into Hampshire’s road network via links such as the A31, A323 and A3011.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

<table>
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<th>Comment ID:</th>
<th>PSLPP16/17260</th>
<th>Respondent:</th>
<th>8585921</th>
<th>Hampshire County Council (Pete Errington)</th>
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It is noted that Policy 13 of the Local Plan (Guildford, 2016) places a requirement on any new developments ‘to demonstrate adequate provision to mitigate the likely impacts, including cumulative impacts, of the proposal on both the safe operation and the performance of the Local Road Network and Strategic Road Network’. Hampshire County Council, as a neighbouring Highway Authority would like the to see the wider area incorporated, to include the cross-borough boundary areas such as Hampshire’s road network, within this requirement.

The County Council would expect to be consulted on any future planning applications as and when it is lodged in relation to the developments in Ash and Tongham, in order to identify the potential impact on Hampshire’s Road Network. In addition, it is requested that Hampshire County Council be involved in any discussions aimed at addressing the impacts of any such development.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

<table>
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<tr>
<th>Comment ID:</th>
<th>PSLPS16/3188</th>
<th>Respondent:</th>
<th>8586017</th>
<th>Leslie Brown</th>
<th>Agent:</th>
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<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy A42</td>
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<td><strong>Do you consider this section of the document; complies with the Duty to Cooperate?</strong></td>
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</table>
I object to this development because of the additional traffic from that development coupled with the traffic from the new marina with 80 berths which you have agreed further down Tannery Lane which is mainly a single lane with passing places. This additional traffic will be unable safely to join the much overused main road through Send. This road is the main through road from Woking to the A3 and M2S which is already used to capacity by general traffic including articulated trucks both local and European plus all manner of other heavy vehicles for which the road was never designed. There is also an increasing number of cyclists who are more at risk without a cycle lane for which there is no room and who slow the traffic down because they are difficult to pass. Additional traffic joining from Tannery Lane would have great difficulty and any attempt to ease the problem with a roundabout or traffic lights would simply exacerbate the situation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<tr>
<th>Comment ID: PSLPS16/3189</th>
<th>Respondent: 8586017 / Leslie Brown</th>
<th>Agent:</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43</td>
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<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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</table>

I object to this proposal because the number of homes proposed would add to local traffic congestion which is already excessive at peak travel periods. This site is also located underneath one or more pylons carrying power cables which constitute a health hazard for anyone and especially children living in such close proximity to them.

I also object to the location of any form of industrial activity which would increase traffic movements in that area leading to even greater traffic congestion. If additional industrial space is needed the ideal location is Slyfield which has the space to cater for it and where there is a symbiotic relationship between the various activities on such a site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<tr>
<th>Comment ID: PSLPS16/3190</th>
<th>Respondent: 8586017 / Leslie Brown</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a</td>
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<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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</table>
I object to this proposal because it would do nothing to ease the density of traffic on a road which already suffers from long tailbacks at peak times.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/2982  Respondent: 8586017 / Leslie Brown  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A44

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

**Policy A44: Land west of Send Hill (page 225)**

I have already written to you with my objection to the two traveller pitches proposed for the above location and now enclose a recent press report concerning travellers' visits to sites in the Guildford area. This is only one of many such reports of similar events in Ripley and elsewhere in the country but this is ample evidence of the reason why people react to any mention of travellers and the prospect of their being located in any residential area.

Please bring this to the notice of the Inspector.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents: LP2016- Leslie Brown.pdf (147 KB)

Comment ID: PSLPS16/3191  Respondent: 8586017 / Leslie Brown  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A44

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the inclusion of two travellers pitches on this site which would be in contravention of your own stated policy of having a ratio of two such pitches for every 500 houses. It is possible that the widening of the Send Hill road would encroach on the area of the site thus reducing its capacity for 40 houses assuming it could even accommodate as many as that which is doubtful. In any event two pitches among so few houses would certainly have a negative effect on the value of any houses built there and would certainly not secure the best return on the tax payers investment in the land.

Send Hill is certainly not a suitable location for travellers anyway access being difficult from the traffic lights especially with cars parked on one side opposite the school and on the brow of the hill making the approach quite hazardous. What evidence is there that travellers are keen to be located among houses to enable them to integrate with the community.
On the other hand a small development without traveller pitches and in keeping with the surrounding properties could be a possibility.

Traveller issues have arisen in Send several times over the years and Send residents and our Parish Council have expressed their views many times to you the Guildford Borough Council and I find it very disappointing that you do not seem to heed our views and now again insist on trying to locate two pitches in a most unsuitable location. [Response has been redacted due to statements being considered contrary to the Council’s duty under the Equalities Act 2010 to eliminate discrimination, harassment, victimisation against persons with a protected characteristic; and to foster good relations between persons with a protected characteristic and persons who do not share it]

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/6956  Respondent: 8586017 / Leslie Brown  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the Green Belt realignment which will take Send outside the settlement boundary when there are still brownfield sites available for development in urban areas which will have much less impact on local environment and infrastructure. It has never been made clear, to me at least, who this additional housing is for in an area which is primarily residential and not industrialised.

The number of homes proposed for Send (693p.a.) is completely disproportionate in the context of a village like Send. The extensive development proposed for Send and elsewhere in this locality such as Garlick’s Arch, Gosden Hill and Wisley Airfield means that, in effect, it will become a ribbon development from Guildford almost as far as Cobham and transform a pleasant rural area into suburbia.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/6962  Respondent: 8586017 / Leslie Brown  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
General observations

When I have attended Council meetings at Millmead on particular issues of concern to me, I have always been impressed by the quality of debate and general conduct of the meeting. The publications distributed about developments and activities in Guildford are also very positive and well received but despite this I regret to say that I do not have the complete confidence and faith in you, the Council, that I think I should. Nor do I have the feeling that you are on the same wave length in these matters as most of the people you represent. This probably stems from the way these planning issues are perceived. I well understand the complexities involved which in the main are dealt with very well but there is still some element that is missing. For example

1. There is no explanation of why so much housing capacity is required in this area and who it is for.
2. There are no artist's impressions of how a development might look or any idea given of what an "affordable house" looks like.
3. What is a traveller's pitch?
4. Are there any conditions attached to the allocation of travellers pitches?
5. How are they to be managed?
6. Residents should feel confident that the Council representing them properly reflect the feelings of the public.
7. The villages in Surrey are a huge asset which development on the scale proposed in this local plan will change them into small townships many of which will be linked with ribbon development thus changing the character of the area for ever.

I am sorry if this sounds very negative but perhaps there is some value for you to know how someone feels about things.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/2896  Respondent: 8586017 / Leslie Brown  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A42

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY A42 Pages 241-2

I object to the proposed increase of a further 16 houses on the Clockbarn Nursery site. Traffic movements from that site coupled with traffic accessing the Marina development and then trying to join Send Road would cause considerable problems for residents and through traffic alike. Send Road is already used to capacity by traffic heading to and from Junction 10 on the M25 and was never intended to be used by today's very large articulated trucks. The essential traffic islands to enable pedestrians to cross represent an additional hazard plus the increasing number of cyclists exposed to rising levels of exhaust pollution.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/2897  Respondent: 8586017 / Leslie Brown  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A43
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY A43 Pages243-5
I object to the proposed changes to this site which in combination would generate - considerable activity in a most unsuitable location. Show people pitches implies large vehicle traffic movements and a further extension to the commercial premises that have already been added on that side of the road all of which is located in close proximity to the surrounding residential area. In any case the proposed Show people sites contravenes your own guidelines of two pitches on developments of 500 to 1999 houses.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/2898  Respondent: 8586017 / Leslie Brown  Agent:

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy A58

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY A58
I object to this proposal which is not defined and therefore open to interpretation. Any development of that type and on that scale will again impact the road infrastructure on the edge of two villages, Send and Ripley. In any case the need for them is unclear especially when there seems to be spare capacity at Slyfield industrial estate which is much more appropriate.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp17q/248  Respondent: 8586017 / Leslie Brown  Agent:

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Question 6: Any other comments?

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
GENERAL OBSERVATIONS

Whilst so much of what the Council does on behalf of the community is taken for granted, probably with very little expression of gratitude, I personally am much more critical of the Local Plan proposals. We in Send have expressed our views over the years but clearly no attention is paid to them as evidenced by the fact that despite everything that has been said even more houses are proposed to be built in Send than before plus an additional eight Show people pitches.

The opening paragraph to the local plan states "Our Proposed Submission Local Plan balances the needs of residents, businesses and visitors with protecting the borough's most important countryside, landscapes and heritage. It addresses housing, employment, retail and leisure requirements, supported by suitable infrastructure including education, healthcare and transport. The new Local Plan will be in place until 2034."

Furthermore there are signs at various points proclaiming "The Surrey Hills an area of Outstanding Natural Beauty." Yet despite this the Local Plan will considerably increase traffic volumes, transform existing villages into small towns, reduce the benefit of the Green Belt, result in undesirable ribbon development and increase demand for education and health services which are already trying to cope. The scale of the plan is such that it will inevitably diminish these claims. I regret to say that I remain disappointed in the Council's objectives and total disregard of public opinion which have consistently been expressed at meetings and in letters of objection by residents deeply concerned with their environment and way of life. I would like to feel that GBC are more in tune with those they represent but I am sorry to say I do not.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: PSLPA16/3753</th>
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<tr>
<td>I OBJECT to the proposed Infrastructure Schedule (Appendix C)</td>
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<tr>
<td>The Infrastructure Schedule sets out the key infrastructure requirements on which the delivery of the plan depends. For each of the Key Allocated Sites in the borough it identifies infrastructure projects that are required, except for Garlick’s Arch (A43) which is not mentioned. It is clear that the Plan takes no account of the infrastructure required for this site and is therefore not fit for purpose.</td>
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<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)

The Plan’s proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the borough, it is over double the previous figure of 322 used in previous plans. The SHMA report methodology is I believe inaccurate; it inflates the needs of the borough by distorted student numbers. However, it is based on commercially confidential modelling assumptions that cannot be checked or reviewed. There is no transparency to this evidence base and it is therefore impossible to assess its accuracy. This is not democratic and is not appropriate for consultation of the Plan.

The National Planning Policy Framework allows the overall housing target to be reduced to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/7083  Respondent: 8586369 / Mr Luigi Fort  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A25

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Gosden Hill development being in the Local Plan. The land in Gosden Hill does exactly what the Greenbelt was designed to achieve. It provides a green buffer between the Guildford Urban Area and West Clandon, gives Burpham a defined green boundary and breathing space and it hides Guildford town from visitors until they pass the off-slip to Burpham.

No exceptional circumstances have been demonstrated for building on this site and therefore it does not comply with paragraphs 87-89 of the NPPF. It stops the sprawl of Guildford town, assists in safeguarding the countryside from encroachment and assists in urban regeneration by encouraging the recycling of derelict and other urban land. All requirements of the NPPF.

The scale of Gosden Hill is out of proportion to West Clandon. It would have four times the amount of housing plus shops, offices/factories, GP surgery, schools. Development on this scale would blight a historic village with a history going back to the doomsday book and beyond.

Gosden Hill is the most obvious location for the north end of an A3 tunnel. It has rising ground and is situated just before the urban area. If it is built on, it will be very difficult to construct a tunnel.
The development will generate in the region of 6,000 vehicles which will pour on to the A3 which is stationary every day during rush hours. The linking of the A3100, B2215 and A247 would channel thousands of cars through the narrow, winding road through West Clandon, a road where large lorries mount the pavement virtually every day and through Send and Ripley which are also severely constrained.

The volume of traffic will greatly increase air pollution which is particularly critical given the proposal to build two schools.

Currently, a two way junction at the site would require vehicles wanting to go north on the A3 to go through Burpham which is grid-locked every day.

Burpham’s sewers are at capacity. Sewage would have to be pumped to Slyfield for processing, a project of enormous cost.

There is inadequate fresh water in Guildford and current supplies could not meet the needs of a development of this size.

Electricity supply is also inadequate and would require a big infrastructure development.

The railway station was rejected by Guildford Borough Council in 1984 because it feared Gosden Hill would become a dormitory estate for London.

The wording of the Local Plan with regard to Gosden Hill is so loose that the developer could virtually do whatever it wants.

The remaining agricultural land between Gosden Hill and West Clandon is so small that it is highly likely to be uneconomic and therefore a prime candidate for further development which would roll the Guildford Urban Area over West Clandon towards East Clandon and Wisley.

If the Strategic Sites are developed, the north of Guildford will deliver 36%, 5,036 houses towards the total of around 14,000. The infrastructures of the existing villages and the A3 will be overwhelmed by the scale of development.

A new on-slip at Burpham would only be 1.8km from the on-slip at Burnt Common which is against Highway England’s requirement of 2km.

Development of the A3 at best will not start until after 2020 and the building of a tunnel, which is only an “aspiration” in the Local Plan is likely to be many years after. In the meantime given that developers build houses to provide cash-flow for infrastructure, Gosden Hill will have a crippling effect on villages like West Clandon and the A3.

Gosden Hill already has surface water problems. Merrow Stream crosses the site. No hydrological survey has been carried out to assess the implications. Electricity pylons run through the centre of Gosden Hill which have health and safety issues.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/7084  Respondent: 8586369 / Mr Luigi Fort  Agent: 

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I OBJECT to the inclusion of the land at Garlick’s Arch, Send Marsh/Burnt Common and Ripley (A43)

Garlick’s Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8). There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).

The Plan states the preference is to making the best use of previously developed land. Yet at the 11th hour a perfectly acceptable brown field site at Burnt Common, capable of accommodating approximately 100 houses, was removed from the Plan and replaced with the Garlick’s Arch site. There was no proper consultation in relation to the inclusion of this site. Why was a brownfield site removed and replaced a Greenfield site? There is no evidence that Section 18 of the Planning and Compulsory Purchase Act 2004, which requires local planning authorities to produce a Statement of Community Involvement, has been complied with for this site. This only came to light for local residents following a Council meeting on 11th May 2016.

Moreover, Guildford Borough Council’s own Green Belt & Countryside Report does not address Garlick’s Arch at all, so there is no evidence base to support the inclusion of this site.

National Planning Policy promotes sustainable developments, with sustainable transport. With ever reducing bus services in the area and no train station within reasonable walking distance it is impossible for any development on this site to offer a sustainable transport solution. Development on this site is wholly inappropriate (Policy I3).

The stream, which runs through the site, is identified as having a high risk of flooding by the Environment Agency. There are other sites that do not flood that can be developed and therefore this site should be removed from the Plan (Policy P4).

This site is bordered by Ancient Woodland and within it a number of trees are protected by Tree Preservation Orders (Policy D3).

The site has an abundance of wildlife, some of which are protected. It is home to many types of owls and bats, with the woods having cuckoos and woodpeckers. In addition there are regular sightings of badgers, deer and red kites. The development of the site will result in the loss of habitat. No wildlife report has been conducted on the site. (Policy I4)

It is clear that with this site being added at the 11th hours no infrastructure planning has been undertaken. The Infrastructure Schedule makes no provision for any infrastructure improvements for this site. How will the local services such as schools and doctors cope, many of which are already at capacity? (Policy I1)

Furthermore, several electricity pylon runs through the site, which will have the potential to be a health hazard for any residents.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/7085  Respondent: 8586369 / Mr Luigi Fort  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I OBJECT to the inclusion of the land for new on/off ramps at Burnt Common (A43a)

The addition of north facing ramps to the A3 at Burnt Common would be a disaster for local communities. There is no requirement for local traffic to access the A3 to the north, but the addition will draw in a huge amount of ‘through’ traffic.

The route from London/M25 to Woking or would now be through Burnt Common and Send. Equally traffic from the east of Guildford (Merrow etc) and the A25 will now go through West Clandon and Burnt Common. This will cause immense damage to those areas on small roads which cannot be improved.

This Plan does not address the needs of local communities or the Borough in this regard. There has again been no Section 18 consultation on this.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15877  Respondent: 8586369 / Mr Luigi Fort  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the damage to the historic environment as a result of the scale of the proposed development (Policy D3)

I OBJECT to the local plan based on the impact it will have on the special countryside of the borough.

The proposed development at Garlick’s Arch (A43) will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15874  Respondent: 8586369 / Mr Luigi Fort  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I OBJECT to the sustainable employment policy (Policy E1)

If developed, the new employment site at Garlick’s Arch, Send Marsh/Burnt Common (A43), would be treated as a Strategic Employment Site.

The proposed development of up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8) at Garlick’s Arch (A43) is in the scheme of industrial development relatively small. Just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m. The Garlick’s Arch site which is in the Green Belt should not be developed as a Strategic Employment Site when there is a suitable alternative brownfield site very close by, which is far more sustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/15875  Respondent: 8586369 / Mr Luigi Fort  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the location for new employment floorspace at Garlick’s Arch – Site A43 (Policy E2)

Proposals for new industrial, warehousing and storage (use Class B1c, B2 and B8) floorspace will be directed to the Industrial Strategic Employment Sites.

There is no need for the new employment floorspace to be located at Garlick’s Arch, when just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/15876  Respondent: 8586369 / Mr Luigi Fort  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I OBJECT to the loss of rural employment (Policy E5)

Policy E5 supports the retention and development of local services and community facilities in our inset and identified villages. Yet the development at Garlick’s Arch (A43) would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises. The Plan does not promote rural employment; rather it will result in the loss of existing local rural businesses.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6451    Respondent: 8586369 / Mr Luigi Fort    Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E6

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY E6 - The leisure and visitor experience

I OBJECT. Tourism and visitors do not depend on new visitor “attractions” and could actually be damaged by them, as compellingly argued in the current debate over Newlands Corner. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment/“Disneyfication”. Heritage sites and the Green Belt are particularly vulnerable to harm.

Guildford has many “leisure and visitor attractions” already. The case for creating more is not made and no examples are given. Instead, the plan’s explicit priorities should be:

1. To protect the borough’s prime leisure and tourism asset, its countryside, from inappropriate development. This is all the more valuable because of its accessibility from London, the rest of Britain and the Continent, in that order. Rural residents are its custodians and require no Council interference. Economically, the most valuable forms of tourism, such as walking and cycling, require no new development. In the overcrowded South-East of England, lack of development is a leisure and tourism asset, not a liability.

2. To help make Guildford’s river landscape less off-putting and support town-break packages for high-value tourists. To achieve this, the policy needs to define what leverage, if any, Council planners have to influence normal tourism market mechanisms.

3. To help private providers market local tourism. This need not involve extra spending. The Council could, for instance, help co-ordinate ready-made, local tourism packages under a distinctive brand at an all-in price. An “English town break” (including B&B accommodation, a walking tour of Guildford, a pub lunch in the Surrey Hills, a visit to Wisley Gardens and a National Trust property and a SouthWest Trains travelcard for a day out in London) would be highly attractive to many European visitors who currently by-pass Guildford to go to Bath, Oxford or Cambridge instead.

4. To rule out the redevelopment of scarce rural hotel sites (e.g. Thatchers, East Horsley, earmarked for 40 new houses under Site A37 of the plan yet just a short walk from the new opera house).

I trust that the objections made above are fully taken into consideration and that the Plan is amended accordingly.
I conclude by adding I realize I am lucky to live here and can see why many would want to do the same. But unrealistic and overly ambitious development destroys the very elements that make Clandon and neighbouring settlements special. Surrey has few real villages left so why not preserve rather than blight them?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15881  Respondent: 8586369 / Mr Luigi Fort  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT (POLICY H1 – Homes for all) Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan period. It fails to set rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions.

The housing mix is based on out-of-date, pre-Brexit projections and on assumptions set out in a flawed SHMA that has not been scrutinised or evaluated.

I support higher density development in the urban area, without resorting to dehumanising, high-rise buildings that developers commonly claim are necessary for financial viability. Much of Guildford town could usefully be regenerated with 4-5 storey blocks with landscaping and underground parking, as often seen on the Continent and, recently, in London.

Student accommodation should provided for 100% of new students and more than 60% of existing students, which would free up ideal family accommodation in the urban area. Other university cities (e.g. Oxford) insist on higher percentages than those proposed in the plan. In my view, the Council’s timidity is a case of “regulatory capture” by Surrey University, which has failed to use its existing planning permissions (dating from 2004) to accommodate 3,000 students or to improve the efficient development of its campus (e.g. by building on its extensive and under-used surface car parks). If all students were accommodated in this way, 2,000 homes would be freed up in town and there would be no need to build on the Hog’s Back.

Guildford borough has already a higher proportion of traveller sites than most comparable boroughs. Over-provision is inappropriate given other constraints.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15882  Respondent: 8586369 / Mr Luigi Fort  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
POLICY H3 – Rural Exception Homes

I OBJECT This is a Trojan horse policy. It says that homes can be built anywhere near a settlement of any form (including agricultural land and the AONB). These homes are meant for people with a village connection, but they could be for anyone on the Guildford borough housing list. To make the housing viable, or to improve the “mix” this can include “market” housing (i.e. normal commercial development which in Guildford usually means large executive homes). This policy means building anywhere, and ignoring all historic planning restrictions.

The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove “exceptional circumstances.”

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15878  Respondent: 8586369 / Mr Luigi Fort  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT, due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1)

Our villages are already suffering from severe congestion for much of the day, for example the Newark Road & Rose Lane junction in the centre of Ripley. The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.

Furthermore, many of the country lanes around the villages of Ripley, Send and Clandon are narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition.

I OBJECT to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces.

Many of the affected villages, such as West Clandon, already suffer from traffic congestion. Further development around these villages will only result in more traffic and more parking problems.

With some 5000 houses being proposed close to the village of Ripley, the roads serving the village will become even more congested. Cycling has become an ever popular past time, particularly at weekends hundreds of cyclists past through the villages on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road accidents involving cyclists as a result of the development proposed under the local plan.
The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the road becoming ever more dangerous for pedestrians.

The council has a statutory obligation to protect the public and the additional traffic flows will bring added pollution and risk to injury of the public. In the case of West Clandon the Street often only has a narrow footpath on one side of the road making it very dangerous, especially when vehicles mount the pavements.

I OBJECT to the lack of proper infrastructure planning for sites (Policy I1)

Policy I1 requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.

Despite the Garlick’s Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents’ in the locality will see their quality of life significantly deteriorate in many ways.

Many of the utilities in the Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers. No plans to improve these services should mean no development of the Garlick’s Arch site.

Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are already at capacity and suffering from funding cuts or freezes. Any further development without funding will place further stress upon existing health services.

Police services are seeing funding reduced. The development of the proposed 13,860 homes during the plan period will stretch the police services further and is unsustainable.

There is no provision of the increased capacity of Guildford hospital, where is this assessed and remedied?.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I OBJECT due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2)

There is no certainty that either the A3 or M25 in the borough will be improved to increase capacity and reduce congestion during the Plan period. Highways England has no plans to even examine improving the A3 before 2020. I have considerable concerns that development of the large residential sites identified at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), will take place before any improvements are made to the trunk road network. The A3 & M25 are already at capacity during peak hours and any development prior to improvement of these roads will only make the situations worse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

I OBJECT in the strongest possible terms to the Guildford Borough Proposed Submission Local Plan (June 2016). This Plan is unsustainable, unworkable and, in many provisions, unnecessary.

I set out below my objection to specific policies and matters within the Plan.

I have itemised my objections below but also wish to support some of my points by recalling personal experience and other observations (A-C)
1. **Increased danger to pedestrians should the A247 become busier.** I have medical conditions that require my using a walking stick when out and about. Walking along the stretch of A247 between the Burn Common Roundabout to where it meets the A246 is a fraught experience and requires considerable concentration. In many places the pavements are narrow, uneven and winding; should I stumble I could easily end up in the round. To make matters worse these walkways are not continuous so one often has to cross the busy road and back to reach one’s destination.

2. **Clandon Station is a notoriously dangerous place to exit.** Either on foot or by car, turning right from the main car park onto the A247.

3. **Increased congestion on A247 during peaks periods.** While driving during rush hour it can already take 2-3 minutes simply to exit right from Lime Grove onto the A247. Roadworks and accidents cause long –lasting tailbacks as there is no easy way to divert.

I respectfully remind Guildford Borough Council that it has a duty of care to residents and this must be taken into consideration when evaluating the impact of traffic in the area.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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I STRONGLY OBJECT to the Guildford Borough Proposed Submission Local Plan (June 2016). Having lived in West Clandon all my life, I have seen how the local area is already becoming overcrowded. Moreover the A247 is forever becoming a more popular thoroughfare for commuters using the A3 and Woking railway station, coming from Merrow, Gomshall and Horsley, which already has a severe negative impact on those living in the village. The population growth in the surrounding area is evidently already taking its toll on the day-to-day lives of the village people, and I thoroughly believe that to increase it by building almost 14,000 houses will only make matters worse. As a result I consider this Plan unsustainable, unworkable and, in many provisions, unnecessary. Besides congestion I have many other concerns about it, and herewith set out my objections to specific policies and matters. Please email me an acknowledgement that you have received this correspondence and are dealing with it accordingly.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to poor air quality concerns (Policy I3)

Paragraph 4.6.27 of the Plan states that “Development must also mitigate its traffic impacts, including its environmental impacts and impacts on amenity and health.” The significant level of development being proposed, particularly in the north east of the borough will lead to considerable further congestion, despite any attempts to mitigate this through travel plans. This will be particularly acute in built up residential areas and will only lead to greater levels of air pollution, which will have a detrimental effect on local residents and their health and can result in early death.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: PSLPP16/6440</th>
<th>Respondent: 8586369 / Mr Luigi Fort</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to not protecting the Green Belt (Policy P2)

I OBJECT to the proposals to remove the villages of Ripley, Send and Clandon from the Green Belt, together with sites of Wisley Airfield (A35) and Garlick’s Arch (A43). National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these villages (as mere housing need does not constitute a ‘special circumstance’ and the land to be taken from the Green Belt. Once taken the green belt is lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached. GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site.

Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: PSLPP16/15872</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the proposals to remove the villages of Ripley, Send and Clandon from the Green Belt, together with sites of Wisley Airfield (A35) and Garlick’s Arch (A43). National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these villages (as mere housing need does not constitute a ‘special circumstance’ and the land to be taken from the Green Belt. Once taken the green belt is lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached. GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site.

Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15873  Respondent: 8586369 / Mr Luigi Fort  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to development in areas which are at risk of flooding (Policy P4)

National Planning Policy states that Local Plans should take account of climate change over the longer term, including factors such as flood risk. It goes on to say that new development should be planned to avoid increased vulnerability to the range of impacts arising from climate change.

The Plan states that in accordance with national planning practice guidance, the Level 1 SFRA has been used to guide development towards areas at the lowest risk of flooding and identify areas unsuitable for development. However, the document concludes that land outside of the area of flood risk is not capable of accommodating all of the borough’s identified development needs. A Level 2 SFRA has therefore also been produced and will help the Council apply the exceptions test (as described in the NPPG) as necessary to development proposals in areas at risk of flooding.

The site at Garlick’s Arch (A43) is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. I believe this site often floods during the winter months and the flooding is made worse by the...
soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/15870  Respondent: 8586369 / Mr Luigi Fort  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the Local Plan as the development proposed will not be sustainable (Policy S1)

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact on existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are just unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick’s Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/15871  Respondent: 8586369 / Mr Luigi Fort  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I OBJECT to the Borough Wide Strategy (Policy S2)

1. The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

2. The Housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.

3. The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common-sense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guilford with Woking it appears that Guilford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
1. I object to the changed policy A25 Gosden Hill for the development of 1700 homes which is still far too much.
2. There is no need for housing on this site because the local plan housing target is incorrect and inflated and ignores constraints.
3. Gosden Hill is located entirely within the Green Belt. No exceptional circumstances have been demonstrated for building on this site and therefore development here does not meet paragraphs 87-89 of the NPPF. Furthermore, Gosden Hill performs all five functions of green belt.
4. The site has no provision for foul or surface water sewerage and adjoining sewerage is at capacity.
5. The Green Belt at this point serves the important function of separating West Clandon from the edge of urban Guildford. Development here will cause the two to coalesce defeating one of the objectives of the Green Belt. If this development proceeds I believe the narrow strip of Green Belt remaining between Guildford and Clandon at this point will be too narrow and will come under further pressure. It will represent an undesirable ribbon development along the A3. It will be highly visible from the A3 when approaching Guildford and will, in conjunction with A43a at Garlick's Arch give the appearance of almost continuous development from Send through to Guildford.
6. The development of this site cannot be sustainable and will cause massive congestion onto surrounding roads. The development will generate in the region of 6,000 vehicles which will exit straight on to the A3 which is stationary every day during rush hours. The linking of the A3100, B2215 and A247 would channel thousands of cars through the narrow, winding road through West Clandon.
7. I object to the proposal for a link road to bring traffic from the Gosden Hill development to the proposed 4 way junction at Burnt Common. This has the potential to generate large volumes of traffic (including commercial vehicles) on the A247 through Send and West Clandon - a road which is already under traffic stress (see below).
8. The volume of traffic will greatly increase air pollution which is particularly critical given the proposal to build two schools.
9. A new on-slip at Burpham would only be 1.8km from the on-slip at Burnt Common which is against Highway England’s requirement of 2km.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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1. I object to the changed policy A43 Garlick’s Arch for 400 homes and 6 travelling show people pitches
2. It ignores all the thousands of previous objections made by local people
3. There is no proven demand for travelling show people plots in this location
4. There is no need for putting houses on this site because the local plan housing target is incorrect and inflated and ignores constraints.
5. The allocation of 28.9 ha is an excessive land grab into the Green Belt. If we take a normal density of 30 homes per ha and it is at the end of the day proven that there is a need for 400 homes in this location the land requirement is 13 ha not 28.9 ha which is more than double. This replicates a similar over land grab at Burnt Common where the factor is 7 times the land required.
6. This confirms the worrying impression that GBC have a pre-determined policy of building on the Green Belt at every opportunity. The arithmetic does not stack up. One would have thought that they would as custodians of the green Belt be intent on conserving it rather than exploiting it.
7. The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

8. Garlick’s Arch (A43) is in an unsustainable location. It does not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. The site is unsuitable due to lack of access to sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick’s Arch in the Infrastructure Plan. Residents will be dependent on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

9. The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

10. I object to the proposal to remove Garlick’s Arch from the Green Belt. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for this land to be taken from the Green Belt. Once taken the green belt is lost forever. There is a real danger that the loss of this Green Belt will result in urban sprawl and the neighbouring villages merging into one another. The significant development in West Clandon, Send and Ripley will result in the character of these villages being lost and the countryside encroached.

11. I object to the development at Garlick’s Arch because of flood risk. The site at Garlick’s Arch is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. Knowing the area well I am aware that this site often floods during the winter months and the flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be recommissioned to accurately reflect the actual flooding risks of each site.

12. I object to the loss of rural employment on the site. The development at Garlick’s Arch would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises.

13. I object to the potential loss of Ancient Woodland on the site. The proposed development at Garlick’s Arch will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees that existed in the year 1600.

14. I object due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1). Our villages are already suffering from severe congestion for much of the day, for example the Newark Road and Rose Lane junction in the centre of Ripley and the A247 through West Clandon. The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.

15. Furthermore, many of the country lanes around the villages of West Clandon, East Clandon, Ripley, and Send are narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition. I object to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces.

16. Many of the affected villages, such as West Clandon, East Clandon, Send and Ripley, already suffer from parking problems. Further development around these villages will only result in more traffic and more parking problems.

17. With some 5000 houses being proposed close to the villages of West Clandon, East Clandon, Send and Ripley, the roads serving the village will become even more congested. Cycling has become a popular pastime, particularly at weekends hundreds of cyclists past through the village on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road accidents involving cyclists as a result of the development proposed under the local plan.

18. The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the roads becoming ever more dangerous for pedestrians.

19. I object to the lack of proper infrastructure planning for sites (Policy I1). Policy I1 requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.
20. Despite the Garlick’s Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents’ in the locality will see their quality of life significantly deteriorate in many ways.

21. Many of the utilities in the West Clandon, East Clandon, Burpham, Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers. No plans to improve these services should mean no development of the Garlick’s Arch site.

22. Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are already at capacity and suffering from funding cuts or freezes. Any further development without funding will place further stress upon existing health services.

23. I object due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2). There is no certainty that either the A3 or M25 in the borough will be improved to increase capacity and reduce congestion during the Plan period. Highways England has no plans to even examine improving the A3 before 2020. I have considerable concerns that development of the large residential sites identified at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), will take place before any improvements are made to the trunk road network. The A3 & M25 are already at capacity during peak hours and any development prior to improvement of these roads will only make the situations worse.

24. I object to poor air quality concerns (Policy I3). Paragraph 4.6.27 of the Plan states that “Development must also mitigate its traffic impacts, including its environmental impacts and impacts on amenity and health.” The significant level of development being proposed, particularly in the north east of the borough will lead to considerable further congestion, despite any attempts to mitigate this through travel plans. This will be particularly acute in built up residential areas and will only lead to greater levels of air pollution, which will have a detrimental effect on local residents and their health.

25. I object to the inclusion of the land at Garlick’s Arch, Send Marsh/Burnt Common and Ripley (A43). Garlick’s Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8). There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).

26. It is clear that with this site being added at the eleventh hour and no infrastructure planning has been undertaken. The Infrastructure Schedule makes no provision for any infrastructure improvements for this site. How will the local services such as schools and doctors cope, many of which are already at capacity? (Policy I1)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/4717  Respondent: 8586369 / Mr Luigi Fort  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A58

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to Policy A 58 at Burnt Common and to the proposed inclusion of Burnt Common as an Industrial Strategic Employment Site
2. This previous allocation for B1c, B2 and B8 development was removed from the 2014 draft due to all the objections made previously.
3. The word “minimum” is a change from the previous “maximum” in the 2016 plan and since that time there has been a decline in demand for industrial land. This change alone is unacceptable since even if there was a need to
build 7,000 sq m at Burnt Common this development would only require 1.4 ha at a standard plot ratio density of 50% not 9.26 ha. There is no justification for zoning an additional 7.86 ha in the Green Belt.

4. There is in fact no justification for building any more industrial development in the borough particularly at Burnt Common. The current industrial pipeline of granted consents of 38,357sqm in B1c, B2 or B8 use class space is double the 19,000 sq m said to be needed by Aecom who justify the need for new space on top of the existing pipeline by a completely unsubstantiated suggestion that “there is the possibility that some pipeline developments may not come forward at all, or be developed in different quantities by use class than has been consented.”

5. There is no need to build industrial or warehouse development in the middle of the Green Belt when Slyfield and Guildford still have empty sites and industrial units.

6. The 2017 Employment Land Need Assessment shows a reduction in demand to 3.9 hectares for industrial land for the whole borough not a huge over allocation of 9.26 hectares at Send in the Green Belt.

7. The Employment Land Needs Assessment update 2017 (ELNA) states “that the pipeline for employment floorspace defined by planning permissions yet to be implemented and prior approvals suggests the potential for an additional 33,607sqm of B use class floorspace to come forward. This figure comprises a net loss of 4,750sqm of B1a use class floorspace and a net gain of 38,357sqm in B1c, B2 or B8 use class space.”

8. 38,357 sq m of B1c, B2 or B8 use class is quite sufficient supply for the plan period and is in fact more space than the 3.9 ha of industrial land that is said to be needed for the plan period by Aecom. Since if you were to develop 3.9 ha at a plot ratio of 50% it would provide new industrial development of 19,000 sq m approximately half of current planning permissions granted. This does not justify the need for new development of industrial space on the Green Belt in such areas as Burnt Common.

9. The reality of demand for industrial space is that it is both nationally and locally in decline and this is evidenced by old existing permissions that have not been taken up and developed. The ELNA alludes incorrectly to the poor quality of existing space being a “constraint” on supply and fails to acknowledge that this assertion cannot apply to potential newly developed space e.g. the undeveloped pipeline of 38,357sqm.

10. The impact on small surrounding roads will create traffic gridlock.

11. It will join up existing villages and defeat the purpose of the Green Belt.

12. The ongoing poor quality of the updated research undertaken by Aecom in the Employment Land Needs Assessment 2017 does not support industrial development on land in the Green Belt at Burnt Common.

13. The Aecom research is generally superficial and lacks sufficient detail and analysis between B1c, B2 and B8 use classes and no reliable individual analysis has been undertaken of the widely different supply and demand dynamics of light industrial, general industrial and warehousing and distribution floor space.

14. The potential inclusion of a waste management facility mentioned at paragraph 4.4.23a lacks enough detail for proper consultation and is completely inappropriate.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** pslp171/3167  **Respondent:** 8586369 / Mr Luigi Fort  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy S1

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ( )**
The Plan now states: “the presumption in favour of sustainable development will not automatically apply to policies relating to sites protected under the Birds and Habitats Directives and/or designated as Sites of Special Scientific Interest (SSSIs), land designated as Green Belt, Local Green Space, the Surrey Hills Area of Outstanding Natural Beauty, designated heritage assets and locations identified as at risk of flooding.”

Gosden Hill and Blackwell Farm (both currently in the green belt) are called “urban extensions” surely a euphemism for urban sprawl? Garlick’s Arch and Burnt Common developments take land from the green belt to extend Ripley/Send. One of the important specific purposes of the green belt is to prevent urban sprawl.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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The NPPF states para 155: “Early and meaningful engagement and collaboration with neighbourhoods, local organisations and businesses is essential. A wide section of the community should be proactively engaged, so that Local Plans, as far as possible, reflect a collective vision and a set of agreed priorities for the sustainable development of the area, including those contained in any neighbourhood plans that have been made.”

The changes in this latest version of the Guildford Local Plan show little or no willingness of Guildford Borough Council to reflect a collective vision. Despite the many thousands of responses to previous versions of the Plan which overwhelmingly rejected building on Green Belt land this latest version has as much, if not more, building on the Green Belt and increased problems of infrastructure and traffic which will bring increased noise and air pollution and danger to residents.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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I object to the 2016 Draft Local Plan and specifically to the development at Gosden Hill Farm -

I do not agree that the council need to build 14,000 new homes I feel there is a lack of evidence for the alleged housing need numbers - independent reviewers do not agree with the Council's number of 693 per year and the plan does not include any constraint on this figure.

The proposed sites including Gosden Hill Farm are all in a straight line in one area of the borough, there is therefore a disproportionate level of development in this area.

The development of Gosden Hill would move Guildford 3 miles north up the A3 and include the loss of a large area of Green Belt, the loss of Green Belt is unacceptable.

The development at Gosden Hill Farm will bring a vast amount of traffic into an already congested area and there is no provision in the plan for specific infrastructure. Without the correct infrastructure the increased traffic will make it almost impossible to drive into Guildford Centre from the Burpham/Merrow area which will discourage people from visiting the town centre, working in Guildford and will also be a disincentive for businesses who will move to towns with a better and planned traffic infrastructure or to out of town sites.

The proposed sites are all along the A3 and a decision needs to be made on the future of this road prior to any developments - if a tunnel is the answer to the traffic congestion problems the site of this must be decided first, if not a tunnel, what other improvements are to be made and where, all of this must be decided prior to any development.

If a small town/village like Hindhead can get a tunnel on the A3 surely a large town like Guildford should be lobbying for a tunnel and perhaps the Council could put some energy into this.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/3617  Respondent: 8586785 / Elizabeth Critchfield  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

GBC advocates building 13,860 homes during the period of the Plan – 693 dpa according to the SHMA. This begs a few questions.

• Why can we not know the calculations used to reach this figure, over twice the number promulgated four years ago?
• Why have GBC said that we can trust the model the consultants have used because many other local authorities have done so? This shows either a distressing gullibility or appalling arrogance.
• On the one hand we are told that the OAN is deliverable, on the other we are informed of constraints that may affect deliverability; how can we be asked to approve something which does not offer a realistic target number that takes all constraints into account?
• Why has GBC not imposed constraints to overall housing growth when other boroughs have? Guildford is a congested gap town yet little effort seems to have been made to preserve its urban or rural character, or maintain the unique identities of its villages.
- Why is the level of expansion in the north of the Borough so disproportionate? Over 40% of the proposed total will be located within a few miles of Burpham, turning a pleasant village at the urban edge of Guildford into an anonymous built up area suffocated by traffic.
- An independent report commissioned by the Guildford Residents Association (GRA) offers a much lower OAN of 510 dpa. The report found errors in the way student needs were calculated, a failure to correct historical data and flaws in the estimation of homes needed to support job growth.

It is clear that the housing figures quite literally do not add up, therefore they render the whole Plan unsound.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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I am totally opposed to this development. I have lived in Burpham for many years and have watched a small community grow ever larger as developments were built - Great Oaks Park, Weylea Farm, Weybrook, Raynham Close and a fair amount of garden grabbing. I have also watched the concomitant increase in traffic and pollution. Two thousand homes, schools, offices and commercial premises, a new station, a Park and Ride will generate a huge amount of traffic and have an utterly devastating effect on Burpham and our neighbouring communities.

The A3/A3100 is one of the major routes into Guildford and as has been pointed out is already overcrowded. The proposed access will only exacerbate the problem so if the development does go ahead, the only possible solution is a four way intersection in the vicinity of Potters Lane as was suggested thirty years ago.

There has been talk of a tunnel to carry through traffic under Guildford and alleviate the overcrowded roads. The idea has merit but a decision has to be made before Gosden Hill disappears under homes and all the associated infrastructure. How galling to decide to go ahead, then realise that the best site for a tunnel entrance is now a housing estate.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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We object to this policy as we feel that more residential use should be made of the town centre. Independent research suggests a fall in demand for retail space – there is enough visible evidence of empty shops in High Streets – and no account seems to have been taken of the increase in online shopping.

The Guildford Retail and Leisure Study 25 September 2015 states “Town centres, once the principle focus for retail and leisure are now increasingly under threat.”

Proposing a 40% increase in retail space seems perverse; better surely to concentrate on high quality enterprise that reflects Guildford’s heritage and prioritise brownfield development for imaginative housing. This would take pressure off the Green Belt. The NPPF clearly states that Green Belt serves a key purpose, “to assist in urban regeneration, by encouraging the recycling of derelict land and other urban land.”

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15169  Respondent: 8586785 / Elizabeth Critchfield  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Transport

There is no real clarity on transport and road infrastructure. The Plan hints at road improvements but in an ill-defined way. The traffic issues that have dogged Guildford for years are not resolved – there is no commitment to new town bridges, no indication of a central bus exchange, no commitment to consider the viability of a tunnel. Some things that are proposed are unsustainable – the Sustainable Movement Corridors for example. This has all the hall marks of a brainstorming session with Google maps. One site visit would have been enough to realise that the A3100 is not wide enough and has too many pinch points to accommodate four traffic lanes.

The Gosden Hill development is another example of lack of intellectual vigour. Access to it is via a new on-then-off A3 slip road, with the current slip road becoming two way. With all that is proposed for this development, including a 1000 vehicle Park and Ride, and other developments north of Burpham such as Garlick’s Arch and Wisley, thousands more vehicles will be on the roads and many of them will need to access the north bound carriageway of the A3. How do they do this? Drive through Burpham to the Clay Lane north bound slip road. It may look fine and dandy on Google but the reality is somewhat different. Our roads are already congested to the point of grid lock. I live by the present south bound slip and see the traffic come to a halt most days. The SHAR does note that there will be an increase in traffic through Burpham, putting pressure on the A3100/B2234 roundabout. May I respectfully draw your attention to the fact that there is already a great deal of pressure on that roundabout which alternates between a highways version of bumper cars and complete gridlock.
We object to this policy. The Metropolitan Green Belt constitutes 89% of the Borough and should be at the heart of all planning concerns. It is not merely a space separating urban areas but a vibrant community in its own right – home to agriculture, tourism and leisure activities. It provides biodiversity, beauty, wide rural views – all essential for physical and psychological wellbeing. It plays a vital rôle in water management and flood control. And it is not the personal fiefdom of Guildford Borough Council but belongs to the wider community, including London, and should be regarded as a national asset and a legacy for the future. Once the Green Belt is lost it is lost in perpetuity.

It is reasonable to expect some development but it should be proportional; a village that has 1% of the total number of homes in the Borough should not be expected to accommodate more than 1% of new homes. The demands on infrastructure would also be proportional, and settlements would be more likely to retain their character.

Policy P2 seeks to impose strategic development in the Green Belt, despite government commitments to protect it.

The NPPF states

“…..the essential characteristics of Green Belts are their openness and their permanence…….new Green Belts should only be established in exceptional circumstances.”

Brandon Lewis, the then Minister of State, said

“[the NPPF]… makes it clear that inappropriate development may be allowed only where very special circumstances exist and that Green Belt boundaries should be adjusted only in exceptional circumstances through the Local plan process and with the support of local people. We have repeatedly made clear that demand for housing alone will not change Green Belt boundaries.”

This Local Plan proposes covering large areas of the Green belt with housing estates – 8,086 homes are planned as opposed to 1,135 for the urban area of Guildford, a huge imbalance.

Urban regeneration, the use of brownfield sites, homes in the town centre rather than the proposed 40% increase in retail space that flies in the face of retailing trends, more student accommodation on campus – these should be utilised before summarily dumping blocks of housing onto a precious resource.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: PSLPP16/15167  Respondent: 8586785 / Elizabeth Critchfield  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Green Belt

The Green Belt is not entirely sacrosanct. There is no reason to object to some development, so long as it is proportional and appropriate. What GBC is proposing however is scandalous. More than half the planned total build is scheduled for the Green Belt – have GBC forgotten the purpose of the Metropolitan Green Belt? It was put in place to prevent urban sprawl, not provide a playground for developers. It is farmland, open space, manages water and flood control, is an area of biodiversity, and a provider of tourism and leisure activities. In the words of the NPPF, "... the essential characteristics of Green belts are their openness and their permanence."

The Green Belt is a national asset and should be held in trust for future generations. Once lost, it cannot be regained.

Why does urban regeneration not play a greater role in this Plan? Prioritising development of brownfield sites, locating more student accommodation on campus, reducing the proposed 40% increase in retail space would take the pressure of the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12263  Respondent: 8586785 / Elizabeth Critchfield  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to this policy which presumes sustainable development in line with the NPPF. It is our contention that the proposal to build 13,860 homes across the Borough is not sustainable. The policy fails to recognise that rural areas with inadequate road and other infrastructure cannot cope with development on this scale and is therefore unsound.

NPPF 10 notes that "plans and decisions need to take local circumstances into account so that they respond to the different opportunities for achieving sustainable development in different areas."

Policy S1 says: "We will work proactively with applicants jointly to find solutions that mean that proposals can be approved wherever possible and to secure development that improves the economic, social and environmental conditions in the area."
There is a subtle shift of emphasis from the NPPF’s “need to take local circumstances into account” to GBC’s “proposals can be approved wherever possible.”

There are twelve planning principals outlined in the NPPF which the Local Plan should take into account. Some seem to be disregarded, for example:

“...take account of the different roles and character of different areas, promoting the vitality of our urban areas, protecting the Green Belts around them, recognising the intrinsic character and beauty of the countryside and supporting thriving communities within it.”

“...support the transition to a low carbon future.”

“...contribute to conserving and enhancing the natural environment and reducing pollution”

“...encourage the effective use of land by reusing land that has been previously developed (brownfield land) provided it is not of high environmental value.”

These values do not sit easily with the proposed strategic developments.

Another statement from Policy S1 gives serious cause for concern.

“Planning applications that accord with the policies in this Local Plan (and, where relevant, with policies in adopted neighbourhood plans) will be approved without delay, unless material considerations indicate otherwise.”

This offers a degree of flexibility that is tantamount to offering carte blanche to developers, and the presumption in favour of applications fails to recognise any constraints such as the Green Belt.

Policy S1 looks to securing “the economic, social and environmental conditions in the area” but fails to acknowledge the conflict that can often occur between economic growth, environmental protection and social justice. There are difficult decisions to be made but no guidance is given as to how dissension might be resolved.

This policy reveals a distinct bias towards development – one might almost add at any price. References to sustainability are nebulous, and inconvenient constraints are swept aside. Perhaps the most shocking omission is the lack of commitment to uphold Green Belt boundaries.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12269  Respondent: 8586785 / Elizabeth Critchfield  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
We object to the proposal to build 13,860 homes in the Borough over the period of the Plan for the following reasons:

- The figures are from the SHMA but we are not privy to the calculations used to derive the required housing need of 693 dwellings per annum (dpa). The consultants who prepared the SHMA claim intellectual ownership and, despite FoI requests, the details remain hidden. We are told to trust the model because many other local authorities use it, a specious argument. GBC have presumably taken the report on trust which suggests a degree of naivety. There is significant concern, too, that the consultants’ website indicates an agenda that is clearly pro development.
- The OAN is 693 dpa but there is no Housing Target within the Plan. GBC seem to suggest the two are the same, that the OAN is deliverable and cannot be gainsaid. However, we understand that deliverability may be affected by various constraints. How can we be asked to approve a plan that does not actually propose a realistic target number that takes all constraints into account?
- An independent report by NMSS, commissioned by Guildford Residents’ Association (GRA), has arrived at a much lower OAN of 510 dpa. This report finds that the SHMA inflates the OAN due to
  1. a) failure to correct historical data
  2. b) issues with the way student needs are considered
  3. c) flaws in the estimation of homes needed to support job growth.
- Other boroughs such as Woking and Waverley have applied constraints to overall housing growth, Guildford has not. There seems to have been little effort to protect the character of either urban or rural aspects of Guildford, already a very congested gap town. The unique identities of villages like Send, Ripley and Clandon are threatened with being lost as a result.
- There is a disproportionate level of expansion in the northern part of the Borough. This will impinge particularly on Burpham which would cease to be a definable village and diminish to just the name of an area within the urban sprawl of Guildford. The planned development of Gosden Hill Farm offers the second largest number of homes, a new railway station, a Park and Ride, shops and primary/secondary schools, all situated in the Green Belt that includes an area of ancient woodland.

It is our contention that these deficiencies render the Local Plan unsound.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15164  Respondent: 8586785 / Elizabeth Critchfield  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Poor documentation and lack of consultation time

Six weeks is insufficient for most people to fight their way through thousands of pages to ascertain the aims and objectives of GBC and prepare a reasoned and informed response.

- The documentation is appalling. The language used is infelicitous to say the least and the presentation is poor; the use of white font on coloured background will have caused problems for visually impaired people.
- The website is cumbersome to navigate.
- The sheer volume of documentation is overwhelming – a literary equivalent of traversing the Himalayas. I would guess many people did not make it beyond the foothills. At the very least, some kind of summary as to the intentions of GBC should have been provided.
- Transport and infrastructure documents were released at the last minute and are incomplete.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: PSLPP16/15171</th>
<th>Respondent: 8586785 / Elizabeth Critchfield</th>
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I can understand the need for economic development but it should not be at any price. This Plan seems to focus on expansion regardless of the harm done to the existing community. There are serious issues with regard to current infrastructure deficiencies which have not been addressed. They will not be solved by burying acres of Green Belt under houses and requiring the developers to pay for infrastructure in the faint hope that the rest of us might benefit.

A sound and sustainable Local Plan should surely have one major outcome – that most residents on reading the proposals can say “This Plan will so something to improve my quality of life.” On that ground alone, this Plan fails.

I have read the responses submitted by the Burpham Neighbourhood Forum, the Guildford Residents’ Association and the Campaign to Protect Rural England and am in agreement with them.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Respondent: 8586785 / Elizabeth Critchfield</th>
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Policy A25 Gosden Hill

My reasons for objecting to the changes in this policy are as follows:

1. The housing number would appear to have been reduced to 1,700 until you look closely and realise that that figure is a minimum build, leaving 300 homes to be delivered after the plan period.

2. The "improved" two way junction is nothing of the sort. The proposed development - houses, commercial and office premises, a Park and Ride, a station - will generate thousands of vehicles. Any vehicle leaving the development, unless accessing the southbound A3, will travel through Burpham; local traffic wanting to access the southbound A3 will travel through Burpham. The impact on the community will be horrendous. I live along the A3 slip road and am daily witness to the traffic congestion; a slow moving trail of cars, commercial vehicles and an increasing number of HGVs that sometimes judders to a halt. This can be caused by incidents on the southbound A3 that cause traffic to back up and endeavour to escape down the Burpham slip road. It can also result from the planning disasters that Burpham has had to endure over the last few decades with no thought given to infrastructure. We are talking of what is happening NOW - what on earth will it be like if this proposal goes ahead without proper infrastructure? The visible current overloading of our road system is one thing; the invisible result - air pollution - is another. Pollution makes people ill, sometimes kills them. National government is concerned, so should you be.

3. Access/egress to and from the development is from one roundabout; block that and no one can get in or out, including emergency vehicles. That is incredibly bad planning, unless of course you are emulating Blackadder with a cunning plan that could possibly involve another entrance in Merrow Lane.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/1487  Respondent: 8586785 / Elizabeth Critchfield  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I am concerned that the DLP only requires 60% of full time University students to be housed on campus. Surrey University could easily meet a more realistic target of 80% by using its existing planning permissions which would free up more affordable homes in the town. I object to this policy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I note the housing need has been reduced from 693 to 653 per annum, a reduction of around 5%. As last year, there is a significant reluctance to elaborate on the calculations and assumptions that underpin this figure. An independent and open analysis of the housing need figure undertaken by a respected national expert has arrived at a much reduced figure of 404 homes per annum. That is a difference of nearly 40% - statistically extremely significant.

There is no doubt that more homes are needed - so long as they are of the right kind, providing for public sector workers, first time buyers and older people wanting to downsize, not the developer preferred money-grubbing high end of the market housing. However, the housing need figure must be realistic and its raison d'etre transparent. This is not the case and I therefore object to this policy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/2375  Respondent: 8586817 / Mr J Lawes  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A42

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT

To the building of 45 houses at Clockbarn Nursery this is over development of an area with poor access.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/2376  Respondent: 8586817 / Mr J Lawes  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I OBJECT

To the building of 400 houses at Garlick’s Arch, this is a large Greenbelt area, flood area, there are more appropriate brownfield sites near Slyfield which could be used. Many good trees will be cut down.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/2377  Respondent:  8586817 / Mr J Lawes  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A44

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT

To the proposed 40 houses and 2 travellers' pitches at Send Hill, my family and I live in [Response has been redacted due to statement containing personal data which cannot be disclosed due to the provisions of the Data Protection Act 1998], one of the access roads to The Send Hill site, our lane is very narrow and cannot sustain any further major traffic. The countryside will be ruined! House values will fall!

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5259  Respondent:  8586817 / Mr J Lawes  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT

To the new Burnt Common interchange to A3 for 2000 proposed Wisley houses, 2000 houses at Gosden Hill, and 1850 houses at Blackwell farm, much of the traffic would go through Send, there would be major traffic problems on every weekday, life in Send would be made much worse.

I cannot understand why Send has been singled out for this treatment, our family for one would certainly want to move out of this area to another Greenbelt village elsewhere, where we would hopefully receive better treatment from our authorities. We will be seeking compensation.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5258  Respondent: 8586817 / Mr J Lawes  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I have resided in Send since 1980 moving to the area from a busy area where houses were being built on every piece of available land, I picked Send / Ripley as I was certain that it would remain within the Greenbelt.

I OBJECT

To Send losing its Green Belt status, I have received no notification from any planning authorities that these changes were coming, I only heard from neighbours. Local councillors promised that this area would remain "GREEN" but have now reneged on their promises. Send would lose its identity completely and end up like Woking and other similar sprawling towns. Greedy developers would soon move in and do what they want and make vast profits at our expense, I have already met one who has bought land in Send two years ago off main by river, on spec based on "inside knowledge" that the Green belt will be destroyed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/4069  Respondent: 8586977 / Ms Loraine Austin  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A22

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The land off Keens Lane, Worplesdon (Site A22) in the GBC Draft Local Plan for the proposed development of 140 homes and a care home I believe is inappropriate for three main reasons:

1. The area is Green Belt, which should be retained and not built on. I am appending at the end of this email* the agreed Policy of Surrey County Council for your reference and urge that the green belt be protected by Guildford Borough Council.
2. Keens Lane is a narrow road (the word "lane" is a clue) and building more homes there would entail the widening of the road, but this does not account for the fact that at the far end, near to Gravetts Lane/Tangle Lane, it is constricted and the area is already congested. Since the new housing has been built the traffic in the lane is uncontrolled and many cars speed along it. I have been in contact with Surrey County Council about this and asked that traffic calming measures be put in place but nothing has happened. I copy the email response I got below. There are often near collisions on the brow of the hill on the lane as traffic speeds faster and faster.

3. The proposed development site is close to Whitmoor Common and a Site of Special Scientific Interest, and would have a damaging effect on ecology and wildlife. It is also bounded by Broadstreet Common. The open nature of Worplesdon should be retained.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

### Comment ID: PSLPP16/8574  Respondent: 8586977 / Ms Loraine Austin  Agent:

**Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1**

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ()**

I disagree with the proposal of many traveller pitches in Guildford [Response has been redacted due to statements being considered defamatory, derogatory, inflammatory or offensive in nature]

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

### Comment ID: PSLPP16/8572  Respondent: 8586977 / Ms Loraine Austin  Agent:

**Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1**

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ()**

Building new homes is treating the symptoms of over population. All it will bring about is more population and more housing needs. The causes need to be treated, the Government and local authorities should be addressing the causes of over population, not eternally accommodating it. The infrastructure of Guildford cannot take any more population. The Aldershot road is always heavily congested in the morning and evening, the A322 around the Brookwood area is regularly congested and more housing in Guildford would add to this problem, the same for Burpham, Jacobs Well etc. Concreting over the land creates more flooding, with all the rain this summer the flooding is more than evident.
You have posted on YouTube a clip of people supporting the developments – one being Alf Turner at the Royal Surrey County Hospital. The A&E dept is over run with people attending when they don’t need to – if the Government addressed immigration.....maybe now we’re out of the EU things will change for the better.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8573  Respondent: 8586977 / Ms Loraine Austin  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

There is a lot of wildlife in the area, my home is directly opposite site A22 where there is an abundance of wildlife, even stag beetles which I believe are endangered. Frogs, birds, foxes, all sorts of things will be lost if the 140 planned homes and a care home are built on it.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8571  Respondent: 8586977 / Ms Loraine Austin  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I write to object most strongly to the proposals to build on Guildford’s greenbelt land. Past Governments made the policy of greenbelt to protect it for the country, the people and the wildlife and for new Governments to erase these policies makes the making of any policy a farce if, in time, it can be overwritten.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8575  Respondent: 8586977 / Ms Loraine Austin  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

* It is Surrey County Council policy (March 2013) by a Motion agreed at a Full Council meeting of Surrey County Council about the Green Belt:

Surrey County Council, March 2013
RESOLVED (unanimously):

Council notes:

1. Surrey County Council has a proud history as the creator of the Green Belt. The County’s Countryside Estate founded by the Surrey County Council Act of 1931 was the basis of the London County Council’s Green Belt Act of 1938.

2. The Coalition Agreement states:

‘We will maintain the Green Belt, Sites of Special Scientific Interest (SSSIs) and other environmental protections, and create a new designation – similar to SSSIs –to protect green areas of particular importance to local communities.’

Council believes:

Surrey’s Green Belt, Countryside Estate, SSSIs and other green spaces are vital, not only for the county’s environment but also for maintaining a “green lung” around London.

Council resolves:

1. To use its power to protect Surrey’s Green Belt.
2. To support the National Planning Policy Framework (section 9 – paragraphs 79 to 92) and the Government’s policy of protecting the Green Belt.
3. To make Surrey’s MPs and the County’s Districts and Boroughs aware of this resolution.
4. That any Green Belt development in the County is in line with the needs and wishes of Surrey residents

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/957  Respondent: 8586977 / Ms Loraine Austin  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A22

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I have seen the changes to Policy A22, Land North of Keens Lane, Guildford (Pitch Place Farm) and thank you for the invite to submit comments.

I have written to you several times opposing the use of the Greenbelt land for development. The Greenbelt policy was created to safeguard the land from development and the undoing of the policy makes the making of any policy a farce. Despite my objections and those of my children, you now want to increase the number of houses so I feel disappointed that my objections aren’t making any difference, I bought my home here because it’s my home town and all I could afford to not have to live surrounded by other houses, developments and traffic. I have to pay a premium to live in my own home town.

The infrastructure of Guildford and the surrounding area is already under extreme pressure from too much traffic and over population. Schools are under strain, doctors appointments are harder to get now than they’ve ever been, the local hospital is under strain, all the hospitals are. Keens Lane is a very narrow lane, there have already been two housing sites in recent years at the end of the lane joining with Tangle and Gravets Lane – the additional traffic from them is very noticeable, much of it speeding and despite requests to SCC for speed restrictions they keep saying that because no accidents have happened in the last 5 years there’s no need for speed restrictions. There will be an accident one day, it’s only a matter of time with the speed some of the users choose to drive at.

I strongly oppose the building on Pitch Place Farm, my garden is directly opposite the field. The additional traffic will bring noise and vehicle pollution to us. My garden is often flooded in the winter as it’s a very wet area already, taking trees and concreting over the land is only going to make this worse, the trees are a valuable part of the area taking up the flood waters. It is greenbelt land – you shouldn’t be taking this and going against a policy that was put in place for the protection of the area. No greenbelt land should be taken.

I have recently had a letter from Levanter Developments saying that they have bought the land Roseberry in Keens Lane, they want to cut all the leylandi trees down that belong to my Close and border our garage block and their land. I’ve objected but am now anxious that they’ll push and push to get them down, they want to build 2/3 storey terraced cottages, taking yet more greenbelt land. It’s an outrage to the policy and I’m surprised GBC Planners are overlooking it. The leylandi trees I believe form a sound and pollution barrier to the A322 which is congested on a daily basis, SCC see fit to keep having road works on the stretch of road from the Seafare Fish and Chip shop down to the roundabout at Cumberland Avenue and Keens Lane making it even worse.

Keens Lane cannot take the addition of these 150 houses and a Care home – the additional traffic will create many problems for the already problematic traffic problem Guildford faces on a daily basis. You have referred to “Encourage cycling and pedestrian movements from the site” - this won’t happen in reality and with the 150 houses alone it will be bringing in the region of a further 300 cars to the lane, more with the visitors to the care home. I strongly oppose both the houses and the care home. The care home will bring potentially a further 60 cars from visitors and regular HGV vehicles for deliveries, ambulances, mini buses (ie Dial a Ride) coming back and forth for mobility (hospital visits for the residents). The lane isn’t suitable for this amount of additional traffic.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/760  Respondent: 8587073 / Rushmoor Borough Council (Louise Piper)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A29

Do you consider this section of the document; complies with the Duty to Cooperate? ( Yes ), is Sound? ( Yes ), is Legally Compliant? ( Yes )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Guildford Borough contains some “Countryside Beyond the Green Belt”, although this notation covers only 2% of the Borough, and is located in the west of the Borough near Ash and Tongham. Mindful of the hierarchy set out in paragraph 4.3 above, and the need to identify enough land to deliver an average of 693 new dwelling a year, the draft Plan contains several housing allocations that fall on land that is subject to this designation.

Policy A29 is the most significant of these allocations, identifying land for approximately 1200 homes around Ash and Tongham. A map showing the distribution of the sites that comprise this allocation is shown at Appendix 1 of this report. In addition to this, there are two other smaller allocations (A27: Warren Farm, Ash Green and A28: Land to the east of White Lane, Ash Green) of 120 units in total, 629 homes with planning permission (net outstanding) and 124 completions since the base date of 2013. In the wider Ash and Tongham area, taking into account completions, permissions and Local Plan allocations, this equals 2,057 homes to be delivered by 2033.

In terms of any potential cross boundary impacts of this development identified in Policy A29, whilst it is located close to the boundary with Rushmoor Borough, mindful of the constraints noted above, Guildford Borough Council has very limited opportunities to accommodate its objectively assessed housing need. The draft Plan contains a number of other strategic housing allocations, including land at former Wisley Airfield (2,100 homes), Slyfield Regeneration Project (1,000 homes), Gosden Hill Farm (2,000 homes), and Blackwell Farm (1,800 homes). In addition, there are a number of other allocations of around 100 units. Importantly, the evidence supporting the Plan has had to review the function of land within the Green Belt, and facilitate some land releases from it, in order to achieve the scale of residential development required to meet Guildford’s OAN.

Rushmoor Borough Council is supportive of Guildford’s approach of “leaving no stone unturned” in seeking to meet its housing need. This is positive in as much as it is not asking Rushmoor to help meet its housing needs, and in this respect, at this point in time, both authorities can be said to satisfy the “duty to cooperate” on the cross boundary strategic issue of meeting housing needs.

The Strategic Highway Assessment report (2016) sets out that in respect of the development proposed in the Local Plan, without any mitigation, the greatest potential impacts are seen on the network in the vicinity of Ash / Ash Vale and travelling north into the borough of Surrey Heath. Some of the trips in Ash / Ash Vale will join the A331 Blackwater Valley Road to travel further afield, but it is likely that a reasonable proportion will travel into the neighbouring boroughs of Rushmoor and Surrey Heath. Some of these roads already experience congestion, despite the model suggesting that existing traffic flows are relatively low.

Specifically of interest to the strategic allocation around Ash and Tongham, further information on key infrastructure projects is provided at Appendix C of the draft Plan, in the Infrastructure Schedule. Infrastructure projects LRN9 through to LRN14 relate to improvements to traffic management and environmental improvements in and around Ash, Ash Vale and Tongham, to be funded through a combination of developer contributions and Enterprise M3 Local Economic Partnership Local Growth Fund awards. For example, the schedule identifies LRN14, which is a junction improvement scheme at the connection of the A331 Blackwater Valley Route with the A31 Hog’s Back (Tongham). It is important to note that this mitigation is required to enable the development proposed in the Local Plan to proceed.

In this context, Rushmoor Borough Council is supportive of the planning policy framework and detailed infrastructure projects as they relate to the road network, subject to certainty regarding the delivery of these improvements as part of the overall package of implementation of development in and around Ash, Ash Vale and Tongham.

However, in the absence of the implementation of the full suite of transport policies and proposals to support the quantum of development set out in the Local Plan, this would potentially result in negative cross boundary transport impacts, the residual cumulative impacts of which would be severe. In this context, the Council looks forward to continuing to work with Guildford Borough Council on potential cross boundary strategic transport issues, to ensure that those arising from development proposed in the Guildford Local Plan are appropriately mitigated.

In addition, PED6 sets out a potential expansion of Ash Grange Primary School if required to provide spaces for the primary age children who will live in the new homes to the south and east of Ash and Tongham. These infrastructure proposals are supported by Rushmoor Council, mindful of the strategic allocation for residential development in and around the settlements of Ash and Tongham.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/1564  Respondent: 8587073 / Rushmoor Borough Council (Louise Piper)  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

Do you consider this section of the document; complies with the Duty to Cooperate? ( Yes ), is Sound? ( Yes ), is Legally Compliant? ( Yes )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The draft Local Plan sets out policies that provide a strategy for supporting Guildford Borough’s strong and vibrant local economy. It allocates 37,200 – 47,200 sq m of office and research and development floorspace (including a 10 hectare extension to Surrey Research Park), and 4.7 – 5.3 hectares of industrial land. It also seeks to protect existing strategic and locally important employment sites.

Rushmoor Council is supportive of Guildford Borough’s approach to protecting and enhancing the employment land offer within its administrative area, particularly as the objectively assessed housing need takes account of the need to facilitate the delivery of new homes to help provide a local pool of economically active workforce. Moreover, this is reflective of the Enterprise M3 LEP’s Strategic Economic Plan, and the role that Guildford plays in the economic well-being of the northern part of the LEP area, within which Rushmoor also falls.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/1554  Respondent: 8587073 / Rushmoor Borough Council (Louise Piper)  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E7

Do you consider this section of the document; complies with the Duty to Cooperate? ( Yes ), is Sound? ( Yes ), is Legally Compliant? ( Yes )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The focus for retail and service provision is centred on Guildford itself. Policy E7 (Guildford Town Centre) includes the delivery by 2033 of a new retail-led mixed use development of 45,000 sq m (gross) of additional comparison goods floorspace on the North Street regeneration site. Moreover, the policy supports the delivery of a mix of other town centre uses such as food and drink establishments, cinemas and gyms, active use of the riverside, and around 1,172 new homes.

The policy contained in the draft Plan is in keeping with the role of Guildford as the Borough’s main town centre, and the scale of development is commensurate with this role. Rushmoor Borough Council recognises that it is an appropriate scale of future growth for Guildford.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1555  Respondent: 8587073 / Rushmoor Borough Council (Louise Piper)  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( Yes ), is Sound? ( Yes ), is Legally Compliant? ( Yes )

Answer (if comment is on questions 1-7 of the questionnaire): ()

In terms of the detail of the proposed housing allocations around Ash and Tongham, other policies in the draft Plan enable the consideration of relevant planning issues; for example, Policy H1 (Homes for all) requires a mix of housing to be provided to meet a range of accommodation needs.

The suite of policies use to support the determination of proposals for residential development and associated infrastructure, including Policy H1, is supported.

Policy S2 (Borough Wide Strategy) contains reference to the identification of 43 permanent pitches for Gypsies and Travellers and 6 permanent plots for Travelling Showpeople within Guildford Borough by 2017. A requirement for additional pitches and plots beyond 2017 is also recognised.

In terms of meeting this need, Guildford Borough Council is committed to meeting its identified needs for travellers within its administrative boundary in the first instance, which is important to Rushmoor Borough mindful of the fact that even though our Boroughs adjoin, we are cited in a different County. It is noted that in order to meet these needs, as well as some individual site allocations, such as at Sendmarsh and Effingham, the draft Plan requires in Policy H1 (Homes for all) that traveller accommodation should be provided on development sites of 500 homes or more. However, on land around Ash and Tongham, the individual housing sites that together comprise the allocation are individually less than 500 units, hence the policy requirement to provide traveller sites will not apply in this location. Rushmoor is supportive of the policy approach to planning for travellers as set out in the draft Local Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1523  Respondent: 8587073 / Rushmoor Borough Council (Louise Piper)  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( Yes ), is Sound? ( Yes ), is Legally Compliant? ( Yes )

Answer (if comment is on questions 1-7 of the questionnaire): ()
The Strategic Highway Assessment report (2016) sets out that in respect of the development proposed in the Local Plan, without any mitigation, the greatest potential impacts are seen on the network in the vicinity of Ash / Ash Vale and travelling north into the borough of Surrey Heath. Some of the trips in Ash / Ash Vale will join the A331 Blackwater Valley Road to travel further afield, but it is likely that a reasonable proportion will travel into the neighbouring boroughs of Rushmoor and Surrey Heath. Some of these roads already experience congestion, despite the model suggesting that existing traffic flows are relatively low.

Policy I1 (Infrastructure and delivery) of the draft Plan requires the infrastructure needed to support development to be provided and available when first needed to serve the occupants and users of the development. Infrastructure includes parks, green spaces and play areas, roads and other transport, schools, flood defences, sporting and recreational facilities, and medical facilities. Policy I3 deals with sustainable transport for new developments, and seeks to ensure that new developments will contribute to the delivery of an integrated, accessible and safe transport system.

Specifically of interest to the strategic allocation around Ash and Tongham, further information on key infrastructure projects is provided at Appendix C of the draft Plan, in the Infrastructure Schedule. Infrastructure projects LRN9 through to LRN14 relate to improvements to traffic management and environmental improvements in and around Ash, Ash Vale and Tongham, to be funded through a combination of developer contributions and Enterprise M3 Local Economic Partnership Local Growth Fund awards. For example, the schedule identifies LRN14, which is a junction improvement scheme at the connection of the A331 Blackwater Valley Route with the A31 Hog’s Back (Tongham). It is important to note that this mitigation is required to enable the development proposed in the Local Plan to proceed.

In this context, Rushmoor Borough Council is supportive of the planning policy framework and detailed infrastructure projects as they relate to the road network, subject to certainty regarding the delivery of these improvements as part of the overall package of implementation of development in and around Ash, Ash Vale and Tongham.

In addition, PED6 sets out a potential expansion of Ash Grange Primary School if required to provide spaces for the primary age children who will live in the new homes to the south and east of Ash and Tongham. These infrastructure proposals are supported by Rushmoor Council, mindful of the strategic allocation for residential development in and around the settlements of Ash and Tongham.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: PSLPP16/1551</th>
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<th>Agent:</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3</td>
<td>Do you consider this section of the document: complies with the Duty to Cooperate? (Yes), is Sound? (Yes), is Legally Compliant? (Yes)</td>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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The Strategic Highway Assessment report (2016) sets out that in respect of the development proposed in the Local Plan, without any mitigation, the greatest potential impacts are seen on the network in the vicinity of Ash / Ash Vale and travelling north into the borough of Surrey Heath. Some of the trips in Ash / Ash Vale will join the A331 Blackwater Valley Road to travel further afield, but it is likely that a reasonable proportion will travel into the neighbouring boroughs of Rushmoor and Surrey Heath. Some of these roads already experience congestion, despite the model suggesting that existing traffic flows are relatively low.

Policy I1 (Infrastructure and delivery) of the draft Plan requires the infrastructure needed to support development to be provided and available when first needed to serve the occupants and users of the development. Infrastructure includes...
parks, green spaces and play areas, roads and other transport, schools, flood defences, sporting and recreational facilities, and medical facilities. Policy I3 deals with sustainable transport for new developments, and seeks to ensure that new developments will contribute to the delivery of an integrated, accessible and safe transport system.

Specifically of interest to the strategic allocation around Ash and Tongham, further information on key infrastructure projects is provided at Appendix C of the draft Plan, in the Infrastructure Schedule. Infrastructure projects LRN9 through to LRN14 relate to improvements to traffic management and environmental improvements in and around Ash, Ash Vale and Tongham, to be funded through a combination of developer contributions and Enterprise M3 Local Economic Partnership Local Growth Fund awards. For example, the schedule identifies LRN14, which is a junction improvement scheme at the connection of the A331 Blackwater Valley Route with the A31 Hog’s Back (Tongham). It is important to note that this mitigation is required to enable the development proposed in the Local Plan to proceed.

In this context, Rushmoor Borough Council is supportive of the planning policy framework and detailed infrastructure projects as they relate to the road network, subject to certainty regarding the delivery of these improvements as part of the overall package of implementation of development in and around Ash, Ash Vale and Tongham.

As well as Policy I3, Sustainable transport for new developments, the draft Local Plan is also committed to supporting the Department for Transport’s Road Investment Strategy (Policy I2), focusing on improvements to the strategic road network (A3 and M25). The draft Local Plan is supported by the Guildford Borough Transport Strategy 2016, which sets out the strategic and local transport infrastructure required to support the development proposed in the Plan.

Rushmoor Borough Council is supportive of the suite of transport policies and proposals identified through the policy framework in the draft Plan and the Guildford Borough Transport Strategy 2016. It is likely that the benefits of the implementation of these proposals will be felt not only within Guildford Borough, but also more widely, given the sensitivity of the transport network to individual incidents. For example, Policy A26, the mixed use allocation for Blackwell Farm, off the A31, includes a new link road from the A31, through to Surrey Research Park and the Royal Surrey County Hospital. This will be immensely beneficial in terms of relieving congestion on the A31 into Guildford, as this will assist with removing the need for traffic travelling from the west of Guildford to drive in and back out using either the A3 trunk road or via the town when seeking to access the Research Park and the Hospital.

However, in the absence of the implementation of the full suite of transport policies and proposals to support the quantum of development set out in the Local Plan, this would potentially result in negative cross boundary transport impacts, the residual cumulative impacts of which would be severe. In this context, the Council looks forward to continuing to work with Guildford Borough Council on potential cross boundary strategic transport issues, to ensure that those arising from development proposed in the Guildford Local Plan are appropriately mitigated.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Policy P2 of the draft Local Plan relates to Green Belt. This notes that whilst some land has been removed from the Green Belt to facilitate residential development to meet identified housing needs, the Green Belt boundary has in fact been extended between Ash Green village and the Ash and Tongham urban area in order to prevent coalescence. Whilst not directly adjoining Rushmoor Borough, it is relevant to note and support this proposed addition to the Green Belt, given the supplementary protection it offers to the green infrastructure surrounding Ash and Tongham in the longer term, once the permissions and allocations for this part of Guildford Borough are built out over the period to 2033.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

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<th>Comment ID: PSLPP16/1552</th>
<th>Respondent: 8587073 / Rushmoor Borough Council (Louise Piper)</th>
<th>Agent:</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P3</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? (Yes), is Sound? (Yes), is Legally Compliant? (Yes)

Answer (if comment is on questions 1-7 of the questionnaire): ()

Of relevance to Rushmoor, mindful of the allocations around Ash and Tongham, Policy P3 (Countryside) is predicated on the need to ensure that there is no further encroachment into the countryside designation to the west and south of the urban area of those settlements. It notes specifically that any further proposals for development beyond those permitted and allocated would only be allowed provided they would not lead to a greater physical or visual coalescence between the Ash and Tongham urban area and Aldershot. The reasoned justification supporting Policy P3 states that,

“Any development proposals which compromise the integrity of the gap that separates the Ash and Tongham urban area with neighbouring Aldershot will be resisted.”

In the context of the strategic allocation for residential development on land to the south and east of Ash and Tongham, Rushmoor Borough Council welcomes the inclusion of Policy P3 in the draft Plan, and the recognition of the importance of the gap between the Ash and Tongham urban area and Aldershot.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

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<th>Comment ID: PSLPP16/1559</th>
<th>Respondent: 8587073 / Rushmoor Borough Council (Louise Piper)</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P5</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? (Yes), is Sound? (Yes), is Legally Compliant? (Yes)

Answer (if comment is on questions 1-7 of the questionnaire): ()
In terms of the detail of the proposed housing allocations around Ash and Tongham, other policies in the draft Plan enable the consideration of relevant planning issues; for example, Policy P5 relates to the Thames Basin Heaths Special Protection Area (SPA), and would prevent proposals that are not supported by measures to avoid and mitigate the adverse effects on the ecological integrity of the SPA.

The suite of policies used to support the determination of proposals for residential development and associated infrastructure, including Policy P5, is supported.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** PSLPP16/1522  **Respondent:** 8587073 / Rushmoor Borough Council (Louise Piper)  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? (Yes), is Sound? (Yes), is Legally Compliant? (Yes)

Answer (if comment is on questions 1-7 of the questionnaire): ()

The draft Plan sets out at Policy SS2 a spatial development strategy; effectively, what type of development, how much of it, and where will it go. In respect of housing, Policy SS2 plans for 13,860 new homes over the Plan period (2013-2033). This equates to an average of 693 net new dwellings a year, and would meet Guildford Borough’s objectively assessed housing need (OAN) within its administrative area.

Guildford Borough Council considers that, in fact, the Plan will meet the OAN with flexibility. The total potential provision of new homes across the plan period (including completions since 2013 and outstanding capacity) is 15,844. This provides 1,984 homes as a buffer. This is not planned over provision, but rather, flexibility that helps to guard against the policies in the plan becoming out of date by failing to deliver a five-year supply of available housing sites. Guildford Borough Council does however make clear in the supporting documentation that it is unable to help with addressing unmet housing needs from within its own Housing Market Area. Rushmoor Borough Council is supportive of Guildford Borough’s commitment to meet its OAN within its administrative boundary.

In terms of the availability of housing sites, an interesting statistic to note is that 89% of Guildford Borough falls within the Metropolitan Green Belt. The Plan sets out in Policy SS2 a spatial hierarchy, which identifies a brownfield first policy including, where appropriate, previously developed land in the Green Belt. The following spatial options are then considered to be the most sustainable locations:

- Guildford town centre
- Guildford, and Ash and Tongham urban area
- Inset villages
- Identified Green Belt villages
- Rural exception housing
- Countryside beyond the Green Belt
- Guildford urban extensions
- New settlement at the former Wisley airfield
- Development around village

Guildford Borough contains some “Countryside Beyond the Green Belt”, although this notation covers only 2% of the Borough, and is located in the west of the Borough near Ash and Tongham. Mindful of the hierarchy set out in paragraph
4.3 above, and the need to identify enough land to deliver an average of 693 new dwelling a year, the draft Plan contains several housing allocations that fall on land that is subject to this designation.

Policy A29 is the most significant of these allocations, identifying land for approximately 1200 homes around Ash and Tongham. A map showing the distribution of the sites that comprise this allocation is shown at Appendix 1 of this report. In addition to this, there are two other smaller allocations (A27: Warren Farm, Ash Green and A28: Land to the east of White Lane, Ash Green) of 120 units in total, 629 homes with planning permission (net outstanding) and 124 completions since the base date of 2013. In the wider Ash and Tongham area, taking into account completions, permissions and Local Plan allocations, this equals 2,057 homes to be delivered by 2033.

In terms of any potential cross boundary impacts of this development, whilst it is located close to the boundary with Rushmoor Borough, mindful of the constraints noted above, Guildford Borough Council has very limited opportunities to accommodate its objectively assessed housing need. The draft Plan contains a number of other strategic housing allocations, including land at former Wisley Airfield (2,100 homes), Slyfield Regeneration Project (1,000 homes), Gosden Hill Farm (2,000 homes), and Blackwell Farm (1,800 homes). In addition, there are a number of other allocations of around 100 units. Importantly, the evidence supporting the Plan has had to review the function of land within the Green Belt, and facilitate some land releases from it, in order to achieve the scale of residential development required to meet Guildford’s OAN.

Rushmoor Borough Council is supportive of Guildford’s approach of “leaving no stone unturned” in seeking to meet its housing need. This is positive in as much as it is not asking Rushmoor to help meet its housing needs, and in this respect, at this point in time, both authorities can be said to satisfy the “duty to cooperate” on the cross boundary strategic issue of meeting housing needs.

Policy S2 (Borough Wide Strategy) contains reference to the identification of 43 permanent pitches for Gypsies and Travellers and 6 permanent plots for Travelling Showpeople within Guildford Borough by 2017. A requirement for additional pitches and plots beyond 2017 is also recognised.

Guildford Borough Council is committed to meeting its identified needs for travellers within its administrative boundary in the first instance, which is important to Rushmoor Borough mindful of the fact that even though our Boroughs adjoin, we are cited in a different County. It is noted that in order to meet these needs, as well as some individual site allocations, such as at Sendmarsh and Effingham, the draft Plan requires in Policy H1 (Homes for all) that traveller accommodation should be provided on development sites of 500 homes or more. However, on land around Ash and Tongham, the individual housing sites that together comprise the allocation are individually less than 500 units, hence the policy requirement to provide traveller sites will not apply in this location. In this context, Rushmoor is supportive of the policy approach to planning for travellers as set out in the draft Local Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to the planned slip roads for the A3 from the Garlick’s Arch site. Access roads are needed to directly serve the new communities at Wisley and Gosden Hill if those sites are developed. The A247 through Send is already under pressure and cannot take further traffic. Nor can it be widened without demolishing existing housing!

I object to the proposed light industrial component of the Garlick’s Arch site. The original site at Burnt Common was far more suitable as it is already partly developed and has direct access to the A3. The land at Slyfield should be developed in preference to the Garlick’s Arch site. The only merit of this site is its immediate availability, but that would be at the expense of threatening ancient woodland and causing havoc to the traffic in and around Send.

I object to the proposed development in and around Send that would lead our village to become a suburb of both Woking and Guildford.

I object to the proposed 45 houses and two traveller pitches on Send Hill, on the grounds that the lane is too narrow to carry further traffic, especially at its junction with Potters Lane; and that the only other route for traffic is along Send Road/ Send Barnes Lane which already suffer from congestion at peak times.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1013  Respondent: 8587105 / Linda Parker-Picken  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the proposals for affordable housing rather than social housing. Young people locally cannot “afford” affordable housing. Current housing stock is often granted permission to extend, so the number of small housing units grows ever smaller.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1015  Respondent: 8587105 / Linda Parker-Picken  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to the short sighted attention to infrastructure, which it would appear will not be built in time to match the need created by further housing. Quite apart from the roads, the medical centre has no further capacity and nor do the Send schools.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1014    Respondent: 8587105 / Linda Parker-Picken    Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to all proposed development of housing on the Green Belt. In particular, I object to the proposed housing on Tannery Lane Send, Send Hill and at Garlick’s Arch. Plus the insetting of the villages which would leave vast swathes of local countryside unprotected. Government policy deems that housing need alone does not constitute the extraordinary circumstances that are required to develop on Green Belt land; and our local MP, Sir Paul Beresford, has reiterated this point of view recently

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1012    Respondent: 8587105 / Linda Parker-Picken    Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the SHMA figure of 693 houses per annum. That figure remains unsubstantiated. The south east is a magnet for people and any amount of development would remain insufficient. So – if you don’t build the houses, then people can’t move into this already overcrowded part of the country!

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp173/604    Respondent: 8587105 / Linda Parker-Picken    Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2017 / Appendix H: Maps - Send
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

GBC introduces the Local Plan like this: "Our Proposed Submission Local Plan balances the needs of residents, businesses and visitors with protecting the borough's most important countryside, landscapes and heritage. It addresses housing, employment, retail and leisure requirements, protecting the borough's most important countryside, landscapes including education, healthcare and transport". My comments aim to dispute most of these statements as they apply to Send.

Send has been targeted throughout this process for a disproportionate amount of development. Our residents' needs have been expressed in the approx. one third of comments overall received in response to the summer 2016 consultation. But they have been almost totally ignored! Development proposed in Green Belt land plus insetting which will lead to many other areas becoming future development sites pays no heed to protecting the borough's most important countryside (&). landscapes.

Send parish consists of three separate settlements: Send itself, Send Marsh and Burnt Common. These areas are semi-rural and currently have many green spaces used for leisure activities which are now threatened. None of the settlements contains a significant commercial centre and there are no proposals for retail development here. Parking in most areas is limited. Traffic along the main A247 is heavy at peak times and comes to a standstill if there are local incidents on the A31 Hog’s Back, A3 or M25 which result in more traffic being diverted here (transport). The local primary school, which recently combined onto one site with no further potential for development, is almost at capacity (education). There are no proposals for additional bus services (transport) which only run once an hour and not at all on Sundays. The local medical centre (healthcare) already has difficulty arranging patient appointments at short notice. I e our infrastructure is already at capacity.

I therefore object to the further increase in the proposed number of houses in the Send/ Burnt Common area. The housing number has dropped by 39 houses per annum. Yet the proposed number of houses in Send has increased to 500, despite our high volume of objections in summer 2016.

I particularly object to the increase in proposed additional houses in Tannery Lane (Policy A42) from 45 to 60. The arguments against development in this narrow lane were clearly covered in the 2016 objections; yet this number has been increased rather than reduced or removed.

I object to the allocation of 8 travelling showpeople pitches at the Garlick’s Arch site. Local Plan H1 Policy states that such accommodation should be provided to development sites of 500 homes and above. The Garlick’s Arch site is for a proposed 400 houses (and the whole development is highly contentious) Two traveller pitches were already allocated to Policy A44, a development of 40 houses only and there is no justification for further traveller accommodation in this area. The 8 pitches for travelling showpeople should be allocated to a development of 500 or more houses in the Guildford Borough to meet Policy H1.

I support the decision to move employment floorspace from Garlick’s Arch to Burnt Common (A58) as the latter site is already industrial. I consider it would also be a more appropriate location for travellers, with easy access to the A3.

However, I object to the change from “up to 7000 sq m” to “a minimum of 7000 sq m” now allocated to A58. That leaves this site open to unlimited future development. The local road network is not suitable for unlimited increase and will probably struggle even with 7000 sq m max additional employment floorspace. Document T47 refers to “Significant, recurrent traffic congestion … experienced during peak hours on the A3 trunk road as it runs through the town of Guildford and between the Ripley junction and the A3/M25 (Junction 10) Wisley interchange junction” (transport) ie the next junction from Burnt Common travelling north on the A3.

I consider that the Local Plan has given insufficient consideration to the overall traffic flows in the Send and Ripley/ Wisley A3/ M25 interchange areas as they would be affected by high increases in traffic volume caused by additional
housing, employment and traveller allocations in both Send and at the nearby Wisley and Gosden Hill sites plus the A43a construction of new slip roads at Burnt Common. **(transport)**

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** pslp172/4128  **Respondent:** 8587105 / Linda Parker-Picken  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy A42

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

I particularly object to the increase in proposed additional houses in Tannery Lane (Policy A42) from 45 to 60. The arguments against development in this narrow lane were clearly covered in the 2016 objections; yet this number has been increased rather than reduced or removed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** pslp172/4129  **Respondent:** 8587105 / Linda Parker-Picken  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy A58

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

I object to the allocation of 8 travelling showpeople pitches at the Garlick’s Arch site. Local Plan H1 Policy states that such accommodation should be provided to development sites of 500 homes and above. The Garlick’s Arch site is for a proposed 400 houses (and the whole development is highly contentious) Two traveller pitches were already allocated to Policy A44, a development of 40 houses only and there is no justification for further traveller accommodation in this area. The 8 pitches for travelling showpeople should be allocated to a development of 500 or more houses in the Guildford Borough to meet Policy H1.

I support the decision to move employment floorspace from Garlick’s Arch to Burnt Common (A58) as the latter site is already industrial. I consider it would also be a more appropriate location for travellers, with easy access to the A3.

However, I object to the change from “up to 7000 sq m” to “a minimum of 7000 sq m” now allocated to A58. That leaves this site open to unlimited future development. The local road network is not suitable for unlimited increase and will probably struggle even with 7000 sq m max additional employment floorspace. Document T47 refers to “Significant, recurrent traffic congestion … experienced during peak hours on the A3 trunk road as it runs through the town of Guildford.
and between the Ripley junction and the A3/M25 (Junction 10) Wisley interchange junction” (transport) ie the next junction from Burnt Common travelling north on the A3.

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<th>Comment ID:</th>
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<th>Respondent:</th>
<th>8587105 / Linda Parker-Picken</th>
<th>Agent:</th>
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<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2017 / Policy ID1</td>
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<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
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I consider that the Local Plan has given insufficient consideration to the overall traffic flows in the Send and Ripley/ Wisley A3/ M25 interchange areas as they would be affected by high increases in traffic volume caused by additional housing, employment and traveller allocations in both Send and at the nearby Wisley and Gosden Hill sites plus the A43a construction of new slip roads at Burnt Common. (transport)

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

<table>
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<tr>
<th>Comment ID:</th>
<th>PSLPA16/496</th>
<th>Respondent:</th>
<th>8587201 / Mrs Lucy Lines</th>
<th>Agent:</th>
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<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule</td>
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Thirdly, floating the vague idea of an A3 tunnel as a sop to local residents that infrastructure issues will be addressed is frankly insulting. The infrastructure needs to come FIRST not vague promises of looking at options which could easily fall away and require enormous sums in financing which the council can only dream of raising. Fourth, have GBC councillors tried returning by car on the A3 from London in the evening rush hour? If they had, they would know that most nights there is a tailback from before the Burpham interchange even without any "incidents". To assume that thousands more cars can be accommodated in what is already gridlock defies logic and fact. How is bringing even more congestion to Guildford and surrounding areas to the benefit of residents? Oh I forgot, they will all use bicycles to get to work in London under the new Guildford transport corridor plan (sic.)

Fifth, GBC needs to stand up for its residents - they are after all supposed to be protecting their interests - against central government diktat. The NPPF is the most nakedly political planning law to ever be passed - its sole purpose to drive the economy via construction. Cameron and Osborne are out of the way now. Let us see some leadership from GBC and the
councillors honouring their pledge that "the green belt is safe with us".

Finally, I attach a copy of an article I read in the local press which sums up my views perfectly. Rather than copy it out in my comments verbatim I attach it instead to save time.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents: IMAGE 3.png (293 KB)
IMAGE 1.png (240 KB)
IMAGE 2.png (321 KB)

Comment ID: PSLPA16/495  Respondent: 8587201 / Mrs Lucy Lines  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

First could I make the very obvious point that with the result of the EU referendum the assumptions by GL Hearn of future immigration numbers are now unsound. Although we do not yet know what form of limits on immigration and freedom of movement will be agreed, it cannot possibly be right to approve a plan which includes such a high number of houses required for future immigration.

Secondly, I do not understand why there is such an allowance for student numbers. My understanding is that the university has planning permission for a significant number of student dwellings at Manor Park but has never built them. If the university would do so then it would free up almost 2000 dwellings in Guildford for the use of families plus have the advantage of council tax being paid on those 2000 dwellings. Why is the council proposing in the draft plan to allow the university to profit by the sale of Blackwell Farm without addressing the real underlying issue of student accommodation?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/3774  Respondent: 8587489 / University of Surrey (Malcolm Parry)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Site Allocation Policies: I am in support of the development of Blackwell Farm (Site Allocation A26) being in the Local Plan but believe that it should be extended to provide for 3,000 homes.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8078  Respondent: 8587489 / University of Surrey (Malcolm Parry)  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy D1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Design Policies: I am fully supportive of Design Policies D1 “Making better places”, D2 Sustainable design, construction and energy” and D3 “Historic Environment”.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8072  Respondent: 8587489 / University of Surrey (Malcolm Parry)  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Economic Policies: I am in support of Policy E1 “Sustainable employment”

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8073  Respondent: 8587489 / University of Surrey (Malcolm Parry)  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
but believe that Policy E2 “Location for new employment floor space” fails to realise that Guildford Town Centre is relatively insignificant in economic value added terms. The University Quarter provides three times as much economic gross value added as the Town Centre yet is prejudiced by this policy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8074  Respondent: 8587489 / University of Surrey (Malcolm Parry)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I am supportive of Policy E4 “Surrey Research Park”,

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8075  Respondent: 8587489 / University of Surrey (Malcolm Parry)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I am supportive of………Policy E5 “Rural Economy”

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8076  Respondent: 8587489 / University of Surrey (Malcolm Parry)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E6
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I am supportive of.....and Policy E6 “The leisure and visitor experience”

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8077  Respondent: 8587489 / University of Surrey (Malcolm Parry)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E7

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

but caution that Policy E7 “Guildford Town Centre” could lead to overdevelopment of the Town Centre.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8069  Respondent: 8587489 / University of Surrey (Malcolm Parry)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Housing Policies: Policy H1 “Homes for all” suffers from the inclusion of an unacceptable requirement to impose on the University (regardless of Blackwell Farm) an obligation to provide accommodation for 60% of its students on campus. This imposition will limit education and will create a “them and us” style society. The housing problem in Guildford is not caused by students or the University and the Town should not discriminate against them.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<th>Comment ID: PSLPP16/8070</th>
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<td>Policy H2 “Affordable Homes” imposes a high obligation on developers for affordable housing but makes no reference to viability. If we are unrealistic about expectations of what developers must provide it will limit the supply of new homes and increase the cost of those that are built.</td>
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<td><strong>Infrastructure Policies:</strong> The infrastructure policies are sensible. Policy I3 “Sustainable transport for new developments” and Policy I4 “Green and blue infrastructure” are important and I support each of them. Blackwell distinguishes itself in each of these areas.</td>
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Protecting Policies: The Protecting Policies P1 “AONB”, P2 “Green Belt” and P3 “Countryside” are supported.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8067  Respondent: 8587489 / University of Surrey (Malcolm Parry)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I am writing in support of the Local Plan and in support of the University of Surrey’s part in that plan.

The University plans are robust, professional and show genuine smart growth; they support sustainable transport, relieve critical infrastructural issues and deliver high levels of employment and affordable housing. Those plans need to be prioritised within the Local Plan.

My comments on the most material of the policies are as follows.

Strategic Policies: The strategic policies within the plan are sensible. Development must be sustainable and respect natural assets; it must also include some careful use of greenbelt land for the simple reason that there is not enough developable capacity in brownfield sites. I therefore support both Policy S1 “Sustainability” and Policy S2 “Housing number”.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/4905  Respondent: 8587585 / Mr & Mrs M Chattaway  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
• ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
• adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/1858  Respondent: 8587937 / Mair L Davis  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

When I heard you were producing a further Local Plan I had hoped you might at least reduce the number of houses to be built. But no, the number of houses planned in my area has increased horribly. This seems a far cry from democracy and more like a war of attrition. These are my objections and deep concerns:

1. Potential influx of people on such a grand scale. I live five minutes’ walk from Effingham Junction Station and crossing the roads in the morning rush hour with my dogs is hazardous enough as it is. These people will need cars to get around and to park.
2. Our side road is used as a traffic overflow for commuters who already have crowded trains and insufficient spaces in the stations car park. Car parking itself will be a problem beside Horsleys shops, medical centre etc.
3. We also have many potholed and old roads are liable to flooding from overflowed drains. Increased traffic will do no favours to the state of these roads which were never constructed to deal with such an increased volume of traffic. One-way systems generated by the Wisley Airfields loathsome development or any widening of the roads will spoil the environment of those who live here.
4. How can our Horsley Medical Centre cope with added patients and Guildford Hospital too?
5. Health itself will be affected. Air pollution from traffic is already above the legal limit on Junction 10 of the M25
6. You take no account of where incoming children are going to be educated in the Horsleys.
7. You propose to use our precious Green Belt to accommodate 65% of new houses here. Our population value our green areas for recreational purpose and it is part of the charm of this locality

I understand that Sadiy Khan, the new mayor of London, has instructed his planners not to approve development and green belt land within the M25. I do wish you had a more sensitive approach to Guildford’s planning. We already have housing stretching from here to Central London. Surely you do not need to extend this plague of concentrated development to beautiful Guildford? I would have thought it worthwhile to preserve green space in our area for Londons enjoyment too.

I wholeheartedly OBJECT to your local plan more STRONGLY than ever. You are violating the area totally failing to protect your current population from being overcrowded and suffering the consequent effects of pollution and distress. Cramming Wisley Airfield with a concentration of housing worthy of tower Hamlets is VILE. Perhaps when Brexit comes into full force we wont need so many new homes on this crowded island. Frankly you need to think again before your votes seek to have more Green Belt protection on the council.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: pslp172/2782  Respondent: 8587937 / Mair L Davis  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I am writing to object most strongly to the development on the Former Wisley Airfield. The number of houses involved remains quite horrific. I have written to you several times now and nothing of any consequence seems to have been taken into consideration of in excess of 30,000 objections to last year’s plan. To think a [illegible word] will make any difference is laughable. Our area/station will be saturated. Worse still, you will be housing these new folks just off Junction 10 of the M25 which is already over the limit of contaminated air.

I appreciate the developers need to cram in as many houses as possible on the Airfield in order to make a turn on their investment, ie they probably paid too much for the site. But they do not live here! Surely such a plan that affects generations to come, as well as the current taxpayers, should not be held ransome to these developers. Green spaces surrounding our capital are precious. We all need areas for play and enjoyment, as indeed does the wildlife.

I do hope the Government’s Planning Inspector has some sensitivity towards democracy as opposed to a developer’s greed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/444  Respondent: 8588961 / Mrs Margaret Knight  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy A21

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy 21: These allotments are a vital part of the green infrastructure that enhances the landscape of the city. Particularly as they are on the north side of Guildford which is in particular need of these green pockets. They provide important recreational and health benefits both physical and mental for the residents of Guildford. They need to be protected at all costs. Additional allotments are particularly welcomed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/981  Respondent: 8588961 / Mrs Margaret Knight  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy ID4
Policy 14: I support this policy in its aim of enhancing biodiversity supporting which the allotments do.

It is for these reasons that I strongly support these two policies.

I also think that "allotments" needs to be specifically included in the list of green spaces in the definition of "green and blue infrastructure" in para 4.6.31 of the draft plan (page 116)"

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/7958  Respondent: 8589249 / WAAG (Mary Claire Travers)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Wisley Action Group (WAG) has reviewed the Proposed Submission Local Plan (Local Plan) and considers that:

1. Despite GBC’s protestations to the contrary, the Local Plan has failed in a number of key areas to take into account or to answer many valid comments and criticisms submitted by thousands of residents and organisations in respect of e.g. the 2013 Draft Local Plan.
2. The Local Plan prioritises growth to the detriment of the ongoing viability, character and “liveability” of Guildford town centre and neighbouring villages and the protection and maintenance of the countryside, the Green Belt, and protected wildlife areas such as the Thames Basin Heath SPA
3. The Local Plan allocates too much land for development, based on a flawed Strategic Housing Market Assessment, and an artificially inflated Housing Target not justified by actual or reasonably projected demand.
4. There are a number of inclusions in the Local Plan which, in WAG’s view, undermine the soundness of the Plan as a whole on grounds of lack of sustainability, deliverability and need.
5. The purpose of the Local Plan should be to enhance the quality of life of the Borough’s resident population, not to increase those aspects which cause the most dissatisfaction: traffic congestion and pollution are not eased by increasing the amount of traffic; inadequate infrastructure, whether schools, services, or sewerage, is made worse not better by increasing demand; and building houses, schools or other facilities in places furthest from existing areas where people live or work merely increases problems of inconvenience, travel, and development sprawl.

Against this background, WAG OBJECTS to the Local Plan overall on the following grounds:
1. The Local Plan proposes major, unjustified and unacceptable erosion of, and removal of villages or major parts thereof from, the Green Belt.

2. Over 70% of new housing is proposed to be built within the existing Green Belt notwithstanding that there is more than enough genuinely brownfield land and non-Green Belt land available.

3. The housing number of 693 houses per year from the Strategic Market Housing Assessment is based on flawed analysis and is too high. Guildford Residents Association (GRA) has commissioned an independent review of the SHMA, which concludes that the methodology used to arrive at the figure of 693 homes is flawed and that the FOAN for Guildford District is in fact 510 homes a year over the plan period.

4. New houses, schools and services should be developed in or adjacent to areas of actual demand and not in relatively remote areas which inevitably and unnecessarily result in major increases in travel requirements from home to work, work to home, home to school, etc.

5. The proposed allocation of housing in the north east of the Borough particularly Ockham, Ripley, Send and the Horsleys is a prime example of locating supply impractically far from the areas of demand, and is totally disproportionate to allocations elsewhere in the Borough.

6. The continued inclusion in the Local Plan of the former Wisley airfield (which is located in Ockham and which is known locally as Three Farms Meadows) is perverse and illogical, and is unsound for reasons of sustainability, deliverability and need.

Specifically in relation to the former Wisley airfield/Three Farms Meadows (FWA/TFM), WAG considers that the inclusion of the site in the Local Plan renders it unsound and the plan should be modified to exclude it. These objections have been made consistently by WAG and others in relation to, inter alia, the GBC’s 2013 draft Local Plan and Planning Applications for development or use of FWA/TFM:

1. FWA/TFM was included in the draft 2013 GBC Local Plan and was widely objected to. That draft Plan was eventually withdrawn after many months of consultation and deliberation.

2. The Wisley Property Investments Ltd (WPIL) planning application of January 2015 (Reference: 15/P/00012), as subsequently amended, for a phased development of a new settlement of over 2000 dwellings at FWA/TFM was decisively and unanimously rejected by GBC on 8 April 2016, after 15 months’ consideration by the Council, including extensive consultation and several major amendments, following the recommendation of the GBC Planning Officers.

The reasons for the refusal of the application were many, including that the proposed development:

- was an inappropriate development within the Green Belt;
- would have a clear and substantial detrimental impact on the openness of the Green Belt and conflict with the purposes of including land within the Green Belt;
- failed to demonstrate that the benefits amounted to very special circumstances such as to clearly outweigh the harm to the Green Belt and the other harm identified;
- failed to comply with the objectives of policy RE2 of the Guildford Borough Local Plan 2003 (as saved by CLG Direction dated 24/09/2007) and chapter 9 of the National Planning Policy Framework;
- was within the 0 -400m and the 400m to 5km zones of the Thames Basin Heaths Special Protection Area, etc.
- would have a severe adverse impact on the safe and efficient operation of the strategic road network, and a severe impact on the efficient operation of the local road network;
- failed to deliver the required transport sustainability measures;
- failed to secure an appropriate provision of affordable housing;
- was detrimental to the viability and vitality of the existing district and local centres in the vicinity of the site;
- would result in loss of the safeguarded waste site;
- presented a dense and urban form of development owing to its quantum and scale;
- had an adverse impact on the setting and significance of a designated heritage asset;
- had an unacceptable air quality impact;
- impacted on education infrastructure;
- impacted on policing infrastructure;
- impacted on health infrastructure;
- impacted on library provision.
1. Both these and other serious objections and concerns had been raised by WAG, neighbouring borough and parish councils, Surrey County Council, statutory bodies, CPRE, Surrey Wildlife Trust, University of Surrey, Thames Water, NATS, the Environment Agency, Police Authorities, Highways Authorities, residents’ associations and several thousands of other organisations and individuals - both in the context of the planning application and in relation to the current and earlier GBC draft Local Plans.

The numerous concerns raised by WAG and others have been well documented in previous correspondence from WAG to GBC (copies of these representations attached). These concerns are supported by a series of legal opinions from Leading Counsel (appended for convenience), most recently the opinion of Richard Harwood QC, dated 17th May 2016, which advises that the FWA/TFM allocation is highly likely to be found unsound by the Inspector at the Local Plan examination. They are founded on the following:

1. The value of the Green Belt and most importantly the value of FWA/TFM as a critical core at the heart of the Green Belt.
2. The very serious harm to the openness of the Green Belt which would be caused by a development of this scale in this location, as acknowledged by the Council in refusing permission for the recent application. As was also acknowledged by the Council, unless the exceptional circumstances test is made out there is not even scope for redeveloping the previously developed parts of the site – the runway, the taxiways and aircraft hardstanding – because of the serious harm which would be caused to openness and to the Green Belt purposes.
3. The absence of any exceptional circumstances justifying removal of the site from the Green Belt. The only justification for releasing the site is said to be the shortfall in available sites to meet the housing needs of the Borough. However the Council’s own evidence base demonstrates that the release of this site is not, in fact, required in order to meet the housing need. Thus:

   1. Draft policy S2 states that 13,860 new dwellings will be provided over the Plan period in order to meet the identified housing need, based on a FOAN of 693 dpa (693 x 20 years = 13,860).
   2. However the LAA advises that, not including sites with planning permission, sufficient land is already available to construct 13,708 new dwellings over the next 15 years i.e. up to 2031 (with any development from 2031-2033 to be added to this total).
   3. There are 1,342 homes with planning permission which are expected to deliver new homes within the next five years, as well as 66 homes in the 11-15 year period.
   4. Accordingly, there is already provision for a total of 15,116 new homes, even without taking into account completions for 2013-2014 (132), 2014-2015 (242) and 2015-Feb 2016.

Even on the Council’s own analysis, there is therefore a significant surplus of available land compared to the identified housing need, and this surplus has previously been acknowledged by the Leader of the Council. Consequently, the housing need cannot amount to exceptional circumstances justifying the release of this site. Moreover, as noted above, the expert advice received by WAG is that the FOAN of 693 dpa is far too high and that the correct figure is in fact 510 dpa, or 10,200 dwellings over the plan period. On this analysis the available land far exceeds the identified housing need.

1. The Sustainability Appraisal includes the FWA/TFM allocation only if the Plan proposes OAN plus 14% (page 32). Consequently FWA/TFM is not required to meet the Council’s own needs figure. The presumption in favour of sustainable development in para 14 of the NPPF does not support the FWA/TFM allocation – as policy is simply to meet OAN with sufficient flexibility to adapt to rapid change unless specific policies, including Green Belt, indicate development should be restricted. Paragraph 47 of the NPPF requires Local Plans to meet OAN (unless there are constraints). The policy does not include a buffer in the Local Plan figure (the 5 year Housing Land Supply is distinct from the Local Plan total numbers). In the absence of national policy support for a buffer in the total, there is no case whatsoever for the allocation of FWA/TFM. There are no potential exceptional circumstances which could therefore support the allocation.
2. The value of FWA/TFM from an environmental and ecological standpoint, not least in relation to the Thames Basin Heath Special Protection Area, a SNCI and a SSI.
3. The value of FWA/TFM as a community asset and as a vital “lung”, not least because of the health risks associated with increasing pollution and decreasing air quality, as well as acid deposition on the SPA impacting human health and animal, plant and soil viability in the site and immediately surrounding area.
4. The wealth of evidence demonstrating that the adverse consequences of development of the site, including damage to the ecology of e.g. the SPA, cannot be satisfactorily mitigated. This is also self-evident from WPIL’s failure to overcome these adverse impacts, despite considerable efforts over a period of 15 months.

5. The significant harm to the character of the surrounding area which would inevitably be caused by a development of up to 2100 dwellings in this location, necessitating building heights of up to five storeys and creating a wholly incongruous urban form of development in the middle of the countryside.

6. The critical location and current nature of FWA/TFM in relation to the historic and current viability of the Ockham hamlets and surrounding villages.

7. The unacceptable impact of a development of this scale on Ockham, an historic rural village with around 160 existing dwellings, and with narrow lanes, no street lights, few pavements, a Conservation Area and many listed properties – which would be completely subsumed by a 2000+ dwelling development, with urban style buildings up to 5 storeys high and a population density higher than most London boroughs. Ockham’s existing population of just over 400 would be increased by more than 15 times.

8. A Local Plan and potential development which do not meet, and indeed which are completely contrary to, the needs and desires of Ockham’s population, as evidenced in the existing Ockham Parish Plan.

9. The detrimental and unsustainable impact of development at FWA/TFM on transport, the A3 and M25, local roads and road safety, with increased vehicle movements (an estimated 4000 additional cars plus increased bus and HGV movements during construction and afterwards), on rail stations and car parking which are already at capacity, and on local services and infrastructure. It is by no means clear how - or whether - the mitigation schemes referred to in policy A35 can be delivered in order to overcome the severe impact of a development of this scale at FWA/TFM on the strategic or local road network (and, certainly, WPIL was unable to overcome these issues, despite considerable efforts on its part and on the part of the relevant authorities).

10. The value of FWA/TFM for agriculture, comprising as it does over 75% of agricultural land including 63ha of Grade 2; 3a and 3b agricultural land (of which at least 45.4ha is classified as best and most versatile land – Grade 2 and Grade 3a). As advised by the planning officer, a development of this scale would result in the loss of approximately 20ha of best and most versatile agricultural land.

11. The loss of a rare consented waste site in the County, which will increase pressure for waste sites elsewhere in the Borough.

12. The impossibility in practical terms of creating a sustainable development on FWA/TFM, which is further demonstrated by the limited historical use of, or development of, the site, and most recently by the inability of the current landowner/developer and its many experts and advisers to come up with a sustainable development plan despite numerous attempts over an extended period.

13. The cumulative adverse consequences of other actual or potential developments in the area particularly in Ripley, Send and the Horsleys.

Consequently the allocation is unsound under paragraph 182 of the NPPF in that:

- It is not positively prepared, since the allocation is not part of meeting objectively assessed requirements nor is it consistent with achieving sustainable development;
- It is not justified, failing to be ‘a most appropriate strategy’ (applying the LPEG change from ‘the most appropriate strategy’) since it contravenes numerous policies and alternative strategies can meet the needs in a less harmful manner;
- The allocation is not effective. The FWA/TFM site is not deliverable, as the objections from the highway authorities show. If the site was deliverable then certain reasons for refusal would have been overcome – the developer’s failure to do so despite a long application process indicates that these are insoluble. It is not based on effective joint working, the planning application being subject to objections from the county planning authority, two neighbouring district authorities and the local and strategic highways authorities;
- The proposal is not consistent with national policy and does not enable the delivery of sustainable development. Instead it is an isolated Green Belt site in an unsustainable location which causes harm to the countryside, landscape, agricultural land, natural conservation, highways, air quality and the historic environment.

CONCLUSION
These objections demonstrate conclusively why removal of FWA/TFM from the Green Belt cannot be justified, and why its isolated location, size, distance from places of employment, and lack of infrastructure, including overstretched and inadequate public transport, roads, services and facilities, make the site totally unsuitable for any kind of significant development – as WAG and others have consistently argued.

The fact that the Local Plan still includes FWA/TFM (as well as neighbouring land not owned by WPIL) as a potential site for development flies in the face of logic and GBC’s own arguments and previous findings, and ignores widespread expert and local opinion.

The repeated attempts, in numerous guises, over the last 3 years to take FWA/TFM out of the Green Belt and to press for both major and ancillary development of the site have stretched the patience and goodwill of local communities, not least Ockham Parish; have imposed heavy and unwarranted costs and other burdens on those local communities (who bear the costs twice: once directly and then again through their Council Tax contributions to GBC), have caused a blight on the area, distress to local residents and farming businesses, and have adversely prejudiced peoples’ lives and livelihoods.

WAG therefore strongly OBJECTS to this further and unwarranted attempt to exclude FWA/TFM from the Green Belt and thereby to promote a highly unsustainable, unnecessary and ultimately undeliverable development. It invites the Council to withdraw the deposit draft and re-deposit a version without the FWA/TFM allocation or to ask the Local Plan Inspector to modify the Plan by removing the allocation. If not, the Inspector is asked to find the plan unsound and if the Council request modifications, to recommend the removal of the allocation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
- Wisley Local Plan adv 170516 final.pdf (187 KB)
- Local Plan Strategy and Sites Consultation Response Covering Letter.pdf (201 KB)
- Tyler Grange Landscape and Visual Implications Report Sept 2014.pdf (5.1 MB)
- Wisley Action Group objection to amended application 15 P 00012.pdf (479 KB)
- Former Wisley Airfield Advice 17 06 14.pdf (275 KB)
- BCP2 Letter from Nick Boles MP.pdf (2.2 MB)
- Wisley Local Plan lt to councillors 0416.docx (16 KB)
- WAG Response to GBC Local Plan consultation 19 Sept 2014 Final.pdf (1.8 MB)
- BCP1 FWA Location Plan.pdf (1.6 MB)
- AQ Review Report J2476 final.pdf (116 KB)
- BC for WAG 20131126.pdf (2.5 MB)
- WAG additional comments on flood risk.pdf (194 KB)

Comment ID: PSLPA16/2458  Respondent: 8589345 / Ms Mary Symes  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I write to comment on your local plan for the Horsleys. I know that you have spent time, money and energy preparing the plan. Once built on, the soil plants and wildlife large and small will be destroyed, perhaps for ever.

We need green spaces for plants to photosynthesise and keep the air that we breathe free from pollution.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/10227  **Respondent:** 8589345 / Ms Mary Symes  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

May I suggest a solution? Many people like to downsize as they get older to apartments with lifts, views and with shops and transport within easy reach. Some nice three storey apartments would be good. Then the houses would be freed up for people with families to move into. Please do not cover the Horsleys in concrete. You must know yourselves the damage that will be done to the environment. Let us guard what we have in our rural, lovely part of England. How about four stories in Guildford as well, so that we can keep our countryside.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPA16/2464  **Respondent:** 8589505 / CGMS Consulting (Matthew Roe)  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

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**GUILDFORD BOROUGH COUNCIL**

**DRAFT LOCAL PLAN (PROPOSED SUBMISSION) CONSULTATION**

**REPRESENTATIONS ON BEHALF OF ASHILL LAND LTD**

**LAND AT TITHEBARN FARM, SEND**

We write on behalf of our client, Ashill Land Ltd, to submit representations to the draft Local Plan (submission version) to support development at the site at Tithebarn Farm, Send. A site location plan identifying the land is enclosed at Appendix A.

**Background to the Site**

The site currently comprises a series of one and a half storey sheds with shallow pitched roof which are in storage use (B8...
Use Class). In total there are 5 sheds and one hut on site which were historically used as chicken sheds. However, they have been in B8 storage use for 20 years and this has been confirmed by a certificate of lawful existing use or development (application ref. 16/P/00333) granted on 6th June 2016. As the sheds are purely within storage use they make no employment provision.

The buildings are surrounded by hard standing and there is a single vehicular access off Tithebarn Lane. This also serves the substantial barns fronting the road. The land to the north towards the A3 is open and to the east is a farmyard and farmland. To the south east is residential development with natural screening on the boundary fronting onto Tithebarns Lane. The site is located within the Green Belt and also within the 5 km buffer of the Thames Basin Heath SPA.

Summary of Representations and Recommendations We submit these representations on behalf of Ashill Land Ltd, with particular interest to their site at Tithebarn Farm, Send. The representation is thus submitted in support development at this site for the following reasons:

1. The lawful use of the building is confirmed as storage (B8 Use Class) and therefore brownfield land within the Green Belt and can be developed under paragraph 89 of the NPPF.
2. Paragraph 89 of the NPPF supports the complete redevelopment of previously developed sites (brownfield land) and the draft Local Plan Policy P2 should adequately reflect the Framework.
3. We recommend that the threshold trigger for affordable housing within draft Local Plan Policy H5 is increased to 1,000 sq m or 10 or in line with the NPPG.
4. We suggest a flexible approach to the affordable housing policy to have further consideration to starter homes, viability and deliverability. In addition, to payment in lieu towards affordable housing where appropriate.
5. We recommend that the approach to the change of use of non-designated employment sites is reviewed to take into consideration the conditions of existing buildings for employment uses.
6. The development of the site would contribute towards the housing need within Guildford and offer a number of high quality dwellings.
7. The site is deliverable and viable to offer development in the immediate term. The representations, on behalf of our client, to the draft Local Plan (submission version) with regards to the above are set out in the following paragraphs. Green Belt Allocation and Policy The site is located within the Green Belt within the adopted Local Plan. Paragraph 89 of the NPPF states that local authorities should regard the construction of new buildings as inappropriate in Green Belt. However, exceptions to this are:
   - Buildings for agriculture and forestry;
   - Provision of appropriate facilities for outdoor sport, outdoor recreation and for cemeteries, as long as it preserves the openness of the Green Belt and does not conflict with the purposes of including land within it;
   - The extension or alteration of a building provided that it does not result in disproportionate additions over and above the size of the original building;
   - The replacement of a building, provided the new building is in the same use and not materially large than the one it replaces;
   - Limited infilling in villages, and limited affordable housing for local community needs under policies set out in the local plan; and
   - Limited infilling or the partial or complete development of previously developed sites (brownfield land), whether redundant or in continuing use (excluding temporary buildings), which would not have a greater impact on the openness of the Green Belt and the purpose of including land within it than the existing development.

Draft Local Plan Policy P2 ‘Green Belt’ states that the council will continue to protect metropolitan Green Belt, as shown on the proposals map, against inappropriate development. The policy dictates that the construction of new development will be considered inappropriate and will not be permitted unless very special circumstances can be demonstrated. The policy further details that certain forms of development are not considered to be inappropriate. Proposals will be permitted where they are consistent with the local level criteria as set out in the draft policy. Specifically included within the draft policy is the criteria for ‘replacement of buildings’ within the Green Belt. The policy dictates the replacement of a building would be appropriate, provided the new building:
   - Would be in the same use;
   - Is not materially larger than the one it replaces; and
   - Is sited on or close to the position of the existing buildings.
The supporting text of the policy states that when assessing whether the replacement buildings are materially larger, account will be taken of the forthcoming Green Belt SPD. The text justifying the policy further states that the replacement buildings are expected to be sited on or close to the position of the original building, unless it can be clearly demonstrated that an alternative position would reduce the overall impact on the openness of the Green Belt.

The draft policy distinguishes between three criteria including ‘extensions or alterations, replacement buildings and limited infilling’ within the main text. This classification of the acceptable types of development within the green belt is too narrow and does not go far enough to fully reflect the guidance for local authorities included within paragraph 89 of the NPPF.

The guidance within the NPPF is clear and confirms that ‘brownfield land’ within the Green Belt is appropriate development as long as it would not have a greater impact on the openness of the Green Belt than the existing development. The draft local plan policy should clearly state that the ‘limited infilling or partial or complete redevelopment of previously developed sites (brownfield land)’ is appropriate and furthermore the policy should not be restrictive to the same use as this does not fully reflect the policy in paragraph 89 of the Framework. The draft policy broadly follows paragraph 89 of the NPPF but does not go far enough to detail the acceptability for the replacement of buildings on brownfield land within the Green Belt. The NPPF is clear that exceptions to construction of new buildings within the Green Belt are appropriate where the land is classified as ‘brownfield’. This draft policy should be reviewed to include ‘development of brownfield land within the Green Belt is appropriate’ subject to the impact on the openness of the Green Belt.

We also note that the monitoring indicator of this policy is the number of appeals allowed involving development of the Green Belt and that the target is the reduction in the number of appeals allowed. We do not believe this is a clear monitoring indicator and the stance of it appears to be restrictive to development overall and not account for the clear policy tests within the NPPF. This monitoring mechanism should be reviewed to state that development in the Green Belt ‘not’ on brownfield land, to fully reflect the guidance within the NPPF.

Proposed amendments to Draft Local Plan Policy P2 ‘Green Belt’
- With the above in mind, we recommend amending the wording of the policy to read Replacement of a building, provided the new building:
  ? Is on previously developed/ brownfield land;
  ? Is not materially larger than the one it replaces, and
  ? Is sited on or close to the position of the existing building.

Furthermore, we would recommend that the policy is broadened to include the tests included within paragraph 89 of the NPPF and not restricted to the three categories as currently drafted.Affordable Housing Policy Draft Local Plan Policy H2 ‘Affordable Homes’ details that the council will work with registered providers, developers and landowners to increase the number of affordable home in the borough to meet the identified need. The draft policy states that affordable homes will be provided:
- On sites providing five or more home, or sites of 0.17 ha or more regardless of the number of homes. At least 40 percent of the homes on these site must be affordable homes; and
- On developments providing solely affordable housing either on public sector owned land or developments by registered providers.

The policy dictates that the mix of affordable units and tenure split need to reflect the SHMA and 70% rented with the remainder being other forms of affordable housing. The policy confirms that affordable rent must be no more than the maximum level set out in recent housing guidance.

The supporting text of the policy does not go far enough to justify the trigger point of providing affordable housing on site at being 5 or more homes or sites of 0.17 ha in size. This policy has been derived from the SHMA and the update to Guildford Local Plan Viability and Affordable Housing Study. Referring to the SHMA it identifies that approximately half of all Guildford households over the plan period will not be able to afford to buy or rent a home that meets their needs on the open market without subsidy. However, the SHMA does not conclude or provide evidence that supports the draft policy that developments with the capacity of 5 or more units or 0.17ha should contribute towards affordable housing.

Although there is an identified need for affordable housing, the threshold as drafted within this policy at five or more units or sites of 0.17 is onerous. We object to this trigger point of 5 or more dwellings due to the lack of evidence base which supports this low threshold and trigger of affordable housing. Furthermore, the viability study of the draft policies states
that the council should have a flexible approach to applying draft policy H2. This threshold brings into question the viability and deliverability of housing schemes and will ultimately jeopardise housing supply in Guildford. As per other boroughs the threshold for onsite affordable housing should be bought to 1,000 sq m as per the guidance included within the NPPG and recent appeal decision upholding the 10 unit threshold.

A recent appeal decision confirms that following the Court of appeal judgement dated 11th May 2016 that the obligations for affordable housing have been reinstated and refers to the NPPG. This states that such contributions should not be sought from development of 10 units or less and which have a maximum combined gross floorspace of no more than 1000m². The appeal was at 21 Clarence Avenue, London SW4 8LA (Appeal Ref. APP/N5660/W/16/3142911).

Viability and Affordable Housing

It should be noted that viability is determined by a range of elements including but not limited to, the density of the scheme, the location, the build costs incurred, the level of the sales values achievable and of key importance the benchmark land value. Therefore, this restrictive approach to seeking affordable housing from developments of five or more dwellings or 0.17ha does not account for these factors and could bring the viability of smaller housing schemes in question and therefore ultimately affecting the councils ability to achieve their housing target. Starter Homes

The supporting text of draft policy does not refer to the opportunity or inclusion of starter homes. As per national guidance these fall within the affordable housing definition and could be a solution to the affordable housing need in Guildford. The justification for this is that starter homes should be offered at a discount of at least 20% below market value and that they should cost no more than £250,000 outside of London.

The supporting policy text does not provide sufficient evidence as to why starter homes are not included within the affordable housing policy. We object to this exclusion in the policy and believe it is not in-line with the Government’s current consultation on national planning policy guidance. Furthermore, it does not follow the prescribed approach for the draft policy to be flexible.

Proposed amendments to Draft Local Plan Policy H2 ‘Affordable Homes’ With this in mind, we recommend amending the wording of the policy to read:As well as providing and managing affordable homes ourselves, the Council will work with registered providers, developers and landowners to increase the number of affordable homes in the borough toward meeting identified needs. These affordable homes will be provided:

- On sites providing 10 or more home, or sites 1000 sq m. At least 40 percent of the homes on these sites must be affordable homes, subject to viability.

The above amendment is in line with guidance in the NPPG, furthermore, the policy should be reviewed to include viability and the provision of starter homes as a type of affordable housing.

Loss of Employment Floorspace

Paragraph 51 of the NPPF supports the change of use of commercial buildings currently in Use Class B to residential where there is an identified need for additional housing in that area provided there are not strong economic reasons why such development would be inappropriate.

Draft Policy E3 ‘Maintaining employment capacity and improving employment floorspace’ states that in order to sustain and enhance employment capacity:

? Employment floorspace will be protected and the loss strongly resisted on the Strategic Employment Sites, which are defined in policy E1. Change of use will only be acceptable if evidence is provided of active and comprehensive marketing of the site for its current use (offices, research and development or industrial) for a continuous period of at least two years.

? Employment floorspace will be protected and the loss resisted on the Locally Significant Employment Sites, which are defined in policy E1. Change of use will only be acceptable if evidence is provided of active and comprehensive marketing of the site for its current use (offices, research and development or industrial) for a continuous period of at least 18 months.

? Employment floorspace will be protected in line with latest needs assessment and the loss be resisted outside designated employment sites. Change of use will only be acceptable if evidence is provided of active and comprehensive marketing of the site for its current use (offices, research and development or industrial) for a continuous period of at least 12 months.

We are making representations to the following part of the draft policy:
“Employment floorspace will be protected in line with the latest needs assessment and the loss resisted outside designated employment sites. Change of use will only be acceptable if evidence is provided of active and comprehensive marketing of the site for its current use (offices, research and development or industrial) for a continuous period of at least 12 months”.

The draft policy further states that “once the period of comprehensive and active marketing is achieved, any other suitable employment use should be considered before change of use to residential or other use will be permitted”.

Proposed amendments to Draft Local Plan Policy E3 ‘Maintaining employment capacity and improving employment floorspace’

The policy as drafted is restrictive and covers all sites which are in employment use and not designated, furthermore there is a requirement to market these sites for 12 months continuously to provide evidence for a change of use. The draft policy does not take account for site specific characteristics which could impact and hinder the current employment use, this includes:

- The type of employment use;
- The employment generation of sites;
- The suitability and condition of the employment buildings;
- Economic viability for refurbishment;
- The availability and demand for the employment floorspace; and
- Flexibility in employment floorspace.

In addition, the NPPF does not require marketing evidence for employment sites. Therefore these factors of non-designated employment sites should be considered in the draft policy and a pro-active approach should be taken by the council assess the suitability of sites to remain in employment use. With this in mind, we recommend amending the wording of the policy to read:

“Employment floorspace will be protected in line with the latest needs assessment and the loss resisted outside designated employment sites.

Change of use will be acceptable if evidence is provided of active and comprehensive marketing of the site for its current use (offices, research and development or industrial) for a continuous period of at least 12 months or where it can be demonstrated that the building or site is unsuitable for continued employment use”.

The supporting text should further be amended to take account of the proposed amendment above “once the period of comprehensive and active marketing is achieved or provided the existing employment floorspace is redundant and does not offer suitable employment generating uses, a change of use to residential or other use will be permitted”

Please acknowledge receipt of our representations to the Draft Guildford Local Plan (Proposed Submission). We look forward to discussing matters with you further in the future.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents: 160718 - JCG19510 - Tithebarn Farm - Representations to the LP.pdf (471 KB)

<table>
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<tr>
<th>Comment ID: PSLPA16/3623</th>
<th>Respondent: 8589505 / CGMS Consulting (Matthew Roe)</th>
<th>Agent:</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Guildford Urban Area</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
We write on behalf of our client, Ashill Land Ltd, to submit representations to the draft Local Plan (submission version) to support residential development at the site at Keens Lane/Tangley Lane, Worplesdon. A site location plan identifying the land is enclosed at

Appendix A.

Ashill has previously made representations to draft Local Plan consultations including the Issues and Options document (Autumn 2013) and draft Local Plan (Summer 2014). These representations support the release of the land from the Green Belt and the allocation for residential development to contribute towards the Council’s strategic housing land allocation. Our representations to the draft Local Plan (submission version) are detailed within the following sections of this submission.

In addition to the above, Ashill have engaged with Guildford Borough Council (GBC) through pre-applications over the last year and the development of land at Keens Lane and Tangle Lane Worplesdon. In addition, Surrey County Council (SCC) has been consulted with regards to highways. Both GBC and SCC have been supportive for development of the site for housing.

Background to the Site

The site is 5.25 ha in size and is currently used as arable farming land. Built development on site comprises horse stables and agricultural buildings which are ancillary use. The boundaries of the site to the north and east are characterised by existing hedgerows and a bridleway. Adjacent to Keens Lane and Tangley Lane are residential areas which form part of Guildford Urban area. Residential dwellings are located on Keens Lane and Tangley Lane in the south west corner of the site. The site is located at the edge of the Guildford Urban Area to the north west of the town centre. It lies to the north of Keens Lane and is in close proximity to Gravetts Lane and the A322 which is approximately 200m away. To the north of the site is open farmland and the settlement of Worplesdon and to the north-east is Whitmoor Common which forms part of the Thames Basin Heath SPA. To the east and south of the site are existing residential areas. To the west is residential dwellings and agricultural land. The site is adjoined by development on the east, south and west and partially to the north. It is within short walking distance of a range of local amenities and services on Worplesdon Road approximately 450m away. Bus stops are located on Worplesdon Road and Cumberland Avenue (route 26, 27, 28 and 91) and are located within approximately 400m in walking distance of the site. This connects the site to Guildford town centre and the wider employment, leisure and retail services.

Summary of Representations and Recommendations

We submit these representations on behalf of Ashill Land Ltd, with particular interest to their site at Keens Lane, Tangle Lane at Worplesdon. The representation is submitted in support of residential development at this site for the following reasons:

1. The Strategic Housing Market Assessment (SHMA) identifies a low Objectively Assessed Need (OAN) per annum for the Guildford area;
2. The Land Availability Assessment (LAA) confirms the housing target over the plan period and per annum for Guildford which uses the base OAN but is low given the deficit against housing need;
3. The 5 year housing land supply relies on a number of extant planning permissions to be delivered within the period to meet the housing need;
4. The overall housing targets included within draft policy S2 ‘Borough Wide Strategy’ need to reflect the housing need provided within the evidence base;
5. The site has been classified as ‘medium sensitivity’ in the Green Belt Review and thus appropriate for release for development.
6. The site is adjacent to the settlement boundary and is suitable and sustainable site for housing development.
7. The site is the only medium sensitive site in the Green Belt Review in the Guildford Urban Area.
8. The site is suitable and deliverable to offer a significant amount of new housing to contribute towards the council’s housing need within the first 5 year period.
9. We support the requirements of the allocation (A22) but the residential development can be maximised to a minimum of 150 dwellings.
10. We support the requirements of the allocation (A22) to incorporate a residential care home to be provided within the 400m Thames Basin Heaths SPA buffer.
11. We request that the opportunity for self-build plots is removed from the allocation (A22) as there is little evidence to support this requirement.

The representations, on behalf of our client, to the draft Local Plan (submission version) with regards to the above are set out in the following paragraphs.

**Housing Numbers and Evidence Base**

**SHMA June 2016**

The West Surrey SHMA (June 2016) provides an evidence base for the housing policies and targets included within the draft Local Plan and identifies the OAN. The SHMA covers the boroughs of Guildford, Waverley and Woking. The NPPF highlights the Strategic Housing Market Assessment SHMA as a key piece of evidence in determining housing needs. Paragraph 159 in the Framework outlines that this should identify the scale and mix of housing and the range of tenures which the local population is likely to need over the plan period that:

- Meets household and population projections, taking account of migration and demographic change;
- Addresses the need for all types of housing, including affordable housing and the needs of different groups in the community; and
- Caters for housing demand and the scale of housing supply necessary to meet this demand.

The SHMA identifies across the housing market area based on the ONS 2012-based SNPP that there is a need to deliver 1,352 dwellings per annum. Specifically within Guildford there is an OAN for 517 dwellings per annum for the plan period between 2013 – 2033. Taking into account further adjustments such as economic growth, affordability and student growth, the OAN for Guildford has been increased to 693 dwellings per annum. It should be noted that this projection provides a starting point for housing need and is a minimum requirement.

The identified OAN is low for the Guildford area given the factors assessed within the SHMA, specifically with regards to the forecasted population increase which has been identified to increase by 15% by 2033 in the borough and the significant need for Guildford to increase housing to support the growing economy. Therefore the housing target prescribed in Policy H1 ‘Homes for All’ should be reviewed in light of the above and increased substantially to reflect the current need and should be set as a minimum requirement.

The OAN highlights the baseline which is considered in the Strategic LAA and the Five Year Housing Land Supply, the analysis with regards to Land at Keens Lane, Tangley Lane is detailed within the following paragraphs.

**Strategic Housing Land Availability Assessment May 2014**

Guildford Borough Council published their Strategic Housing Land Availability Assessment (SHLAA) in May 2014 noting an overall target of 13,240 dwellings over the proposed plan period. The total figures of 13,420 equates to 652 dwellings per annum. The draft Local Plan cited a 5 year deliverable figure of 1,394 dwellings over the plan period which equated to 279 dwellings per annum. This was however; considerably lower than the 652 dwellings per annum projected by the SHLAA published in May 2014. As part of the evidence base for the current draft Local Plan, the SHLAA has been updated to a LAA to incorporate a number of factors which are detailed within the following paragraphs.

**Land Availability Assessment May 2016**

As part of the evidence base for the Local Plan (proposed submission), a Land Availability Assessment (LAA) has been published (May 2016). This provides evidence to support the ‘draft Local Plan Policy S2’ which identifies the provision of 13,860 dwellings over the plan period. This equates to 15,116 (net) taking into consideration those sites which currently have achieved planning permission. The overall provision from the 2014 figures has increased by 412 dwellings following an update to the LAA. This increase is low given the identified factors and deficit of required housing within the borough.
This LAA supersedes the SHLAA (2014) and has identified sites by the following:

- Sites and broad locations with potential for development for housing and economic development over the plan period;
- Assessment of the development potential; and
- Assessment of their suitability for development and the likelihood of development coming forward.

The LAA notes that planning permissions were granted for no significant strategic sites and of only 20 or more dwellings. This highlights the low level of both consent and delivery and the inability to meet the current housing need within the borough. Therefore, the current low level of delivery contributes towards the overall deficit within the borough and the housing target prescribed in draft policy S2 ‘Borough Wide Strategy’ should be increased to allow more homes to be delivered over the plan period and meet the OAN.

It should be noted that in the borough over 1,471 dwellings have planning permission but have not yet been built (as of February 2016), this highlights a low level of deliverability of permissions within the borough. These generally include smaller sites and the site at Ash and Tongham (398 dwellings 12/P/01973), of which conditions are being discharged for implementation. Of these the Council anticipate that only 1,408 dwellings will be delivered in the next 5 years. The council have discounted the rest and anticipate these to be delivered in the period of 11 – 15 years. It should be noted that there is a reliance on historic permissions to be delivered in the plan period, particularly within the first 5 years. We promote greater flexibility in the draft policy S2 ‘Borough Wide Strategy’ to ensure that a higher number of dwellings can be delivered over the plan period.

Five Year Housing Land Supply

The LAA confirms that the first five years of the plan that 3,583 dwellings will be delivered. This equates to 717 dwellings (net) per annum. The council have set targets for each of the years within the 5 year period from 2018 – 2023 for between 500 - 700 new dwellings per annum. It is noted that the housing numbers takes account and relies on the deliverability of a number of extant permissions. This totals 1031 dwellings over the 5 year period.

It should be noted that given the undersupply of housing during the current plan period during the first five years of the plan there will still be an overall cumulative deficit of – 912 dwellings. Furthermore, of the total 5 year housing land supply, 1,342 have already been granted planning permission but have not yet started on site. Therefore there is a reliance on the extant permissions to be implemented and delivered. The deliverability and viability of these sites and their inclusion within the 5 year housing land supply can be questioned and ultimately highlights that the 5 year land supply targets per year are low and should be increased. This follows a similar trend to the old SHLAA (May 2014) and is highlighted by the minor increase in the target from 652 to 717 dwellings to be delivered within the first 5 years per annum. This equates to a 9.9% increase in provision which is low when considered against the current poor delivery of housing and deficit In Guildford.

In summary, the council could not demonstrate an adequate 5 year housing land supply with the SHLAA (May 2014). Although there has been an update to this by way of the LAA (May 2016) and SHMA, there is still a significant shortfall and net additional dwellings required which has been confirmed through the analysis of the figures above. Therefore, there is a need to increase the provision per annum within the first 5 years by at least 20%, this is in accordance with the National Planning Policy Framework which states that local planning authorities should “identify and update annually a supply of specific deliverable sites sufficient to provide five years’ worth of housing against their housing requirements” plus a buffer of 5 per cent, or 20 per cent where there has been a record of persistent under delivery. This should further be reflected in draft Policy H1 ‘Homes for All’ and the housing provision increased.

Land at Keens Lane/Tangle Lane, Worplesdon

The site is assessed within the LAA as a proposed extension to an urban area which is currently within Green Belt. The assessment confirms that the provision of new homes at this site would contribute towards meeting the housing numbers in the Local Plan and contribute towards achieving sustainable, inclusive and mixed communities. We fully support these conclusions of the LAA. In addition, it is identified that the provision of a nursing or residential care home (C2) would help meet the need for such accommodation within the borough. The LAA concludes that this site is available for development and development for residential dwellings and a care home can be realistically delivered within 5 years. Therefore, the
subject site of these representations is deemed to be suitable, available and achievable to contribute towards the housing need within the borough. This is fully supported by GBC and our client.

Recommendation of amendments to Draft Policy S2 ‘Borough Wide Strategy’

Policy S2 ‘Borough Wide Strategy’ states that “during the plan period (2013 – 2033), we will make provision for 13,860 new homes, 37,200 – 47,200 sq m of office and research and development (B1a and b) floorspace and 4.7 – 5.3 hectares of industrial (B1c, B2 and B8) employment land to help meet the needs for new homes, support the economy and supply 3,200 additional B class jobs”.

The annual housing targets drafted within this policy are detailed below:

(see attachment)

Following a detailed review of the evidence base to support draft Policy S2 ‘Borough Wide Strategy’ we propose the following amendments to the draft text and the annual housing targets:

“During the plan period (2013 – 2033), we will make provision for a minimum of 13,860 new homes, 37,200 – 47,200 sq m of office and research and development (B1a and b) floorspace and 4.7 – 5.3 hectares of industrial (B1c, B2 and B8) employment land to help meet the needs for new homes, support the economy and supply 3,200 additional B class jobs”.

Annual Housing Target (minimum)

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Release of the Green Belt for Development

Background to the Green Belt Review 2014

The National Planning Policy Framework (NPPF) states that the fundamental role of Green Belts is to prevent urban sprawl by keeping land permanently open, identifying the essential characteristics of Green Belts as their openness and their permanence.

The NPPF states that Green Belt boundaries should only be altered in exceptional circumstances such as through the preparation or review of a Local Plan. Paragraph 83 details that when reviewing green belt boundaries, local authorities should take account of the need to promote sustainable patterns of development. Furthermore, the NPPF advises that local authorities should channel development towards urban areas inside the Green Belt boundary, towards towns and villages inset within the Green Belt or towards locations beyond the outer Green Belt boundary.

A Green Belt review was undertaken by Pegasus Planning Group on behalf of Guildford Borough Council in February 2013 and updated in 2014 to positively plan for the release of land to meet the identified housing need. This forms part of
the evidence base of the draft Local Plan and supports the proposed site allocations. The Borough was categorised into various land parcels. Paragraph 84 of the NPPF advises that when defining boundaries of the Green Belt, local authorities should:

- Ensure consistency with the Local Plan strategy for meeting identified requirements for sustainable development;
- Not include land which it is unnecessary to keep permanently open;
- Where necessary, identify in their plans areas of ‘safeguarded land’ between the urban area and the Green Belt, in order to meet longer-term development needs stretching well beyond the plan period;
- Make clear that the safeguarded land is not allocated for development at the present time. Planning permission for the permanent development of safeguarded land should only be granted following a Local Plan review which proposes the development;
- Satisfy themselves that Green Belt boundaries will not need to be altered at the end of the development plan period; and
- Define boundaries clearly, using physical features that are readily recognisable and likely to be permanent.

The Green Belt review assessed a number of sites across the Borough for potential development sites to yield up to 9,000 dwellings over the plan period. This review tested environmental constraints, sustainability and accessibility of various sites. Therefore it is considered necessary to release appropriate Green Belt land for housing and we support the release of the site which is subject to these representations.

Release of Land at Keens Lane/Tangley Lane, Worplesdon from the Green Belt

The site at Keens Lane and Tangley Lane formed part of the potential development area defined as J3. J3 includes the site specifically and a wider area to the north of the site. The Green Belt review confirms opportunities to accommodate appropriate development at the site without significantly comprising the purposes of the Green Belt. This wider site is highlighted on the accompanying ‘Potential Development Areas surrounding Urban Areas and Villages Plan’ as a ‘potential development area surrounding an urban area’. Furthermore Appendix 2 of the Green Belt review details the sensitivity assessment in terms of Green Belt purposes of the identified sites across the Borough.

Land at Keens Lane/Tangley Lane is identified as a ‘medium sensitivity site’ on the urban edge of Guildford. It should be noted that the parcel that this site falls into is the only medium sensitivity parcel immediately surrounding the Guildford Urban Area. The council have been advised by the Green Belt review to guide development to those sites which are ‘low sensitivity’ and ‘medium sensitivity’. It is therefore considered to be the most sustainable Green Belt release within the Borough.

We therefore support the release of Land at Keens Lane/Tangley Lane from the Green Belt to deliver housing considering its location on the edge of the urban settlement and medium classification; all other sites in Worplesdon have been assessed as high sensitivity and inappropriate to release, therefore our site is the only site identified.

Site Allocation

Worplesdon

The land north of Keens Lane is identified in the draft Local Plan (submission version) to deliver circa 150 high quality new homes and a 60 bed care home. A number of factors support this proposal which accord with paragraph 14 and paragraph 85 and 89 of the NPPF regarding sustainability and the boundaries of Green Belt land. This includes:

1. The sustainable location of the site on the northern edge of the Guildford Urban Area including its close proximity to local amenities including local shops, employment opportunities and education facilities;
2. There are no environmental constraints on the site regarding flooding and development is restricted within the 400m buffer of the SPA to the 60 bed care home is proposed. This is deemed an acceptable use within the buffer of the SPA;
3. Ecological appraisals have been undertaken for the site and have confirmed future development would not cause any significant ecological impact on the conservation status of wildlife and habitats;

4. The development of the site will not impinge on the five tests of the Green Belt as set out in paragraph 89 of the NPPF;

5. The site offers the opportunity to provide high quality residential dwellings and contribute to the housing supply;

6. There is an existing natural and defensible boundary located on the northern part of the site which would protect the Green Belt to the north;

7. The future residents that will occupy the dwellings will enhance the localised economy;

8. The proposed vehicle and pedestrian access routes are sustainable and will not have a detrimental impact on the existing highways network; and

9. The site provides a natural extension to the Guildford Urban Area.

It can therefore be concluded that the site provides a sustainable opportunity to contribute towards housing need within Guildford. The site is a natural extension to Guildford Urban Area and has the capacity to bring forward a significant number of high quality dwellings and care home and ultimately contribute to the housing supply.

This is further supported by Guildford Borough Council who have promoted the site for housing within the ‘Strategy and Sites’ allocation draft policy document in September 2014 and the site was deemed appropriate for development within the Green Belt Review. Therefore the proposal is in accordance with paragraph 14 and paragraph 89 of the NPPF to meet longer-term sustainable development needs within the Borough.

Details of the Allocation (A22 ‘Land north of Keens Lane’)

The detailed allocation and Policy ‘A22 ‘Land North of Keens Lane, Guildford’ confirms that the site is allocated for approximately 140 homes (C3) and a care home (C2) with approximately 60 beds. In addition, a number of the requirements regarding environmental constraints are detailed including, the distance of the Thames Basin Heaths SPA. Whilst we generally support the allocation at the site we believe there is capacity to accommodate a minimum of 150 homes and a 60 bed care home given the surrounding residential context and the location on the edge of the urban area. Furthermore, as detailed above this site is the most sustainable for delivering housing within the first 5 years of the plan period and therefore, the draft policy should maximise on this.

In addition, given the low OAN identified in the SHMA and subsequent housing target per annum which forms part of the 5 year housing land supply, it has been confirmed that this site is viable, suitable and deliverable for housing development and therefore its capacity should be maximised within the draft local plan. The allocation notes an opportunity to provide self-build plots; however, no further justification is given within the draft local plan to support this. We note that the SHMA identifies a very low level of interest in self-build plots in the Borough and there is currently not a register publically available. Furthermore, the LAA (2016) confirms and identifies four strategic development sites to require the inclusion of self-build plots, these include the following:

- Gosden Hill Farm, Merrow Lane, Guildford (LAA site 46)
- Blackwell Farm, Hogs Back, Guildford (LAA site 311)
- Land at former Wisley airfield, Ockham (LAA site 53 and 54)
- Land to the south of Normandy and north of Flexford (LAA site 368)

Land at Keens Lane and Tangley Lane should therefore not include the requirement to provide these plots within future housing development without adequate justification. Whilst the principle of self-build plots is supported by our client, there are implications that this requirement could incur on this specific site including; maximising the number of dwellings delivered, lack of a coherent design approach and the deliverability and viability of completing the future development within the defined plan period of 5 years. We would therefore recommend that this requirement is removed from the allocation.

We note that the subject site of these representations is identified to incorporate development of a residential care/nursing home (C2) for 60 beds and this is considered to be delivered within the first 5 years of the adoption of the Local Plan. We support this allocation and the requirement for this to be located within the 400m Thames Basin SPA buffer zone.

Proposed amendments to draft site allocation (A22 ‘Land north of Keens Lane’)

Page 907 of 3335
Following a detailed review of the evidence base to support draft site allocation (A22 ‘Land north of Keens Lane’ we propose the following amendments to the draft text:

“The site is allocated for a minimum of 150 homes (C3) and a care home (C2) with approximately 60 beds”.

In addition the ‘self-build plots’ should be removed from the allocation ‘opportunities’.

We are generally in support of the plan and its attempt to achieve greater housing delivery, however the suggested alterations would support GBC to ensure that that the housing targets are delivered. Furthermore, through engagement with GBC and SCC, it is clear that there is support for this site to come forward in the immediate term for housing.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents: attachment 1234.doc (39 KB)

Comment ID: PSLPA16/4515  Respondent: 8589953 / Michael R. Murphy  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Send

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

In addition I attach the reasoned objections to the whole dreadful Guildford Plan which is opposed by virtually all the Villages Around Guildford and most of the Guildfordians and our local MP Sir Paul Beresford. Compiled by Andrew Procter.

Finally the most important objection:

I OBJECT to Send village being removed from the Green Belt.

This fantastic legacy from our Victorian Philanthropists was always intended to be permanent, as required by the National Planning Policy Framework. There are no special circumstances to justify abandoning this fantastic legacy.

The Green Belt in Send provides an ESSENTIAL Buffer, stopping Woking and Guildford becoming one conurbation. The GBC Councillors and Government gave clear election promises to protect the GREEN BELT. This plan blatantly reneges on those promises, and goes against Government Guidelines as pointed out by Sir Paul Beresford our local MP.

This would be a Developers Charter to provide unlimited development all over our Village and some other villages.

Please do not allow this dreadful error which will be irreversible.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents: Andrew Procter Objection to GBC Local Plan 11 July 2016.doc (260 KB)

Comment ID: PSLPS16/6905  Respondent: 8589953 / Michael R. Murphy  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A25
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the proposals for Gosden Hill because they breach the Green Belt, put West Clandon in danger of being joined up to Guildford and will generate excessive extra traffic for Send.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/6906  Respondent: 8589953 / Michael R. Murphy  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the proposals for Blackwell Farm because they breach the Green Belt, the housing numbers are excessive, damage would be caused to the Surrey Hills AONB and excessive extra traffic would be inflicted on Send.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/6904  Respondent: 8589953 / Michael R. Murphy  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Wisley Airfield, which is classified as a brownfield site on a spurious technicality when everybody can see that it is not what is understood by brownfield, being included in the Local Plan as a development site for 2000 houses when Guildford Planning Committee have just refused the planning application relating to it. Either the left hand does not know what the right hand is doing or this is a devious diversion. I object for all the reasons identified by GBC Planning Committee when it rejected the application.
I OBJECT to building 2000 houses at what GBC calls Wisley but is actually at Ockham, because it would massively and
detrimentally overwhelm Ockham village, East and West Horsley and the entire neighbouring area. The proposal is ill
conceived, showing scant regard for the Green Belt, infrastructure requirements, transport, or pollution and lacking nearly
all the evidence that is needed to show that such a development would be sustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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I OBJECT to building 45 houses at Clockbarn Nursery.

There is inadequate access and high local traffic volume.

Planning permission has been given for 64 apartments at the Tannery and for building the Marina. This will generate
additional heavy traffic. By adding another 45 houses, this will greatly add to the traffic already there it will be even more
chaotic. The junction with Send Road is already very dangerous for vehicles joining the Main Road, this proposal will make
it even worse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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I OBJECT to building 400 Houses and 7000 sq meters of industrial Space at Garlicks Arch opposite Send Marsh Road.

This is Green Belt Land with Ancient Woodland, and is prone to considerable flooding. The industrial space is definitely
not needed as there is adequate space at Slyfield Green, and the owners at Slyfield are keen to have extra use there if there
is in fact a need at all for extra industrial Space.
If GBC used the brownfield sites this Green Belt land would not be needed.

The gridlock that this development would cause on the local Roads would be

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/6903  Respondent: 8589953 / Michael R. Murphy  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to a new interchange with the A3 at Burnt Common because Send would have to take traffic from the proposed 2000 houses at Wisley Airfield, 2000 at Gosden Hill and 1850 at Blackwell Farm as well as 485 from Send itself. This is in addition to what it takes at the moment. Much of this traffic to and fro the A3, M25, Woking and Guildford would go through Send. Send Road, which is already overloaded, would face gridlock. This would exacerbate noise and pollution levels which are already excessive and is wholly unacceptable.

I OBJECT to the new interchange with the A3 at Burnt Common because it is being presented as a way of facilitating the movement of a massive increase in vehicles whereas in reality it would cause havoc on the A247 and the many feeder roads in Ripley and Clandon in addition to Send.

I OBJECT to the fact that Guildford Councillors approved the Local Plan before the Transport Assessment had even been published which indicates what scant regard they had for the traffic implications which are at the forefront of residents’ worries. They have to contend with the problem every day in terms of delays, pollution and noise which are already destroying our villages as decent places in which to live.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/8225  Respondent: 8589953 / Michael R. Murphy  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I OBJECT to this proposed new interchange with the A3 at Burnt Common because much of the traffic to and from the A3, the M25, Woking and Guildford would be going through to Send Road which is already at full capacity. It would be total gridlock as this road funnels into a small roundabout and very small congested roads in Old Woking.

The proposed junction would have to take traffic from the proposed 2000 houses at Wisley Airfield, 2000 houses at Gosden Hill, Burpham and 1850 at Blackwell Farm, this would be a total disaster for the Village of Send.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/8224  Respondent: 8589953 / Michael R. Murphy  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A44

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the development of 40 houses and 2 Travellers Pitches at Send Hill.

A totally inappropriate location with very narrow Roads with single tack roads with insufficient access.

The subsoil here contains documented unsafe landfill waste registered at GBC.

This development would spoil a high amenity area set in beautiful countryside.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15091  Respondent: 8589953 / Michael R. Murphy  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to GBC withholding from residents their consultant’s and sub-consultant’s calculations of housing need, which is what is driving this whole issue. It would appear that even some individual councillors are not privy to the calculations or how the total has been reached but are blindly accepting a figure produced without workings or explanation. There are strong grounds for believing that GBC, aided and abetted by their consultants, have overstated by a wide margin what the figure should be. There are also grounds for believing that the numbers have been exaggerated as a result of pressure from developers. As the grabbing of Green Belt land is predicated on the need for a particular number of houses, a good starting point would have been to get the number right and to show transparently how it was reached.
Other submissions will provide supporting statistics and there are authoritative figures online to show the escalation of housing need in Guildford Borough has been about 0.5% per year for the last ten years. The draft plan provides no proper data which proves that it is increasing significantly more at the moment or that in future years it will rise by so much more. Guildford’s projected number in the last draft local plan was challenged by the Office of National Statistics which is a more reliable source since it is not driven by developers. Since the current set of figures was published other underlying data has changed; for example it was too late to take into account the effects on housing demand of changes to the population which could arise from Brexit. Nor has GBC applied the normal constraints to their maximum projections. For a proper professional assessment of housing numbers I refer the reader to the submission from Andrew Procter on behalf of the Save Send Action group.

I OBJECT to the combined total of 2000 (Wisley) + 485 (Send) + 2000 (Gosden Hill) + 1850 (Blackwell Farm) houses all alongside a short stretch of the A3 between the M25 and the university. To concentrate 6335 of the borough’s assessed need for housing of 13860, that is close to half of it, in such a small area of the borough is by any standards unreasonable. If GBC wants to build this number of houses, which has more to do with developer pressure than properly calculated need, it should spread them more evenly throughout the borough, which it is manifestly failing to do. This would help to alleviate excessive traffic congestion and pollution which is a certain consequence of GBC’s current proposals.

Applied specifically to Send, although it is the largest village in the borough it should not have to take a significantly higher proportion of new houses than the borough overall. It should also not have to take a significantly higher proportion of new houses on account of its current size which arises as a result of a disproportionate volume of housing previously being located in Send, Send Marsh and Burnt Common. When the Wimpy Estate of several hundred houses (Linden Road, Maple Road and all adjacent “tree” roads) was built in Send some 40 or more years ago it represented a massive increase in the size of Send Marsh which increase at the time was disproportionate to the size of the village and its amenities. A further massive increase now, which relates numbers proposed to numbers existing, compounds the offence. It would be more equitable to say that as Send accepted a very large number previously, it should not be expected to do so again.

The housing number calculations also have to take into account the constraints, in particular those resulting from the Green Belt. I therefore repeat the points made in paragraph 11 above which cannot be over emphasised. The NPPF states that in their local plans local authorities are required to meet objectively assessed housing needs “as far as is consistent with the policies set out in this Framework”. The policies referred to include Section 9 - Protection of the Green Belt. The Court of Appeal has clarified the interpretation of this by stating categorically that there may be nothing very special about a housing shortfall in an area which has very little undeveloped land outside the Green Belt.

The key question is not “is there a shortfall in housing land supply?” You have to ask “have special circumstances been demonstrated to outweigh the Green Belt objection?” And such circumstances are not demonstrated simply because there is a less than five year supply of housing land. Special circumstances will not exist unless the potential harm to the Green Belt is clearly outweighed by other considerations. Given the large amount of Green Belt in Guildford Borough, the council can legitimately argue that it does not have to match the housing targets of boroughs with less Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the Local Plan because it seeks to build on Green Belt land unnecessarily. The work of Professor Anne Power at the London School of Economics, amongst much other expert research, clearly demonstrates that there is more than sufficient land to build all the houses that are needed without taking any of the Green Belt. In our area several studies show that unused brownfield sites in Guildford Town itself are capable of yielding most of the required land. GBC has not properly explored the capacity which is available there or on brownfield sites elsewhere in the borough, which would have provided a sensible starting point since GBC own many of them.

I OBJECT to the Local Plan in that GBC’s approach to the Green Belt introduces a concept of grading its quality. This is an alien concept, not recognised in law. Of course some Green Belt is seen to be better than other Green Belt but the law does not make any distinction, nor should it. It depends who is looking at it and from what standpoint they are looking. Green Belt is Green Belt and it is not for GBC to stand in judgement on what bits it thinks are worth keeping and what are not.

I OBJECT to proponents of the plan representing those against it as “nimbys”. Those against are not against building houses. They recognise the need for them. They are against building them in unsuitable, unthought out locations which damage existing amenities. This relates particularly to building them on Green Belt land, thereby destroying an existing amenity, when it is not necessary to do so.

I OBJECT to the Local Plan because it seeks to promote sites for houses with woefully inadequate attention being paid to the infrastructure to support those sites. Without proper infrastructure none of the identified sites will deliver what is claimed for them. No detailed thought has been given to the form of the infrastructure required, still less to how much it would cost and, it would appear, none at all to where the money for it would come from.

I OBJECT to removing Send and other villages from the Green Belt. The Green Belt was intended to be permanent, and its permanence was enshrined in law through the National Planning Policy Framework, reinforced by the NPPG and a succession of Ministerial guidance statements. For all of this to be overridden requires “special circumstances” which do not exist in the case of Send.

I OBJECT to all four proposed sites in Send because they are all in the Green Belt and not one of them displays the very special circumstances which would be needed in order to outweigh the substantial harm caused by reason of inappropriateness. There is abundant legal authority but I would cite the Court of Appeal cases of City of St Albans v Hunstan Properties and Gallagher Homes v Solihull Metropolitan Council. These precedents, which have been ignored by Guildford Council before, show that it is necessary to demonstrate that harm to the community at large, by taking the Green Belt, would be less than if it was not taken. The crucial words are “to the community at large”. Paragraph 47(1) of the NPPF advises local authorities “to ensure that their local plans meet the full, objectively obsessed, needs for markets and affordable housing in the housing market area as far as is consistent with the policies set out in this framework”. As the Court of Appeal has made clear one cannot rely on objectively assessed needs without having regard to the policy constraints. The qualification in this clause “as far as is consistent with” is not qualifying housing need; it is qualifying the extent to which the local plan should go to meet those needs. It is quite clear from the precedents that exceptional circumstances will not exist unless the potential harm to the Green Belt has been shown to be clearly outweighed by other considerations. In other words harm to the Green Belt is included in the factors which the NPPF requires to be taken into account.

The NPPF further states that in their local plans local authorities are required to meet objectively assessed housing needs “as far as is consistent with the policies set out in this Framework”. The policies referred to include Section 9 – Protection of the Green Belt. The Court of Appeal has clarified the interpretation of this by stating categorically that there may be nothing very special about a housing shortfall in an area which has very little undeveloped land outside the Green Belt.
The key question is not “is there a shortfall in housing land supply?” You have to ask “have special circumstances been demonstrated to outweigh the Green Belt objection?” And such circumstances are not demonstrated simply because there is a less than five year supply of housing land. Special circumstances will not exist unless the potential harm to the Green Belt is clearly outweighed by other considerations. The draft plan has not begun to demonstrate that there are exceptional circumstances and indeed offers very little to suggest that the authors have even read what the Court of Appeal has said about the provisions in the NPPF.

It is noted that the Court of Appeal precedents have been ignored before by GBC, which appears to regard itself as over and above the law. GBC seems willing to expend residents’ funds on counsel’s advice, in support of what its client developers want to do, but cannot bring itself to get a QC’s opinion in order to guide it on understanding the case law that actually exists, which manifestly it does not understand.

Given the large amount of Green Belt in Guildford Borough, the council can legitimately argue that it does not have to match the housing targets of boroughs with less Green Belt. But if Guildford wants to match the housing target which would apply if it was not constrained by the Green Belt, it can still do so using brownfield land which is in plentiful supply. It is difficult to avoid the conclusion that it has not taken either of these legitimate routes because it finds the allure of developers’ propositions on green field sites more attractive. GBC should also note that the Green Belt was created not just for the benefit of local residents. It came to be known as the Metropolitan Green Belt because it was intended to be of benefit to a much wider range of people, especially Londoners visiting open spaces outside but near to London. It is beyond the remit of GBC to arrogate to itself the power to override Parliament’s intention.

I OBJECT to any sort of diminution of Send’s Green Belt because it provides an essential buffer stopping Woking and Guildford becoming one conurbation. It has served this purpose effectively since its inception and should continue doing so for the benefit of subsequent generations living here. No group of councillors, especially without a mandate, has the authority to impose a different future on residents.

I OBJECT to any reduction in Send’s Green Belt because so much land in Send provides the setting for the beautiful Wey Navigation corridor, which is a conservation area that enhances biodiversity, is visually important, provides a valuable leisure facility and combined with the surrounding lakes an exceptional habitat for a wide range of bird species and other wildlife.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>pslp172/3699</th>
<th>Respondent:</th>
<th>8589953 / Michael R. Murphy</th>
<th>Agent:</th>
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<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2017 / Policy A42</td>
<td></td>
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<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate?</td>
<td>( )</td>
<td>is Sound?</td>
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<td>is Legally Compliant?</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire):</td>
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</table>

I object to CLOCKBARN NURSERY TANNERY LANE POLICY A42 because:

Increasing the homes from 60 instead of 45 is an increase of 33% is far too many.

Why have all the previous objections been ignored and then you have added to the number of houses?

The Junction of Tannery Lane and the A247 are at gridlock, lots of times each day at present, and coming out from this junction is VERY DANGEROUS.
Adding any houses to Tannery Lane would add to the danger but 60 houses with say another 120 vehicles as well as delivery vans will give constant gridlock, and accidents.

It will add to the existing surface water flooding.

As a boat user on the River Wey Navigation it will detract from the loveliness views from this Canal.

It will further erode our precious Green Belt, which the Government is Committed to keep.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/3700  Respondent: 8589953 / Michael R. Murphy  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT TO POLICY A 43 because:

It ignores thousands of previous objections made by us local people.

It will cause even more traffic congestion, which is dreadful already, gridlocking the Roads in and out of Send and Ripley.

It will fill in the gap between Send Marsh and Ripley, so defeating the purpose of the Green Belt.

It will cause over development of our village and this number of homes is excessive.

There are NO "exceptional circumstances" existing to use our precious, beautiful Green Belt Land.

The beautiful Ancient Woodland in this site has been there since Elizabeth the First and must be protected for future generations.

Being a flood zone 2 allocation it is prone to frequent flooding, so the surface water will be moved onto the lower ground where I live.

There is a clay pigeon shooting site here which has polluted the ground with lead shot for over 50 years.

There is NO PROVEN demand for Traveling Show people plots here.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/3701  Respondent: 8589953 / Michael R. Murphy  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A58
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

<table>
<thead>
<tr>
<th>I Object to POLICY A58 at BURNT COMMON because :</th>
</tr>
</thead>
<tbody>
<tr>
<td>It was deleted in the 2014 plan because of so many objections were made.</td>
</tr>
<tr>
<td>There is no need to build industrial or warehousing development IN THE MIDDLE OF THE PRECIOUS GREEN BELT when Slyfield and Guildford have EMPTY sites and industrial units.</td>
</tr>
<tr>
<td>The 2017 Employment Land Need Assessment shows a REDUCTION in demand to 3.9 hectares for industrial use in the whole Borough NOT a huge allocation of 10 hectares at SEND IN THE GREEN BELT.</td>
</tr>
<tr>
<td>The resultant GRIDLOCK in the already very congested local roads from car and heavy transport would be a disaster for local Send residents.</td>
</tr>
<tr>
<td>AGAIN this will join up local villages thus defeating the object of our precious Green Belt.</td>
</tr>
<tr>
<td>The WORD MINIMUM has been craftily changed from the previous MAXIMUM in the 2016 plan and since then there has been a large decline in demand for industrial land.</td>
</tr>
</tbody>
</table>

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<td>Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P2</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

<table>
<thead>
<tr>
<th>I OBJECT TO THE PROPOSAL TO INSET SEND BUSINESS PARK FROM THE GREEN BELT BECAUSE:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Further expansion of development of this location detracts from the intended openness of our Precious GREEN BELT, and is totally inappropriate.</td>
</tr>
<tr>
<td>It is a an Old Non Conformer user in an area of outstandingly beautiful countryside adjacent to the lovely River Wey Navigation Canal.</td>
</tr>
<tr>
<td>Tannery lane is a twisty narrow country lane with very restricted vehicle use in both directions.</td>
</tr>
</tbody>
</table>

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: PSLPA16/3509  Respondent: 8590113 / Ms Melanie Mawby  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Send

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I am writing to register my objection to projected development around Send and Ripley, in particular the proposals for Garlick's Arch. I also find it staggering that the green belt status of Send and neighbouring villages is threatened, paving the way for further development which will start to close the gap between London and Guildford.

Please take note that I find these proposals unacceptable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/476  Respondent: 8590209 / Mr Michael J Harris  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Send

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I am aghast at the Plan released for public consultation on 6th June 2016, particularly in regard to our villages of Send, Send Marsh and Burntcommon.

Firstly, I OBJECT to the proposed removal of these villages from the Green Belt. This is a scandalous raping of these rural settlements, and by re-drawing the Green Belt boundaries around them (insetting) you have attempted to transfer those beautiful fields and 16th century woodlands known as Garlick's Arch (Area A43) from Green Belt, protected from development, into building land for about 400 houses and 7000sq.metres of industrial buildings and warehousing. This site was not included in the Regulation 18 Draft, and has not been consulted on previously, and is therefore illegal in my view. Any requirement for additional industrial development should be at Slyfield, an area which has been developed in this way for many years and if far more appropriate.

Therefore I strenuously OBJECT to Garlick's Arch being removed from the protection of the Green Belt.

I also believe that the proposal in this Draft Plan for 485 new houses for our Send villages is totally out of proportion to the current size of them, and will turn this from a rural area into a suburban one. So I must again OBJECT to this inflated number and ask that it be reduced back to the 185 which it was at in April this year, prior to the last minute inclusion of Garlick's Arch.

Should both Garlick's Arch and the new London bound entry and exit slip roads to the A3 by the A247 bridge go ahead, then traffic will be totally gridlocked around the A247/B2215 roundabout at Burntcommon, by the Shell petrol station/ Little Waitrose. As the only access to and from Boughton Hall Avenue is just 50 metres or so from this roundabout, on to the B2215, I have serious doubts as to whether our residents will actually be able to get in or out of this Avenue, at rush...
hours particularly. Portsmouth Road will be jammed from Kilne/Send Marsh Road to the roundabout; Clandon Road (A247) will be queueing probably from about West Clandon station to the A3 slip road, whilst Send Road will be solid with traffic for its whole length from the Old Woking roundabout. Traffic trying to exit the A3 from Guildford will be clogging up the whole of the Y. mile slip road to Burnt Common roundabout, and probably back on to the A3 itself. Very, very dangerous!

It seems to me that there has been very little, if any, real thought or planning given to the infrastructure problems that will occur due to all this development. What about Jack of school spaces? And the local Villages Medical Centre? There is only just about enough capacity in these facilities NOW. I attended the special Send Parish Council meeting at the Lancaster Hall on Tuesday 14th June 2016. Also present were Cllrs Paul Spooner and Matt Furniss, plus our local borough councillors Cllrs Mike Hurdle and Susan Parker (who spoke against the Plan). The Hall was packed full of very angry local residents!!! Councillors Spooner and Furniss very clearly stated that no developments included in this Plan would go ahead UNLESS THE REQUIRED INFRASTRUCTURE WAS ALREADY IN PLACE!! They emphasised this. I cannot help but wonder whether this was merely political assurances, given in order to appease the locals, or whether it will actually be written into the Local Development Plan as a positive legal requirement before planning approvals are handed out wholesale to hungry developers!!

(Since I drafted this letter on the 16th June, we've had the result of the referendum, which as we all know, is for Brexit!! So, as we are promised, immigration will be controlled, and there will now be nowhere near as much need for all the homes that you are proposing. Therefore, this is definitely the case for bringing the totals for Send, Send Marsh and Burnt Common back to the 185 that I mentioned above. Garlick's Arch MUST be deleted from this Plan!)

I ask that a copy of this letter be passed to the Government's Planning Inspector.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID:  pslp172/2926  Respondent:  8590209 / Mr Michael J Harris  Agent: 

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy A58

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the proposed changes to POLICY A58 at Burnt Common, where the plan now is to allocate 10 hectares for industrial/warehousing on what is currently Green Belt land. This is totally unnecessary as the 2017 Employment Land Need Assessment shows a reduction in demand to 3.9 hectares for industrial land for the WHOLE of Guildford Borough, and there is still spare capacity at Slyfield.

This would also cause a huge impact on all our local roads, particularly at the Burnt Common roundabout, A247/B2215. One of my main worries is that, together with all the extra traffic generated by the 400 houses at Garlick's Arch and the 60 at Clockharn Nursery site, it will become almost impossible to exit our Avenue (a 2/3rds of a mile long cul-de-sac containing 76 properties) at peak times, as our entrance is only about 100 yards from the roundabout. This will cause great and unacceptable difficulties for emergency vehicles as well.

The above situation will be made much worse, in fact, if the proposed new slip roads to the A3 (to and from Clandon Road, to give access to and from London bound traffic) are built, as traffic using these new slip roads will also mainly be using our roundabout. I can foresee gridlock for most of the day, every day!! Regarding this whole new Local Development Plan, far too little thought has gone into the road infrastructure planning.
Enormous improvements to the A3 around Guildford, as well as the local major roads, simply MUST TAKE PLACE BEFORE the huge house and industrial building projects are constructed, NOT AFTERWARDS!!

Our present road system is overloaded right now --- please listen to those of us who have to live with the current situation every day, and do not put the cart before the horse ... take the blinkers off, I implore you! Before retiring. I helped run a large housebuilding business. When we constructed a new estate, the first thing we did was to build the roads ... and then the houses --- not the other way round!

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy A35 Former Wisley Airfield as being totally inappropriate and unsustainable development of 2000 homes in the Green Belt

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/2940  Respondent: 8590753 / Mr Michael Anning  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the inclusion of strategic site Policy A43 Garlick's Arch and its late substitution in the Local Plan with no prior consultation with the local. This site should be protected as it is agricultural land that is previously undeveloped and within the Green Belt. There is no sound reasoning as to why the Garlick's Arch site was substituted at the last minute on 24th May 2016 in preference to the original site A43 Land at Burnt Common Warehouse which is an existing brownfield site with industrial space, provision for at least a further 7000sqm of industrial employment space and an additional 100 homes which is more in keeping with the acceptable growth in housing numbers for the residents of Send, Burnt Common, Send Marsh and Ripley. The development of 400 homes at the Garlick's Arch site will cause coalescence with Send, Send Marsh, Burnt Common and Ripley thus losing forever the independent identity of each village and hamlet.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/2947  Respondent: 8590753 / Mr Michael Anning  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I OBJECT to Policy A43a, the proposed on/off ramps to the A3 at Burnt Common as this will inevitably cause traffic chaos on the local road network throughout Ripley, Burnt Common, Send and West Clandon, with absolutely no possibility of mitigation due to the nature of our rural roads and lanes.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/2961  Respondent: 8590753 / Mr Michael Anning  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A45

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy A45 The Talbot Ripley as this is over development in an open space within the Green Belt

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/2955  Respondent: 8590753 / Mr Michael Anning  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A57

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy A57 The Paddocks for the provision of 4 traveller pitches in Rose Lane as this is in excess of current requirements within the borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/6407  Respondent: 8590753 / Mr Michael Anning  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
I OBJECT to all insetting of villages from the Green Belt, in particular for Ripley, Send Marsh/Burnt Common, Send and East/West Horsley.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6429  Respondent: 8590753 / Mr Michael Anning  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to development in areas which are at risk of flooding (Policy P4) such as site A43 Garlick's Arch which is designated as flood zone 3 by the Environment Agency

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6395  Respondent: 8590753 / Mr Michael Anning  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the Guildford Borough Proposed Submission Local Plan (June 2016) as this plan is unsound, unsustainable, unworkable, flawed and in many instances, unnecessary for the reasons set out below:

I OBJECT to the Local Plan as the proposal of 13,860 homes proposed will not be sustainable (policy S1) and it will have a permanently detrimental effect by over development in existing communities, in particular Ripley, Send, East/West Horsley and West Clandon.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Comment ID: PSLPP16/6420  
**Respondent:** 8590753 / Mr Michael Anning  
**Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the disproportionate amount (36%) of all proposed development being in one area of the borough from Wisley to Burpham creating a narrow ribbon effect along the A3.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Comment ID: PSLPA16/4542  
**Respondent:** 8591041 / Surrey Wildlife Trust (Mike Waite)  
**Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix A: Glossary

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Glossary(Appendix A)

Special Area of Conservation (SAC) appears twice.

**Protected species:** A species legally protected by wildlife legislation, including the Wildlife & Countryside Act (as amended) 1981, and the Conservation of Habitats & Species Regulations 2010.

**Biodiversity:** Biodiversity is the variability among living organisms from all sources including, among other things, terrestrial, marine and other aquatic ecosystems, and the ecological complexes of which they are part; this includes the diversity within species, between species and of ecosystems (source: EU-UN Convention on Biological Diversity).

Practically, the term is synonymous with both ‘habitats and species’, and ‘wildlife’.

Certain of these suggested insertions and corrections would also need to be carried through to the Green & Blue Infrastructure Topic Paper.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
SRN3, LRN7: Highways projects at M25 Junction 10/A3 Wisley Interchange
- Adjacency of Thames Basin Heaths SPA/Ockham & Wisley Commons SSSI. Within BOA TBH06 Wisley, Ockham & Walton Heaths; due sensitivity is necessary and projects should assist achievement of BOA objectives (inc. protection, restoration & creation of Priority habitats, esp. Heathland, Acid grassland).

SANG 4: Tyting Farm
- Within BOA ND02 North Downs Scarp & Dip: Guildford-Mole Gap; SANG proposal should assist achievement of BOA objectives (inc. protection, restoration & creation of Priority habitats, esp. Chalk grassland, Beech & yew woodland).

SANG 5: Burpham Court Farm
- Within BOA R04 River Wey & tributaries; proposal must not impact existing ecological interest, and should assist achievement of BOA objectives (inc. protection, restoration & creation of Priority habitats, esp. Floodplain grazing marsh, Wet woodland and other wetland habitats).

SANG 6: Russell Place Farm
- Within BOA TBL01 Wanborough to Normandy Woods & Meadows; proposal should assist achievement of BOA objectives (inc. protection, restoration & creation of Priority habitats, esp. Mixed deciduous woodland, Meadows, Hedgerows, Ponds).

SANG 7: Ash, West of Ash Green
- Partly within BOA TBL01 Wanborough to Normandy Woods & Meadows/Ash Green Meadows SNCI; proposal must not impact existing ecological interest, and should assist achievement of BOA objectives (inc. protection, restoration & creation of Priority habitats, esp. Mixed deciduous woodland, Meadows, Hedgerows, Ponds).

SANG 9: Benswood
- Within BOA TBL02 Clandon to Bookham Parkland; proposals should assist achievement of relevant BOA objectives (inc. protection, restoration & creation of Priority habitats, esp. Mixed deciduous woodland, Hedgerows, Ponds).
Within BOA TBL01 Wanborough to Normandy Woods & Meadows; proposal should assist achievement of BOA objectives (inc. protection, restoration & creation of Priority habitats, esp. Mixed deciduous woodland, Meadows, Hedgerows, Ponds).

Within BOA TBL02 Clandon to Bookham Parkland/Merrow Lane Woodland SNCI; proposal must not impact existing ecological interest, and should assist achievement of BOA objectives (inc. protection, restoration & creation of Priority habitats, Mixed deciduous woodland, Hedgerows, Ponds).

Within Wisley, Ockham & Walton Heaths BOA/ Wisley Airfield SNCI, adjacent Thames Basin Heaths SPA & Elm Corner Woodlands SSSI; proposal must not impact existing ecological interest, and should assist achievement of BOA objectives (inc. protection, restoration & creation of Priority habitats, esp. Heathland, Acid grassland, Arable field margins). The Trust reserves objection to use of the entire site as SANG, pending further impact analysis.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/8279  Respondent: 8591041 / Surrey Wildlife Trust (Mike Waite)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A23

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Within BOA TBH04 Ash, Brookwood & Whitmoor Heaths, with the Thames Basin Heaths SPA/Whitmoor Common SSSI adjacent. Change of use should assist achievement of BOA objectives (inc. restoration/creation of Priority habitats, inc. Heathland and Acid grassland).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/8280  Respondent: 8591041 / Surrey Wildlife Trust (Mike Waite)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A24

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
As acknowledged this site allocation presents major Priority habitat restoration/creation opportunities. Also adjacent to Riverside Park LNR/SNCI & Ancient woodland where due sensitivity is required.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment ID: PSLPS16/8281</th>
<th>Respondent: 8591041 / Surrey Wildlife Trust (Mike Waite)</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A25</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Within BOA TBL02 Clandon to Bookham Parkland; development should be scaled appropriate to environmental constraints and assist achievement of BOA objectives (inc. protection, restoration & creation of Priority habitats, inc. Mixed deciduous woodland, Wood-pasture & parkland, Meadows, Hedgerows, Ponds). There is Ancient woodland present on the site, while both Cotts/Merrow Lane Woods SNCIs are adjacent and their protection must be assured. The Trust reserves further representation on the scale of development currently allocated here if these tensions cannot be satisfactorily reconciled.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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<th>Comment ID: PSLPS16/8283</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Within BOA TBL01 Wanborough & Normandy Woods & Meadows; development should be scaled appropriate to environmental constraints and assist achievement of BOA objectives (inc. protection, restoration & creation of Priority habitats, esp. Mixed deciduous woodland, Meadows, Hedgerows). There is Ancient woodland adjacent that is particularly vulnerable to ecological isolation (Strawberry Grove/Manor Copse/Dean Bottom). The Trust reserves further representation on the scale of development currently allocated here if these tensions cannot be satisfactorily reconciled.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
**Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A29**

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

As acknowledged this site allocation potentially impacts the Ash Green Meadows SNCI & several Ancient woodlands. The Trust reserves further representation if these tensions cannot be satisfactorily reconciled.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** PSLPS16/8278  **Respondent:** 8591041 / Surrey Wildlife Trust (Mike Waite)  **Agent:**

**Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A3**

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

It is important to retain opportunities for urban Green Infrastructure here.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** PSLPS16/8284  **Respondent:** 8591041 / Surrey Wildlife Trust (Mike Waite)  **Agent:**

**Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A32**

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Ancient woodland adjacent. Your draft policy A32 erroneously states proximity of a SSSI.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:
<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>PSLPS16/8285</th>
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<th>8591041 / Surrey Wildlife Trust (Mike Waite)</th>
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<td><strong>Document:</strong></td>
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Within BOA TBH06 Wisley, Ockham & Walton Heaths; development should be scaled appropriate to environmental constraints and assist achievement of BOA objectives (inc. protection, restoration & creation of Priority habitats, esp. Heathland, Acid grassland, Wet woodland, Arable field margins). Thames Basin Heaths SPA/Ockham & Wisley Commons SSSI is adjacent. Wisley Airfield SNCI is significantly impacted; Elm Corner Woodlands SNCI is adjacent. The Trust objects to the scale of development currently allocated for this site, as impacts on sensitive biodiversity interests are unavoidable.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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<thead>
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<th>Comment ID:</th>
<th>PSLPS16/8286</th>
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</table>

Partly within BOA TBL02 Clandon to Bookham Parkland; development should be scaled appropriate to environmental constraints and assist achievement of BOA objectives (inc. protection, restoration & creation of Priority habitats, inc. Mixed deciduous woodland, Hedgerows, Ponds).

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>PSLPS16/8287</th>
<th>Respondent:</th>
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<td><strong>Answer (if comment is on questions 1-7 of the questionnaire):</strong></td>
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</table>
Within BOA TBL02 Clandon to Bookham Parkland; development should be scaled appropriate to environmental constraints and assist achievement of BOA objectives (see A38 above). Lollesworth Wood SNCAncient woodland is adjacent and the Trust reserves further representation if this tension cannot be satisfactorily reconciled.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/8288  Respondent: 8591041 / Surrey Wildlife Trust (Mike Waite)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A40

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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Within BOA TBL02 Clandon to Bookham Parkland; development should be scaled appropriate to environmental constraints and assist achievement of BOA objectives (inc. protection, restoration & creation of Priority habitats, inc. Mixed deciduous woodland, Wood-pasture & parkland, Meadows, Hedgerows, Ponds).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/8289  Respondent: 8591041 / Surrey Wildlife Trust (Mike Waite)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A41

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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Within BOA TBL02 Clandon to Bookham Parkland; development should be scaled appropriate to environmental constraints and assist achievement of BOA objectives (see A40 above). As acknowledged Lollesworth Wood SNCAncient woodland is adjacent and the Trust reserves further representation if this tension cannot be satisfactorily reconciled.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/8290  Respondent: 8591041 / Surrey Wildlife Trust (Mike Waite)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Within BOA R04 River Wey & tributaries (includes the section of the Clandon Stream); any development here should be scaled appropriate to environmental constraints and assist achievement of BOA objectives (inc. protection, restoration & creation of Priority habitats, esp. Wet woodland, Meadows and wetland habitats). The site supports Ancient woodland, and there is also possible interest for locally rare protected species. The Trust reserves further representation pending resolution of potentially irreconcilable tensions here.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
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<th>Comment ID: PSLPS16/8291</th>
<th>Respondent: 8591041 / Surrey Wildlife Trust (Mike Waite)</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A46</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Partly within BOA TBL01 Wanborough to Normandy Woods & Meadows; development should be scaled appropriate to environmental constraints and assist achievement of BOA objectives (inc. protection, restoration & creation of Priority habitats, inc. Meadows, Mixed deciduous woodland, Hedgerows).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
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<th>Comment ID: PSLPS16/8292</th>
<th>Respondent: 8591041 / Surrey Wildlife Trust (Mike Waite)</th>
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<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A47</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
This site includes the Little Flexford SNCI, and is within BOA TBL01 Wanborough to Normandy Woods & Meadows. Development here is therefore likely to be incompatible with BOA objectives (inc. protection of Priority habitats). The Trust reserves objection if this tension cannot be satisfactorily reconciled.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Policy D1: Making better places.

Developments should include sufficient open recreational spaces proportionate to their overall size and scale. These open spaces should be designed and managed to support biodiversity alongside their sometimes other primary uses. Useful guidance on ensuring relative sufficiency is Natural England’s Access to Natural Greenspace Standard (ANGSt) and your monitoring of Policy D1 could therefore usefully incorporate the achievement of ANGSt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Policy D2: Sustainable development, construction and energy.

We welcome this policy, and the apparent importance the Borough places on such matters through its inclusion and prominence in the plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Policy E6: The leisure and visitor experience.

We welcome the reference here (para. 4.4.55) to the importance of Guildford’s natural environment to leisure activities and as an attraction for visitors from beyond the Borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2112  Respondent: 8591041 / Surrey Wildlife Trust (Mike Waite)  Agent:

Policy E7: Guildford Town Centre.

We welcome specific reference here to the importance of the River Wey corridor as a natural feature, and aspirations for the improvement of the natural environment within the town.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2115  Respondent: 8591041 / Surrey Wildlife Trust (Mike Waite)  Agent:
Policy II: Infrastructure and delivery.

We would caution the premise here that the sole driver for ensuring the adequate supply of publically accessible green infrastructure is as Suitable Alternative Natural Greenspace (SANG), required via the EU Birds Directive. This is not true and therefore misleading.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2116  Respondent: 8591041 / Surrey Wildlife Trust (Mike Waite)  Agent:  

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy III: Sustainable transport for new developments.

We welcome this policy embracing the importance of mitigating the environmental impacts of transport, including noise and pollution.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2118  Respondent: 8591041 / Surrey Wildlife Trust (Mike Waite)  Agent:  

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy IV: Green and blue infrastructure.

We greatly welcome this vastly-improved policy over that in the previous document. We have several suggestions for improvements to the supporting text around the policy, as below (indicated in red);

4.6.31 Introduction. ...The diversity of potential uses means that by planning for adequate retention and provision of green and blue infrastructure we can make a significant contribution to wellbeing and sustainability across the social, environmental and economic dimensions.

4.6.33 A positive approach to the adequate supply and maintenance of Green Infrastructure is crucial to the maintenance, protection and enhancement of biodiversity and wildlife in the borough, not least through the potential for
creation provision of new habitats and by serving to provide connections between existing habitats. It can further assist in adaptation to climate change by providing pathways for species dispersal and migration; climate amelioration through providing the cooling effects of tree cover; and in natural management of fluvial flooding, for example, through floodplain re-connection and restoration, provision, connectivity, which can also result in and the creation of new wetland habitats.

4.6.34 The Surrey Nature Partnership (SyNP) is the designated Local Nature Partnership for Surrey mandated by Government. SyNP is working with Surrey local authorities to set out an approach to conserving and enhancing the biodiversity of the county at a landscape scale. This approach identifies Biodiversity Opportunity Areas (BOAs) as areas where there are concentrations of recognised sites of biodiversity importance, both statutory and non-statutory, a particular type of habitat. BOAs represent areas where improved habitat management and efforts to restore and re-create priority habitats will be most effective in improving connectivity and reducing habitat fragmentation. BOAs extend across local authority boundaries and therefore provide a strategic approach that addresses biodiversity at a landscape scale. In fact, the majority of the Guildford’s countryside within the borough of falls within BOAs (see figure 1), which is broadly indicative of just how rich in wildlife the borough is.

Blue infrastructure

4.6.39 The River Wey Navigation is a highly valued asset of borough wide significance, both as an important element of our borough’s biodiversity and as a very significant public space. The National Trust has compiled a set of guidelines for what it considers are important characteristics of the river, and how this should be managed. These include the importance of the river as a ‘visually important open corridor’ and ‘an important leisure asset’ as well as a Conservation Area.

4.6.40 The EU Water Framework Directive 2000 aims for achievement of ‘good status’ for all ground and surface waters in the EU, initially by 2015 but by 2027 at the latest. This is assessed against a set of standards including water quality (both its chemistry and biology) and river morphology (for example, preserving or restoration to a naturally meandering course; having natural river banks as habitat) and re-connecting rivers to their floodplains; and providing backwater ponds). Much of the River Wey in the borough currently achieves ‘moderate status’, with some tributaries achieving only ‘poor’ or ‘bad’. The River Wey directly upstream from the borough is largely ‘poor’. The River Blackwater also largely achieves ‘moderate status’, but is a tributary of and thus within the neighbouring River Loddon catchment. This is considered a strategic issue due to the cross boundary nature of the impacts, and the importance of our waterways for the ecological health of the borough. Significant pressures on the River Wey include pollution from waste water and deriving from agricultural inputs, as well as from various sources in towns and from transport infrastructure; and the constraints to its natural function imposed by historic physical modifications to the river.

4.6.41 Both the River Wey and the River Blackwater, in combination with their floodplains and tributaries, are identified as BOAs.

Within Policy 14 itself; Blue infrastructure. Waterways will be protected and enhanced. Development proposals that are likely to have an impact on waterways (including across their catchments), must demonstrate how they will support the achievement of the Water Framework Directive and have followed guidance from the Environment Agency and Natural England on implementation of the Wey Catchment Management Plan and flood risk management.

Definitions

4.6.42 Net gains in biodiversity means biodiversity creation and/or enhancement. This should be integrated into the design of the site through the provision of new wildlife habitats, but also…

[...]

Certain of these suggested insertions and corrections would also need to be carried through to the Green & Blue Infrastructure Topic Paper.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2108  Respondent: 8591041 / Surrey Wildlife Trust (Mike Waite)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy P1: Surrey Hills Area of Outstanding Natural Beauty (AONB)

We welcome the inclusion and content of this policy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2109  Respondent: 8591041 / Surrey Wildlife Trust (Mike Waite)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy P4: Flood risk and water source protection zones

We welcome the inclusion and content of this policy, especially with regard to (d) “the scheme incorporates flood protection, flood resilience and resistance measures appropriate to the character and biodiversity of the area and the specific requirements of the site.” Note para. 4.3.49 correct reference – European Union Water Framework Directive.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2110  Respondent: 8591041 / Surrey Wildlife Trust (Mike Waite)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P5
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy P5: Thames Basin Heath Special Protection Area

We welcome the inclusion and content of this policy. It may be useful to mention the role of SPA and SAC in the Natura 2000 schedule, within the context of international commitments to biodiversity conservation, in view of future uncertainties around the proposed UK withdrawal from the European Union.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
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<th>Comment ID: PSLPP16/2106</th>
<th>Respondent: 8591041 / Surrey Wildlife Trust (Mike Waite)</th>
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<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy S1</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Question 6. The content of the plan.

Policy S1: Presumption in favour of sustainable development

We suggest adding to the policy as follows (underlined); “...We will work proactively with applicants jointly to find solutions that mean that proposals can be approved wherever possible, and to secure development that improves the economic, social and environmental conditions in the area, without compromise to any one of these (or words to that effect).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
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<th>Comment ID: PSLPP16/2107</th>
<th>Respondent: 8591041 / Surrey Wildlife Trust (Mike Waite)</th>
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<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Policy S2: Borough Wide Strategy

We maintain our challenge of the need for this scale of development across the Borough. We therefore continue to object to the overall quantum of development as proposed here, in that it can only result in cumulative negative impacts on the Borough’s natural environment. Clearly the proposed UK withdrawal from the European Union is likely to influence the ONS’ future projections for population growth, which may also have a bearing here.

Para. 4.1.8. Where sites allocations propose the development of greenfield sites, we could only support these where the overall proposed built densities are convincingly constrained by their adjacency/proximity to land of existing value for biodiversity conservation, and their potential value for enhancing landscape connectivity within Biodiversity Opportunity Areas may be fully realised.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/405  Respondent: 8591041 / Surrey Wildlife Trust (Mike Waite)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Guildford borough Proposed Submission Local Plan: Strategy and Sites Regulation 19 consultation (June 2016)

Thank you for your consultation on the above document. Please find below the comments of the Surrey Wildlife Trust, which are confined to issues concerning the protection of the natural environment, including the conservation of Surrey’s biodiversity. Our most recent communication with you on this matter was our letter of 22/09/2014, where we detailed a range of concerns with the emerging Strategy & Sites document of that time. Some of these have been reflected in the present version now on consultation, but others have not. Overall, we remain concerned that the dependencies of present and future human society on maintaining a healthy and thriving natural environment are reflected adequately in the emerging Guildford Local Plan Strategy & Sites.

National planning policy in the NPPF aims to plan only for sustainable future development and economic growth. That sustainability is defined in part, as the ability to clearly demonstrate a contribution to protecting and enhancing the natural environment; including to “improve biodiversity, use natural resources prudently, minimise waste and pollution, and mitigate and adapt to climate change.” The opportunity to clearly articulate the potential for synergies here (as opposed to tensions) is overlooked at various points within the plan (see comment on para. 4.6.31 below), but especially under the definition of ‘sustainability’ in the Glossary at Appendix A.

Our comments are structured to correspond with the questions as set-out in your consultation questionnaire.

Question 1: The evidence base and submission documents. Do you agree that the evidence used for the Proposed Submission Local Plan Strategy and Sites is adequate, up-to-date and relevant?

Regarding the accurate characterisation and valuation of the natural environment, the Borough’s Local Wildlife Sites (Sites of Nature Conservation Importance) are still being reviewed. Whilst this latest iteration of the Local Plan Sites & Strategy makes due reference to the importance of the natural environment to Guildford’s economy and the well-being of its occupants, we feel that this is not translated consistently into policy for the various sites allocations.
To reiterate the point made originally in our previous response, Guildford Borough has arguably the clearest responsibility for the conservation of English and UK biodiversity of all Surrey’s boroughs and districts, with a wealth of declining and nationally-restricted wildlife species under its charge; this is still not adequately reflected in the plan (eg. at paragraphs 2.23-5) nor the underlying evidence base.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>pslp173/122</th>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

FRR Flood risk reduction: surface water mitigation measures (including FRR1 Minimising surface water flood risk at the strategic site at Gosden Hill; FRR2 Minimising surface water flood risk at the strategic site at Blackwell Farm). The Trust welcomes these infrastructure projects.

SANG 4: Tyting Farm  
SANG proposal should assist achievement of relevant BOA objectives (inc. protection, restoration & creation of Priority habitats, esp. Chalk grassland, Beech & yew woodland).

SANG 5: Burpham Court Farm  
SANG proposal must not impact existing ecological interest, and should assist achievement of relevant BOA objectives (inc. protection, restoration & creation of Priority habitats, esp. Floodplain grazing marsh, Wet woodland and other wetland habitats).

SANG 6: Russell Place Farm  
SANG proposal should assist achievement of relevant BOA objectives (inc. protection, restoration & creation of Priority habitats, esp. Mixed deciduous woodland, Meadows, Hedgerows, Ponds).

SANG 7: Ash, West of Ash Green  
SANG proposal must not impact existing ecological interest, and should assist achievement of relevant BOA objectives (inc. protection, restoration & creation of Priority habitats, esp. Mixed deciduous woodland, Meadows, Hedgerows, Ponds).

SANG 8: Land adjacent to Long Reach Farm, West Horsley  
SANG proposal should assist achievement of relevant BOA objectives (inc. protection, restoration & creation of Priority habitats, esp. Meadows, Hedgerows, Ponds).

SANG 9: Benswood  
SANG proposal should assist achievement of relevant BOA objectives (inc. protection, restoration & creation of Priority habitats, esp. Mixed deciduous woodland, Hedgerows, Ponds).
<table>
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<tr>
<th>SANG 10: Blackwell Farm</th>
<th>SANG proposal should assist achievement of relevant BOA objectives (inc. protection, restoration &amp; creation of Priority habitats, esp. Mixed deciduous woodland, Meadows, Hedgerows, Ponds).</th>
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<tr>
<td>SANG 11: Gosden Farm</td>
<td>SANG proposal must not impact existing ecological interest, and should assist achievement of relevant BOA objectives (inc. protection, restoration &amp; creation of Priority habitats, Mixed deciduous woodland, Hedgerows, Ponds).</td>
</tr>
<tr>
<td>SANG 12: Former Wisley Airfield</td>
<td>SANG proposal must not impact existing ecological interest, and should assist achievement of relevant BOA objectives (inc. protection, restoration &amp; creation of Priority habitats, esp. Heathland, Acid grassland, Arable field margins). The Trust reserves objection to use of the entire site as SANG, pending further impact analysis.</td>
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</table>

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/1233  Respondent: 8591041 / Surrey Wildlife Trust (Mike Waite)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A25

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Surrey Wildlife Trust recognises the decelerated phasing of development here (from 2000 to 1700 dwellings over the life of the Local Plan). The Trust retains its reservation for further representation on the specific development management decisions at this site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/1234  Respondent: 8591041 / Surrey Wildlife Trust (Mike Waite)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Surrey Wildlife Trust recognises the decelerated phasing of development here (from 1800 to 1500 dwellings over the life of the Local Plan). The Trust retains its reservation for further representation on the specific development management decisions at this site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/287  Respondent: 8591041 / Surrey Wildlife Trust (Mike Waite)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy ID4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy ID4: Green and Blue infrastructure. 4.6.34 “This approach identifies Biodiversity Opportunity Areas (BOAs) as areas where there are concentrations of recognised...” (suggest insertion to aid clarity here)

Policy ID4: “Proposals for development must demonstrate how they will deliver appropriate net gains in biodiversity where possible.” Our only concern here is over where the arbitration of ‘possibility’ would ultimately lie. This is perhaps better clarified later on as resting wholly with yourselves (and essentially not with a developer or their advisers/consultants). We trust the Borough will be equipped with the specialist knowledge to implement this and look forward to working with you as and when required on such matters.

4.6.50 “The NPPF requires... through a Green & Blue Infrastructure Supplementary Planning Document once enough detail has emerged.” (suggest insertion here for consistency if appropriate). The Trust welcomes this intended SPD and we look forward to working with you on its development.

Monitoring Indicators: Net gains in biodiversity provided by development on sites of 25 homes or greater. This appears a reasonable enough approach; perhaps the derivation of this threshold requires some further clarification however.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Policy ID4: Green and Blue infrastructure. 4.6.34 “This approach identifies Biodiversity Opportunity Areas (BOAs) as areas where there are concentrations of recognised..” (suggest insertion to aid clarity here).

Policy ID4: “Proposals for development must demonstrate how they will deliver appropriate net gains in biodiversity where possible.” Our only concern here is over where the arbitration of ‘possibility’ would ultimately lie. This is perhaps better clarified later on as resting wholly with yourselves (and essentially not with a developer or their advisers/consultants). We trust the Borough will be equipped with the specialist knowledge to implement this and look forward to working with you as and when required on such matters.

4.6.50 “The NPPF requires… through a Green & Blue Infrastructure Supplementary Planning Document once enough detail has emerged.” (suggest insertion here for consistency if appropriate). The Trust welcomes this intended SPD and we look forward to working with you on its development.

Attached documents:

Comment ID: pslp171/279  Respondent: 8591041 / Surrey Wildlife Trust (Mike Waite)  Agent:
| Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy S1 |
| Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( ) |
| Answer (if comment is on questions 1-7 of the questionnaire): () |

Policy S1: Sustainable development. With reference to para 4.1.4, is the list here (“Birds and Habitats Directives…flooding.”) drafted to be inclusive? If this is the case, we are interested to know whether Local Wildlife Sites (Sites of Nature Conservation Importance in Surrey), as well as Regionally Important Geological Sites, are also referable. If they are not, there is clearly an incentive here for designating SNCI as Local Green Spaces (which has indeed begun to proceed through several Neighbourhood Plans).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

| Comment ID: pslp171/288  Respondent: 8591041 / Surrey Wildlife Trust (Mike Waite)  Agent: |
| Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy S2 |
| Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( ) |
| Answer (if comment is on questions 1-7 of the questionnaire): () |

Policy S2: Planning for the borough - our spatial development strategy. We recognise and appreciate the reduction in the overall quantum of housing proposed for the Borough during the plan period (at c. 10%), but remain concerned for the long-term, cumulative impact this is will inevitably have on the Borough’s natural environment, as expressed through our previous responses.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

| Comment ID: PSLPS16/7702  Respondent: 8591073 / Connectivity Associates Ltd (Mike Gibson)  Agent: |
| Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A23 |
| Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( ) |
| Answer (if comment is on questions 1-7 of the questionnaire): () |
On behalf of the owners of this site, I am writing to support the removal of this site from the Green Belt and its allocation for a Burial Ground, together with a new site access and appropriate supporting facilities, in the proposed submission Local Plan, to confirm that I have made representations via the Council’s on-line consultation, and to request that the following information be taken into account by the Council when approving the Local Plan for submission to the Secretary of State.

Our case in support of this allocation is set out below under the following headings:

1. The site and its ownership
2. Removal of the land from the Green Belt
3. Allocation for development
4. Ecological impact
5. Summary

1. The site and its ownership

The site is wholly owned by my clients, Hazel Rosemary Farris and Maureen Elizabeth Trotter, whom I represent and on whose behalf this letter and my on-line representations are made.

The site, with an area of 7.88 ha (19.5 acres), is a level area of improved grassland, situated on the north side of Salt Box Road, immediately to the north of the built-up area of Guildford. The site was previously used for the rearing of pigs, but since the 1970’s has been used for the grazing of domestic horses and the original farm buildings at the eastern end of the site are now in a derelict condition. Existing access is from Salt Box Road by way of a service road at the extreme eastern end of the site. This road also serves a mixed residential and commercial area, lying between the site and the railway line. To the north and west the site adjoins the Thames Basin Heaths Special Protection Area, the mature trees of which form a readily recognisable boundary.

Salt Box Road links with the A322 (Worplesdon Road) to the west and with the A320 (Woking Road) to the east and both these roads enjoy good connections with the principal traffic route of the A3 to the south. There is convenient access for vehicles, pedestrians and cyclists to the Guildford urban area to the south and footpaths and cycleways provide a convenient route to Worplesdon railway station, some 2k to the north. Bus services, operating along the A322 (to the west), the A320 (to the east) and Grange Road (to the south), are convenient to the site.

The site is level, is not at risk of flooding (being within Flood Zone 1), is easily and conveniently accessible by all modes of transport and is readily and immediately available for development.

2. Removal of the land from the Green Belt

The Local Plan’s proposal to remove the land from the Green Belt in order to meet future needs is supported.

The site is not within the Thames Basin Heaths Special Protection Area or within any Sites of Special Scientific Interest, so the presumption against development applies only to its current Green Belt status.

The work that the Council has undertaken in the preparation of the proposed submission Local Plan has demonstrated that there will be insufficient land within the current built-up area to meet future needs over the next 20 years and that land for development will need to be taken out of the Green Belt to meet these needs.

The National Planning Policy Framework (NPPF) of March 2012 sets out the following policy approach to drawing up or reviewing Green Belt boundaries. At paragraph 84 it says that local authorities should take account of the need to promote sustainable patterns of development, and at paragraph 85 it asks local authorities to (among others):
• Ensure consistency with the Local Plan strategy for meeting identified requirements for sustainable development;
• Not include land which it is unnecessary to keep permanently open;
• Satisfy themselves that Green Belt boundaries will not need to be altered at the end of the development plan period; and
• Define boundaries clearly, using physical features that are readily recognisable and likely to be permanent.

Having regard to this national policy, I make the following propositions in respect of the land at Salt Box Road:

• The site is in a sustainable location, being immediately adjacent to the built-up area of Guildford, close to residential and employment development, conveniently served by the A320 and the A322 (both of which have good southward connections to the A3) and bus services and within reasonable distance from Guildford and Worplesdon railway stations, the latter by attractive pedestrian routes and cycleways;
• The development of the site as a burial ground would constitute a logical northward extension to the built-up area of Guildford;
• The site is not within the Thames Basin Heaths Special Protection Area or within any Sites of Special Scientific Interest, so there would be no objection to the development of the site as a matter of principle;
• The site would help to satisfy the Borough’s need for burial ground land over the plan period (and beyond) in a sustainable way;
• There is no need or reason why the land should be kept permanently open; and
• The boundary of the Thames Basin Heaths Special Protection Area (marked, in particular, by a line of mature oak trees around the site) would be a more logical and recognisable boundary to the Green Belt, particularly since the constraints to development of this protected area would ensure that the boundary would be permanent and accord with national policy on defining Green Belt boundaries.

3. Allocation for development

The Council needs land for burial ground purposes to meet future requirements. The land at Salt Box Road will help the Borough to meet these needs in a sustainable way. The allocation of the site under Policy A23 for a burial ground with a new site access and appropriate supporting facilities is therefore supported.

The development of the site for burial ground purposes would be appropriate here, given the proximity of residential development and the accessibility of the site. Moreover, it would not, in principle, be harmful to the Thames Basin Heaths Special Protection Area and would not be ruled out by the Avoidance Strategy.

Having regard to the Council’s allocation of the site for burial ground purposes under Policy A23, I make the following propositions:

• The site is an ideal one for burial ground purposes, being in a sustainable location, immediately adjacent to the built-up area of Guildford, close to residential development, conveniently served by the A320 and the A322 (both of which have good southward connections to the A3) and bus services and within reasonable distance from Guildford and Worplesdon railway stations, the latter by attractive pedestrian routes and cycleways;
• The site has an existing access from Salt Box Road via a service road at its eastern end. Whilst this could provide a secondary or emergency access, a more suitable access can be provided using the existing traffic light-controlled junction of Salt Box Road with Grange Road at the southern edge of the site. A photograph showing this potential access is appended to this letter;
• The allocation of the site as proposed under Policy A23 would assist in meeting anticipated needs for burial ground purposes over the plan period (and beyond); and
• The site is wholly owned by my clients and available for development

4. Ecological impact
Policy A23 states a requirement for a Habitat Regulations Assessment in connection with a future planning application.

A Phase 1 Habitat Survey has been undertaken to assess the likely impact of development on the ecology. The report of the survey and its findings were submitted with my earlier representations letter of 18 September 2014. The report concludes that the development of the site will be able to mitigate and compensate for all protected species and habitats found on site as long as the correct procedures are followed.

There can therefore be no justifiable objection to the proposed allocation of the site for burial ground purposes on grounds of ecological harm.

5. Summary

We support the removal of the site from the Green Belt and the allocation of the site for burial ground purposes under Policy A23 and we ask that what is said above is taken into account when approving the Local Plan for submission to the Secretary of State.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents: grange.jpg (257 KB)
I wish to **OBJECT** to the Draft Local Plan currently under consultation as follows:

1. I object to the housing number – 693 homes per annum. This number is far too large and is based on a formula which the Council has declined/failed to reveal to the public for analysis and indeed even to its own Councillors. Any figures are of course already redundant given the Brexit result with its impact on population numbers resulting from lower levels of migration.

2. I object to the 693 housing number because constraints have not been applied to the number. GBC is 89% Green Belt and that alone should result in a significant reduction in housing numbers. Failure to consider infrastructure constraints (road congestion/lack of schools etc) is a failing in the Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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- I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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a1 I object to the proposed housing sites in East Horsley as follows:

1. Ockham Road North – A39
2. Thatchers Hotel – A36 – already rejected following a planning application by GBC earlier in 2016

b1 I object to the insetting of West and East Horsley

c1 I object to the insetting of Ripley, West Clandon and Send

d1 I object to the creation of new Metropolitan Green Belt at Ash and Tongham – the farthest point within the Borough from London

e1 I object to the failure of the Council to consider ‘brownfield first’ as a policy. There are large swathes of brownfield/ previously developed land within Guildford Town

which should be considered for housing rather than office/warehouse development. Such land is very sustainable for housing in terms of local transport. Given modern

house building technology any flood risk can be managed successfully. I object too, to the lack of affordable housing included in the Plan.

f1 I object to the Borough’s Infrastructure Delivery Plan which lacks detail, is reliant on central government funding which is not confirmed and is merely an expensive wish

list

g1 I object to the Green Belt and Countryside Study. It is lengthy and inconsistent. for example regarding site allocation and the 5km zone for the Thames Basin Heath SPA

I support objections to the Local Plan made by West Horsley, East Horsley, Send and Ripley Parish Councils and by the Wisley Action Group. I support objections made by

West Horsley resident, Mr David Roberts

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/439  Respondent: 8591169 / Michael Bruton  Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Specifically within West Horsley I object as follows to:

1. Manor Farm – A38
2. Bell and Colvill – A37 – already rejected by GBC’s Planning Committee earlier in 2016
3. Land at Ockham Road North – A40
4. Land at East Lane – A41
POLICY A25

1. I object to the inclusion of Gosden Hill (A25) in the local plan. Gosden hill meets all the five requirements of the Green Belt

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

POLICY A26

1. I object to the inclusion of Blackwell Farm (A26) in the local plan. The site is within the Green Belt and all constraints have been ignored. The site is owned by Surrey University which has permission to build 2000+ units of accommodation on campus but has failed to do so. Building on Blackwell Farm would be detrimental to the Surrey Hills AONB and adjoining AGLV. Given existing congestion in the locality on the A31/A3 the additional 200+ homes would make congestion/commuting intolerable and impact on Air Quality. (I have objected elsewhere to the Wisley (A35) Development. Blackwell Farm and Wisley are similar in need of protection from any development).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: PSLPS16/580  Respondent: 8591169 / Michael Bruton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

w. Site Objection (A35) Three Farms Meadows (TFM) – former Wisley Airfield. I object to this site being removed from the Green Belt. The site was comprehensively rejected for housing by GBC’s Planning Committee earlier in 2016 and for a raft of very good reasons. Nothing has changed to justify the inclusion of TFM for housing development. Specifically TFM should be excluded because:

1. It is unsustainable and reliant on private cars
2. Unsustainable because of poor air quality on both housing and the SPA
3. Impact on the Surrey Hills AONB
4. Urban nature – a townscape/cityscape rather than a rural design
5. No infrastructure for the site
6. No promised funding from central government/SCC for required infrastructure
7. Impact of NOx and other carcogens on the potential residents and on the SPA
8. No consideration of the cumulative impact of the many other developments locally and on the expansion Plans of RHS at Wisley
9. Failure to consider protection of /impact on the historic properties within Ockham and the Chatley Heath Semaphore Tower

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/6645  Respondent: 8591169 / Michael Bruton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

• I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/7077  Respondent: 8591169 / Michael Bruton  Agent:
Objections to Guildford Borough Council Proposed Local Plan (June 2016) and to the continued inclusion in the plan of the Former Wisley Airfield (FWA), now known as Three Farms Meadows (TFM) –

Allocation A35 - for the phased development of a new settlement of up to 2100 dwellings

I wish to make a supplementary submission regarding the proposed GBC Local Plan as follows:

- I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.
- I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.
- I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans.
- I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).
- I object to the threat the Local Plan poses to the historic rural village of Ockham and the blight on properties there. The plan calls for a village of 159 residences (with narrow lanes, no streetlights, very few pavements and many listed houses) to be subsumed into a 2,000+ dwelling development, with urban-style buildings up to five storeys high and a population density higher than most London boroughs.
- I object to the detrimental impact on transport, local roads and road safety. I specifically object to:
  1. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars
  2. The increased volume of car traffic. A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads
  3. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements
  4. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them)
  5. The increase in the already severe congestion on the Strategic Road Network of the A3 and M25. A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest
  6. The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity
• I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).

• I object to the fact that air quality concerns have not been taken seriously – air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels (and in breach of the Air Quality Directive). Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.

• I object to the fact that the proposed plan does not meet the needs and desires of local communities, as evidenced through the Ockham Parish Plan. The top two responses as to why local residents enjoy life in Ockham are (1) access to the countryside and clean air, and (2) the peace and quiet afforded by wide open spaces. Over 90% wish to see both the historic features of the village maintained and the village’s green spaces, including the FWA/TFM, protected.

• I object to the continued inclusion of a site (the former Wisley Airfield, now known as Three Farm Meadows) – where the planning application has already been unanimously rejected by GBC’s Planning Committee.

After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd’s (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter.

Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

I request that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/8314  Respondent: 8591169 / Michael Bruton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

[re Policy A35]

6) I object to the detrimental impact on transport, local roads and road safety. I specifically object to:

a. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars

b. The increased volume of car traffic. A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads

c. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements
d. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them)

e. The increase in the already severe congestion on the Strategic Road Network of the A3 and M25. A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest

f. The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/6580  Respondent: 8591169 / Michael Bruton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A42

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY A42

1. I object to the development of Clockbarn Nursery (A42). The site has very restricted access along Tannery Lane. Tannery Lane is narrow and is already overused as a route to the local Business Park.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/581  Respondent: 8591169 / Michael Bruton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
x. Site at Garlick’s Arch (A43) – I object to this site for housing which would result in a loss of ancient woodland and impact adversely on the local infrastructure. It is too near to the congested A3 and will suffer from air pollution.

y. I object to the proposed SANG at Long Reach West Horsley as it would be used to support over 1000 additional homes in this small village.

z. I object to all proposed sites in West Horsley in excess of 5 homes. If approved there will be urban sprawl contrary to Green Belt protection – and a merging with all surrounding villages.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/6581  Respondent: 8591169 / Michael Bruton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A44

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY A44

1. I object to the inclusion of Send Hill (A44). This is a high quality Green Belt area which would be spoiled by development. It is also the site of an old refuse tip who’s contents are unknown and must therefore present a potential health hazard.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/6582  Respondent: 8591169 / Michael Bruton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A46

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
POLICY A46

1. I object to A46 – land between Normandy and Flexford – being allocated for development. No exceptional circumstances have been demonstrated for its removal from the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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POLICY 49/50

1. For similar reasons I object to land being allocated for development/removal from the Green Belt as follows – A49 (Normandy); A50 (Normandy)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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- I object to the threat the Local Plan poses to the historic rural village of Ockham and the blight on properties there. The plan calls for a village of 159 residences (with narrow lanes, no streetlights, very few pavements and many listed houses) to be subsumed into a 2,000+ dwelling development, with urban-style buildings up to five storeys high and a population density higher than most London boroughs.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<tr>
<th>Comment ID:</th>
<th>PSLPP16/1257</th>
<th>Respondent:</th>
<th>8591169 / Michael Bruton</th>
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<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

| k. | I object that many of the sites proposed are in unsustainable locations as defined in the NPPF. |
| l. | I object to the assumptions in the Plan which projects a major shift to cycling and walking. This is highly unlikely given the absence in the Plan of adequate safe cycling lanes/walking routes – especially in rural areas. |
| m. | I object to the threat to relatively small villages of major housing developments. Such villages will be overwhelmed and will cease to be villages. |
| n. | I object to any villages being ‘taken out of the Metropolitan Green Belt’. The MGB is meant to be a permanent and open feature in itself and protected forever and for future generations. |
| o. | I object to the impact of excessive housing numbers in terms of increased traffic congestion on the M25/A3 and other A roads as well as on rural roads which are congested already and which will become even more used as ‘rat runs’ to the A roads. Small accidents already cause major hold ups on the A3/M25 in particular. There is no tolerance in the Plan for increased road accidents/road closures resulting from more traffic. |
| p. | I object to a failure in the local plan to consider the impact of increased traffic on parking congestion both in Guildford and the villages |
| q. | I object to the failure to consider adequate protection in the Plan for heritage assets in both Guildford town, the villages and countryside. |
| r. | I object to the failure in the Plan to consider environmental protection as a fundamental objective. |
| s. | I object to the failure to consider in the Plan the impact of 693 homes per annum on Policing requirements/crime prevention |
| t. | I object to the failure to consider the impact in the Plan on local GP surgeries and increased difficulty in securing doctor appointments. |
| u. | I object to the failure in the Plan to consider and plan for additional school places and how children will journey to these schools – especially at Three Farms Meadows in Ockham. |
| v. | I object to the proposal to build 70% of new housing on the Green Belt which is supposed to be permanent countryside for existing and current generations |

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents: 

Comment ID: PSLPP16/1255  Respondent: 8591169 / Michael Bruton  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3 

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
i. I object to the number of homes planned in terms of the resulting increase in traffic/traffic congestion and air pollution. In particular I object to the failure to take into account the impact of air pollution on Protected areas such as the Green Belt, SPAs and SSSIs.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPP16/13961  **Respondent:** 8591169 / Michael Bruton  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ( )**

- I object to the detrimental impact on transport, local roads and road safety. I specifically object to:
  
  1. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars
  
  2. The increased volume of car traffic. A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads
  
  3. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements
  
  4. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them)
  
  5. The increase in the already severe congestion on the Strategic Road Network of the A3 and M25. A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest
  
  6. The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPP16/1254  **Respondent:** 8591169 / Michael Bruton  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy ID4
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

f. I object to the failure in the Plan to consider the impact of excessive housing numbers on Special Protection Areas, SSSIs, Conservation areas and Guildford’s heritage assets

g. I object to the housing densities proposed for the major strategic sites – which are higher than many inner London Boroughs.

h. I object to the failure in the Local Plan to consider in any detail the impact of poor air quality on many of the proposed developments. In parts of the Borough, emissions exceed EU standards already band are in breach of the Air Quality Directive.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPP16/13057  **Respondent:** 8591169 / Michael Bruton  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I wish to submit objections to the Local Plan in addition to those in my email below.

I have now read the submission on behalf of CPRE Surrey (Guildford Branch) by Mr Tim Harrold – dated 15 July 2016. I am a member of CPRE Surrey and a past CPRE County Chairman for CPRE Cornwall. I support wholly Mr Harrold’s 29 page submission and the objections therein. I would like to bring to your attention in particular the statement on the Green Belt by the Housing Minister, Brandon Lewis of 7/6/16 as replicated (p 28) in the CPRE Guildford Branch submission.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPP16/13790  **Respondent:** 8591169 / Michael Bruton  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
POLICY P2

1. I object to all Green Belt sites allocated in the local plan. GBC has had calculated housing numbers on a formula withheld from the public and indeed from the Councillors who have voted in support of the draft Plan. To vote on any Plan based on an unexplained formula must make any such proposals non credible.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13792  Respondent: 8591169 / Michael Bruton  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY P2

1. No explanation of the ‘exceptional circumstances’ required to build housing on a Green Belt has been provided by the Council.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13958  Respondent: 8591169 / Michael Bruton  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

• I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1253  Respondent: 8591169 / Michael Bruton  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

e. I object to the housing number overall and to the disproportionate housing numbers allocation to locations to the north and east of Guildford.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY S2

1. No constraints have been applied to the housing numbers ( e.g. Green Belt, Infrastructure, Air Quality issues adjoining all three major allocated sites).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: PSLPP16/13959</th>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

- I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

c. I object to the vast amount of paperwork involved in the Plan. Its effect is to put off many people from reading it. A concise Summary should have been included. I object to the short period allowed/Regulation used for the Consultation period. The amount of documentation available, combined with the shortened time available to comment - and to be made during the holiday period is contrary to UK democratic principles.

d. I object to the failure of the controlling Conservative Group on GBC to uphold their Manifesto promise to protect the Green Belt. This promise was included in their election literature in May 2015. They thus have no mandate to implement a Plan involving major intrusions into the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

QUESTIONNAIRE Q7

1. The Plan has changed very little since the 2014 Draft Local Plan which received 20,000+ objections. The Council has wearied objectors this time by ignoring objections in 2014. It is a natural human condition to ‘give up’ against GBC’s apparent wall of deafness to reasoned objections?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp17q/141  Respondent: 8591169 / Michael Bruton  Agent:


Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (No)

Local Plan

I OBJECT to the revised/latest version of the Guildford Local Plan. I request that the following comments together with all my previous objection letters are passed to the Inspector. I reserve my right to appear at the Inquiry and to present my evidence in person.

In addition to my own objections I fully support those made by Mr Andrew Proctor, [Response has been redacted due to statement containing personal data which cannot be disclosed due to the provisions of the Data Protection Act 1998] of June 2017. Mr Proctor’s objections are thorough, detailed and well considered. I would like the Inspector also to view/be provided by Guildford Borough Council (GBC) with a video of the C4 Dispatches Programme of 10 July 2017 entitled ‘Secrets of Britain’s New Homes’. This programme explains well the fallacy of so called ‘affordable homes’ as included in any Local Plan and has particular emphasis on Guildford’s Local Plan and housing numbers within the Metropolitan Green Belt within Guildford Borough.

2/4

My own objections are as follows:

1. The GBC Regulation 19 Draft Local Plan is unsound and does not take into account my previous objections and the 30,000+ other valid objections made by others to the previous 2016 Local Plan version. I request written confirmation from GBC that my previous objections will be placed before the Inspector at the EIP.
2. I request that the current Draft Plan is amended taking into account all the objections and that this is reissued before its submission to the Inspector. I object to this version of the Plan being considered under Regulation 19.
3. 89% of the GBC area is Metropolitan Green belt. I object that GBC has adopted a lower but still inflated OAN of 12,426 homes without taking into account Planning Constraints as detailed in the NPPF and NPPG.
4. 70% of GBCs proposed new housing is destined for the Metropolitan Green Belt. The Conservative Government has promised to protect Green Belts and both Mrs May and Mr Javid assured the country that this was Government Policy. If the Inspector reads the local Conservative Election Manifesto for the last GBC Council Elections he/she will see similar assurances from Conservative candidates. The proposed Regulation 19 Plan abandons both central and local government assurances regarding the Green Belt. I object on the basis of assurance given.
5. There is a presumption v development in the Green Belt but no such presumption within Guildford Town. In the Plan there should be a much greater emphasis on urban regeneration and brown field development within Guildford Town for residential development. Only 10% of the new housing numbers are proposed for Guildford Town. Town development can be of a higher density but somehow GBC makes no mention of ‘density for development’ in its latest Plan version. Most potential sites are owned by GBC and the Council has the opportunity to develop more houses there if it chooses. I object.

The housing numbers proposed by GBC are based on a flawed SHMA. And GBC has steadfastly refused to reveal the basis for their housing formula. Why? Indeed the whole proposed plan is already out of date. Town centres are in decline as shopping patterns change. Footfall is in decline as the customer chooses increasingly to shop on line. GBC should reflect changes in lifestyle and shopping habits in their Plan. They have not. I object.

1. The role of any LPA is to be a protector of the environment. However with its property purchases GBC is appearing to become a developer landowner rather than a guardian of planning rules.
2. I object to the inclusion of the three major strategic sites as proposed. They are all sites of outstanding landscape characteristics reflecting the original objectives of the Metropolitan Green Belt – namely openness, the separation of towns/villages one from the other and stopping urban sprawl – particularly from London. The Green Belt in Guildford provides Londoners currently with beautiful countryside on their doorstep, That will be largely eroded if the Plan is approved. The three sites to which I object are Blackwell Farm, Three Farms Meadows(TFM) (the former Wisley Airfield) and Gosden Hill Farm.
3. I object also to the removal of villages around Guildford from the protection of the Green Belt/ revised village boundaries. Such villages as Send, Ripley, Ockham and East and West Horsley are and should remain self contained communities. They should not be subject to significant expansion/ a developer free for all.
4. I wish to comment and OBJECT in some detail to the proposed development of Three Farms Meadows (TFM) in the very small historic village of Ockham. Once the home of medieval philosopher, William of Occam and more recently in the 19Cy of Ada Lovelace, the computer pioneer. This site has already been rejected overwhelmingly in 2016 by GBC Planners and its elected Planning Committee when the Cayman Islands owners submitted an application for 2000+ homes there within the Metropolitan Green Belt. GBC has declined to reveal who is behind this application given its offshore status.

1. Why include a site again which was rejected on at least fourteen different grounds?
2. It is the least sustainable of the three strategic sites given its location and constraints. That does not make the other strategic sites sustainable!
3. It has no convenient public transport links despite claims by the applicant. It is adjacent to the A3, one of the most congested trunk roads in the county and by Jct 10 of the M25, the busiest junction on the M25.
4. The site is near the famous RHS Gardens at Wisley where congestion already occurs at peak periods, never mind general traffic congestion for much of the day on the A3/M25.
5. The proposed TFM development would overwhelm the facilities of East Horsley and the station car park there is already full most days.
6. The site would have a negative impact on the Surrey Hills AONB.
7. The local narrow lanes in the Ockham area are unsuitable for extra traffic. Cycling in the locality on these roads would be increasingly dangerous.
8. The site epitomises every reason and justification for the establishment of the Green Belt and should not be removed from it or damaged in any way.

9. I object to the fact that GBC has failed to apply Green Belt (GB) constraints to this site – such as GB itself, air quality, lack of infrastructure and protection of the AONB and the Thames Basin Heath SPA.

My OBJECTIONS to GBC’s revised Local Plan remain. The Council has ignored the well considered 1000’s of Objections. And it has spent vast amounts of taxpayer money in so doing. Its revised Local Plan remains unsound.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/4178  Respondent: 8591329 / The House of Commons (Anne Milton MP)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

How many homes does Guildford need, and why? It is clear that GBC have not convinced everyone that we need an annual target of 693 homes. However, I understand that GBC’s own analysis suggests that this could be factored down to approximately 360 homes achievable per year if Green Belt is an absolute constraint and no investment is put into A3 and other road improvements.

Will the decision to leave the European Union and the possible reduction in free movement of people have an impact on the OAN?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/4177  Respondent: 8591329 / The House of Commons (Anne Milton MP)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix F: Policies overview map

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The opening statement from the Leader of the Council reflects what most people in my constituency feel - that Guildford is a very special, beautiful place. Many of my constituents would also support: the desire to enhance and protect our natural and built environment; homes they can afford either to rent or buy; a good and vibrant jobs market; improvement in transport across the borough through increased travel options; preservation of our open spaces; enhancement of the river frontage in our town centre; and viable local shops. I would also highlight the importance of the Areas of Outstanding
Natural Beauty, the Green Belt, the Thames Basin Heaths Special Protection Areas and also some of our undesignated countryside which enhance people's lives. This is consistently recognised in the correspondence I receive although this is outweighed by the number of people who write to me because they find it impossible to find a home to rent or to buy.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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Comment ID: PSLPP16/18615  
Recipient: 8591329 / The House of Commons (Anne Milton MP)  
Agent: 

**Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D1**

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

A town proud of its heritage and economic contribution should be building to the very highest design standards. I continue to be dismayed that whilst we have long and necessary arguments about the principle of building we fail to concentrate on the design of those buildings.

A town with so many constraints should not shy away from dense housing development. The often falsely accepted wisdom is that high density means poor development when the opposite can be true. Where we do have brownfield sites they should be used to the maximum: with good design, evidence shows the end result can be far more attractive, in keeping with the local environment and reduce the need for building in more sensitive areas and without taking the easy option of building upwards.

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To ensure that the Local Plan isn’t a static document, design of our built environment should include the ability to gather information about how people's lives could be improved: noise, footfall, humidity, air quality, traffic congestion and where people go for their leisure time.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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Comment ID: PSLPP16/17180  
Recipient: 8591329 / The House of Commons (Anne Milton MP)  
Agent: 

**Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D2**

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I hope GBC will anticipate societal trends and advancing technology. A great deal of work is being done with so called 'smart cities' to enhance people's quality of life and increase efficiency of services to lower cost. We should be looking at new materials that allow buildings to be built faster and cheaper than traditional forms of building. We should be setting standards to reduce the need for lighting and heating. These ideas need to be embraced in the final Local Plan.

There is a wealth of new technology being explored and in new forms, eg roads that can now be laid with solar panels to generate energy. I understand Greenwich is networking solar panels, energy from water (the Thames) and other sources as it becomes a test bed for smart city energy technology. This information can be used continually to inform and improve people's quality of life in every new building.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17184  Respondent: 8591329 / The House of Commons (Anne Milton MP)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E7

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The redevelopment of the town centre is long overdue and there is an opportunity for GBC to be ambitious and visionary and inspire the people who live here, come here to work and those that visit. The town centre is currently designed around the traffic that goes through it and little is made of the river, the High Street or the views around. I would like to see GBC include some of these ideas and put more emphasis on enhancing the town for the future not simply doing more of the same.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17181  Respondent: 8591329 / The House of Commons (Anne Milton MP)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Specialist accommodation is of particular concern specifically the need for accommodation for adults with learning difficulties and special needs. Close working with Surrey County Council is essential to make sure that opportunities are found to bring specialist housing back into the county.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17179  Respondent: 8591329 / The House of Commons (Anne Milton MP)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I congratulate Guildford Borough Council on producing a much improved Local Plan with a positive approach to the future of Guildford. We need more homes. We must drive developers and those that own land to maximise brownfield development and thus to protect the countryside as far as possible. As I have done before, I will continue to lobby Government for vital investment in infrastructure as, without this money, the number of homes we can build will be constrained.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17183  Respondent: 8591329 / The House of Commons (Anne Milton MP)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Similarly societal trends are also showing an increase in electric cars and smart/electric bikes, development of driverless vehicles and the need for mass transit systems.

Existing train services from Guildford are inadequate. Commuter trains are overcrowded and, at peak hours, unreasonably so. I would welcome the opportunity for a halt at Park Barn, although I have reservations about Merrow. I will continue to lobby the train operators and Network Rail as I have done for many years.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: PSLPP16/17182  Respondent: 8591329 / The House of Commons (Anne Milton MP)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Flood risk remains and areas such as Burpham, Worplesdon, Clay Lane and Seale and Sands have particular problems. Although flood risk will be modelled we are not yet at a position to alleviate the problems with flooding that already exists, often due to the cost.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17178  Respondent: 8591329 / The House of Commons (Anne Milton MP)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I would urge GBC to review areas of already developed land. The land around the Law Courts and Surrey Police headquarters is an obvious example where the buildings are unattractive and land is poorly used. Land at the Research Park and University is similarly not well used. Surface parking for instance could be decked, and interspersed with a mix of residential homes to rent or buy. The Plan does not explore these options in any detail. These sites should be looked at to maximise housing opportunities, enhance the built environment and improve land use – but without simply building higher.

The Local Plan does stress the need for protection of the Green Belt and I would restate the very high value local people place on this. So with these competing demands I welcome the 'brownfield first' approach to building, such as the regeneration project at Slyfield. Green Belt land, particularly where it abuts AONB, is particularly sensitive. I would highlight in particular the planned development at Blackwell Farm and the impact on the AONB and the Green Belt. I would draw particular attention to the statement in the NPPF where it says, “Green Belt boundaries should only be altered in exceptional circumstances”. I do not feel that this case has yet been made. However, there may have to be some Green Belt encroachment where there is local support in order to meet local housing need.

I congratulate Guildford Borough Council on producing a much improved Local Plan with a positive approach to the future of Guildford. We need more homes. We must drive developers and those that own land to maximise brownfield development and thus to protect the countryside as far as possible. As I have done before, I will continue to lobby Government for vital investment in infrastructure as, without this money, the number of homes we can build will be constrained.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Policy A26 – Blackwell Farm - Serious consideration needs to be given to the engineering solutions necessary to maintain the fragile balance of water in the area. If this is not addressed, it will have a damaging impact as far away as Whitmoor Common.

I draw the Council’s attention in particular to the very useful work by Worplesdon Parish Council which they will have submitted separately.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Policy A59 – new station at Park Barn – it is excellent now to see specific policy relating to this, but there is some local resident concern about how kiss and ride’ provision only will be managed; not providing car parking does not prevent train users arriving by car and seeking somewhere to park.

I congratulate Guildford Borough Council on amending the Local Plan to reflect local concerns and the continuing positive approach to the future of Guildford. We need more homes. We must drive developers and those that own land to maximise brownfield development and thus to protect the countryside as far as possible.

I will continue to lobby Government strongly for vital investment in infrastructure as, without this money, the number of homes we can build will be constrained.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

4.5.8a – The addition of this paragraph on broadband echoes the efforts I have made over a long period to help constituents in no-spots, some of them in surprisingly urban areas. It is crucial that any land required for base stations or other communications equipment is safeguarded

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/3361  Respondent: 8591329 / The House of Commons (Anne Milton MP)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy D4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy D4 – I am delighted to see the considerable detail added to this section of the Plan. This reflects what I said in my response to the previous consultation, that in debating what should be built where, we often lose sight of the importance of excellent design.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/3360  Respondent: 8591329 / The House of Commons (Anne Milton MP)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy E5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy E5 – I am pleased to see reinforcement of the need to keep our rural shops and services.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Accessibility – Policy H1 states 10% but at 4.2.4 and 4.2.10 the figure is 15% - higher is better for people with disabilities, but figure needs to be consistent to be effective.

Local residents, particularly in areas close to the University, continue to raise concerns about the need for more on-campus accommodation and pressures on the HMO and other rented property market in the town.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

H2 - Affordable homes – is it strong enough to use ‘seek at least 40% of the homes on these sites as affordable homes’ to replace ‘must be affordable homes’ (as in previous wording)? Does the new wording reduce enforceability? I also prefer to see the term ‘homes which are affordable to rent and to buy’.

Flooding – I was pleased to see at 4.3.39 the clarification of approach to Flood zone 3 designation. Flooding remains a significant issue in and around Guildford, and led to the establishment of 5 flood forum groups which I chair in my constituency.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Policy ID1 – Again, the strengthening of the need for infrastructure to precede or accompany development is excellent.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/3363  Respondent: 8591329 / The House of Commons (Anne Milton MP)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy ID3 – An imaginative approach to planning for car ownership and use is essential, particularly in town centre locations, and the changes to this policy and supporting text appear to go some way to achieving this.

I would like to see reference to cycling provision (particularly safe storage facilities) strengthened even further. Building car-free development will continue to have an element of aspiration until public and alternative transport is of excellent quality.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/3357  Respondent: 8591329 / The House of Commons (Anne Milton MP)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Vision and objectives

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I recognise that consultation is limited to changes made to previous strategy and sites document. My constituency includes the majority of Guildford Borough, but does not include Ash, Ash Vale, Tongham or most of Normandy, and my comments will not cover changes to policies or sites in those areas.

The opening statement from the Leader of the Council reflects what most people in my constituency feel - that Guildford is a very special, beautiful place. Many of my constituents would also support: the desire to enhance and protect our natural and built environment; homes they can afford either to rent or buy; a good and vibrant jobs market; improvement in transport across the borough through increased travel options; preservation of our open spaces; enhancement of the river frontage in our town centre; and viable local shops. I would also highlight the importance of the Areas of Outstanding Natural Beauty, the Green Belt, the Thames Basin Heaths Special Protection Areas and also some of our undesignated countryside which enhance people's lives. This is consistently recognised in the correspondence I receive although this is outweighed by the number of people who write to me because they find it impossible to find a home to rent or to buy.
Transport: In Policies BT5 and BT6 it is good to see bus schemes added for significant bus networks serving Gosden Hill Farm and Blackwell Farm proposed sites respectively to match additional requirements for their site allocation policies.

2.13 – I was pleased to read additional emphasis on the needs of cyclists and at 2.14a/b on transport infrastructure needs

Extension to Surrey Research Park – although slightly reduced, if this comes to fruition, the land allocated must be used for maximum result, and therefore better planned with better land use than the original Research Park development.

Redevelopment of the land used for surface parking must be considered. The University campus and the Research Park are attractively designed but with such a high demand for housing in an area close to the AONB and Green Belt it would be negligent not to re-consider the land use at both these locations

I am pleased to see town centre increase in number of flats, and I would reiterate what I have said before about increased town centre housing.

At 4.1.9a I support the strengthened need for a dependent link between delivery of necessary infrastructure and delivery of housing.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPA16/3843  **Respondent:** 8591521 / Mark Daniell  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Send

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to Send being removed from the Green Belt. I understand that this designation was intended to be permanent to protect our countryside. If the Green Belt is eroded by the policies proposed Guildford and Woking will become a conurbation. The Green Belt should only be used in very exceptional circumstances which GBC has not justified.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPS16/7198  **Respondent:** 8591521 / Mark Daniell  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A42

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to A42. Tannery Lane has already been designated for the development of a marina which will put more traffic on a narrow road. There is inadequate access to the proposed site for 45 houses and the increase in traffic will cause more burden on Send Road which is frequently solid with cars.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/7196  Respondent: 8591521 / Mark Daniell  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to policy A43. This will place a strain on local services including schools, doctors, roads and hospitals. We have not the infrastructure to support such an increase in road traffic. Send is regularly over stretched by busy traffic with queues of traffic a very common problem.

Additionally I object to the use of country side to be used for the proposed development. This will threaten natural habitats.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/7197  Respondent: 8591521 / Mark Daniell  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A44

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to policy A44. Send Hill is an extremely narrow road and access onto Potter's Lane is difficult. Putting more cars on this road would cause extra problems and the risk of accident. I also understand that the land is previous landfill and is unsuitable for residential use. Again I am concerned that our schools and other services will be put under strain by this development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16135  Respondent: 8591521 / Mark Daniell  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2
| Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( ) |
| Answer (if comment is on questions 1-7 of the questionnaire): () |

I object to A25 and A35 with the creation of up to 4000 homes. This increase in population will create a huge burden on local services and I question why this area should be used to meet more than its fair share of the new housing quota GBC need to build. Every evening the A3 is solid with traffic queuing to reach Guildford. This would worsen if the houses proposed are built. Such an increase in population would also lead to excessive traffic on subsidiary roads, including Send Road which regularly grinds to a standstill following RTAs on the M25 or A3. We cannot support the loss of working hours etc this would cause and the subsequent affect on the local economy not to mention quality of life.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/3659</th>
<th>Respondent: 8591681 / The House of Commons (Paul Beresford MP)</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2</td>
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After the housing numbers have been revised downwards, the entire approach to planning in Guildford Borough ought also to shift. I have in the past publically called for a planning strategy which focuses more on higher rise development in the centre of Guildford itself if in doing so the historic very central portion of Guildford must be respected. Such developments have a number of advantages, they constitute a far more effective use of land than new builds in rural Green Belt, they are far more likely to be well linked to existing infrastructure, they will be more energy efficient and perhaps most importantly I believe that such development would also be more in line with what future Guildford residents would be looking for in a place to live as opposed to smaller clusters of houses out in the Green Belt, further away from Guildford's amenities and rail links.

The position or central government with regard to local planning and development on the Green Belt is clear. Residents have heard in the past comments to the effect of 'it is the government in Westminster which is forcing us to do this …' This was not true then and it is not true now. I have met with Ministerial colleagues on multiple occasions and corresponded with the Department for Communities and Local Government at length on the questions of Local Planning and Green Belt policy. The Conservative Government is absolutely committed to Green Belt protection, I would urge the leadership and planners at Guildford Borough Council to closely study both the National Planning Policy Framework (NPPF) and the various Ministerial statements published on this topic. The only message one could draw from these needs re-emphasising. There is nothing in national policy which supports, encourages or condones any development on the Green Belt save for the most exceptional - and housing need is acknowledged as not falling into this category.

In addition to the Green Belt issue, I do not believe it is appropriate to propose developments in the green belt, dependant upon large and expensive road infrastructural developments. With the present economic outlook, especially with Brexit looming ahead these are most unlikely to be fulfilled. Whether we take the ill-conceived plans for thousands of
houses at Gosden Farm in West Clandon, at Wisley or Garlick Arch there is a clear lack or foresight where the reliance on such suggested infrastructure will produce planning blight on surrounding areas. This statement is true in the context or not only roads but sewerage or local services such as hospitals and school places.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/3658  Respondent: 8591681 / The House of Commons (Paul Beresford MP)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

As the Mole Valley M P with a num ber of G uildford Wards in my Constituency I m ust acknowledge the great effort made by many thousands or Gui ldford Borough residen ts i n contacting the Council and object ing to the latest draft of the Loca l Plan. This di l igence on the pa rt of people determi ned ro protect the u nique environment i n which they live and work is heartening and encour aging to me as someone who has long campaigned on and fought for Green Belt protection. The pro portion of ptotected land i n these wa rd s is of considerable signilicancc.

I will not be addressing in great detail those many individual sites and proposals contained within the draft Local Plan which arc highly contentious. I ha ve read ma ny subm issions from constituent s wh ich do this perfect ly effectively and I endorse and agree with these objections. The accum ulation of t hese object ions prod uces a pic tu re in w hich residents or the Mole Val ley Wa rds of Guildford Borough are united in opposition to what i s proposed in the draft Local Plan - if any resident has written in support of the current draft I am not aware or this! I submit that a Plan which has drawn such an utterly negative response, even compared to the much revised 2014 draft, cannot be legitimate and must be withdrawn and reworked.

A reworked Plan would not simply be a matter of slightly altering some bound aries or numbers - at this stage it must constitute a wholesale realignment of thinking and direction of travel on the part of Guildford Borough Council. Central to this would be the Council acknowledging that the present figures for predicted future housing need, around which much or this Local Plan hinges, are currently too high and in light of the particular situation in Guildford Borough (the prevalence of Green Belt land) they must fight as hard as is needed to have these numbers brought down. In this they would have my full support and that of the huge majority of concerned residents.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/3660  Respondent: 8591681 / The House of Commons (Paul Beresford MP)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The approach to the plan should be to proceed on the acceptance that it has proved possible to persuade the Government Inspectors and hence the Government that because of the protections on such a huge proportion of Guildford Borough a lower target of housing numbers is acceptable. I personally believe and hope that the new leadership or GBC is more open, more receptive to new ideas and more creative than that which came before and that it is with the capacity or the council to craft a genuinely successful plan - but only if lessons are learnt and a genuine acceptance of the need for a change or direction guides council thinking from this point onwards.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/844  Respondent: 8592001 / Mr Michael Trower  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I am writing to make a formal objection to the Guildford Local Plan 2016 under the public consultation.

The whole consultation appears to be based on figures which have been kept secret from the public, so how can there be any transparency in the whole process? The first line of Policy P2 states “we will continue to protect the Metropolitan Green Belt against inappropriate development” and then the policy looks at totally changing the green belt boundaries and a massive and inappropriate development therein, so there is an initial and gross contradiction in the plan.

Much use is made of the word sustainable in the local plan. My Oxford English Dictionary gives the meaning as “which conserves an ecological balance by avoiding depletion of natural resources or that can be sustained” Please advise how once green belt land is built upon, how it can be sustained? Answer is it can’t – once the green belt is gone it’s gone for ever. If there is going to be a massive growth in population how is the increased population going to be fed if agricultural land is built upon? Besides the recent referendum vote for Brexit from the EU must cast doubt on many of the assumptions made for population and employment forecasts.

I object to the removal of West Horsley from the green belt by the extension of the 2003 Local Plan Settlement boundaries – there is no justification for this extension.

The alteration of the green belt is only allowed under “exceptional circumstances” and these have not been demonstrated in the plan – the inclusion of more housing to meet an unproven need is not an exceptional circumstance – I therefore object to this alteration.

There is no expansion of many local facilities and infrastructure commensurate with the proposed addition to the total housing numbers. The roads in West (& East) Horsley are already very busy, very badly maintained, mostly unlit and with very poor drainage, again with little or no maintenance. There is a drain in School Lane which is full of silt and has been for the 8 years I have lived in West Horsley. The building of more homes with drives and paved areas will only exacerbate...
the problem and result in greater water run off every time there is rain. Ripley Lane is impassable except by boat after any heavy rain, so how is more traffic in the area going to be able to use it?

The expanded village will not have the infrastructure to support it. There is now no Newsagent or Post Office, and the only other village shop is due to close in the autumn. There is a very limited bus service through the village on weekdays only. The medical centre is in East Horsley and is already at capacity. Existing residents must perforce use their cars to travel to East Horsley for the shops or railway station. This is without the massive increase in housing numbers planned. The village schools are again full and there is no mention in the local plan about new schools to cater for the likely increased demand.

The proposed housing developments are at a much greater density than the existing housing. Current small scale developments have to be in keeping with the area & street scene, so why are new ones on such a higher density?

What West Horsley does need, and has been proven is about 20 affordable homes. This was proven by The West Horsley Parish Council Housing survey and local plan in 2014. All that does get built in the area are 4 and 5 bedroom executive homes, usually following the demolition of a perfectly useable smaller home, which brings in a 2 (or more) car family placing extras strain on the village infrastructure. The WHPC survey indicated that there is little scope for older people to downsize, or for starter homes for children born and brought up in the village.

The whole process is very undemocratic and GBC are simply ignoring the wishes of the local population. The plan has been re-issued in virtually the same format as the previous one, and all previous objections have been ignored in the current consultation. It appears to be a copy of the strategy of the remain camp from the Brexit or Scottish Independence referenda – if you don’t achieve your desired result, try again until you do.

**I therefore strongly object to the 2016 Local Plan**

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp173/493  Respondent: 8592001 / Mr Michael Trower  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Appendix H: Maps - East Horsley

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I am writing to formally object to the Guildford Draft Local Plan 2017 as far as it affects West Horsley.

While the reduction in the number of new homes is an improvement it does not go far enough in reducing the very large number of proposed houses proposed on Green Belt land. No development should be permitted in Green Belt land.

The plans make it a disproportionate number of homes which are intended to be placed in the eastern side of the borough and in Green Belt land.

Guildford BC is not choosing to constrain its overall housing growth, which is out of line with what other councils are proposing, and the proposed growth is nearly 25%, which is far in excess of what the Office for National Statistics are predicting for the growth of Guildford.
There has been nothing new put forward since last year's consultation to improve the sustainability of the West Horsley development sites and to thus meet national policy requirements. The intended development will place an inordinate strain on the local road network which is already very badly maintained for the current traffic, let alone any proposed increase.

GBC are still using flawed evidence to justify the overexpansion of West Horsley, and all the neighbouring areas.

There is a requirement in Guildford for more apartment style properties, not retail shopping space.

I object to the fact that no changes are being proposed since the 2016 consultation to the insetting of West and East Horsley from the Green Belt.

I also support the arguments put forward by the Wisley Action Group against the development of the proposed new town on the old Wisley airfield sites, for all the reason that they have put forward.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** PSLPP16/12549  **Respondent:** 8592449 / Neil Huggins  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Just a short note to say that I support the Guildford Residents Association (GRA) response and oppose Guildford expanding by a quarter.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** PSLPP16/2025  **Respondent:** 8593185 / Niels Laub  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy D4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( Yes )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I OBJECT

There are effectively two separate parts to this policy, both are flawed, and in the case on insetting, fatally flawed. In the case of urban development there are numerous flaws, including:

- The plan envisages that 40% of homes built will be affordable, but this does not provide any accommodation for low paid workers, for example, those on the minimum wage, who cannot afford to buy “affordable” homes, nor can they pay the so-called “affordable” rent. There is a need for some expansion in social housing, especially in urban areas, where there is a greater concentration of low paid workers such as those employed in the retail, warehousing and distribution sectors.
- The number of homes planned in the urban area is too low – there is a need for regeneration in some areas, but this is ignored and instead the plan concentrates on building homes on green field sites, which does not meet the needs for housing within the town, especially with the centre. This is not a sustainable policy as building outside the town has a disproportionate effect on road traffic.
- The plan envisages a large expansion of the traditional “bricks and mortar” retail sector, but this is a sector in long term decline.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2024  Respondent: 8593185 / Niels Laub  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E7

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( Yes )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT.

There should be much more residential use of the town centre. Online shopping patterns would suggest that there is limited need for further retail space, which will use valuable land inefficiently and further increase traffic congestion in the town centre. There is an urgent need for a brownfield register and to focus on brownfield redevelopment before considering development outside the existing urban area. CIL strategy must promote brownfield redevelopment.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/23  Respondent: 8593185 / Niels Laub  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Students:

The University first undertook to achieve a 60% target in 2003 (Manor Farm Master Plan (2003), Section 5.2) when it lobbied to have Manor Farm released from the Green Belt and has so far failed to achieve it, and so monitoring of their performance is crucial.

It is particularly of concern that the University has consent for campus accommodation that has not been built and that it developed the veterinary school on the site of a proposed accommodation block which could have been sited elsewhere. Over 7,500 university students are estimated to live in private rented homes within the town and this is likely to increase with the opening of a medical, veterinary and business school. This represents a large number of more affordable homes that could potentially be made available to the wider community if the university had more accommodation on their own campus.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2026  Respondent: 8593185 / Niels Laub  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( Yes )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT

Various aspects of Infrastructure are acknowledged as congested, inadequate for the existing population and not able to accommodate much growth. However, greenfield sites – requiring heavy infrastructure investment – are targeted in order to generate CIL income for the council. This is not sensible. The current draft CIL scale also encourages development on greenfield sites rather than brownfield.

The Council’s methodology assessing traffic and roads infrastructure needs is inadequate. It identifies only the tip of the iceberg in terms of existing congestion. Looking at local traffic situations around the Borough it becomes clear that the schemes proposed will not solve existing congestion and the local road network has not been given sufficient consideration. Some proposed locations would require highway schemes that involve demolition of property and road-widening in residential areas to solve the resultant congestion. The A3 improvements are not guaranteed to take place but they are being used to justify removing large areas from the Green Belt before detailed traffic assessments have taken place. These detailed investigations are being deferred until the planning application stage and will be left to developers to prepare. If a site then proves to be unsustainable its Green Belt protection will have been lost for no reason and unsuitable development will take place by a more insidious process.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2027  Respondent: 8593185 / Niels Laub  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( Yes )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT

This policy is concerned only with the strategic road network – the A3 and M25 for which the responsibility and decision-making lies with Highways England. It is only reasonable that the council will work closely with Highways England to ensure that the Local Plan does not utilise land in a way that limit the scope for future improvements.

However, the proposals for the A3 are undecided and the council has suggested a very expensive tunnel proposal that, even if HE decided to go ahead with it, is unlikely to be delivered until the end of the plan period. Less expensive alternative A3 improvements are not planned to be implemented until 2026 and would not be delivered before implementation of the current draft Local Plan. These road improvements are likely to lead to massive disruption to traffic during the construction phase on top of an already overloaded road network. It would be folly to allow any development on strategic sites dependant on access to the A3 until completion of the A3 improvements. The only logical conclusion is that a very significant traffic constraint should be applied to the OAN for this Local Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/25  Respondent: 8593185 / Niels Laub  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to this policy. It does not mention the need for permanence of Green Belt boundaries (NPPF para 79) nor does it define the exceptional circumstances required to change Green Belt boundaries (NPPF para 83).

The GBC topic paper on housing claims that the decision by Bath & North East Somerset Council to build on the Green Belt justifies a change of Green Belt boundary in Guildford to allow domestic and other building. The scale of building proposed in the Green Belt at Guildford is vastly greater than at Bath and the strategic sites in Guildford can hardly be described as “highly sustainable”.

The analysis of Green Belt in pages 52 and 53 is wholly inadequate as a basis for review of Metropolitan Green Belt around Guildford. A far more strategic assessment is required, especially given the recent letter from the Planning Minister that “unmet housing need alone” is unlikely to justify housing development in Green Belt.

The Green Belt and Countryside Study remains deeply flawed for the following reasons and should be withdrawn:

• Not based on an overall strategy view of how the borough should develop. It is piecemeal in approach.
• Unacceptable definition of sustainability – it is used simply to mean proximity to facilities
• Does not recognise the “very special circumstances” required for Green Belt development or the even stronger protection for the AONB.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/21  Respondent: 8593185 / Niels Laub  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

For the avoidance of confusion, this policy should set out the specific policies that restrict development as set out in the NPPF e.g. the Birds and Habitats Directive, SSI, Green Belt and AONB.

The section on “Monitoring Indicators” should state that the Monitoring Report will cover all three aspects of sustainable development as set out in the NPPF i.e. economic, social and environmental. Currently it focuses on the provision of additional housing and employment land. It should also cover:

- A regular assessment of the ability of the local infrastructure to cope with the increased development (housing and commercial development).
- An environmental impact assessment of new development to check that this was as planned
- Reductions in targeted housing and employment land if new demographic and other studies indicate lower growth than forecast.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/22  Respondent: 8593185 / Niels Laub  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to this policy.

The proposed housing target is a more than doubling of the target since the Local Plan adopted in 2003 and is not supported by the evidence.

According to the 2012 Based SNPP, taking into account natural causes (births and deaths) and movement within the UK, the population of Guildford is projected to decline over the next twenty years. The entire increase in population is due to
net international migration of which, according to the ONS, 57% are overseas students who would normally be expected to return home or move away from Guildford on completion of their studies.

Moreover, the Household Projections are distorted by the very high proportion of young people in the population of Guildford due to the fact that (1) Guildford is a university town and (2) the permanent address of students is taken as being their term time address. Students are therefore taken as permanent residents of Guildford whereas in reality they move away from Guildford on completion of their studies. According to the Alumni Team at the University of Surrey, only 9% of former students live within the GU postcode.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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<th>Respondent: 8593185 / Niels Laub</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (No)

**The West Surrey SHMA** which determines the "objectively assessed need" for Guildford is flawed for the following reasons:

**517 houses per annum to accommodate Demographic Indicators**

- The starting point in establishing housing need due to “demographic indicators” is the SNPP. G L Hearn claim that the 2012 Based SNPP is a robust starting point because it shows a level of population growth that falls roughly in line with a 12 year trend to 2013. The 2012 Based SNPP predicts the population of Guildford to grow to 161,300 by 2031. In actual fact, the linear trend based on 2001-2011 predicts a population of about 156,000, a difference of 5,300.

- The ONS 2012 Based SNPP is significantly distorted by an unusual increase in the number of overseas students attending the University of Surrey between 2006 and 2011. This is clearly demonstrated in a number of figures and tables in the report (see Figure 15 on page 50; Table 17 on page 51; Figure 18 on page 53). To establish its projections, the SNPP only looks back over the previous five years. The 2012 Based SNPP is therefore based on population trends between 2006 and 2011, a time which saw the number of overseas students at the university increase by 35% and full time students increase at a rate of 700 per annum.

- If you consider natural growth (births and deaths) and net internal migration (movement within the UK), the 2012 Based SNPP forecasts the population of Guildford to **decline** by 1800 by the year 2031. Therefore the overall projected increase in Guildford’s population to 161,300 in 2031 is entirely due to the projected growth in net international migration of 23,100, of which, according to the ONS, 57% are foreign students who would normally be expected to return home, or move away from Guildford, at the end of their studies.

On page 190 in the SHMA, there is an assertion that overseas students only make up 6% of overall migration. According to the ONS, an analysis of indicative immigration estimates by broad stream (mid-2006 to mid-2010) estimates that the student stream is 57% for those years. Currently 37% of all students at the university are overseas students.
On the 1st December 2015 George Osborne announced that foreign students will no longer be counted as immigrants. The chancellor said that the public is concerned only about “permanent” migrants. “The public’s concern is about permanent migration, people permanently or for many years coming to live in the country. Students come and go.” Daily Telegraph 1 Dec.

- International Immigration is based on International Passenger Surveys (IPS) which are carried out only at the border (seaports, airports, channel tunnel). The intentions of immigrants are highly approximate being based on voluntary face to face interviews on only a sample of passengers. IPS data is therefore not reliable enough to be used at Local Authority level. Estimates of net international migration at Local Authority level are therefore based on (1) the number of migrant workers or students applying for a National Insurance Number (2) data from the Higher Education Statistics Agency (HESA) and (3) data from the NHS Patient Registration Data Service. Unfortunately this data does not accurately record when students return home or move away from Guildford as students often neglect to inform their GP, which explains why emigration is often under reported.

- Un-attributable Population Change (UPC) is essentially the difference between the forecast population and the actual population as recorded in a census. In Guildford the UPC ran at -717 per annum between 2001 and 2011. The population in Guildford was significantly lower as measured in the 2011 census than had been forecast. It is assumed that this is due to the under reporting of foreign students returning home. Nevertheless, in their “sensitivity tests”, G L Hearn has declined to make any adjustment for UPC. According to Table 22 on page 68 the housing need for Guildford would be reduced to 239 houses per annum if UPC were applied.

- The figure on page 183 Appendix B demonstrates that Guildford has an abnormally high proportion of people in the 19-25 age bracket (students) which is to be expected because Guildford is a university town. While this has an impact on internal out-migration, it has a major and disproportionate effect on projected household formations because the 2011 Census measured the term time address of students as being their main place of residence with the assumption that the majority settle in the area and become heads of households, when in reality, being students, they are more likely to return home or move away from Guildford at the end of their studies. According to the Alumni Team at the University of Surrey, only 9% of former students live within the GU postcode, of which a high percentage are likely to have been brought up in the area anyway.

- The figure of 517 houses per annum to accommodate demographic indicators appears to be based on the Figure of 496 taken from the 2012 Based Household Projections (see Table 20 page 66) multiplied by a factor of 104.2% to allow for occupancy levels for Guildford based on the 2011 Census (unoccupied houses recorded as being 4.2% of total housing stock). The NPPG clearly states that vacant properties should be deducted from housing targets.

25 houses per annum to accommodate Students

- In the report, the justification for adding an extra 25 houses per annum to the OAN to cater for students is because “the University of Surrey expects stronger growth in student numbers going forward than occurred during the period on which the SNPP is based”. In paragraph 4.79 page 72 the report states that “the 2012 Based SNPP is based on population trends between 2006/7 and 2012”. However we have already seen that the period between 2006/7 and 2011 was a time which saw an unusual increase in the number of students attending the university. Table C3 on page 187 shows that the number of students attending the university increased from 10,000 in 2006/7 to 13,500 in 2011/12, an increase of 3,500, which represents an increase of 700 per annum, which is very much higher than the 315 per annum increase the university forecasts from 2013 to 2033. This is also at variance with the University’s published Estate Strategy which states that they plan to grow at 2% per annum. There is therefore no justification for building 25 extra houses per annum to house students. In any event, surely the University has a responsibility to provide adequate student accommodation on campus to reduce the demand for affordable housing in the town. Out of a full time student population of 14,000, there is only provision for 5100 student bed spaces on campus.

How are students counted?

The way students are counted has always been an issue. In the 1991 Census, students were treated as living at their home address. In the 2011 Census, students were counted as being usually resident at their term time address. Overseas students, who had no usual address in the UK, were counted as usually resident in their halls of residence regardless of how long
they intended to stay here. This has a distorting effect on the proportion of young people in Guildford and exaggerates projections for household formations.

How is the movement of students monitored?

Internal migration is monitored by (1) the number of migrant workers or students applying for a National Insurance Number (2) data from the Higher Education Statistics Agency (HESA) and (3) data from the NHS Patient Registration Data Service. Unfortunately this data is unreliable in recording when students leave an area because either they fail to unregister from their GP or, when moving abroad, fail to notify the Department of Work and Pensions. The ability to monitor people intending to move away from Guildford to live abroad (overseas students returning home) is even more fraught with difficulties.

120 houses per annum to support Economic Growth

- In the West Surrey SHMA, economic growth for Guildford is taken as 0.9% per annum being the average of three studies (Cambridge Econometrics Employment Projections; Experian UK Local Market Forecasts; Local Authority District Forecasting Model by Oxford Economics). Assuming only one person in employment per household, surely any increase in the supply of housing in excess of 0.9% would more than accommodate the needs of economic growth. One could argue that this is therefore double counting and there is no justification for an additional 120 homes.

- In any event, the impact of economic growth (or decline) for a particular area must be reflected in both the Census and in population projections based on past trends. Therefore the ONS SNPP must already reflect the effects of economic growth. It is therefore misleading and incorrect to make additional allowances in housing need to accommodate economic growth. Economic growth cannot be forecast with any degree of certainty as it depends on so many variables.

31 houses per annum to promote Affordability

- The supply of housing is actually regulated by economic factors, not simply the release of more land. Developers will only build in a rising market when they can afford to borrow money to build and buyers can afford to borrow money to buy - and crucially - when profits are guaranteed. Consider Ebbsfleet in the Thames estuary, where the government announced plans to build a new “garden city” to provide 15,000 new homes. So far, despite the availability of land, only 100 homes have been built.

- Nor will releasing vast areas of the green belt guarantee to increase the supply of affordable housing. Indeed one could argue that greenbelt land is more likely to generate low density high value housing rather than affordable housing. According to a recent report, the biggest house builders in the UK currently have enough land to build more than 615,000 new homes, equivalent to three years housing supply in the whole of the UK.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/25  Respondent: 8593185 / Niels Laub  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (No)
I consider the Proposed Submission Plan to be **unsound** because it ignores guidance in the PPG regarding the use of constraints, bearing in mind that 89% of the borough lies within the Metropolitan Green Belt.

Specifically

**Paragraph: 044 Reference ID: 3-044-20141006**

Do housing and economic needs override constraints on the use of land, such as Green Belt?

The Framework is clear that local planning authorities should, through their Local Plans, meet objectively assessed needs unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the Framework taken as a whole, or specific policies in the Framework indicate development should be restricted. Such policies include those relating to sites protected under the Birds and Habitats Directives, and/or designated as Sites of Special Scientific Interest; land designated as Green Belt, Local Green Space, an Area of Outstanding Natural Beauty, Heritage Coast or within a National Park or the Broads; designated heritage assets; and locations at risk of flooding or coastal erosion.

The Framework makes clear that, once established, Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan.

**Paragraph: 034 Reference ID: 3-034-20141006**

Can unmet need for housing outweigh Green Belt Protection?

Unmet housing need (including for traveller sites) is unlikely to outweigh the harm to the Green Belt and other harm to constitute the "very special circumstances" justifying inappropriate development on a site within the Green Belt.

Revision date: 06 10 2014

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (No)

The West Surrey SHMA is unsound in two significant ways because (1) overseas students, who are only here on a temporary basis to study, are included in statistics for net international migration which has an inflationary effect on population projections for Guildford and (2) because the term time address of students is taken as their permanent place of residence, the population of Guildford appears to have a very high proportion of people in the 18-24 year age bracket who are assumed to have a high probability of forming new households and settling in Guildford.

The 2011 Census recorded a population for Guildford significantly less than had been forecast. The ONS suggested that this discrepancy (referred to as Un-attributable Population Change or UPC) was probably due to the under-reporting of overseas students returning home. This discrepancy is so significant that, if an allowance for UPC had been applied, the housing need for Guildford to accommodate demographic indicators would be reduced to 239 homes per annum as opposed to 577 homes per annum in the current Local Plan. This problem would be resolved if overseas students were removed from statistics for international migration on the basis that they are only here on a temporary basis to study.

In the 2011 Census, the term time address of students was taken as their permanent place of residence. This means that Guildford appears to have a very high proportion of people in the 18-24 year age bracket who are assumed to have a high probability of forming new households and settling in Guildford when in reality students move away from Guildford at the end of their studies. This problem would be resolved if, for the purposes of projecting household formations, the home address of students should be taken as their permanent place of residence.

Finally, students generally should not be included in statistics for calculating housing need. Students need student accommodation, not housing. One of the problems we have in Guildford is that, because the university has not built enough Halls of Residence, students occupy an estimated 2500 affordable houses in Guildford which are therefore no longer available for key workers such as council employees, hospital employees, teachers, shop assistants etc. At the moment the university only provides accommodation for about 35% of their full time students despite a requirement in the 2003 Local Plan that they should provide accommodation for at least 60%. The University should be required to provide more student accommodation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:


Document: Proposed Submission Local Plan: strategy and sites 2017 / Question 6: Any other comments?

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (Yes)
There should be a firm requirement for all future residential development to be concentrated in existing urban areas or settlements before any development is allowed within the green belt. For example, there should be a much greater allowance for housing in the North Street Development and an appropriate amount of housing assigned to the Telephone Exchange site which currently has none. Moreover, no development should be allowed on any of the Strategic Sites in the green belt until improvements to the A3 and all supporting infrastructure are in place.

Because, once the Local Plan has been adopted, the council will be tied to a commitment to deliver a certain amount of housing within a stated period of time, the council should consider introducing penalties for developers who leave urban areas derelict, or buildings unoccupied, for long periods of time.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** PSLPS16/3229  **Respondent:** 8593537 / Normandy Parish Council (Leslie GA Clarke)  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A46

**Do you consider this section of the document; complies with the Duty to Cooperate?** ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

Normandy Parish Council strongly objects to the Guildford Borough Proposed Submission Local Plan: Strategy and Sites ("Local Plan") and in particular to the allocation of land south of Normandy and north of Flexford for substantial development.

**In principle objection to development of this site**

The Parish Council opposes the principle of the development of this site:

1. The site lies within the Green Belt, and has been assessed by Guildford Borough Council (GBC) as having high sensitivity in Green Belt terms, serving to check the southward sprawl of Normandy and northward sprawl of Flexford, preventing the merger of those settlements, and safeguarding the countryside from encroachment (see Green Belt Purposes Assessment, April 2014). Accordingly, given the very significant contribution made by the site to the Green Belt in this area, it should not be developed.

2. The development of the site would not amount to sustainable development within the meaning of the National Planning Policy Framework. GBC's claim that the approach would be sustainable fails to attach any or any meaningful weight to the environmental aspects of sustainability.

3. The proposed allocation has not been the subject of any proper assessment of highways impacts. The local road network is incapable of coping with the proposed scale of development and there is no evidence that the necessary highways improvements are feasible or deliverable within the plan period.

4. The site lies within 1 km of the Thames Basin Heaths Special Protection Area and accordingly requires substantial provision of alternative green space as an avoidance strategy. Preferable sites for development elsewhere could be delivered without such provision.

The development of this site would significantly affect Normandy and the surrounding area and has not been justified in the Local Plan or in the supporting documents. In addition to the principled objections to the development set out above, the
Parish Council considers that there have been substantial flaws in the plan-making process to date which go to both the merits and legality of the Local Plan.

Specific criticisms of the plan making process

A sound plan must be based on proper evidence and consistent with national policy. To be lawful, the plan must be promoted on the basis of a proper analysis of the environmental impacts of policies together with an assessment of reasonable alternatives (see Environmental Assessment of Plans and Programmes Regulations 2004/1633 and e.g. Calverlon PC v Nottingham City Council [2015] EWHC 1078 (Admin), per Jay J at (67)).

The history of the Local Plan is known to GBC. The Parish Council wishes to emphasise that in the 2014 plan, it was not proposed that this site be allocated for development. Since then, there has been no further Green Belt review, but there has been a Green Belt Purposes Assessment which identified this site as particularly sensitive in Green Belt terms.

There is no explanation in the published documents of the "exceptional circumstances" (NPPF, 80) that are said to justify release of the site from the Green Belt. The Green Belt Capacity Study does not explain why such exceptional circumstances exist, and nor does the Sustainability Appraisal ("SA"). Extraordinarily, the SA states that the development of the site is regarded as a "given" (6.3.16). The SA acknowledges (in footnote 68, p 131) the greater impacts on the Green Belt in developing sites such as this, but does not explain why such development is nonetheless justified on both environmental grounds and by reference to the exceptional circumstances test.

The SA is open to further criticism through its failure to accord any weight to the Green Belt in analysing various options. This is a significant deficiency which renders the SA unsound and indeed unlawful, since the alternatives are not subjected to proper analysis on environmental grounds.

Further, GBC has consulted on the Local Plan with the proviso that this site should be deleted from the plan should it be demonstrated the provision of a secondary school on the site is not required.

However, there has been no proper assessment of whether alternative sites could accommodate the school, as is clearly required given the "exceptional circumstances" test. GBC's assessment of alternative secondary school sites notes that Surrey County Council's concerns as to remoteness of the site from development are as was only overcome by the new housing provision in the Local Plan i.e. that housing which is proposed on this site. The alternatives assessment fails to identify the land area required for the school, and fails to assess alternative sites on the basis of their contribution (or otherwise) to the Green Belt. This is a fundamentally flawed sequential assessment.

Even if this site is the only possible school site (which is not accepted) then there is no explanation as to why 1,100 houses are required to be delivered in addition to the school, with a materially greater impact on the Green Belt and the environment generally. Part of the justification offered for the selection of this site for a school is that it is close to the proposed housing (together with other development sites). This argument is circular, since if the school is not required in this location then nor is the housing. In any event, this justification does not compare alternative sites on a fair basis, since other sites are rejected for schools on the basis of their Green Belt location. This site also lies within the Green Belt.

The Leader of GBC has suggested that the proposed houses should be regarded as "enabling development". The Parish Council submits that school funding should be achieved through the normal channels and not through the release of Green Belt land to housing development. This suggested cross-subsidy is an unjustified claim (there has been no viability analysis) and in any event is not a proper planning reason for allocating the site for development. The Local Plan is therefore unsound.

Next Steps

GBC's consultation on the Local Plan was based on the proviso that policy A46 was to be deleted in the absence of justification for the location of a secondary school at the site.

The Parish Council has seen no proper justification for the location of a secondary school in this Green Belt site. The selection of the site appears to have been justified on the basis that it will be close to the housing identified in the
allocation. This makes for an entirely circular argument; the housing is only put forward on the basis of the school, and the school on the basis of the housing.

This cannot amount to an exceptional circumstance for the release of land from the Green Bell. There has been no adequate sequential site assessment for a new secondary school.

In those circumstances, GBC is invited to confirm that policy A46 will be deleted from the Local Plan because the school location has not been justified. The Spatial Strategy should be amended accordingly.

We await GBC's urgent confirmation that the Local Plan will not be proceeding with Policy A46 and that the land in question will remain within the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Please see attached

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:  

LP2016-Normandy-L_Clarke-Parish.pdf (638 KB)
Normandy Parish Council strongly objects to the Guildford Borough Proposed Submission Local Plan: Strategy and Sites ("Local Plan") and in particular to the allocation of land south of Normandy and north of Flexford for substantial development.

In principle objection to development of this site

The Parish Council opposes the principle of the development of this site:

(1) The site lies within the Green Belt, and has been assessed by Guildford Borough Council (GBC) as having high sensitivity in Green Belt terms, serving to check the southward sprawl of Normandy and northward sprawl of Flexford, preventing the merger of those settlements, and safeguarding the countryside from encroachment (see Green Belt Purposes Assessment, April 2014). Accordingly, given the very significant contribution made by the site to the Green Belt in this area, it should not be developed.

(2) The development of the site would not amount to sustainable development within the meaning of the National Planning Policy Framework. GBC's claim that the approach would be sustainable fails to attach any or any meaningful weight to the environmental aspects of sustainability.

(3) The proposed allocation has not been the subject of any proper assessment of highways impacts. The local road network is incapable of coping with the proposed scale of development and there is no evidence that the necessary highways improvements are feasible or deliverable within the plan period.

(4) The site lies within 1 km of the Thames Basin Heaths Special Protection Area and accordingly requires substantial provision of alternative green space as an avoidance strategy. Preferable sites for development elsewhere could be delivered without such provision.

The development of this site would significantly affect Normandy and the surrounding area and has not been justified in the Local Plan or in the supporting documents. In addition to the principled objections to the development set out above, the Parish Council considers that there have been substantial flaws in the plan-making process to date which go to both the merits and legality of the Local Plan.

Specific criticisms of the plan making process

A sound plan must be based on proper evidence and consistent with national policy. To be lawful, the plan must be promoted on the basis of a proper analysis of the environmental impacts of policies together with an assessment of reasonable alternatives (see Environmental Assessment of Plans and Programmes Regulations 2004/1633 and e.g. Calverlon PC v Nottingham City Council [2015] EWHC 1078 (Admin), per Jay J at (67)).

The history of the Local Plan is known to GBC. The Parish Council wishes to emphasise that in the 2014 plan, it was not proposed that this site be allocated for development. Since then, there has been no further Green Belt review, but there has been a Green Belt Purposes Assessment which identified this site as particularly sensitive in Green Belt terms.

There is no explanation in the published documents of the "exceptional circumstances" (NPPF, 80) that are said to justify release of the site from the Green Belt. The Green Belt Capacity Study does not explain why such exceptional circumstances exist, and nor does the Sustainability Appraisal.
("SA"). Extraordinarily, the SA states that the development of the site is regarded as a "given" (6.3.16). The SA acknowledges (in footnote 68, p 131) the greater impacts on the Green Belt in developing sites such as this, but does not explain why such development is nonetheless justified on both environmental grounds and by reference to the exceptional circumstances test.

The SA is open to further criticism through its failure to accord any weight to the Green Belt in analysing various options. This is a significant deficiency which renders the SA unsound and indeed unlawful, since the alternatives are not subjected to proper analysis on environmental grounds.

Further, GBC has consulted on the Local Plan with the proviso that this site should be deleted from the plan should it be demonstrated the provision of a secondary school on the site is not required.

However, there has been no proper assessment of whether alternative sites could accommodate the school, as is clearly required given the "exceptional circumstances" test. GBC's assessment of alternative secondary school sites notes that Surrey County Council's concerns as to remoteness of the site from development are as was only overcome by the new housing provision in the Local Plan i.e. that housing which is proposed on this site. The alternatives assessment fails to identify the land area required for the school, and fails to assess alternative sites on the basis of their contribution (or otherwise) to the Green Belt. This is a fundamentally flawed sequential assessment.

Even if this site is the only possible school site (which is not accepted) then there is no explanation as to why 1,100 houses are required to be delivered in addition to the school, with a materially greater impact on the Green Belt and the environment generally. Part of the justification offered for the selection of this site for a school is that it is close to the proposed housing (together with other development sites). This argument is circular, since if the school is not required in this location then nor is the housing. In any event, this justification does not compare alternative sites on a fair basis, since other sites are rejected for schools on the basis of their Green Belt location. This site also lies within the Green Belt.

The Leader of GBC has suggested that the proposed houses should be regarded as "enabling development". The Parish Council submits that school funding should be achieved through the normal channels and not through the release of Green Belt land to housing development. This suggested cross-subsidy is an unjustified claim (there has been no viability analysis) and in any event is not a proper planning reason for allocating the site for development. The Local Plan is therefore unsound.

**Next Steps**

GBC's consultation on the Local Plan was based on the proviso that policy A46 was to be deleted in the absence of justification for the location of a secondary school at the site.

The Parish Council has seen no proper justification for the location of a secondary school in this Green Belt site. The selection of the site appears to have been justified on the basis that it will be close to the housing identified in the allocation. This makes for an entirely circular argument; the housing is only put forward on the basis of the school, and the school on the basis of the housing.

This cannot amount to an exceptional circumstance for the release of land from the Green Belt. There has been no adequate sequential site assessment for a new secondary school.

In those circumstances, GBC is invited to confirm that policy A46 will be deleted from the Local Plan because the school location has not been justified. The Spatial Strategy should be amended accordingly.

We await GBC's urgent confirmation that the Local Plan will not be proceeding with Policy A46 and that the land in question will remain within the Green Belt.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:  

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<td>LP2016-Normandy-L Clarke- Parish.pdf</td>
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</table>

**Comment ID:** SQLP16/1339  **Respondent:** 8593537 / Normandy Parish Council (Leslie GA Clarke)  **Agent:**
The Parish Council opposes the principle of the development of this site:

(1) The site lies within the Green Belt, and has been assessed by Guildford Borough Council (GBC) as having high sensitivity in Green Belt terms, serving to check the southward sprawl of Normandy and northward sprawl of Flexford, preventing the merger of those settlements, and safeguarding the countryside from encroachment (see Green Belt Purposes Assessment, April 2014). Accordingly, given the very significant contribution made by the site to the Green Belt in this area, it should not be developed.

(2) The development of the site would not amount to sustainable development within the meaning of the National Planning Policy Framework. GBC’s claim that the approach would be sustainable fails to attach any or any meaningful weight to the environmental aspects of sustainability.

(3) The proposed allocation has not been the subject of any proper assessment of highways impacts. The local road network is incapable of coping with the proposed scale of development and there is no evidence that the necessary highways improvements are feasible or deliverable within the plan period.

(4) The site lies within 1 km of the Thames Basin Heaths Special Protection Area and accordingly requires substantial provision of alternative green space as an avoidance strategy. Preferable sites for development elsewhere could be delivered without such provision.

The development of this site would significantly affect Normandy and the surrounding area and has not been justified in the Local Plan or in the supporting documents. In addition to the principled objections to the development set out above, the Parish Council considers that there have been substantial flaws in the plan-making process to date which go to both the merits and legality of the Local Plan.

Specific criticisms of the plan making process

A sound plan must be based on proper evidence and consistent with national policy. To be lawful, the plan must be promoted on the basis of a proper analysis of the environmental impacts of policies together with an assessment of reasonable alternatives (see Environmental Assessment of Plans and Programmes Regulations 2004/1633 and e.g. Calverlon PC v Nottingham City Council [2015] EWHC 1078 (Admin), per Jay J at (67)).

The history of the Local Plan is known to GBC. The Parish Council wishes to emphasise that in the 2014 plan, it was not proposed that this site be allocated for development. Since then, there has been no further Green Belt review, but there has been a Green Belt Purposes Assessment which identified this site as particularly sensitive in Green Belt terms.

There is no explanation in the published documents of the "exceptional circumstances" (NPPF, 80) that are said to justify release of the site from the Green Belt. The Green Belt Capacity Study does not explain why such exceptional circumstances exist, and nor does the Sustainability Appraisal ("SA"). Extraordinarily, the SA states that the development of the site is regarded as a "given" (6.3.16). The SA acknowledges (in footnote 68, p 131) the greater impacts on the Green Belt in developing sites such as this, but does not
explain why such development is nonetheless justified on both environmental grounds and by reference to the exceptional circumstances test.

The SA is open to further criticism through its failure to accord any weight to the Green Belt in analysing various options. This is a significant deficiency which renders the SA unsound and indeed unlawful, since the alternatives are not subjected to proper analysis on environmental grounds.

Further, GBC has consulted on the Local Plan with the proviso that this site should be deleted from the plan should it be demonstrated the provision of a secondary school on the site is not required.

However, there has been no proper assessment of whether alternative sites could accommodate the school, as is clearly required given the "exceptional circumstances" test. GBC's assessment of alternative secondary school sites notes that Surrey County Council's concerns as to remoteness of the site from development are as was only overcome by the new housing provision in the Local Plan i.e. that housing which is proposed on this site. The alternatives assessment fails to identify the land area required for the school, and fails to assess alternative sites on the basis of their contribution (or otherwise) to the Green Belt. This is a fundamentally flawed sequential assessment.

Even if this site is the only possible school site (which is not accepted) then there is no explanation as to why 1,100 houses are required to be delivered in addition to the school, with a materially greater impact on the Green Belt and the environment generally. Part of the justification offered for the selection of this site for a school is that it is close to the proposed housing (together with other development sites). This argument is circular, since if the school is not required in this location then nor is the housing. In any event, this justification does not compare alternative sites on a fair basis, since other sites are rejected for schools on the basis of their Green Belt location. This site also lies within the Green Belt.

The Leader of GBC has suggested that the proposed houses should be regarded as "enabling development". The Parish Council submits that school funding should be achieved through the normal channels and not through the release of Green Belt land to housing development. This suggested cross-subsidy is an unjustified claim (there has been no viability analysis) and in any event is not a proper planning reason for allocating the site for development. The Local Plan is therefore unsound.

**Next Steps**

GBC's consultation on the Local Plan was based on the proviso that policy A46 was to be deleted in the absence of justification for the location of a secondary school at the site.

The Parish Council has seen no proper justification for the location of a secondary school in this Green Belt site. The selection of the site appears to have been justified on the basis that it will be close to the housing identified in the allocation. This makes for an entirely circular argument; the housing is only put forward on the basis of the school, and the school on the basis of the housing.

This cannot amount to an exceptional circumstance for the release of land from the Green Belt. There has been no adequate sequential site assessment for a new secondary school.

In those circumstances, GBC is invited to confirm that policy A46 will be deleted from the Local Plan because the school location has not been justified. The Spatial Strategy should be amended accordingly.

We await GBC's urgent confirmation that the Local Plan will not be proceeding with Policy A46 and that the land in question will remain within the Green Belt.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness

**Comment ID:** SQLP16/1340  **Respondent:** 8593537 / Normandy Parish Council (Leslie GA Clarke)  **Agent:**

**Attached documents:** [LP2016-Normandy-L. Clarke- Parish.pdf](#) (642 KB)
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (No)

Normandy Parish Council strongly objects to the Guildford Borough Proposed Submission Local Plan: Strategy and Sites ("Local Plan") and in particular to the allocation of land south of Normandy and north of Flexford for substantial development.

In principle objection to development of this site

The Parish Council opposes the principle of the development of this site:

(1) The site lies within the Green Belt, and has been assessed by Guildford Borough Council (GBC) as having high sensitivity in Green Belt terms, serving to check the southward sprawl of Normandy and northward sprawl of Flexford, preventing the merger of those settlements, and safeguarding the countryside from encroachment (see Green Belt Purposes Assessment, April 2014). Accordingly, given the very significant contribution made by the site to the Green Belt in this area, it should not be developed.

(2) The development of the site would not amount to sustainable development within the meaning of the National Planning Policy Framework. GBC’s claim that the approach would be sustainable fails to attach any or any meaningful weight to the environmental aspects of sustainability.

(3) The proposed allocation has not been the subject of any proper assessment of highways impacts. The local road network is incapable of coping with the proposed scale of development and there is no evidence that the necessary highways improvements are feasible or deliverable within the plan period.

(4) The site lies within 1 km of the Thames Basin Heaths Special Protection Area and accordingly requires substantial provision of alternative green space as an avoidance strategy. Preferable sites for development elsewhere could be delivered without such provision.

The development of this site would significantly affect Normandy and the surrounding area and has not been justified in the Local Plan or in the supporting documents. In addition to the principled objections to the development set out above, the Parish Council considers that there have been substantial flaws in the plan-making process to date which go to both the merits and legality of the Local Plan.

Specific criticisms of the plan making process

A sound plan must be based on proper evidence and consistent with national policy. To be lawful, the plan must be promoted on the basis of a proper analysis of the environmental impacts of policies together with an assessment of reasonable alternatives (see Environmental Assessment of Plans and Programmes Regulations 2004/1633 and e.g. Calverlon PC v Nottingham City Council [2015J EWHC 1078 (Admin), per Jay J at (67)).

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There is no explanation in the published documents of the "exceptional circumstances" (NPPF, 80) that are said to justify release of the site from the Green Belt. The Green Belt Capacity Study does not explain why such exceptional circumstances exist, and nor does the Sustainability Appraisal ("SA"). Extraordinarily, the SA states that the development of the site is regarded as a "given" (6.3.16). The SA acknowledges (in footnote 68, p 131) the greater impacts on the Green Belt in developing sites such as this, but does not explain why such development is nonetheless justified on both environmental grounds and by reference to the exceptional circumstances test.
The SA is open to further criticism through its failure to accord any weight to the Green Belt in analysing various options. This is a significant deficiency which renders the SA unsound and indeed unlawful, since the alternatives are not subjected to proper analysis on environmental grounds.

Further, GBC has consulted on the Local Plan with the proviso that this site should be deleted from the plan should it be demonstrated the provision of a secondary school on the site is not required.

However, there has been no proper assessment of whether alternative sites could accommodate the school, as is clearly required given the "exceptional circumstances" test. GBC's assessment of alternative secondary school sites notes that Surrey County Council's concerns as to remoteness of the site from development are as was only overcome by the new housing provision in the Local Plan i.e. that housing which is proposed on this site. The alternatives assessment fails to identify the land area required for the school, and fails to assess alternative sites on the basis of their contribution (or otherwise) to the Green Belt. This is a fundamentally flawed sequential assessment.

Even if this site is the only possible school site (which is not accepted) then there is no explanation as to why 1,100 houses are required to be delivered in addition to the school, with a materially greater impact on the Green Belt and the environment generally. Part of the justification offered for the selection of this site for a school is that it is close to the proposed housing (together with other development sites). This argument is circular, since if the school is not required in this location then nor is the housing. In any event, this justification does not compare alternative sites on a fair basis, since other sites are rejected for schools on the basis of their Green Belt location. This site also lies within the Green Belt.

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents: [LP2016-Normandy-L Clarke- Parish.pdf](#) (642 KB)
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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In those circumstances, GBC is invited to confirm that policy A46 will be deleted from the Local Plan because the school location has not been justified. The Spatial Strategy should be amended accordingly.

We await GBC's urgent confirmation that the Local Plan will not be proceeding with Policy A46 and that the land in question will remain within the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents: LP2016-Normandy-I. Clarke- Parish.pdf (642 KB)
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4. Removal of Infrastructure Schemes AM4, BT4, EG6, FRR4, FRR5, LRNI8, LRN19, PED1, SANG 13, SED3, WCT5, WS4 and OS4

We accept that the removal of Sites/Policies A46 and A47 has greatly reduced the need for these infrastructure projects, so in that respect we offer no objection to their removal as well. However, Normandy and Flexford have for many years suffered problems with traffic management and flood risk and these will continue to worsen, particularly if other developments proceed (10,000 homes are planned within a ten mile radius of Normandy). Please note that we will continue to press for improvements, but for the sole purpose of this consultation and the removal of A46 and A47, we support their removal from the Draft Local Plan.
Normandy Parish Council has consulted with its residents on GBC’s amended Local Plan 2017 and would like to make the following comments, which are a combination of Councillors’ and residents’ opinions.

As per the consultation’s requirement, our comments are confined solely to those changes in the revised 2017 Plan.

In addition, we have restricted ourselves to those changes that affect Normandy and Flexford directly, although we know that many of our residents feel strongly about some of the other aspects of the revised Plan, in particular that insufficient attention has been paid to protecting and preserving the Green Belt across the Borough. We commented at greater length on the version submitted for consultation in 2016, and we assume those comments will form part of GBC’s submission to the Planning Inspector.

. Removal of sites A46 and A47.

We support the removal of these sites from the 2016 Plan. They were strongly opposed by Councillors and residents on the basis that they would have irretrievably destroyed the character of Normandy and Flexford, and would have imposed an impossible burden on the local transport and other infrastructure. We are glad that GBC has taken note of the many objections to these proposed sites, and also of the findings of the revised Sustainability Appraisal 2017, and removed them from the Plan.

Removal of Infrastructure Schemes AM4, BT4, EG6, FRR4, FRR5, LRN18, LRN19, PED1, SANG13, SED3, WCT5, WS4 and OS4

We accept that the removal of Sites/Policies A46 and A47 has greatly reduced the need for these infrastructure projects, so in that respect we offer no objection to their removal as well. However, Normandy and Flexford have for many years suffered problems with traffic management and flood risk and these will continue to worsen, particularly if other developments proceed (10,000 homes are planned within a ten mile radius of Normandy). Please note that we will continue to press for improvements, but for the sole purpose of this consultation and the removal of A46 and A47, we support their removal from the Draft Local Plan.

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/2980  Respondent: 8593537 / Normandy Parish Council (Leslie GA Clarke)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A47

Removal of sites A46 and A47. We support the removal of these sites from the 2016 Plan. They were strongly opposed by Councillors and residents on the basis that they would have irretrievably destroyed the character of Normandy and Flexford, and would have imposed an impossible burden on the local transport and other infrastructure. We are glad that GBC has taken note of the many objections to these proposed sites, and also of the findings of the revised Sustainability Appraisal 2017, and removed them from the Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/4264  Respondent: 8593537 / Normandy Parish Council (Leslie GA Clarke)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A50

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Traveller site at Palm House Nurseries (Policy/Site A49) and Travelling Show-people site at Whittles Drive (Policy/Site A50)

The Parish Council especially objects to the Traveller site at Palm House Nurseries (Site A49) and the travelling Show-people site at Whittles Drive (Site A50) being made permanent and inset from the Green Belt.

7. At a previous planning appeal the Inspector stated that the land at Palm House Nurseries contributes to the openness of the Green Belt and because of this the Parish Council feels strongly that it should remain ‘washed over’. We understand that Travellers already own the adjacent land; if their existing site is ‘inset’ we fear there will be an attempt to enlarge the site onto this land even though it remains in the Green Belt (see comments above in para 3). The same arguments apply to the Travelling Show-people site at Whittles Drive. Both sites are rated “High Sensitivity” in the Sustainability Appraisal 2017 (Table 10.1) and in the Parish Council’s view this flies in the face of allowing them to be ‘inset’ from the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

4. Green Belt boundary changes
We are pleased to see the reversion of the Green Belt boundaries to more or less their existing levels (with the exception of 'insetting': see below) as a consequence of the withdrawal of the previously proposed strategic sites (A46 and A47), and welcome the protection this offers for our precious countryside. In particular we welcome and support the acknowledgement that the land lying between Normandy and Flexford (the previous site A46) is particularly sensitive in Green Belt terms as it contributes significantly to the openness of the Green Belt in this area, as well as being of high grade agriculturally and therefore of importance in terms of the rural economy.

However, the Parish Council objects to the 'insetting' in the Green Belt of the three most settled areas of Normandy and Flexford on two counts. First, no case has been made on the grounds of 'exceptional circumstances' for removing this land from the Green Belt, and by so doing GBC will make it easier for further attrition of the Green Belt to take place in future as a result of extensions to the settlement area on adjacent Green Belt land (see para 6 below). Second, all three settlements contribute to the openness of the Green Belt and should therefore remain 'washed over' by it. This view has been supported by Planning Inspectors, who have indicated while rejecting recent appeal decisions that the land at Flexford and Normandy contributes to the openness of the Green Belt. 'Insetting' will make it much harder to sustain this crucial openness in future.

7. At a previous planning appeal the Inspector stated that the land at Palm House Nurseries contributes to the openness of the Green Belt and because of this the Parish Council feels strongly that it should remain 'washed over'. We understand that Travellers already own the adjacent land; if their existing site is 'inset' we fear there will be an attempt to enlarge the site onto this land even though it remains in the Green Belt (see comments above in para 3). The same arguments apply to the Travelling Showpeople site at Whittles Drive. Both sites are rated "High Sensitivity" in the Sustainability Appraisal 2017 (Table 10.1) and in the Parish Council's view this flies in the face of allowing them to be 'inset' from the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Green Belt boundary changes

We are pleased to see the reversion of the Green Belt boundaries to more or less their existing levels (with the exception of ‘insetting’: see below) as a consequence of the withdrawal of the previously proposed strategic sites (A46 and A47), and welcome the protection this offers for our precious countryside. In particular we welcome and support the acknowledgement that the land lying between Normandy and Flexford (the previous site A46) is particularly sensitive in Green Belt terms as it contributes significantly to the ‘openness’ of the Green Belt in this area, as well as being of high grade agriculturally and therefore of importance in terms of the rural economy.

However, the Parish Council objects to the ‘insetting’ in the Green Belt of the three most settled areas of Normandy and Flexford on two counts. First, no case has been made on the grounds of ‘exceptional circumstances’ for removing this land from the Green Belt, and by so doing GBC will make it easier for further attrition of the Green Belt to take place in future as a result of extensions to the settlement area on adjacent Green Belt land (see para 6 below). Second, all three settlements contribute to the openness of the Green Belt and should therefore remain ‘washed over’ by it. This view has been supported by Planning Inspectors, who have indicated while rejecting recent appeal decisions that the land at Flexford and Normandy contributes to the openness of the Green Belt. ‘Insetting’ will make it much harder to sustain this crucial openness in future.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
It is contended, that more emphasis should be placed on facilitating self-build and custom housing provision of smaller sites coming forward for self-build housing.

_Policy H3_
Rural Exception Homes makes no provision for self-build housing as a way of securing starter homes on small sustainable sites in close proximity to existing settlement boundaries.

_Site Description and character._

The site is located within the Green Belt, outside any Area of Outstanding Natural Beauty or Area of Great Landscape Value. The site is also outside the East Clandon Conservation Area. Whilst the Council have produced a Green Belt & Countryside Study as part of its evidence base for the Draft Local Plan, the application site is not identified in the study as being of any strategic value.

The site is within close proximity to the existing settlement boundary, and directly adjacent to a line of cottages known as Snelgate Cottages which front on to the Old Epsom Road, and which run parallel to the new Epsom Road.

[Image]
[Image]

The site is also behind a tree screen. The Snelgate Cottages, which number a row of 12 cottages, are located 90m from the settlement boundary and the Conservation Area of East Clandon.

The cottages, whilst pleasant in character, are of no historic merit and hence were not included in the Clandon Conservation Area.

[Map]

The site itself is covered by shrubs and trees of very limited quality. The few mature trees that are present, are mainly around the edges of the site and could easily be retained as part of any redevelopment of the site.

_Access_
The site does not have a formal access point, although there is a pavement that runs for almost the entire length of the sites frontage onto Old Epsom Road. The site has a frontage onto the Old Epsom Road of 80m, although the overall width of the site is 116m.

_Sustainability_
It is considered that the site is a well located, sustainable site for a small residential development and one that is well located to the existing local transport services that serve East Clandon. There are bus stops in close proximity to the site along Epsom Road, which connect to Guildford, Epsom and Leatherhead. The site is in close proximity to the village, with its local church, parish hall and local pub. Schools can be found in the neighbouring villages of West Clandon and West Horsley. West Clandon train station is a mainline station with connections to Waterloo and Guildford.

_Deliverability_
The site is in one ownership, no third-party land is required to achieve appropriate access for the development and there are no known constraints to the development of the site. The site could come forward and be developed within the next five years.

_Economic Benefits_
The site measures 0.5 hectares and is surplus to Clandon Regis Golf Club’s requirements.

The Golf Club opened in 1994 in 170 acres of land and hosts professional golfing events. However, the decline in the popularity of golf in recent years, has had a knock on effect on the number of annual memberships.

At the same time, increased costs of running the business, maintaining the extensive land holding, coupled with the general poor weather conditions experienced in recent times, has put a strain on the club’s resources. The redevelopment of this 0.5
hectare site, would enable the Club to generate a capital sum that could be invested back into the Golf Course business ensuring that it has the necessary funds to continue.

**The Proposal**

The indicative plan attached to this submission shows how the site could be sensitively developed with a low-density housing scheme. Sketch Plan SK01 shows a slightly more intense scheme that utilises the site’s potential with housing to the rear of the site, thus making best use of the land.

[Sketch 1]

The scheme shows how a proposal of 14 dwellings, made up of 2 and 3 bedroom semi-detached and detached houses, could be achieved on the site.

The proposal would have a density of 7dph, and would include a buffer zone between the application site and the Golf Course.

The proposal would provide affordable housing at 35%, in line with current affordable housing policy, and would equate to 5 affordable dwellings provided on site.

Alternatively, and in line with the recently published Housing White Paper and the Government’s commitment to the Right to Build legislation, the site could be re-developed for self-build and custom build homes.

**Consultation with East Clandon Parish Council**

An initial approach to East Clandon Parish Council (meeting held 2nd February 2017) regarding the promotion of the site for housing, has proved relatively positive.

The Parish Council felt the site could accommodate a small housing scheme of smaller units and affordable housing. However, the Parish Council felt they needed more detailed information on the design, density and layout of the scheme, as well as more information on the affordable housing element of the scheme, to then consult with the wider parish members before the Parish Council could formally comment on the proposal.

**Conclusion**

In light of the site’s sustainability and the benefits the proposal could bring to the local area, it is hoped that the site will be included in the Site Allocations document that will accompany the Draft Local Plan.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents: [Guildford Local Plan Regulation 19 Consultation Reps July 2017.pdf](Guildford_Local_Plan_Regulation_19_Consultation__Reps_July_2017_.pdf) (376 KB)
Landlying to the north of Anchor Close, Normandy, Surrey GU3 2BT

Site Location

The site is located to the north of Anchor Close which is a small cul-de-sac of five dwellings in Normandy off the main A323 Guildford Road running from Guildford to Ash. The proposed site lies to the rear of numbers 2 to 5 Anchor Close. To the east, the site is bounded by a public footpath and Anchor Copse. To the north is a paddock and to the west are detached dwellings set in large plots.

Fig. 1 Land Registry plan with site outlined in red

- The site is located within the Green Belt and abuts the boundary of the Normandy settlement to the south and partially to the

Fig. 2 Extract from Local Plan 2003 Proposals Map with site outlined in red

- The site is a greenfield site used presently as residential It is under private ownership and immediately deliverable.

- It is within the 400m to 5km zone of the Thames Basin Heaths Special Protection Area and is poor agricultural land (classification 4). It is located within Flood Zone 1 (low risk).

3.5 Assessment of Site Opportunities and Constraints

Shown below are photographs of the sites:

Fig. 3 View of site from south east corner looking north west

Fig. 4 View of site from the south looking north east

Fig. 5 View of site looking east along boundary with 5 Anchor Close

Fig. 6 View of site looking west along boundary with 2-4 Anchor Close

Fig. 7 View from site to rear of 2-4 Anchor Close

Fig. 8 View from site to rear of 5 Anchor Close and existing access

Fig. 9 View from proposed access looking west along Guildford Road

Fig. 10 View looking west towards the site from Guildford Road

- The site is located within the Green Belt but adjoins the Normandy settlement zone along the full length of its southern The minor alterations to the settlement boundary within the proposed Local Plan 2016 submission now include the large detached dwellings to the west. Should the redefined settlement zone be agreed, the site will be bordered completely on two sides. An extract from the proposed Local Plan illustrating this is included below:

Fig. 11 Extract from the proposed Local Plan 2016 Proposals Map with the site outlined in red

- The site is not within an Area of Outstanding Natural Beauty, Area of Great Landscaping Value, SSSI or SPA which cover the majority of the No trees or shrubs on or bounding the site are protected by a Tree Preservation Order. A tree, approximately 10m to the south of the site, within the gardens of 1 and 2 Anchor Close has a TPO but this tree will be unaffected by any proposals for a residential development.

- The developable site area is 4ha and therefore at a density of 30dph, 12 houses could be constructed. The surrounding settlement has a density of approximately 16dph. Therefore, should the density of the residential development be reduced to match its surroundings, 6-7 houses could be constructed on the site.
• A new vehicular access could be formed in the south east corner of the site from Guildford. As illustrated within the photographs above, appropriate sightlines exist which would provide safe ingress and egress to and from the site.

• Outside Guildford town centre, established urban areas, inset villages and identified Green Belt villages, the site is in a very sustainable location. A regular bus service also runs down Guildford Road (with a bus stop next to the site) linking the area to Guildford, Aldershot and Woking. It is just 20-25 minutes walk or a 7 minute cycle from Wanborough Railway Station which has two services an hour to Guildford taking just 7 minutes and two services an hour to Aldershot taking 11 minutes. The site is also only 3 miles from the Puttenham junction of the A31 Hogs Back giving excellent vehicular access to the rest of the borough and south to Farnham. It is well located for easy access to cycling routes.

• Guildford Road has a pavement along it providing a safe and easy walking route from the site to the rest of Normandy, giving access to a number of facilities and services including:

1. Places of Workship (Wyke Church, St Marks, Emmanuel Church, RCCG Winners Place)
2. School (Wyke Primary School)
   ◦ Garages (Hyundai Motors, Normandy Motorcycle Co)
3. Public House (The Duke of Normandy)
4. A number of local shops (Session Music)
5. Tennis and sports clubs (Guildford Archery Club, Normandy Tennis Club, Normandy Cricket Club)

Other facilities including Royal British Legion, Dog Obedience School, Nurseries

3.12 Site Planning History

The site was identified as potential development area J16-A in the Green Belt and Countryside Study. It scored three against the purposes of the Green Belt and is ranked 18th in terms of sustainability criteria. The site was classified as suitable, available and viable for residential development in the Strategic Housing Land Availability Assessment (SHLAA) reference part of site 48. It was also included as site 46 within the draft Local Plan Strategy and Sites (regulation 18) document which went out to public consultation in 2014. This document concluded that if sufficient housing land cannot be found in the urban areas and village settlements, this site is potentially suitable for residential development. A copy of the site analysis from this document is included within Appendix A.

3.13 Suitability for Inclusion within the Local Plan 2016

As discussed in section 2, the Local Plan submission proposes a number of large urban extensions and new settlements to deliver the levels of assessed housing required over the 15 year plan period. Many of these sites are dependent on infrastructure improvements which are yet to be agreed with the Department of Transport. Therefore, the majority of the housing proposed is back-loaded to the later years of the plan and may not be deliverable within this time period at all.

• There is a shortfall within the Local Plan submission of housing which could be delivered in the first five years of the plan. This site could help reduce the shortfall as it is within a very sustainable location, available for development and deliverable within 1 to 5 years. It has been assessed previously and found by the Council to be suitable for residential development should sufficient housing land not be found in urban areas and village settlements. The Local Plan submission does not meet this requirement and therefore the site at Anchor Close should be promoted by the Council.

3.15 Comparison with alternative sites allocated within Normandy and Flexford

The Local Plan submission allocates two sites in Normandy and Flexford for residential development. Policy A46 is a large village expansion between the two settlements and will be of mixed use including 1,100 new homes. Policy A47 is a site on Land to the East of the Paddocks, Flexford and is allocated for 50 dwellings. Direct comparison between these sites and the land at Anchor Close is clearly difficult given the differing scales of development but this site will have considerably less impact on the landscape and ecology.
• An assessment of the landscape impact of development on these sites has been undertaken by Jon Etchells Consulting; a practice registered with the Landscape Institute, with extensive experience of landscape design and construction.

With regard to A47 he notes;

“The landscape to the west of Glaziers Lane is very different; it is more rural, relates far less to the settlement edge and is of much higher quality. It is in productive agricultural use, is expansive with long range views across it, and contains a number of large areas of Ancient Woodland. Development here would have significant adverse effects on the landscape, over a wide area.”

And concludes that;

“This large scale development would be likely to have adverse effects on the setting of the nationally designated landscape of the Surrey Hills AONB, as it would cover a large area and would include some large scale buildings for the proposed secondary school, which is intended to be at the southern end of the draft allocation site, closest to the AONB. This potential effect would be increased significantly if the AONB boundary were to be extended to the north into the AGLV, as is currently under consideration.”

• In comparison, the landscape of the application site is small scale, enclosed and strongly related to the settlement. It contains no valuable landscape features, and would have no effects on the setting of the nearby AONB by virtue of its limited extent, buildings of residential scale only and screening along its boundaries.

• The site at A47 is similar in landscaping terms to the site at Anchor Close as it abuts the settlement, is well screened and comprises residential garden and However, the majority of it is designated as a SNCL and lies within an area identified as a ‘water vole alert area’. A stream cuts through the centre of the site and potential mitigation measures may restrict the actual developable area. It appears unlikely, therefore, that this site can deliver the number of houses proposed and it seems somewhat perverse for the Local Plan to designate an area for nature conservation value, but also propose its development, if there are alternative sites such as Anchor Close available.

4.0 Conclusion

• It is considered that the site detailed previously is more suitable for delivering much needed additional housing within the borough than some allocated sites within the draft Local Plan as it is within a very sustainable location, available for development and deliverable within 1-5 years.

• The site has been assessed previously by the Council and it was concluded that if sufficient housing land cannot be found in the urban areas and village settlements, this site is potentially suitable for residential development.

• The position of the site, adjacent to the Normandy settlement boundary, ensures much needed additional housing could be provided in a sustainable location with only a modest indentation into the existing Green Belt.

• The site is more appropriate for residential development in landscaping and ecological terms than other sites allocated within the draft Local Plan for Normandy and

• The site is in a sustainable location on a major bus route and a 20-25 minute walk or 7 minutes cycle from Wanborough. The site has easy highways access on to the A31 Hogs Back.

• The land is of poor agricultural quality and currently used as residential.

Appendix A Extract from

**Guildford Borough Council’s 2014 Local Plan Strategy and Sites Issues and Options Regulation 18 Consultation**
<p>| Site Ref | 46 | Land near Anchor Copse |</p>
<table>
<thead>
<tr>
<th><strong>Ward</strong></th>
<th>Normandy</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Site address / location</strong></td>
<td>Land near Anchor Copse, Normandy</td>
</tr>
<tr>
<td><strong>Site area</strong></td>
<td>1 ha</td>
</tr>
<tr>
<td><strong>Current use (s)</strong></td>
<td>Pastoral farmland</td>
</tr>
<tr>
<td><strong>Surrounding uses</strong></td>
<td>Residential and open land</td>
</tr>
<tr>
<td><strong>Ownership</strong></td>
<td>Private ownership</td>
</tr>
<tr>
<td><strong>Assessment</strong></td>
<td>SHLAA - part of site 48, GBCS - potential development area J16-A</td>
</tr>
<tr>
<td><strong>Considerations</strong></td>
<td></td>
</tr>
<tr>
<td>(including designations, any known contamination)</td>
<td>Green Belt adjoining the settlement boundary.</td>
</tr>
<tr>
<td></td>
<td>Within 400m-5km of the Thames Basin Heaths Special Protection Area.</td>
</tr>
<tr>
<td></td>
<td>Greenfield land.</td>
</tr>
<tr>
<td></td>
<td>Flood Zone 1 (low risk)</td>
</tr>
<tr>
<td></td>
<td>Poor agricultural land (classification 4)</td>
</tr>
<tr>
<td></td>
<td>Delivery is subject to sufficient SANG land being identified.</td>
</tr>
<tr>
<td>Redevelopment uses</td>
<td>Potential uses</td>
</tr>
<tr>
<td>--------------------------------------------------------</td>
<td>---------------------------------------</td>
</tr>
<tr>
<td>Housing, e.g. market housing with a proportion of affordable housing</td>
<td>Good</td>
</tr>
<tr>
<td>All affordable housing</td>
<td>Fair</td>
</tr>
<tr>
<td>Retirement housing care home for elderly, student halls</td>
<td>Fair</td>
</tr>
</tbody>
</table>


<table>
<thead>
<tr>
<th>Category</th>
<th>Rating</th>
<th>Comments</th>
</tr>
</thead>
<tbody>
<tr>
<td>Employment (B1 use classes)</td>
<td>Poor</td>
<td>This site is not well located to accommodate modern offices, and this is an out of town location. These are land intensive uses, and would not make the most efficient use of this land, nor would they be suitable in a residential area as large vehicles would be needed to access the site, and the uses can often be noisy.</td>
</tr>
<tr>
<td>Employment (B2 and B8 use classes)</td>
<td>Poor</td>
<td></td>
</tr>
<tr>
<td>Retail</td>
<td>Poor</td>
<td>The site is outside of the town centre and would not be sequentially preferable for retail uses.</td>
</tr>
<tr>
<td>Food and Drink</td>
<td>Poor</td>
<td>The site is outside of a main centre and would not be sequentially preferable for a food and drink use.</td>
</tr>
<tr>
<td>Leisure</td>
<td>Poor</td>
<td>The site is outside of a main centre and would not be sequentially preferable for a leisure use.</td>
</tr>
<tr>
<td>Community uses</td>
<td>Fair</td>
<td></td>
</tr>
<tr>
<td>Hotel</td>
<td>Poor</td>
<td>Hotels are a main town centre use and should be located in the main centres where possible. A sequential test would need to be passed to show that there are no suitable sites in the main centre or edge of centre, and that this use was needed. It is not thought that a hotel would be a viable use for the site.</td>
</tr>
<tr>
<td>Suggested uses</td>
<td>Housing (including some affordable housing)</td>
<td></td>
</tr>
</tbody>
</table>

Page 1012 of 3335
A community use could be included as part of a primarily residential development, but

See Attachment for pictures and tables

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents: [MCA Represetations on Plan 5 Anchor Close Final.docx](#) (1.5 MB)

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Comment ID: PSLPS16/4476  Respondent: 8594177 / Michael Conoley Associates (Michael Conoley)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Objections to Guildford Borough Council Proposed Local Plan (June 2016) and to the continued inclusion in the plan of the Former Wisley Airfield (FWA), now known as Three Farms Meadows (TFM) –

Allocation A35 - for the phased development of a new settlement of up to 2100 dwellings

I object to the draft Local Plan for the following key reasons:

- I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.

- I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.

- I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans.

- I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).

- I object to the threat the Local Plan poses to the historic rural village of Ockham and the blight on properties there. The plan calls for a village of 159 residences (with narrow lanes, no streetlights, very few pavements and many listed houses) to be subsumed into a 2,000+ dwelling development, with urban-style buildings up to five storeys high and a population density higher than most London boroughs.

- I object to the detrimental impact on transport, local roads and road safety. I specifically object to:

  1. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars
  2. The increased volume of car traffic. A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads
  3. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements
4. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them).

5. The increase in the already severe congestion on the Strategic Road Network of the A3 and M25. A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest.

6. The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity.

- I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCl).
- I object to the fact that air quality concerns have not been taken seriously – air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.
- I object to the fact that the proposed plan does not meet the needs and desires of local communities, as evidenced through the Ockham Parish Plan. The top two responses as to why local residents enjoy life in Ockham are (1) access to the countryside and clean air and (2) the peace and quiet afforded by wide open spaces. Over 90% wish to see both the historic features of the village maintained and the village’s green spaces, including the FWA/TFM, protected.
- I object to the continued inclusion of a site (the former Wisley Airfield, now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC’s Planning Committee.

After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd’s (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter.

Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents: L JPG (125 KB)

Comment ID: PSLPP16/12105  Respondent: 8594177 / Michael Conoley Associates (Michael Conoley)  Agent:  
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy D2 

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Policy D2: Sustainable design, construction and energy

The government has withdrawn the Code for Sustainable Homes to encourage development, sustainable design is appropriately and successfully regulated by the Building Regulations. The requirement for applicants to provide energy statements at the planning submission stage which detail a 15% reduction in carbon emissions is at odds with government guidance and will create unnecessary red tape and costs.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12100  Respondent: 8594177 / Michael Conoley Associates (Michael Conoley)  Agent:  

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy H1: Homes for all

It is agreed that new residential development should make the most efficient use of land whilst responding to local character, context and distinctiveness. This said; some existing housing areas in the borough were developed at a time when there were not the constraints on available land that exist today and as a result are low in density. To limit the impact on the countryside and reduce future incursion into the Green Belt, developers should be encouraged to increase density where this will not impact on the character of the area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12102  Respondent: 8594177 / Michael Conoley Associates (Michael Conoley)  Agent:  

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy H2: Affordable homes

The provision of affordable housing is dependent on it being financially viable for developers to build market housing. Whilst the policy notes that affordable housing contributions may be provided off-site, or with payment in lieu where the Council agrees that on site provision is impractical, the 0.17ha site area criterion set by the policy triggering affordable housing provision is so restrictive that many sites appropriate for development will not be financially viable. Therefore, financial viability studies will be required even for the smallest developments.
Policy P2: Green Belt

It is agreed that the forthcoming Green Belt Supplementary Planning Document (SPD) should set out guidelines on the scale of development that this likely to be considered appropriate and how this is calculated. This will help provide greater clarity to applicants wishing to extend their homes although the figures should still be considered in relation to other design criteria.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Policy S2: Borough Wide Strategy

The West Surrey SHMA found that the housing shortfall in the borough was much greater than expected. It concluded that:

"Taking account of these adjusted household formation rates for younger households and adjustment for student growth, the SHMA draws the following conclusions on the overall need for housing across the HMA to be at 1,729 dwellings per annum with need in Guildford at 693 dpa."

To make up for this shortfall, the plan makes provision for 13,860 new homes which would average 924 dwellings per annum. This is a higher level of development than experienced in Guildford borough during the previous Local Plan period and higher than the assessed need to build flexibility into the plan. The Annual Housing Targets set within this policy...
average out over the 15 year period at the required 693dpa but delivery is back-loaded to the latter years of the plan. Over the first five years a target of just 2,950 has been set which equates to a delivery of 590dpa. This is considerably less than the assessed need and therefore contrary to the requirements set out in paragraphs 47 to 49 of the NPPF.

• We consider that to comply with the requirements for a deliverable five year supply of housing land, the Council should promote additional sustainable smaller sites on the edges of existing settlements that would be deliverable in years one to five of the Local Plan

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** PSLPP16/12096  **Respondent:** 8594177 / Michael Conoley Associates (Michael Conoley)  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Vision and ambition

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

2.1 Spatial Vision

The plan provides for the delivery of 13,860 additional homes by 2033. Considerable effort has been undertaken by the Council to understand the borough’s housing needs through the Land Availability Assessment (LAA) and Strategic Housing Market Assessment (SHMA) and, for the purposes of this representation, we do not seek to challenge the Council’s conclusions in this regard.

• We agree that the preferred location for this development should be existing brownfield sites however; only 2,800 units are proposed by the plan for the urban areas which take advantage of the existing infrastructure and the plan notes the benefit of these sites is that they reduce the need to travel and offer alternative modes of transport to the private car. Significant expansion is also planned to the Guildford Urban Area and around Ash and Tongham which takes advantage of the existing infrastructure and services.

• Much of the remaining provision is in a new settlement at Wisley (2,000 homes) and a significant expansion at Normandy and Flexford which will provide over 1,000 As noted within the plan, the delivery of some of these major sites is dependent upon major improvements to the M25/A3 interchange and the A3 around Guildford and therefore the houses will not be able to be delivered until the later years of the plan. Some of the larger sites may not be deliverable within the plan period at all should agreement not be received from the Department of Transport for the infrastructure improvements. Therefore, it appears the delivery of the required 13,860 additional homes may not be achieved by this plan.

• The plan also proposes almost 1,200 dwellings on non-strategic sites within and around existing villages and over 750 dwellings as extensions to existing villages. We agree that this is important because it will help offer a variety of housing in villages and help contribute to maintaining and improving local services and village When Michael Conoley Associates have organised Public Consultations for small residential developments in villages in the borough, the overwhelming feedback from residents is their support for schemes which will improve the facilities and services in their village and provide lower cost housing that their children may be able to afford and allow them to continue to live locally.

• A number of smaller more sustainable sites on the edges of villages have been identified in the past by the LAA and the Green Belt and Countryside Study but omitted from the Proposed Submission Local Plan, the Council
apparently having concluded that the provision of the larger sites will limit the impact of new development to a few pockets within the borough. Given the majority of the proposed housing will only be deliverable towards the later years of the plan period (if ever) we consider that additional smaller allocated sites should be included within the document to meet the supply requirements for the shorter term (first five years in particular). As discussed in 2 it would make sense that the small sites which are promoted are those that are located in villages which benefit from existing facilities and offer alternative modes of transport to the private car to lessen the impact on the overstretched road network in Guildford. As an example, both Normandy/Flexford and Ash/ Tongham benefit from railway stations with regular and direct access to Guildford on the North Downs Line. This will improve following the addition of the proposed station at the Surrey Research Park.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/408  Respondent: 8594721 / Mr Peter Eperon  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A42

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object the A42: Clockbarn Nurseries, Tannery Lane.

1 This lane is also very narrow and, because of recent Marina approval it will make access into Send Road even more dangerous.

To summarise:
All these proposals are being built on what was green belt and it seems extremely underhand by moving the green belt boundary Jines. This goes against the Secretary of State guide lines and Government planning Minister. A letter received from Sir Paul Beresford in July, 2014 stated that only in exceptional circumstances could properties be built on green belt land. These proposals could be built on brown fields and do not show special reasons for green belt building. With reference to Send Hill development this a complete residential area and could not cope with a large increase in traffic including commercial lorries being used by travellers. However the Clock Barn site is more suitable for commercial vehicles. I am also surprised that Ewbanks brown belt site was suddenly abandoned as it would seem more appropriate for industrial usage and homes. I would be most interested to know how and why this occurred and the other sites suggested were put in at the last moment before the meeting on 24th May. This gives very short notice for discussion.

A copy of this letter is being sent to the Secretary of State, Ministry of Planning, our local Member of Parliament and Prime Minister, David Cameron.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/407  Respondent: 8594721 / Mr Peter Eperon  Agent:
I object to the proposed development of the above sites for the following reasons:

1. Development of this area is totally inappropriate because Send and Ripley could not absorb 400 house and 7000 square feet of industrial usage. As your plan does not include any infrastructure improvements it is obvious that at most time the traffic will be become completely gridlocked. This does not take into consideration the proposed 4000 properties at Wisley and Gosden Hill Farm. The suggested four way entrances on to the A3 would also make a further impact on the area and would encourage traffic to and from Woking and Old Woking to use Send Road to reach this junction. Unless there is vast improvement to the infrastructure, e.g. shops, doctors, hospitals, dentists, schools - all of which are already over subscribed - where are all the people's facilities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

I was totally surprised at the latest addition to the local plan for Send's future development. The development at Send Hill would obviously be built on Green Belt Land and is totally unsuitable for this area.

I object for the following reasons:

1. Send Hill is a very narrow lane and, in particular, where this proposed site will be there is absolutely no room for two vehicles to pass each other. If this proposal was accepted, the road would have to be widened, at considerable cost, to enable lorries and caravans to go back and forth on this site. The sewage in Winds Ridge and Send Hill has always been a problem and as Winds Ridge is at a lower level, with excess effluence, there is considerable back up on our property which has to be cleaned on a regular basis. This will only be exacerbated by additional properties.

2. The privately owner part of this development, over recent years, has become a haven for wild life with deer, badgers, bee orchids and various species of birds.

3. When this piece of land was sold to the present owner there was a Covenant that a corner of this plot should not be disturbed as it was used as a dog and pet cemetery If this is built on, surely this is breaking the lease.
4. The GBC area of this development has been used for many years - to my knowledge well over twenty years - for recreation, children and dog walkers.

5. Previously the land was used as a waste infill. This infill was extremely toxic and has been vented over a period of time. If building was to take place, surely this would disturb any existing toxicity in the ground which could result in serious problems. This could be one risk too far!

6. The cemetery enlargement in Send Hill, which has now been offered to all denominations will, in itself, increase both traffic and parking problems and there would be added chaos to your proposed development. If you take into consideration the traffic from schools and their latest rebuilds, this will also increase the traffic problems. By the riding stables in Send Hill the road gets even narrower and is very dangerous leading into Potters Lane.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/546  Respondent: 8595009 / Compton Village Association (D W Crick)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/4298  Respondent: 8595233 / Partners of Loseley Park (Michael More-Molyneux)  Agent: Strutt & Parker LLP (Rachel Patch)

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Local Plan Representations

Proposed Submission Local Plan: Strategy and Sites - Regulation 19 Consultation Consultation Response from Loseley Park on the Guildford Local Plan

I am writing to make responses to the current Regulation 19 consultation on the Guildford Local Plan on behalf of the Loseley Park estate.

The Loseley Park estate extends to over 1,400 acres of farmland, woods and parkland, from the southern slopes of the Hogs Back to the western and south western outskirts of Guildford and from there to the borders of the villages of Compton and Binscombe. Built in the reign of Elizabeth I, the estate has seen significant changes in recent decades, including changes to farming and the growth of new activities. In the last 15 years the leisure and events business has been developed and a wide variety of businesses have moved onto the estate into refurbished buildings.

Loseley Park is an important open space in Guildford that makes an important contribution to leisure provision in the Borough in addition to supporting local business interests.

We enclose the following information as part of these representations:

- This supporting letter;
- Maps Identifying land on the Loseley Park estate, which have been identified by the Council as being accessible open space (Appendix 1);
- Map identifying three sites - land adjacent to Mount Brown, Artington; The Paddock, adjacent to Sheiling, and land opposite Artington Park and Ride (Appendix 2);
- Completed Response Forms for the following policies:
  1. Policy S1 - Presumption in favour of Sustainable Development
  2. Policy S2 - Borough Wide Strategy
  3. Policy P1 - Surrey Hills Area of Outstanding Natural Beauty
  4. Policy P2 - Green Belt
  5. Policy E1 - Sustainable Employment
  6. Policy E2 - Location for new employment Floorspace
  7. Policy E3 - Maintaining Employment Capacity and Improving Employment Floorspace
  8. Policy E6 - The Leisure and Visitor Experience.
  9. Policy 11 - Infrastructure and Delivery
  10. Policy H3 - Rural exception housing

Representations in relation to Open Space, Sports and Recreation Assessment -

Background Study

I have already drawn to the Council's attention the concerns of Loseley Park regarding the Open Space, Sports and Recreation Assessment, which forms part of the evidence base in support of the Local Plan, in a letter to the Planning Policy department dated 11th July 2016. Our comments are also included below as part of this consultation.

Our primary concern regarding the Open Space Assessment is that it refers to areas of land on the Loseley estate that are labelled within this study as 'accessible'. This would imply it is publicly assessable and unrestricted. However, this land is private and whilst some of the land can be accessed by way of Public Rights of Way, most of the land identified is not
publicly accessible. Please refer to the accompanying maps at Appendix 1 to these submissions when reviewing the comments below.

1. **Ashen Copse** - Whilst referred to as accessible, there are no Public Rights of Way within this area of private woodland.

1. **Puddock Copse** - Whilst referred to as accessible, there are no Public Rights of Way within this area of private woodland.

1. **Pipkin Copse** - Whilst referred to as accessible, there are no Public Rights of Way within this area of private woodland.

1. **Bummoor Copse** - there is a Public Footpath running through the centre of this woodland, however, apart from the footpath width, the rest of the woodland is private and not accessible.

1. **Hurtmore Wood** - We understand this small area of woodland has been included incorrectly in the land owned by Puttenham Golf Club. The area of woodland owned by the Estate is private with a Public Footpath running through it.

1. **Loseley House and Home Farm** - The area coloured green on the proposals map is marked as private space. Loseley House and the immediate gardens are open to the General Public throughout the summer. However, the entry also includes private fields, private residential properties and private commercial let units.

1. **7. Land at Arlington** - It is difficult to see from the proposals maps but we believe a small area of land has been included at This is private land and has no Public Rights of Way.

1. **Land to the South of New Pond Road** - An area of farmland to the south of New Pond Road has been included as "Outdoor Sports (Private)". This land is private agricultural farmland with no public access.

Loseley Park requests that the Council remove these areas of land from this evidence base document. Notwithstanding our position on this matter, should the Council seek to maintain this land within the evidence base document on the basis it serves a purpose as open space adjacent to a recreation function, we request the land be clearly labelled as private and inaccessible so as to avoid any confusion and ensure there is greater clarity within the document. Please contact us if you wish to discuss this matter further.

**Sites with Development Potential in the ownership of the Loseley Park**

We wish to bring to the Council’s attention the following parcels of land within the ownership of Loseley Park, which in our view are suitable, available and achievable within the medium to long term.

**Land adjacent to Mount Brown, Arlington**

This land could be included as a logical infill plot. The site could potentially hold 30 dwellings at a density of 16 dwellings per hectare. Whilst located within the Green Belt and AONB/AGLV the draft local plan is seeking to release similar such sites for development over the life of the plan period and is located adjacent to the Mount Brown site. The emerging policy context supports appropriate levels of infilling.

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<tr>
<td>Site Size:</td>
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The Paddock, adjacent to Sheiling

This land is located adjacent to existing residential accommodation and forms a logical infill plot on a gap site. Whilst located within the Green Belt and AONB/AGLV the draft local plan is seeking to release similar such sites for development over the life of the plan period. The site could potentially hold approximately 6 dwellings along its road frontage with The Ridges. Loseley Park is willing to consider the site for 100% affordable housing and would be happy to discuss this possibility with you.

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<td>Residential Use</td>
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</table>

Land Opposite Arlington Park and Ride

Loseley Park has land adjacent to the existing park and ride car park at Artington. To cater for growth in the region, this land could be included as a logical extension to the site and serve a further increase in parking demand. Although within the Green Belt, the principle of park and ride use has already been established in this location.

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<tr>
<td>Current Use:</td>
<td>Vacant Land</td>
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<tr>
<td>Potential Future Use:</td>
<td>Park and Ride</td>
</tr>
</tbody>
</table>

The above three sites have the potential to make an important contribution to employment, housing and infrastructure provision in the Borough. We would be grateful for the opportunity to meet with you to discuss the planning merits of the above site in more detail.
Conclusions

In summary, we believe the draft Plan could benefit from the minor changes set out in the enclosed representations. Loseley Park makes an important contribution locally to leisure and business uses in the Borough as acknowledged by the Council. Loseley Park remains committed to making sure the estate continues to make this important contribution into the future and therefore trusts you will give due consideration to the development potential of the above sites.

I trust the above comments will be passed to the Local Plan inspector when the Local Plan is submitted for Examination in Public (EiP). We reserve the right to make further representations and attend the Examination in Public if necessary.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
- Appendix 2 - Land Adjacent to Sheiling.pdf (195 KB)
- Appendix 1.pdf (4.8 MB)
- Appendix 2 - Land Adjacent to Artington Park and Ride.pdf (196 KB)
- Appendix 2 - Land Adjacent to Mount Brown.pdf (197 KB)

Comment ID: PSLPP16/17634  Respondent: 8595233 / Partners of Loseley Park (Michael More-Molyneux)
Agent: Strutt & Parker LLP (Rachel Patch)
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E1

Do you consider this section of the document; complies with the Duty to Cooperate? ( Yes ), is Sound? ( Yes ), is Legally Compliant? ( Yes )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We support the aim of an additional 3,200 additional B Class jobs to 2033, although this should not be interpreted as a ceiling. Although not a strategic employment site the Loseley Estate has a number of businesses on the estate which make an important contribution to local employment opportunities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17635  Respondent: 8595233 / Partners of Loseley Park (Michael More-Molyneux)
Agent: Strutt & Parker LLP (Rachel Patch)
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

Do you consider this section of the document; complies with the Duty to Cooperate? ( Yes ), is Sound? ( Yes ), is Legally Compliant? ( Yes )

Answer (if comment is on questions 1-7 of the questionnaire): ()
We welcome the broad thrust of this policy and its support for the provision of additional floorspace for office development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17636  Respondent: 8595233 / Partners of Loseley Park (Michael More-Molyneux)  
Agent: Strutt & Parker LLP (Rachel Patch)

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E3

Do you consider this section of the document; complies with the Duty to Cooperate? (Yes), is Sound? (Yes), is Legally Compliant? (Yes)

Answer (if comment is on questions 1-7 of the questionnaire): ()

The Loseley Estate has a number of employment sites in its ownership that make an important contribution to employment in the area. Over the life of the plan it anticipated that a number of existing business units may need to be redeveloped. We therefore support the last paragraph of this policy, which supports the redevelopment of outmoded employment floorspace to cater for modern business needs.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17637  Respondent: 8595233 / Partners of Loseley Park (Michael More-Molyneux)  
Agent: Strutt & Parker LLP (Rachel Patch)

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E6

Do you consider this section of the document; complies with the Duty to Cooperate? (Yes), is Sound? (Yes), is Legally Compliant? (Yes)

Answer (if comment is on questions 1-7 of the questionnaire): ()

We welcome the acknowledgement within the plan that Loseley Park makes an important contribution to leisure in the Borough, as per paragraph 4.4.57 of the Local Plan. The Estate is constantly reviewing operations to ensure it continues to make a high quality contribution to the Borough.

We support the broad thrust of Policy E6, particularly the section encouraging the re-use of small scale rural buildings. The Loseley Estate regularly reviews its buildings to ensure they are being adequately deployed.

We particularly welcome the provisions of the policy that calls for the provision of new and improved accommodation for tourist visitors on the site. The re-use of existing buildings should be encouraged as part of this strategy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: PSLPP16/17631  Respondent: 8595233 / Partners of Loseley Park (Michael More-Molyneux)
Agent: Strutt & Parker LLP (Rachel Patch)

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H3

Do you consider this section of the document; complies with the Duty to Cooperate? ( Yes ), is Sound? ( Yes ), is Legally Compliant? ( Yes )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We support the aim of this policy as an important measure in meeting the acute shortage of affordable homes in rural areas.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17638  Respondent: 8595233 / Partners of Loseley Park (Michael More-Molyneux)
Agent: Strutt & Parker LLP (Rachel Patch)

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( Yes ), is Sound? ( Yes ), is Legally Compliant? ( Yes )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Welcome the Council’s commitment to provide the Infrastructure needed to support new development. We wish to bring to the Council’s attention land adjacent to the existing Artington Park and Ride, which could serve as an extension to the park and ride. Please refer to the accompanying covering letter and plans.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17632  Respondent: 8595233 / Partners of Loseley Park (Michael More-Molyneux)
Agent: Strutt & Parker LLP (Rachel Patch)

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P1

Do you consider this section of the document; complies with the Duty to Cooperate? ( Yes ), is Sound? ( Yes ), is Legally Compliant? ( Yes )

Answer (if comment is on questions 1-7 of the questionnaire): ()
We support the wording and broad thrust of this policy. Its current wording acknowledges that whilst the main priority is the conservation and enhancement of the AONB, there is a need to allow some development, providing it meets certain key criteria as listed in the policy. Natural England is committed to undertaking a review of AONB boundaries, which also should be given due consideration by the Council.

The Loseley Estate controls a number of buildings within the AONB, which are in use and/or being considered for more viable uses to further support the rural economy of the Surrey Hills.

It is important that flexibility is retained to ensure that businesses located within rural areas are able to adapt to changing business circumstances in the future.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/17633  Respondent: 8595233 / Partners of Loseley Park (Michael More-Molyneux)
Agent: Strutt & Parker LLP (Rachel Patch)

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( Yes ), is Sound? ( Yes ), is Legally Compliant? ( Yes )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We support the broad thrust of this policy, which seeks to reflect the wording of national Green Belt policy contained within the NPPF, whilst it is acknowledged land will need to be taken out of the Green Belt to accommodate growth. Buildings on the Loseley Estate are in active use for a variety of purposes, including residential and business uses. Extension or alteration and replacement of buildings in the Green Belt is a normal part of the lifecycle of buildings and re-use of existing buildings is in line with the principles of sustainability, and should be welcomed. We also support the limited infilling of previously developed sites allowed by policy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: PSLPP16/17629  Respondent: 8595233 / Partners of Loseley Park (Michael More-Molyneux)
Agent: Strutt & Parker LLP (Rachel Patch)

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
We support the aims of this policy, which further reinforces the sustainable development principles set out within the NPPF. Loseley Park seeks to follow the principles of sustainable development by re-using existing buildings wherever possible. To ensure the principles of sustainable development are pursued, the Loseley Estate is constantly reviewing the land and buildings within its control to ensure they are being kept in active use.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17630  Respondent: 8595233 / Partners of Loseley Park (Michael More-Molyneux)
Agent: Strutt & Parker LLP (Rachel Patch)

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( Yes ), is Sound? ( No ), is Legally Compliant? ( Yes )

Answer (if comment is on questions 1-7 of the questionnaire): ()

To meet the anticipated housing targets in the plan the Council should keep open the option of further sites coming forward within the plan period. We welcome the fact that the level of provision set out in the policy for each year is not set as a ceiling. There is no guarantee that every site identified for residential development will be developed over the life of the plan period and housing delivery should be subject to annual review. Further sites should not be ruled out for residential development should they come forward and be found acceptable in planning terms.

We support the provision of more employment accommodation. The Loseley Estate currently has a range of buildings under its control that are in active employment use.

We bring to the Council’s attention land that has the potential to make an active contribution towards housing provision and infrastructure provision in the Borough.

These sites are known as:

- Land Adjacent to Mount Brown, Artington (Possible Residential Use);
- The paddock adj. Sheiling (Possible Residential Use - possibly 100% affordable);
- Land adjacent to Artington Park and Ride (Extension to Park and Ride);

Please see accompanying supporting letter and accompanying location plans for further information on these sites.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/2008  Respondent: 8595233 / Partners of Loseley Park (Michael More-Molyneux)
Agent: Strutt & Parker LLP (Rachel Patch)

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (Yes)

We are making comments on the Open Space, Sports and Recreation Assessment (Please see supporting letter).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents: LP2016 Guildford Local Plan Consultation Submission of Representations on behalf of Loseley Park, Rachel Patch msg.msg (7.3 MB)

Comment ID: SQLP16/2009  Respondent: 8595233 / Partners of Loseley Park (Michael More-Molyneux)
Agent: Strutt & Parker LLP (Rachel Patch)

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 2: Legal compliance

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We have no comment to make.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/2010  Respondent: 8595233 / Partners of Loseley Park (Michael More-Molyneux)
Agent: Strutt & Parker LLP (Rachel Patch)

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Please see the submissions on individual policies below.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<th>Comment ID: SQLP16/2012</th>
<th>Respondent: 8595233 / Partners of Loseley Park (Michael More-Molyneux)</th>
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<td>Agent: Strutt &amp; Parker LLP (Rachel Patch)</td>
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<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination</td>
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<td><strong>Answer (if comment is on questions 1-7 of the questionnaire): (Yes)</strong></td>
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<td><strong>We wish to reserve the right to participate in the Examination in public. Given the extent of land interests Loseley Park has in the Borough we may wish to appear and speak on a range of policies, which we have commented on below.</strong></td>
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<td><strong>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</strong></td>
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<td><strong>Answer (if comment is on questions 1-7 of the questionnaire): ()</strong></td>
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The scale of growth is excessive, the SHMA has not been scrutinised by the Councillors and the details of the calculation is not in the public domain. With the recent referendum result and uncertainty of forecasts of leading economists this growth is not justified.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11855  Respondent: 8595649 / Paul Kassell  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

There is insufficient allocation of social housing for key workers

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11856  Respondent: 8595649 / Paul Kassell  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Affordable housing simply is not affordable in this area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11854  Respondent: 8595649 / Paul Kassell  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

There is no protection against garden grabbing.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The Thames Valley Heaths protection area policy is ineffective. SANGs do not work according to the Council’s own surveys. Assuming people will be displaced from visiting Whitmoor Common to travel further to SANGs is pure fantasy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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The wording of policies is vague. This, coupled with a presumption in favour of development offers no protection. Use of words such as “should” rather than “must” encourages ambiguity.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Monitoring of policies is ineffective and often doesn’t address the objectives of the policy. Examples would be, no measure of the percentage of students housed on campus, no visitor surveys of SPA etc.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp172/2558  Respondent: 8595777 / Ash Green Residents Association (Paul Povey)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A29

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy A29: Land to the south and east of Ash and Tongham
We object to the increase from 1200 to 1750 homes as this would increase the pressure of coalescence between the Ash & Tongham Urban Area and Ash Green Village. This is contrary to Policy P3 (Countryside). Therefore Requirement 6 of this Policy, which attempts to protect the “historic location of Ash Green”, is inadequate and would need rewording to prevent this increased potential for coalescence.

• Requirement 6 Amend: "Development proposals in the vicinity of Ash Green to have recognition of the historic location of Ash Green village and the intrinsic rural character of its countryside location. The properties along Ash Green Road have historically been considered to form part of Ash Green village. Whilst this land is now proposed to be included within the Ash and Tongham urban area, Proposals for the land west of this road and to the south east of Foreman Road / White Lane should must respect the historical context of this area by preventing the coalescence of Ash, Tongham and Ash Green. Any development as a whole will not be of a size and scale that would detract from the character of the rural landscape. This should must include the provision of a green buffer that seeks to maintains a sense of separation between the any proposed new development and the properties fronting onto Ash Green Road, Foreman Road and White Lane. This will also help soften the edges of the strategic development location and provide a transition between the built up area and the countryside beyond"

• Requirement 8 does not sufficiently protect Ash Manor, a historical farmstead of three listed buildings including a medieval hall house and should be amended as follows:

“Sensitive design at site boundaries with the adjacent complex of listed buildings at Ash Manor. Views to and from this heritage asset, including their approach from White Lane, must be protected.”

• Infrastructure before development. Requirement 9 (Land and provision for a new road bridge at Ash Station to enable closure of the level crossing) must be competed before any development of Policy A29 commences.

• Requirement 9 fails to address the other significant transport infrastructure improvements that are required to cope with the increases in traffic generated by Policy A29. Therefore solutions to the following areas are also required before any development of A29 is permitted.
- The Street in Tongham
- A331/A323 intersection and A331/A31 Intersection
- A31/White Lane junction

• Ash Green is not part of the Ash & Tongham Urban Area and therefore the ATUA boundary must not extend south of Ash Green Road and Foreman Road.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

"Development proposals in the vicinity of Ash Green to have recognition of the historic location of Ash Green village and the intrinsic rural character of its countryside location. The properties along Ash Green Road form part of Ash Green village. Proposals for the land west of this road and to the south east of Foreman Road / White Lane must respect the historical context of this area by preventing the coalescence of Ash, Tongham and Ash Green. Any development as a whole will not be of a size and scale that would detract from the character of the rural landscape. This must include the provision of a green buffer that maintains separation between the any proposed new development and the properties fronting onto Ash Green Road, Foreman Road and White Lane. This will also help soften the edges of the strategic development location and provide a transition between the built up area and the countryside beyond”

Requirement 8 does not sufficiently protect Ash Manor, a historical farmstead of three listed buildings including a medieval hall house and should be amended as follows:

“Sensitive design at site boundaries with the adjacent complex of listed buildings at Ash Manor. Views to and from this heritage asset, including their approach from White Lane, must be protected.”

Attached documents:

Comment ID: pslp171/950  Respondent: 8595777 / Ash Green Residents Association (Paul Povey)  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy P3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Ash Green is not part of the Ash & Tongham Urban Area and therefore the ATUA boundary must not extend south of Ash Green Road and Foreman Road

• Ash Green is not part of the Ash & Tongham Urban Area and therefore the ATUA boundary must not extend south of Ash Green Road and Foreman Road
• 4.3.29 Amend: "Originally consisting of the three small rural villages of Ash, Ash Vale and Tongham, the Ash and Tongham urban area has grown considerably in size and now forms Guildford borough's second largest urban area. Given its relative sustainability, the Countryside to the south and east of the urban area within the urban area to the south and east is allocated as a strategic location for development. However to make this growth sustainable, suitable infrastructure must be implemented before further development.”
• 4.3.30 Amend: "We however wish to ensure that whilst accommodating this growth, we are able to protect the remaining countryside around it from inappropriate development in order to protect its intrinsic character and preserve the role it plays in maintaining the separate identity of Ash, Tongham and Ash Green.”
• Policy P3 Amend: (1) (c) should be amended to read "does not lead to greater physical or visual coalescence between the Ash and Tongham urban area, Ash Green and Aldershot."
Regrettably, the Local Plan continues to incorrectly identify the boundary of Ash Green. Ash Green Residents Association made a detailed response to the 2014 Local Plan Consultation and in particular raised their concerns that GBC’s settlement boundary of Ash Green was incorrect and excluded the northern part of the village. AGRA also raised concerns regarding the boundary of the Ash & Tongham Urban Area (previously known as the Ash & Tongham Strategic Location for Growth) and its potential for coalescence with Ash Green. These concerns are detailed in our comments to Policy 11 of the 2014 Local Plan and we attach a copy at Appendix A for your information.

The Ash Green settlement boundary inaccuracy together with the Ash & Tongham Urban Area boundary inaccuracy are still present in the 2017 Draft Local Plan. We therefore ask that our 2014 comments are taken into account when considering the correct settlement boundary of Ash Green, the boundary of the Ash & Tongham Urban Area and a suitable area of separation between them.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

4.3.29 Amend: "Originally consisting of the three small rural villages of Ash, Ash Vale and Tongham, the Ash and Tongham urban area has grown considerably in size and now forms Guildford borough's second largest urban area. Countryside within the urban area to the south and east is allocated as a strategic location for development. However to make this growth sustainable, suitable infrastructure must be implemented before further development."

4.3.30 Amend: "We do however wish to ensure that whilst accommodating this growth, we are able to protect the remaining countryside around it from inappropriate development in order to protect its intrinsic character and preserve the role it plays in maintaining the separate identity of Ash, Tongham and Ash Green."

Policy P3 Amend: (1) (c) should be amended to read "does not lead to greater physical or visual coalescence between the Ash and Tongham urban area, Ash Green and Aldershot.

Attached documents: AGRA 2017 Local Plan Response PDF.pdf (1.7 MB)
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the plans for building in Send Hill - an entirely unsuitable site for environmental reasons but also as access is so limited via such a dangerous and narrow road.

Local residents know their own village well, yet it seems that our concerns are ignored, indeed ridden over roughshod, with plans being approved in short order and without the required consultations. We objected to this sort of behaviour before and will do so again. One simply cannot increase the size of villages by such a huge and sudden proportion without tearing out their hearts and changing them forever. Even small developments in unsuitable sites are madness. There is a known landfill site at Send Hill with recent tests having confirmed the presence of potentially dangerous or harmful waste, yet plans are put forward to build there too. This is highly inappropriate.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: PSLPP16/5638</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object in the strongest possible way to the plans of the Council to build in the Green Belt. This specially protected land is meant to preserve our beautiful countryside and give a quality of life to those who live here. I cannot see any reason why the council would feel it necessary to change this glorious area in which we live irreversibly, and cannot understand what right they have to contravene the central government's commitment to the protection of Green Belt land and remove the rights of our descendants. The whole reason this country is so attractive is the division between discrete villages and towns; take away the right to preserve this and Southampton will eventually join seamlessly to Manchester. You do not have the moral *right* to remove the countryside from future generations, and you were elected on the promise that the Green Belt would be protected. What was the price of your promise?

I object to the plan to remove villages from the Green Belt. There can be no justification for this other than to increase the places it is possible to build. Whether the argument is for housing or disguised as for industrial use, all plans to build what are effectively unwanted industrial sites simply allow later change of use, so should be viewed as extremely circumspect. Where is the evidence that so much industrial space is required in a small village, and surrounding roads will be unable to cope with the resulting traffic.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ()**

I am actually becoming heartily sick of writing with my objections, and I guess the council as a whole hope that this will mean I and many others like me will give up and go away. I objected with many others to size of the previous plans and your answer? To make an even bigger proposal for development. If this is what you plan, you must by law go through a full and proper process, not short cut the system and try to sneak things through in a way which is totally invalid and I object to the way in which this has been done.

I object to the number of houses you are proposing in our area and in others in the Borough. As far as I can gather, the number of homes the Council are planning to build in our area over the next few years far exceeds the need and would stretch the infrastructure and facilities to breaking point. It appears to be based on a report that none of us are allowed to see. Didn't we as council tax payers actually pay for this? Just because other authorities used this company to determine the need does not make it right or accurate. Let us see the basis of their figures as the secrecy surrounding it suggests they may well be unfounded.

I object to plans to build large new conurbations at Wisley Airfield, Gosden Hill and Blackwell Farm as I believe that the need for such large numbers of housing is based on an inaccurate, flawed or no longer relevant projections, and does not protect our local environment.

When are our elected representatives going to listen to what we are saying?

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

In specific terms, I objected to the original proposal to build 45 homes in Tannery Lane, which is narrow and twisting, with a junction in the village that is often difficult to negotiate, and Tannery Lane itself already serves as a terrifying drive or walk for locals with goods vehicles, vans and the like coming from and going to the industrial units by the Wey. Guilford's response to this is to INCREASE the number of homes being considered. I therefore also object to Policy A42; a one-third sized increase in the number of houses now being proposed and I fail to see how this increase will improve the traffic at the junction in the village I have already objected to. We are already in danger of losing countryside views from the banks of the Wey, and this development will be fully visible from the towpath. Any housing in this low-lying area will obviously affect the situation with drainage, and may cause flooding in the locality on a more frequent basis, or in residential areas that do not currently flood.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
Comment ID: pslp172/3004  Respondent: 8595905 / Mrs Jane Whatley  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to Policy A43 citing the building of 400 homes on the Garlick's Arch site as there is no proof these homes are actually required - indeed I understand there has been a reduction in housing numbers in the Borough - and it is a beautiful area of Green Belt with no exceptional circumstances to make this proposal tenable. Local residents were extremely vocal in their previous objections to this site and with other local developments also planned there can be no proven need for the number of homes suggested in this location. It is a crime to deprive our descendants of the right to enjoy the Green Belt as we have done in our lives so far, and there are absolutely NO exceptional circumstances that would EVER make that right here. Nothing has changed, other than the Borough's seeming determination to destroy as much Green Belt as they can by handing it over to developers who will fail, as per most other large developments across the country, to meet any promised requirements for affordable housing, or the provision of services, claiming 'poverty' when it comes to any actual build. Experience shows they will only build what they can make most out of, and the rest of the population pays for their profits in terms of a lost quality of life and place a huge burden on what are effectively still semi-rural services (water, drainage electricity supplies etc). Surely you are required by Law to make sure the infrastructure is in place PRIOR to such large-scale building proposals.

We have complained previously that our village would be completely overwhelmed by such an enormous and sudden increase of people and cars; the newly built school and stretched doctors' surgery could not cope with the extra demand. Local buses and trains are not the best service, and thus most would intend to travel by car, increasing traffic at all times, but at peak times to a level that would become unbearable. Should the village become busier than currently, and living on Potters Lane, where we have recently been operating a Speedwatch campaign we have seen 1000 drivers breaking the speed limit, this sort of practice is bound to increase along all smaller back roads that are not built for such traffic. Pedestrians are in danger now, let alone when there are thousands more vehicles trying to pass through and around the village, and accidents will occur more often.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/3006  Respondent: 8595905 / Mrs Jane Whatley  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the Showpeople's plots at the same site (Garlick's Arch) as there is no proven demand for these, and the disproportionate allocation to the Send area is without foundation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
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I object to the change of wording for the industrial site at Burnt Common (Policy A58) as it would permit far more industrial space to be built even than was originally allocated. This removes all upper limits for the size of the proposed and any future development on this site. I am sure that all of us can point to any number of empty industrial buildings in the area at both Slyfield and in Guildford itself, so on what premise are Guildford basing the need for such enormous amounts of industrial space, and more specifically in the Green Belt, to be turned over to industrial use? I understand that the need for such space has actually reduced according to a recent Land Assessment so this is entirely unfounded, and indeed was removed from previous planning drafts due to weight of opinion, so what has changed? The three distinct settlements of Send, Send Marsh and Ripley will simply merge and lose their identities and for what? For industrial buildings on our beautiful Green Belt, traffic gridlock and more polluted air for us all.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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I object to the plan to take Send Business Park out of the Green Belt (Policy 2 paragraph 4.3.15) because this is such a narrow lane. In the winter, when the pedestrian path becomes unpleasant to use, and walkers must use the roadway it is a dangerous experience to walk along it presently. I am sure that there is no valid reason to make this road any busier by permitting further expansion at this site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: PSLP16/2907  Respondent: 8596481 / Peter Bates  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I wish to strongly object to your so called revised Local Plan.

After all the time and effort land thousands of people in the Guildford Area have been presented with a plan, which is almost a duplicate of the original plan. I wonder why GBC had to rent facilities in Guildford to present the plan only to restate your original thoughts, despite the objections.

The Gosden Hill Farm site, Wisley, Garlick's Arch, Send Marsh, Burnt Common and Ripley will produce thousands of extra homes and vehicles without the road infrastructure to support it. The A3 in particular is full to capacity already.

I have to say the consultants you employed do not appreciate the current traffic difficulties that currently exist. With the extra housing it would gridlock our villages and no one would get any benefits. The infrastructure of services including Hospitals would also be overwhelmed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/4412  Respondent: 8596609 / Penelope Lyons  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Send

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Objections - Local Plan (June 2016)

I write in connection with the Proposed Submission Local Plan (June 2016) and in particular the effect it will have on me as a resident of Send with a young family.

There are no good grounds for taking land out of the green belt designation in this area and it will significantly damage the existing communities and their ability to use their amenities and infrastructure.

Green Belt (Policy P2)

No exceptional circumstances have been put forward to justify removing Ripley, Send and Clandon from the Green Belt contrary to the National Planning Policy. The villages will soon have no separate identities and will merge.

Transport links
The proposals to create additional access points to and from the A3 will only serve to increase rush hour congestion through Ripley and Send, which is already significantly congested. As the extra housing into the mix and we are going to be faced with gridlock whilst trying to take our children to school and on our way to work.

Swamping of local services

In addition to my concerns about the local infrastructure, no plans are being put forward for extra school places or extra primary care services in our area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/8249  Respondent: 8596609 / Penelope Lyons  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy A43

I object to the proposal to build 400 houses and 7,000 m sq of industrial use and warehousing at Garlicks Arch. There is no need for any more houses on top of those already proposed for the borough. This site is NEW and not included in the Regulation 18 draft and has not been consulted on previously. It is Green Belt permanently protected by the NPFF which prevents merging of the settlements. There are no exceptional circumstances. The site has particular conservation sensitivity as it is covered in ancient woodland. The proposed industrial development of 7,000 sq m is simply not required since the latest Employment Land Needs Assessment 2015 (ELNA) shows a reduction of 80% in required employment floor space from the previous plan. If there is a further need for industrial space, then it should be at Slyfield. A new 4-way interchange onto the A3 at Burnt Common would put substantial pressure on the already overloaded Send Road (A247) as it would be the through route for Woking for traffic leaving the M25 and A3 and the proposed new houses at Wisley and Burpham.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/8250  Respondent: 8596609 / Penelope Lyons  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A44

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Policy A44

I object to the proposal to build 40 homes and two new travellers pitches to the west of Winds Ridge and Send Hil. This site is new and was not included in the regulation 18 draft and has not been consulted on previously. Development for housing is inappropriate due to its permanent green belt status and the beauty of the site. The subsoil of the existing site contains documented unsafe land fill waste which is currently being vented. The proposal to include 2 Travellers pitches is inappropriate due to the narrow width single track road providing insufficient access to the site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/18583  Respondent: 8596609 / Penelope Lyons  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy P2

I object to the proposal that Send be removed from the Green Belt. Send provides a buffer between Woking and Guildford. If the vulnerable areas proposed are to be included within the village boundaries and removed from the green belt,(the land behind St Bedes and along the Wey navigation) one assumes that there will be a presumption for building on those sites in the future.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/510  Respondent: 8596609 / Penelope Lyons  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Evidence

I object to the evidence presented to support the plan as follows: There is no sound evidence in terms of the ELNA 201 which shows an 80% reduction in employment space from the previous ELNA carried out by GBC in 2013. This means that the industrial space at Burnt Common is no longer needed. Housing numbers from the Strategic Housing Market Assessment 2015 (SHMA) are highly questionable; the # of foreign students has been wrongly used to inflate the need.
The required 13,860 houses in the local plan is exaggerated. If the population is to grow by some 20,000 in the plan period, we actually need 8000 homes (based on an average of 2.5 persons per home). The Green Belt does not need to be built over. 50% of the new homes could be built on brownfield sites. GBC’s transport assessment was not even available to councillors for the vote taken on 24 May. Infrastructure overload has received scant attention.

Policy P2

I object to the proposal that Send be removed from the Green Belt. Send provides a buffer between Woking and Guildford. If the vulnerable areas proposed are to be included within the village boundaries and removed from the green belt, (the land behind St Bedes and along the Wey navigation) one assumes that there will be a presumption for building on those sites in the future.

Policy A43

I object to the proposal to build 400 houses and 7,000 sq m of industrial use and warehousing at Garlicks Arch. There is no need for any more houses on top of those already proposed for the borough. This site is NEW and not included in the Regulation 18 draft and has not been consulted on previously. It is Green Belt permanently protected by the NPFF which prevents merging of the settlements. There are no exceptional circumstances. The site has particular conservation sensitivity as it is covered in ancient woodland. The proposed industrial development of 7,000 sq m is simply not required since the latest Employment Land Needs Assessment 2015 (ELNA) shows a reduction of 80% in required employment floor space from the previous plan. If there is a further need for industrial space, then it should be at Slyfield. A new 4-way interchange onto the A3 at Burnt Common would put substantial pressure on the already overloaded Send Road (A247) as it would be the through route for Woking for traffic leaving the M25 and A3 and the proposed new houses at Wisley and Burpham.

Policy A44

I object to the proposal to build 40 homes and two new travellers pitches to the west of Winds Ridge and Send Hil. This site is new and was not included in the regulation 18 draft and has not been consulted on previously. Development for housing is inappropriate due to its permanent green belt status and the beauty of the site. The subsoil of the existing site contains documented unsafe land fill waste which is currently being vented. The proposal to include 2 Travellers pitches is inappropriate due to the narrow width single track road providing insufficient access to the site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/4257  Respondent: 8596673 / Peta Malthouse  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
ANNEX A

GBC Transport

LRN9 - LRN 13 and LRN 18 - LRN 19 improvements to the A323 and to Westwood Lane are insufficient and delivery is too late. Westwood Lane are C and D roads respectively where traffic is already very busy as the roads are used in the alternative to the A331 to gain access to the A3 and M3 and Guildford. There is no means of improving the hump backed bridge over the railway in Glaziers Lane or the single laned squint rail bridge over Westwood Lane which is height restricted.

LRN21, a bridge replacement for the level crossing at Ash is welcome but all this will do is pass on trafficholdups to the next pinch point.

In addition to the AUE and PRB, a Super Garrison in Aldershot is being planned. What will the effect of this be on Local Roads in the west of Guildford?

Hot spots on the A323 may be improved, but the congestion will just move on to the next hold-up, be it a car turning right or stopping bus. Large queues will form at peak time at junctions, in particular the roundabout at the junction of the A323 and the B3411 and the traffic lights at the junction of the A323 and the A324. The A323 is a direct road from the AUE into Guildford.

ANNEX B

The flawed nature of the Settlement Hierarchy and Settlement Profiles in respect of Wider Normandy

Wider Normandy is not a village with a centre, but is a collection of the following hamlets; Normandy, Flexford, Christmas Pie, Willey Green, Wyke and the eastern side of Pinewoods, a ribbon development along the A323, the western side being in Ash. Strictly speaking Flexford and Christmas Pie are one settlement, though residents of Christmas Pie think of themselves as separate.

After reading the Settlement Hierarchy and Settlement Profiles documents it is clear to me that Guilford Borough Council (GBC) suffers from confusion between Wider Normandy and Normandy. Wyke is mentioned once and Willey Green and Pinewoods not at all, even to be rejected as being too loose-knit or too small. The populations and amenities of Willey Green, Wyke and Pinewoods are therefore not included in either document. In 2011 Wider Normandy had a population of 2,981. The populations mentioned in these documents are Normandy 585 and Flexford 1,199, a total of 1,784, leaving 1,197 people unaccounted for, over a third of the population of Wider Normandy.

The Settlement Hierarchy

The Settlement Hierarchy document starts with the bold statement “The settlement hierarchy study is a key part of our evidence base for the new Local Plan. ... This document will enable us to have a better understanding of the roles of each of our settlements”. I don't think that the document shows any understanding of Wider Normandy or its settlements.

It is claimed that evidence gathering has identified that Flexford and Normandy would benefit from future development and access to key services for local residents. Where is this evidence?

I am not aware of demand for more services in Normandy, though there are some residents of Normandy who would like a shop for when they run out of milk or bread and to have a chat with the shopkeeper, particularly the chat. (When the Post Office closed, older residents would come to the Surgery and chat to the receptionist. The Church then started Tuesday teas for this group.) This, however, is not a viable business model. The Parish Council undertook a survey to assess demand for a shop, and found that demand was so weak that it would not be worthwhile. We had food shops and pubs in Wider Normandy, but they closed for lack of business. We still have bars in the British Legion and the Cricket Club. We have a farm shop which sells mainly meat, but also milk, fruit and vegetables, and a small range of organic groceries. It opens Weds - Sat and is well used. The Therapy Garden sell their produce and plants on Tuesday Wednesday and Thursday and again this is well used.
The population of Wider Normandy is sufficient to support a pub, there used to be six 15 years ago when the population was less than it is today, and a convenience store, but pubs and local shops are in decline all over the country as living patterns change. The ones we had in Normandy have closed.

Since Fast Broadband arrived two years ago residents increasingly shop online. Sainsbury and Tesco delivery vans buzz round the hamlets, and I have seen the Post van stacked high with Amazon parcels at Christmas. I shop online; my friends in Normandy all shop online. Online shopping and banking is the most sustainable for villages. Local shops will be less sustainable.

The Normandy Community Bus makes three trips a week to the supermarkets for residents who need transport. There is a convenience store in western Pinewoods, and a pub. The milkman delivers a range of groceries.

I am at a loss as to how the current residents of Normandy and Flexford will benefit from this plan, or in what way Normandy and Flexford will be more sustainable. The only thing on offer seem to be shops, which we do not need. The plan only brings disbenefits; loss of green open space, increased traffic, years of noise and disruption during building, pressure on existing services and a loss of identity, as the proposed development will double the size of Wider Normandy. The Settlement Profiles states "In terms of how well the villages work as a community, the settlement scores 35 out of 40, the highest scoring out of all the villages". Will this community spirit still exist if this plan is implemented? As for the evidence gathering, please see below.

The Settlement Profiles

These are the errors and omissions.

- P47 Wider Normandy is confused with Normandy Settlement. The document says

  "Normandy Parish Council considers Flexford and Normandy to be one village. We have therefore assessed and scored it on this basis." Normandy Parish Council considers Flexford and Normandy to be two settlements in the parish. Scoring Normandy and Flexford together is therefore incorrect. The nature of Normandy was explained in the last consultation, but the error has persisted. Why?

- Only Normandy and Flexford are considered. Wyke, Pinewoods and Willey Green are ignored. Wyke has a church, Wyke Infant and Primary Schools and a good bus service. Willey Green has a good bus service and 6 rural businesses, eastern Pinewoods has an Indian restaurant, a Chinese takeaway and a good bus service.
- On page 47 it states that Normandy has two schools. The schools are in Wyke.
- On page 47 it states in respect of Flexford " There is no central meeting place such as a village green within the village" which is true if Flexford is considered to be separate from Normandy, but untrue of they are considered as one, as in this document. Manor Fruit Farm, Normandy, where the Village Hall is situated, is a de facto village green. This is where the May and August Fetes, the 5th November Bonfire and Dog Shows are held. Manor Fruit Farm has a play area for children and an outdoor gym. The Doctors Surgery is also located here, and Normandy Therapy Garden.
- On page 48 it claims that Wanborough station has direct access to London. There is a change at Guildford.
- On page 49 it states that there is a Site of Nature Conservation Interest (SNCI) to the North of Normandy. There are 8 SNCIs in Normandy; Normandy Pond SNCI, Normandy Common SNCI, Wanborough and Normandy Woods SNCI, Little Flexford SNCI, Wyke School SNCI, Wyke Churchyard SNCI, Withybed Copse and Henley Park Fields SNCI and part of Broadstreet Common and Backside Common SNCI.
- On page 50, it is stated that Normandy has two Grade II listed buildings. Normandy has nine, Longer End Farm, Longerend Cottage, Hunts Hill House, Manor House, Normandy Hill Cottage, Normandy Hill Farmhouse, Glaziers, and Halsey Cottage, not two (Or does GBC think that Normandy stops at the A323?). In all, Wider Normandy has 22 Grade II listed buildings.
- Flexford has a Scheduled Ancient Monument, a Romano-Celtic temple complex 385m west of Long Common. List no: 1019641 which lies between Flexford and Wanborough. This not mentioned.
- On page 50 Normandy and Flexford are again considered separately, instead of together, as stated.

ANNEX C
This development is not driven by objectively assessed need as required by the NPPF, but by commercial considerations and GBC's willingness to build on the Green Belt, rather than more difficult options within Guildford itself. The NPPF places priority on Evidence Based planning. This plan has been put forward by Taylor Wimpey, who have options to buy this land and therefore wish to develop it for commercial reasons, as developers quite rightly do. However, to get over the inconvenience of it being Green Belt land, they have offered a free school in return for permission to build 1,100 houses.

Once the offer of a free school in Normandy/Flexford was made, and only then, GBC started to talk about a lack of school places in the West of the Borough, based on need from Blackwell Farm, Ash and the Normandy/Flexford development. Normandy currently has about 20 children.

An amendment was passed at the GBC full Council meeting on 24th May which stated that if the need for a school was not proven, then there should be no development in Normandy/Flexford. It therefore follows that significant need for secondary school places from outside of Normandy should be shown, as children from the new development in Normandy/Flexford cannot be used to justify the school. At the GBC meeting on the 24th May I heard one councillor say "but if the school fails where will we build all those houses?" The houses are the driver and the school is the enabler for building on the Green Belt.

The Infrastructure required is not there

Transport

Roads

The A323, the road that passes through Normandy, is nearing capacity. Travelling eastwards, to turn into Bailes Lane requires a right turn on a sharp left hand bend. Sometimes it can be a long wait, and traffic builds up. Other junctions in Normandy are similar. The traffic lights at the junction of the A324 and A323 have been identified as a bottleneck in the Surrey County Council Strategic Highways Assessment Report (SHAR) 4.9.1, as has the roundabout at the junction of the A323/B341.

Queues also build up on the A323 in Normandy on Mondays, when the rubbish truck collects. There are few bus bays, so traffic queues behind buses. There are no cycle lanes, which means that traffic has to slow and wait to pass cyclists on this narrow road, which has many bends as it passes through Worplesdon.

Westwood Lane and Glaziers Lane form the borders of the Normandy/Flexford Site. Westwood Lane, C16, is a narrow country lane on which two entrances into the Normandy/Flexford site are planned. Queues will form while cars and fairground equipment wait to turn right into the development. Glaziers Lane, D60, where a single entrance is planned is also narrow. These rural lanes have developed over time to allow people to travel between the hamlets of Wider Normandy. They were never meant for, nor are they suitable for, any weight of traffic.

Queues will build at the junction of Westwood Lane, the A323 and School Lane, where Wyke Primary School is located close to the junction. The SHAR table 4.3 anticipates that traffic on Westwood Lane will increase by 1284%. Anticipated improvements to Westwood Lane are not due until 2021-2026. The main area of concern has to be that of traffic. The difficulties arising from the use of the A3, B3000, A323, A322 etc. have all been referred to however the proposal is that the A46 land should hold an additional 1100 homes would generate over 2000 car journeys at peak times.

The exit onto the main roads are via Westwood Lane/A323, Glaziers Lane/A323 and neither of those junctions could be widened or improved. At Westwood Lane the added difficulty is the access for parents to Wyke School, who park along Westwood Lane and cross the busy A323. SCC are presently trying to employ a Lollypop lady but have so far been unsuccessful. The safety for the children at that junction is paramount.

At Glaziers Lane/A323 junction the problem is width of the road combined with flood damage and concerns re subsidence. The road is not capable of widening due to the properties on either side of the road.

So far as the exit onto the Hogs Back is concerned again the junction is sited on an ANLV (soon to be AONB) and it is highly unlikely the junction can be improved. It is also subject to frost and ice making the road impassable at times. People who live in Normandy need SUVs if they are not to be cut off.
Improvements to the junction at Puttenham Hill, if confirmed, will take place between 2021 and 2026. It can be seen that traffic from developments is already preceding improvements to roads. Moreover, the improvements to the A323 and the A31 are anticipated, not confirmed. Given the nature of the A323, it is difficult to see how it can be turned into a major link between Aldershot, Ash and Guildford.

**Rail**

The Normandy/Flexford site is considered sustainable because it is next to Wanborough station. Children from Ash attending the school and commuters to Guildford are expected to use the train. Wanborough is a small rural station, unmanned, with a platform suitable for trains with 4 carriages or less. There are trains to Guildford and Aldershot half hourly, and an hourly service to Reading, which stops at Farnborough. Commuters wishing to travel to London have to change at Guildford onto a service which is already crowded at peak times.

To find out availability on peak hour services I went to Wanborough Station on Monday 6th June between 7:30am and 8:30am. Trains to Reading and Aldershot were quite empty. The 07:48 to Guildford was quite full, but some seats were available. With 40 people standing per carriage, that train could probably have taken 200 passengers. The 08:18 was slightly less crowded. With full standing, this train could probably have taken another 300 passengers. That is 500 spaces on peak hour services for a development with a population of over 2,500 people. Even these few spaces are likely to be unavailable, owing the AUE. The train, a 17 minute journey from Aldershot to Guildford, is likely to be a popular option for AUE residents working in Guildford as it is a 20 minute walk or 10 minute cycle to the station, an overall journey time of 37 minutes.

GBC is in talks with the Train Operating Companies and Network Rail, but any improvements to the service are aspirational.

**Cycling**

Policy A46 mentions an off-site cycle network to Wanborough station. It is not clear where this proposed cycle network would be. There is no space in Glaziers or Westwood Lane, closest to the site, or on the A323. Policy A46 also mentions an off-site cycle network to the Christmas Pie Trail (a rural track), which would lead to key destinations, unspecified.

**Heritage Assets**

It is a core principle of the NPPF to conserve heritage assets so that they can be enjoyed for their contribution to the quality of life of this and future generations.

There are seven Grade II listed buildings and one Grade II listed tomb adjoining or close to, this site. The houses are: Westwood Place, Buckhurst, Great Westwood, Halsey's Cottage and Glaziers. The other buildings are: Great Westwood Barn and St Mary's Church. The tomb is the Pirbright Tomb.

**Glaziers**

Glaziers, a lovely timber framed 16th century cottage, the Glaziers of Glaziers Lane, borders the site. GBC's own plan, according to the Sustainability Scoping Study, is that a site is red for development if an historic house is within 25m. Glaziers is within 25m of the site.

I attach a map showing where these properties are in relation to A46.

**The Thames Basin Heaths Special Protection Area (SPA)**

Policy P5 of the GBC Plan states that 8 ha should be set aside for every 1,000 residents. GBC also estimates an average of 2.4 people per dwelling. As this site proposes to build 1,100 homes, 2,640 people, the SANG should be at least 21 ha.

**Degradation of Ancient Woodland and Ancient Trees and loss of Biodiversity**
Part of this site was originally parkland, laid out with oaks, many of which remain, belonging to Westwood Place. Some oaks are on the Ancient Trees Inventory and are more than 5m in circumference. They are at risk of damage from children, pets, pollution and building work.

There is ancient woodland both on the site and adjoining it. Both will be degraded by cat predation. The woodland on site will be further damaged by children and pollution.

Flooding

Wider Normandy is prone to flooding in all but the driest months, as it is situated in a valley with Ash Ranges to the North and the Hog's Back to the South. As the soil is mostly clay, the drainage is poor. A number of small streams swell and burst their banks in wet weather. There are springs on both the slopes of Ash Ranges and the Hog's Back. The water from these springs, together with surface water, collect in Wider Normandy to form the infant Hoe Stream. The Hoe then passes through Woking to join the River Wey.

The Hoe is notorious for flooding. Woking Borough Council (WBC) and the Environment Agency have worked together to alleviate flooding from the Hoe. As part of the mitigation project, SCC have designed the Hoe Valley Path which follows the Hoe Stream. It is managed by WBC and is designated as an SNCI because of its varied habitats.

Any flood mitigation should therefore be of the greatest sensitivity, in order to protect the Hoe and to avoid flooding other areas of Wider Normandy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<comment>
Comment ID: PSLPS16/7897  Respondent: 8596673 / Peta Malthouse  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A22

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to Policy A22 Land North of Keen's Lane

Parts of this site are within the 400m zone of the Thames Basin Heaths SPA (SPA). I have no objection to the care home, but have concerns over damage to the SPA from the rest of the development, 140 houses.

Whilst there is a covenant banning pets for the care homes, there is not one for the housing. If cats are not banned there is a risk to the SPA. GBC state that only the most immobile will use these homes, such that they are unlikely to access the SPA for recreation. How can this be controlled? Will mobile C2 potential occupants be turned away? And what would the criteria for rejection be? If the occupants have dogs, there is a severe risk to the SPA.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
</comment>
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Guildford Borough Council’s draft Local Plan proposals to build 1,800 houses, an industrial park ad a highway on the slopes of the Hog’s Back at Blackwell Farm, which will:
• Destroy views from the Hog’s Back ridge – a nationally designated Area of Outstanding Natural Beauty
• Remove 72 hectares of scenic farmland and additional ancient woodland from the green belt
• Increase tailbacks on the A31 and traffic congestion
• Result in rat-running through local roads
• Add to Guildford’s pollution

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/7898  Respondent: 8596673 / Peta Malthouse  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to Policy A26; Blackwell Farm.

Unmet housing need is not a reason for building on the Green Belt. Exceptionality has not been shown. (NPPF 87-89)

This site is currently farmed and an AGLV. NPPF states that good agricultural land should be retained for food production. In the light of the Brexit decision GBC should be even more slow to use this valuable farming land for development ( NPPF 112)

Blackwell Farm is home to a wide variety of animal and plant species. Building here will harm Biodiversity. ( NPPF 123 point 4 refers)

The Surrey Hills AONB will be damaged by a proposed new road. ( NPPF 115 )

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/7899  Respondent: 8596673 / Peta Malthouse  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A46
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object strongly to the strategic development in Normandy/Flexford, Policy A46 in the plan.

Boundaries of A46

I am confused about the boundaries and size of A46. The developers have produced a Site Concept Master Plan, but the boundaries are different to, and the site would seem to be a little bigger than, the site set out in GBC's Submission Plan on Page 231. The developer's plan stretches further to the east, and GBC's stretches further to the north. I have worked with GBC's boundaries, although I believe they are incorrect in relation to the extension to the north.

In the Settlement Hierarchy Normandy scored highly for sustainability, largely for its community spirit, rather than facilities. Flexford had only open green space and a station. GBC would seem to be set on damaging the most sustainable aspect of Normandy, its community spirit, by doubling the size of the village. The infrastructure at present is adequate for the population, the proposed 'infill will do nothing to improve sustainability rather it will place further pressure on infrastructure by way of lack of sufficient transport. Flexford is even worse off. It will lose its green space and the train will be much more crowded; standing or no place at all at peak times. There is insufficient room to allow access from both sides of the platforms or parking. In addition situation of the station next to the blind hump backed bridge set on a squint over the line will prevent safe access and egress to it in the proposed far greater numbers.

In exchange Normandy and Flexford get shops, which they don't need and will not be used. I have to express complete frustration with GBC who have been told of the survey prepared by the Village in advance of a neighbourhood Plan. Residents think a shop is a nice idea but will not use it which is why in the last 15 years 3 shops and a post office have closed, 2 pubs and a garage. The provision of shops will not add to the sustainability of the village and will, as have others, go broke.

Objections

1. This strategic site is not based on evidence, as required by the NPPF, but by a developer-led plan which offers a free school. In essence, GBC is agreeing to a proposal to build a large secondary school in the Green Belt, where the roads are inadequate, public transport overstretched, where there are only 20 children resident in the area. There is no opportunity to cycle or walk or to school. A school of such a size would involve travel to and from the area of 1200 pupils and 300 staff.

There is no need for another secondary school in West Guildford. In 2013 the draft Sustainability Appraisal specifically stated that there was adequate secondary school provision throughout the Borough, except Central Guildford. The GBC 2013 Plan contained the sites at Blackwell Farm and Ash. So what has changed between 2013 and 2016?

The number of houses in Blackwell Farm has been reduced from 2,250 to 1,800.

The number of developments in Ash has been reduced, but a strategic site of 67ha has been added, so it is difficult to compare, but the number of hectares available for development has been reduced. So why, if there was not a shortage of secondary school places in 2013, is there one now? The children from the Normandy/Flexford site should not be included in the numbers, as it would be in contradiction to logic (a circular argument, the school exists because of the children who exist because of the school). If a school is needed for children in Ash then it should be built in Ash on a small amount of the additionally set aside land.

1. It uses Green Belt Land without proving exceptionality. The land used by this site has been assessed as the most sensitive Green Belt by GBC. (NPPF 89)

2. The Infrastructure required is not there.
The A323, the road that passes through Normandy, is nearing capacity. Significant new developments further west (Wellesley Place in Aldershot and at Ash) will place additional strain on this road. Improvements to the A323 through Normandy are not due until 2021 - 2026. The budget allocated is small. Their nature is unspecified and they are not guaranteed. Westwood Lane and Glaziers Lane form the borders of the Normandy/Flexford Site. Westwood Lane, C16, is a narrow country lane on which two entrances into the Normandy/Flexford site are planned. It is single lane at the rail bridge which is offset and height limited. Glaziers Lane, D60, is even narrower and there are no planned improvements. Glaziers Lane features narrow entry and egress onto the A323 and a hump back bridge over the railway also set at an angle with blind summit obscuring the access and egress from Wanborough Station.

The Normandy/Flexford site is considered sustainable because it is next to Wanborough station. Children from Ash attending the school and commuters to Guildford are expected to use the train. The train will not provide the level of service suggested, as it is already busy at peak times, and as the AUE develops, will be full when it leaves Aldershot, before calling at Ash, Wanborough and Guildford. The Platforms cannot accommodate long trains. It is not accessible for disabled users and is unmanned. It is sited next to Ancient Woodland and could not accommodate even medium scale redevelopment. It has 8 parking spaces and provides access to a builders yard.

Policy A46 emphasises travel by bus, train and bike, but the reality is that owing to shortcomings in these modes of transport, at least 1,000 residents' cars will stream in and out of this site at peak times. Additionally a significant proportion of pupils and staff of the secondary school (1,200 pupils and 300 staff) will also have to use a car to get to school. Even with the anticipated improvements to the A323 and Westwood Lane, the effect on the roads will be severe.

The junctions of both roads with the A323 and the A31 Hogs back cannot be improved. The A31 junction would involve changing road through what is at present AGLV but which is expected to be changed to AONB as it is presently recommended for approval as such. The A323 junctions would involve demolition of buildings one of which is a SNCI containing a Grade11 listed tomb.

The proposed site for Travelling Showmans Guild is another ‘sweetener’ offered by the developer, which is illogical. Normandy has a successfully integrated site on the Guildford Road at A50 Whittles Drive. It was only a few years back that the owner of the adjacent land offered the land for Travellers pitches but this was refused. If expansion is needed then enquiries should be made there. Although the owners of A 50 find it difficult to manoeuvre their equipment (fairground rides) into Whittles Drive they would find it impossible to do so to gain access to A46. I have no objection to expansion of the site at A50.

The NPPF 30 and 35 refer

1. Heritage Assets

It is a core principle of the NPPF to conserve heritage assets so that they can be enjoyed for their contribution to the quality of life of this and future generations. There are seven Grade II listed buildings and one Grade II listed tomb adjoining or close to, this site. The houses are: Westwood Place, Buckhurst, Great Westwood, Halsey's Cottage and Glaziers. The other buildings are: Great Westwood Barn and St Mary's Church. The tomb is the Pirbright Tomb. Glaziers and Westwood Place face particular threats, none of which are recognised in the Plan. Glaziers is within 25m of the site, red for development in GBC's Sustainability Scoping paper. Westwood Place faces the proposed site upon which a line of ancient oaks marks the approach to the house.

I attach a map showing the sites which also includes sites of National Archaeological Importance and potential archaeological importance. No consideration has been given in this plan as to how these historic buildings will be protected once the greenbelt protection is removed. Indeed I believe they will be damaged.

It is important to note that the owners of the land have allowed hedges to grow without restraint in the last few years since GBC started to make enquiries about available land. This has masked the openness of the site and interfered with the setting of the houses. This can however be remedied.

(NPPF 126)

1. The Thames Basin Heaths Special Protection Area
The threat to the SPA from the proposed site has not been given enough weight. Two entrances to the SPA are within easy reach of the site, Dolley's Hill (600m) and Nightingale Road (1k).

Dog walking is of particular concern to SPA managers for the damage they do to the SPA. It can be expected that a large number of residents will have dogs, the pet of choice in the countryside, and will require somewhere to walk them. However good the SANG provided, it is inevitable that a good number of dog-walkers will prefer to walk their dogs on the SPA, especially in winter, as the SPA is dry and land in Normandy is wet. A46 will harm the SPA

(NPPF 113 and 117 point 3 and 118 point 1)

1. Degradation of Ancient Woodland and Ancient Trees and loss of Biodiversity

Ancient Trees, registered on the Ancient Trees Inventory, are at risk of damage from children, cats and dogs, pollution and the building work required to develop the site.

There is ancient woodland both on the site and adjoining it. Both will be degraded by cat predation. The woodland on site will be further damaged by children and pollution.

St Mark's Churchyard SNCI is within 400m of the site. This SNCI contains the rare Green Winged Orchid, which is sensitive to disturbance. I do not hold out any hope of these rare plants surviving the building work. Normandy Common SNCI and Normandy Pond SNCI will be affected by pollution. Surrounding this site are many UK BAP sites, which will be disturbed by the initial build in particular, birds being especially vulnerable. There is a Traditional Orchard BOA bordering the site.

The SANG will not compensate for this loss of biodiversity, nor will the gardens of the development, which will not provide the openness required by many bird species that currently use the site. If this development goes ahead Normandy will have a net loss of Biodiversity of approx 46ha. (NPPF 118 point 1 and 109 point 3)

1. Loss of Agricultural Land

This land is currently farmed. It is mostly hay meadow, with some pigs and horses. It is Grade 3 agricultural land. The Government places a high priority on using lower grade agricultural for building, and retaining other grades for food production. This Grade 3 land should remain in agriculture. Historically this land was farmed as Market Garden and alongside fruit and nut orchards, remnants of which appear in the hedgerows, supplied Guildford and Aldershot. Following Brexit GBC should be slow to discount this valuable asset (NPPF 112)

1. Flooding

The site is Flood Risk 2 and Flood Risk 3 in places. The site is one of the sources of the Hoe Stream (NPPF 100). The sewerage system appears to be already running at capacity and could not cope with the proposed development. Footnote 9 for NPPF policy 14 indicates that development in locations at risk of flooding such as at Normandy/Flexford should be restricted.

1. Degradation of the view from the Hog's Back AONB

GBC’s POLICY P1 states that. All proposals will be considered against whether they conserve and/or enhance the setting and views of the AONB

The best views from the Hog's Back along the A31 are to the North, towards Normandy. A46 will bring a large expanse of taller buildings with street lights. In summer the site will be partially hidden by trees, but at night it will be clearly visible, and also in winter when the trees are bare. Light pollution and dense housing will spoil the view from the Hog's Back. This development will neither conserve nor enhance the AONB, but will harm it. It is sad but the view to the South of the Hogs Back is totally obscured along the whole of its length (NPPF 115)

Summary
The need for school on this site has not been arrived at by means of evidence. A46 is not sustainable. In my view there are seven contradictions to principles in the NPPF. Some of these cite exceptional need as a reason for ignoring the principle, however, is it reasonable to ignore loss of Biodiversity and likely damage to the SPA and spoiling the view from the Hogs Back and Flood Risk 2 & 3 and spoiling Grade II listed houses and losing agricultural land?

I consider that the Transport arrangements mitigate wholly against the use of this site for any of the purposes claimed.

I am at a loss as to how the current residents of Normandy and Flexford will benefit from this plan, or in what way Normandy and Flexford will be more sustainable.

More information in Annex C (NPPF 87 - 89, 30, 35, 129, 118, 112 and 115)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/7903  Respondent: 8596673 / Peta Malthouse  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A46

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the removal of the land allocated in Policy A46 from the Green Belt by “inset” being that land presently defined in the 2003 Plan as the ‘settlement area’ and it’s extension (NPPF para 83 and 84).

No “exceptional circumstances/very special circumstances” have been given in support of this which redraws the Green Belt boundary for the land in Policy A46 for the present properties along the Guildford Road/Westwood Lane and Glaziers Lane by extension and removal from Green Belt.

I believe the position set out in 2003 Plan should be retained and that the whole of Administrative Normandy (Christmaspie, Flexford, Pinewoods, Willey Green and Normandy) should remain washed over by the greenbelt.

Once a Green Belt has been established and approved, it requires more than general planning concepts to justify an alteration.”

No “exceptional circumstances “ for such re-drawing of boundaries have been offered by GBC in the context of the Local Plan process, so how can residents judge the veracity of this proposal?

The effect would be to urbanise the 2 settlements and destroy the openness and character of this important Green Belt site(s)

SUMMARY

- GBC state that the Town Centre is the most sustainable location to build. The majority of development in is the Green Belt.
- GBC state that they will focus on brownfield development; the majority of building is on greenfield sites in the Green Belt.
- GBC make a priority of Biodiversity. Policy A47 plans to build on an SNCI. The amount of green space is the Borough is reduced by 218ha.
- GBC's policy is infrastructure first, development later. Policy A46 - the developer hopes to deliver in 1-5 years. The infrastructure improvements, minor as they are, will not start until 2021.
• GBC states that they will work with neighbouring Boroughs as the Duty to Co-operate requires. The first commuters from the AUE (Rushmoor) will use the A323 from 2016. Improvements to the A323 start later. The improvements to the A323 will be insufficient to mitigate this increased traffic in any event. There appears to be no consultation with Rushmoor.

To be credible, GBC need to set out policies and then meet them.

Their policies regarding use of greenbelt for housing and Travellers is flawed as no ‘exceptional circumstances’ have been given to support this. They have used the construct of insetting in order to try and push the ability to deliver on housing and Traveller pitch numbers without justification and failed to understand that the greenbelt should be applied as a constraint to those figures with encouragement to make better use of the land already allocated to Urban development in Ash, Tongham and Guildford Town. Brownfield sites in these areas are already sufficient to meet any agreed target.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
- Map of Normandy showing sites of concern.docx (4.4 MB)
- Image.jpg (586 KB)

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<th>Comment ID:</th>
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<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy A47</td>
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**Objection to Policy A47 Land to the East of the Paddocks, Flexford**

GBC’s consideration for this site says.

The majority of the site is designated as an SNCI. The site lies within an area identified as a ‘Water Vole Alert Area’. These areas were identified by the National Water Vole Database and Mapping Project in 2012.

The Government is committed to halting overall decline in biodiversity. Building on this site does not support this commitment. I am very disappointed that GBC could consider building on an SNCI. Are our natural assets safe in their hands?

Even though it is small, this site will generate additional traffic, when the roads are already at or nearing capacity.

NPPF 109 point 3 refers.

Again no exceptional circumstances are put forward to justify this.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to A49 Land set aside and insetted at Palm Nurseries Site Normandy

This area is to be taken out of green belt and the policy and site are inaccurately described. (See above comments on ‘Consultation’) No ‘exceptional circumstances ‘are claimed or can be justified

I object to the use and to the idea of insetting land which is in effect done only to justify use of greenbelt for Traveller pitches. (Advice was obtained to that effect from GL Hearn and has been used to support other policies throughout the Borough.) The land is not accurately described. It is presently occupied by 6 pitches who are licensed on the basis of both personal and temporary permission, given only to allow GBC time to find alternate land to allocate pitches. The Planning Inspector has already commented that this is inappropriate use of the greenbelt. It is not sustainable. The site is not occupied by Travellers but instead sublet mainly to Eastern Europeans. There has been a police raid with firearm use and the Borough Council are or should be aware of who occupies the site and how it is used because it is commonly known in the village and widely known by for instance social services and other service providers The SOS has already called in an additional plan which sought to add two further pitches which the SOS refused again citing the unsuitability of the site for Travellers. These facts are known to GBC and it is difficult to understand where this additional information can be found within their documentation. There are no exceptional circumstances sufficient to remove this land from the greenbelt.

It is important to note that unlike other Traveller sites there is no suggestion in the policy that this should be preserved for Travellers.

It has no common boundary with any of the previously settled land and sits as an island within green belt as a totally new site. Such development is highly inappropriate. Insetting land for Traveller sites in the greenbelt is a fabrication and construct which cannot be sustained by arguing exceptional circumstances/very special circumstances

Recent case law would show that this part of the plan is unsound and not legal

They are:

- Gallagher Homes Ltd v Solihull Borough Council [2014] EWHC 1283 (Admin)
- IM Properties Development Ltd v Lichfield DC [2014] EWHC 2440 (Admin)

In the Solihull BC decision in particular

“Exceptional circumstances are required for any revision of the boundary, whether the proposal is to extend or diminish the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D4</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Objection to Policy D4 Development in urban areas and inset villages

Development in urban areas should be vastly different to development in villages. In this the two are lumped together. Most of Guildford's villages contribute to the openness of the countryside. Their buildings are generally low rise and widely spaced, giving views of the surrounding countryside. The nature of the Guildford countryside will be spoiled if the open character of its villages is damaged. Allowing urban density development within inset villages will damage villages. Development is possible in washed-over villages, either by using brownfield sites such as redundant garages and pubs, or permitted development, such as rural exception housing. It is these types of developments that will preserve the character of the countryside. D4 seeks to suburbanise the countryside. Indeed we have already seen the effect of this at 'Cunningham Close' and Beech Lane' where the developers have been allowed to build in effect 3 story buildings using town density rates (NPPF para 86 ) Beech Lane was an ‘exception site’ yet problems with flooding which have been exacerbated by this build have been ignored

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E3</td>
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I object to Policy E3

GBC’s desire to promote and retain Office space within the town is commendable but naïve.

I am a joint owner of office space in Guildford and along with others find it hard to let it when it becomes vacant. Up to date working methods make very good use of the internet. Modern working practices involve hot desking, cloud storage of documents, telephone conferencing and other up to date methods of communication which reduce the need for office space down to that of a hub rather than a work place. My own business has halved the need for office space in Guildford yet increased our range for provision of services to 4 counties instead of 2. Factors include time and cost of travel, difficulties with public transport and car use, none of which will be addressed sufficiently by the plan. My own property was put on sale for over 6 months and has had to be provided instead on a short term let to the new occupants. (this month 7/16) The office is modern and well connected and sited with car parking! The idea that office owners would have to advertise consistently for up to 2 years would detract from the desire to build and provide space. Pop up offices in fully serviced provision is the way forward and there is already no shortage of that. There is a slow turnover of office space in the urban area and town centre and I object to Policies B1-8.

I also object to the amount of warehousing space set aside at B8.

We are in an age where supply and delivery is dealt with in a sophisticated manner using IT/barcoding/robotics all of which are more and more centralised. We do not need to dedicate acres of development land to this when the urgent need for Guildford Town is housing.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17375  Respondent: 8596673 / Peta Malthouse  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E7

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Objection to Policy E7; North Street development.

GBC has failed to plan proactively for the 21st century when proposing 45,000 sq m of new retail space and has not recognised the role that residential development can play in ensuring the vitality of a town centre.

I object that 45,000 sq m is being set aside for increased retail space in Guildford Centre. This represents a 40% increase in retail space.

Internet shopping now accounts for 13% of all purchases nationally, up from 3% in 2007. Tesco, Sainsburys and Morrisons are all making losses. Austin Reed is closing its shops this month. The British Retail Consortium anticipates
that thousands of stores and 1m jobs will be lost by 2025. The popularity of Amazon and clothes shopping online has come about mainly due to time being wasted in traffic jams and the huge cost in parking (£1.60 per hr in Guildford)

Guildford has been successful in maintaining retail capacity in the past. However, it will be shaped in future shaped by the forces that are changing high streets everywhere; the internet, an overall decline in clothes shopping and more money being spent on experiences and sport. It is not planning for the 21st century. Its assumption that it will continue to maintain and increase shops is flawed. Has there been much interest in this site from retailers?

This space could more profitably be used to fulfil the Government’s and GBC's commitment to building sustainably on brownfield sites and using residential property to boost the vitality of town centres. GBC is only planning to build just 1,300 homes in the town centre. The town centre is where many people would like to live. (NPPF 20 and in particular 23 points 1 & 9 refer)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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POLICY H3 Rural Exception homes

There is no reference to Paragraphs 87 to 89 on pages 20 and 21 of the NPPF which should be included in this policy. It should also be made clear that rural exception homes are not a loophole for those on the Guildford Borough housing list through which to move into the countryside but are made available only to meet local need for people with a village connection that should be monitored and agreed by the Parish Councils concerned.

The Future

How can homes be built in Normandy to meet the needs of it’s population?

By retaining ‘washed over by the Greenbelt’ status, GBC has the opportunity to develop a plan which as the NPPF intends will promote diversity and protect our heritage assets. There is also the not so small issue of retaining farmland and rural community. I would hope that a policy can be drawn up by GBC to cover these points but also to provide details of appropriate density and building styles which will have the effect of promoting openness and this preserving the greenbelt.

In the last plan period the Administrative area of Normandy was able to increase household numbers by 10% and there is no reason to think that this ‘windfall housing’ cannot be replicated in the upcoming plan period.

The Govt has changed the definition of ‘affordable housing’ and there are sites where a small amount of housing by way of flats for sale and rent could be provided both for the young people of Normandy but also the elderly who may wish to free up their family homes in their declining years for ground floor but smaller accommodation which they can manage. There is also a need for supported housing for our elderly. This could be provided under the rural exception scheme as we have before. It remains very important however that there is a limit on roof height and ample spacing (i.e. appropriate density) between homes. GBC have failed to implement a policy in this regard in recent years and the effect has been simply to spoil and change the nature of the area in some places.
I have not been able to read the whole plan because of my complaints above. I hope that I have provided useful information and comment. I will have to leave others to comment elsewhere.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17372  Respondent: 8596673 / Peta Malthouse  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to Policy P2 insetting of Normandy & Flexford

There are no exceptional circumstances demonstrated sufficient to warrant removal of both Normandy and Flexford from their washed over by the greenbelt status

P2 mentions Normandy and Flexford separately in the list of villages to be inset in the Green Belt. However, the new Green Belt Boundary shows that they have been considered as one village. By insetting GBC seek to make ‘Greater Normandy’ referred to in their documentation

Of course both Normandy and Flexford both contribute to the openness of the Green Belt. GBC acknowledge that it is the most sensitive Green Belt. Therefore it should not be inset as it is not sustainable. GBC may have inset Normandy and Flexford in order for A46 to go ahead, against their own policy and the policies of the NPPF on Green Belt. They have mistakenly set about removing the greenbelt status on the basis that they believe more development and shops would make the development sustainable. It will not. It will simply provide development that will put more strain on transport and services (NPPF 86)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17373  Respondent: 8596673 / Peta Malthouse  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to Policy P3 4.3.17, the creation of Green Belt between Ash Green and Ash/Tongham

"The Green Belt boundary has also been extended between Ash Green village and the Ash and Tongham urban area in order to prevent coalescence."

New Green Belts should only be established in exceptional circumstances, for example when planning for larger scale development such as new settlements or major urban extensions.

This is not the case here. (NPPF 82)

In fact by pursuing the creation of greenbelt here the GBC seeks to transfer the benefit of the greenbelt in Flexford and Normandy. This has since its inception prevented coalescence between the land marked in the 2003 Plan as the Urban development land of Ash and Tongham and the Urban Development of Guildford. (Part of the reason given for building a school on the A46 site is to provide for children in Ash)

For many many years Ash has been seen as part of the conurbation of Aldershot and the Blackwater Valley. This huge area of development needs to be contained within solid defensible boundaries. By attacking greenbelt at Normandy and Flexford and creating a ‘new inclusive ‘Village of ‘Greater Normandy ‘the openness of the remaining greenbelt will be hard to defend

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17381  Respondent: 8596673 / Peta Malthouse  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

In Policy P3 (para 4.3.28) GBC refer to an area of countryside near Ash and Tongham who are represented by the current and previous Leaders of the Council. This is land designated as countryside beyond the greenbelt and yet it appears to be given preferential status above that of greenbelt ‘we will seek to limit any development in the countryside unless it can be demonstrated that it is necessary in that location’. Contrast this with all the site allocations and insetting in Normandy and Flexford taken without regard for their proximity to SPA and special protections for habitats and wildlife SNCI status etc or any attempt to justify exceptional circumstances. This is inconsistent and legally unsound.

Heritage Assets

There are other inconsistencies. Policy A36 has a requirement to ensure the Grade II listed building on the site is not harmed. Policy A46 has no requirement to mitigate the harm to the Grade II listed buildings by the site, one within 25m.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17377  Respondent: 8596673 / Peta Malthouse  Agent:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

**I object to the proposals for housing in the Town Centre S1 and S2**

I object that the Policy does not include a density figure, or range, for new housing within the urban area of Guildford, or Ash and Tongham. With suitable land so scarce and pressures mounting on open land and Green Belt surely it is time to be pragmatic and realistic by specifying higher densities for building where this can be done without harming the quality of life of the community.

There is a need in the town for more flats which are conveniently located for independent older people that wish to downsize from their current residential accommodation as well as young professional couples and singles.

The development of the former Surrey Advertiser offices on Martyr Road is an example of what is required.

Similarly there is no provision or guidelines for acceptable house types in the greenbelt areas which should be there and enforced to retain openness

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** PSLPP16/17371  **Respondent:** 8596673 / Peta Malthouse  **Agent:**

The Plan is flawed in places and confused. GBC has totally failed to implement the Guidance set out in the NPPF with regard to using Greenbelt land for any development. In recent correspondence dated the 28th June 2016 the Minister Brandon Lewis said inter alia

*The Government has put in place the strongest protections for the Green Belt. The Framework (NPPF) makes it clear that inappropriate development may be allowed only where very special circumstances exist, and that Green Belt boundaries should be adjusted only in exceptional circumstances, through the Local Plan process and with the support of local people. We have been repeatedly clear that demand for housing alone will not change Green Belt boundaries’*

Other guidance has emanated from the Dept. for instance on numerous occasions GBC has had cause to appears before the Planning Inspectorate in respect of land set aside for the Travelling Communities Sites in Normandy were dealt with by way of temporary and personal permissions being given to allow GBC to come up with alternative and suitable sites. In respect of Palm Nurseries a further application was called in by the Minister who made it clear that no further development on the land was acceptable because the land was greenbelt, meeting all of the greenbelt standards but in particular openness.
Recent decisions on the question of sites in Normandy and Flexford are set out below for your ease of reference

- Palm House Nurseries GBC 09/P/01851, Application 12 November 2009 Appeal Ref: APP/Y3615/A/10/2131590 Decision 24 Feb 2011
- Green Lane East GBC 10/P/00507, Application 8 March 2010 Appeal Ref: APP/Y3615/A/10/2140630 Decision 14 June 2011
- North Wyke Farm GBC 14/P/00779, Application 17 April 2014 Appeal Ref: APP/Y3615/W/15/3002308 Decision date: 14 July 2015

1. It is clear from the Plan that an assumption was made from the start that Guildford needed to expand as a Regional Centre and as such the Brownfield sites in the town should be allocated to Commercial and Retail use. That assumption then turned into a presumption that it would need to build on the Green Belt to meet its housing target.

This presumption has led to building on the Green Belt becoming the main focus for development of housing. The Town Centre Plan is incomplete the funding for infrastructure falls far short of what is required to bring about such large scale development and yet the ‘balancing exercise’ of exercising constraints on the building proposed has purportedly been done.

They as such have not followed the NPPF with regard to the Greenbelt as constraint appears not to have been exercised in this regard by any measure The question of ‘exceptionality’ or ‘very special circumstances has not been addressed in respect of any of the sites removing land from greenbelt, either by way of increasing ‘settlement boundaries’ insetting’ or allocating green belt sites to housing. Neither has it been addressed when removing land from urban development areas to create new green belt

1. There appears to be no Heritage Site Assessment rather a MERE LIST OF Grade 1 and 11 listed buildings accessible (in theory) from Surrey County Council’s website. Indeed I found the information almost impossible to find and I am a retired lawyer! I would say that this would be necessary in order to consider any development proposals it is not sufficient to just raise this issue at Planning Permission stage (NPPF 126)

GBC hopes to remain an historic county town and be a centre for technological industry at the same time. In order achieve this it would need to have a top quality medium rise (8-10 story) technological centre, with workplaces, retail, leisure and flats, in an area offset from the town centre, Slyfield or somewhere similar. This would enable people to live and work sustainably.

The historic town centre should be preserved for retail, tourism, housing, particularly more one and two bedroom flats, and leisure. It would be cost-effective and sustainable, as there would be less need for expensive upgrades to transport infrastructure, as people would not be travelling in so much from the villages. The Town Centre would be transformed from being a ‘ghost town’ to one living and breathing with residents enjoying the arts theatre restaurant and cafe culture

Taller buildings in Guildford will have to come, if not in this Plan, then in the next, or the one after.

This would leave the important Green Belt countryside available for farming, wildlife, tourism and leisure. Guildford is as much defined by its historical centre as it is by its greenbelt countryside and the greenbelt should be as carefully preserved as the historic town it surrounds. Much of Guildford history is found in its greenbelt countryside but the Borough Council seem unaware of this. In respect of Normandy and Flexford a very comprehensive assessment was provided as part of the Parish Council response but there is no reference ito it in the plan other than to highlight an area on Policy page A46 which is considered to be of High Archaeological Potential. Certainly no account appears to have been taken of it, One such property ‘Glaziers ‘Grade 11 is within 25 metres of the proposed site at A46

1. A further fundamental flaw is the amount of infrastructure improvement required to deliver the Plan, much of which is unfunded. Some improvements are dependent on external providers, the Highways Agency, Surrey County Council and Network Rail, who may have different priorities. I applaud GBC for attempting to tackle the problems that Guildford has with its transport infrastructure. I am not sure how successful they will prove to be. Guildford is by nature a ‘Gap Town’, a route centre constrained by its geography. Many of the ideas for improvement of major pinch points cannot be delivered either because of this reason or because to do so would require land in an AONB or possible demolition of Heritage property. Further some of the proposals will simply not alleviate the problem
2. Another fundamental flaw is the amount of extra infrastructure developers are expected to fund. The bulk of these costs incurred by developers will be passed on to property buyers, driving house prices higher. A recent example of this type of development is found in the neighbouring Town of Aldershot. There the developer has been made responsible for schools community facilities offices etc and the like. The 3850 properties that will be sold start at £395000 for 2 bed accommodation. 2 bed properties in Aldershot are presently £169,000 to £200,000.

The plan is not sound in other places. I would draw your attention to:

**Duty to co-operate**

I can see no evidence that GBC have co-operated fully with Rushmoor Borough Council and Surrey Heath Borough Council. Both the Aldershot Urban Extension (AUE) in Rushmoor and the Princess Royal Barracks (PB) in Surrey Heath will impact on GBC’s transport strategy and housing numbers. Although both Authorities are mentioned, both in the Transport Strategy and the West Surrey SHMA, it is not clear where data concerning these sites has been fed into either Transport or Housing policies.

**Duty to Consult**

The plan is presented using at times impenetrable language and with confusing contradictory information (eg Settlement Hierarchy and Sustainability report for Normandy Flexford see later)

It is inconsistent in approach for instance see A49. The policy fails to acknowledge that present occupation is temporary and personal only. That the SOS has indicated already this is not an appropriate use of the greenbelt. The Borough has also failed to provide in its policy statement despite having done so in other A Policy documents ‘and must remain in perpetuity as Traveller accommodation whilst there remains an identified need for Traveller accommodation in the borough’.

One can only speculate that this is because they are aware they have failed to enforce the personal permission aspect of the present occupation knowing that the sites have been occupied mainly by eastern European workers who are not members of the travelling community but are mere sub lessees. The point is that it is impossible to find this provision elsewhere and one is left floundering on the question of how to respond and properly object. The Evidence base has changed frequently without highlighting and there are masses of it.

The amount and complexity of the documentation is such that it is not appropriate at this stage to allocate the minimum recommended time to the consultation process of just 6 weeks, especially as for Normandy and Flexford the changes have only been suggested in this plan and not mentioned in previous consultation. Indeed I say that in respect of all of the changes at Normandy and Flexford this consultation should be a S118 consultation not a S19 one.

**Late inclusion of Policies A43 and A46 and Insetting in Normandy and in Flexford**

These sites were not included in the last version of the Plan. They were not announced until April 2016. This is the first time residents have been able to comment on them, and have had very little time to consider their responses. GBC have been aware of A46 since 2014. Cllr Paul Spooner had the opportunity to engage with Normandy residents on A46 when he addressed Normandy residents in April 2016, but chose not to take it. The NPPF is quite clear that there should be early and meaningful engagements with residents.

During the last consultation the vagary of the maps made it impossible to respond to the proposal to ‘inset’ the present homes in Normandy and Flexford to the extent that area has been altered, because it was simply not clear. The Parish Council complained of that but no effort was made to respond and the summary prepared by the GBC of the objections was not full and complete.

**Failure to meet the principles of the NPPF**

There are places where the GBC Submission Local Plan does not meet the principles set out in the NPPF and these are dealt with below in context.
In particular, GBC have not met either its own policies on Biodiversity, found in Policy 14, nor those of the NPPF paragraph 14. There will be a significant net loss of Biodiversity if this Plan goes ahead in full.

Paragraph 119 NPPF is also disregarded with its guidance that “the presumption in favour of sustainable development (paragraph 14) does not apply where development requiring assessment under the Birds or Habitats Directives, is being considered, planned or determined”. Guildford surely needs to recognise this strategic policy in view of its close proximity to the Thames Basin Heaths.

The GBC Spatial Vision states "Over 250ha, equivalent to more than 350 football pitches, will be provided in perpetuity for the use of residents and visitors. This space will also support and improve the borough’s biodiversity". This is disingenuous. GBC plans to use 467ha of land that is either farmland or other green space for building. Against this it is creating 249.8ha of mixed use Suitable Alternative Greenspace (SANG) a net loss 218.2 ha of fields and other green space.

THE EVIDENCE BASE

You ask if the evidence base is adequate, up-to-date and relevant. I have objections to parts of the three documents below.

I also object to the fact that it seems apparent there is no Heritage Sites Assessment (as referred to above), there being 22 such sites in the Administrative area of Normandy. There are also 4 sites of Archaeological potential one of which is of National importance and another still under examination

Transport Strategy and Settlement Hierarchy & Settlement Profiles

In the GBC Transport Strategy I object to;

Local Roads Network Strategy.

Major external developments have not been sufficiently accounted for, leading to flaws in the strategy on Local Roads in the West of the Borough. The AUE, 3,850 homes, and PRB, 1,200 homes, are already under development and significant traffic flows to and from Guildford will result. The AUE is predicated on many residents using the car. Local Roads affected will be the A323, A331, B3411 and also the A31. To this is to be added 1,300 homes in Ash and 1,100 in Normandy. The effect on these local roads will be severe. One has to question whether the additional traffic anticipated by the development in AUE and PRB would lead to gridlock as there are already too many problems experienced on the A323 and A31.

Improvements to the A323 and to Westwood Lane are insufficient and delivery is too late. Judging from the sum to be spent, £6.6m, improvements will be minor. LRN9-LRN 13 and LRN 18-LRN19 will deliver improvements between 2017 and 2026. The A323 is especially vulnerable, being a narrow A road with no opportunity to widen it along its length. Large queues already form at peak time at junctions. The planned improvements will be delivered well after the first commuters travel from the AUE and PRB to Guildford.

There will be resulting pollution and longer journeys, frustration for motorists and inconvenience and potentially health issues from traffic pollution for villagers. GBC has not produced a strategy that deals with the quantum leap in commuters from the new developments in West of the Borough and external developments.

More Information in Annex A

AM4 delivery 2020 - 2024.

The Christmas Pie Trail runs from Wood Street to Farnham. The surface is unmade and unlit. It is muddy in winter and narrow where it passes through woods. There is little scope for lighting and improving the surface at the Wood Street end, as it runs through Broad Street and Backside Commons, which are both SNCIs. It is unsuitable for year round travel.
I object to the housing target in the SHMA

I would have liked to have been able to understand how the housing target is calculated, Requests have been made under FIA for information about the modelling etc but this is not to hand in time for the Consultation process.

I accept that the owner of the model that calculates housing need wishes to protect their intellectual property. I do not believe that GBC should accept the findings of the model just because other Authorities have. I would have liked to have seen the input that GBC submitted for the model. A summary of the test scripts run by the developer to show that the model delivers correct results should have been made available to the Borough Council and to those of us who are in a position to check it.

There have been a number of alternative studies carried out, entirely due to the fact that the GBC have refused to work openly with the community on this issue. The GBC used public funds to commission the work of GL Hearn yet failed to put in place proper checks to allow them to comply with their duties. On that basis I would urge you to rely instead on the study produced by

‘Green Balance’ instructed by Compton Worplesdon Parish Councils and by the CPRE

I do not accept and OBJECT STRONGLY that the numbers produced are an accurate reflection of a truly objective housing need in the Borough.

To what extent have GBC engaged with Rushmoor and Surrey Heath? The AUE is 500m from the Guildford border. Have the AUE and PRB been taken into account when calculating the housing numbers, especially as they are intended in part for people who work in Guildford?

Furthermore I object strongly to the treatment of the students from the University of Surrey. Surrey University have failed to deliver promises to house their students in accommodation built on their extensive land holdings. Manor Farm was removed from the Greenbelt in 2003 with a promise to do so and GBC seems to think it is acceptable to agree they should only house 60% of their students on site. Given Guildford almost traditional role as ‘domatory town’ it should be 100%. There is plenty of room for development. Instead considerable ground is wasted both at the university and on Manor Farm for open car parking.

I object to the flawed nature of the Settlement Hierarchy and Settlement Profiles in respect of Wider Normandy

The Administrative Area of Normandy is made up of five hamlets, of which Normandy is one.

The Settlement Hierarchy and Settlement Profiles;

- Confuse Normandy with Wider Normandy (referred to rather quaintly as Greater Normandy by GBC)
- Ignore two of the hamlets, Willey Green and Pinewoods
- Consider Flexford to be part of Normandy, although they have been informed that this is not the case
- Consider Normandy and Flexford as being one settlement when it suits their case, and as two when not
- Claim that Normandy would benefit from shops, with no proof. How up-to-date is any evidence that GBC are using? Is it pre-superfast Broadband? Why have they ignored the reported result of the Household Survey carried out for Normandy PC
- There are 10 errors/omissions in the Settlement Profile for Normandy/Flexford. For example; GBC state that we have one SNCI in Normandy when there are eight: a Scheduled Ancient Monument of National Importance which lies partly in Flexford is omitted.

I object to the fact that there is no Heritage Sites Assessment

even though there are 22 Grade 11 listed buildings in the area 8 of which are sites on the curtilage of Site 46. One of these was occupied till his death by John Cobbett

There are also 2 sites of high archaeological potential and a site of National importance (mentioned above)

More information in Annex B
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** SQLP16/2028  **Respondent:** 8596673 / Peta Malthouse  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination

Do you consider this section of the document complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

1) Although the Parish Council acknowledges that the Borough has published much of their evidence and draft documents, together with providing roadshows and events to which the Parish Council have been invited, these have not been found to be helpful generally both by the Parish Council or by the residents of Normandy. The reason for this is:-

1. The opportunity to attend meetings where information is to be disseminated to parish councillors has almost always been notified too late i.e. within 2 weeks of the appointment.
2. Such meetings have often been fixed to take place during the course of the day.
3. When significant documentation has been put out for public consultation it has been sent out at the end of July with the 12 week period for consultation taking place over the summer holidays. This is traditionally at the time when most Parish Councils do not meet. This last period of consultation has ended on the 22 September leaving Parish Councils with little opportunity to meet and approve their consultation document; most Parish Council meetings are held at the end of the calendar month. Most Parish Clerks take the opportunity over August to take a long holiday. Most Parish Councils have only one clerk and often they are part-time.
4. The documentation supplied has been dense and couched in terminology not accessible to most, scattered throughout with acronyms
5. Requests for more accessible information which could be circulated to our residents were basically ignored until we received 38 copies of the disc and a number of documents including the questionnaire on 6th and 8th September
6. The Borough produces a newspaper which is delivered to every home. Nowhere in that did it out line it’s plans to build 13000 homes the large majority of which would be sited along the A323 corridor Ash into Guildford and A322 both roads which already suffer significant traffic problems Had they done so the residents would have been alerted at an early stage. A summary of proposals would have been useful to all residents throughout the Borough. Instead the newspaper simply placed a PR spin on the process of consultation asking everyone to get involved
7. The questions that the consultees have been asked to address are in some instances almost peripheral to the plans and leave insufficient space and opportunity for consultees to give full answer

2) The Borough Council has failed to communicate effectively with residents because, although inviting them to a number of events, the information that has been given has been put before the residents on the basis of “this is to happen” rather than “we would welcome your comments”.

3) There has been an overreliance and an assumption that the residents of the Borough are IT literate to the extent required by the Borough. Where printed information is sought it is provided at considerable cost

With particular reference to the consultation period that ends on the 22 September 2014
1. The Parish Council have been asked to comment on a draft plan which proposes wide scale development based on a housing number in a SHLA which is presently under review. It is impossible in this Parish Council’s view to respond effectively to the consultation without this essential document being available.

2. The Borough Council seeks to obtain effective consultation on this document despite the fact that the maps provided for each Parish show changes to boundaries against a map that is just a blur of colour. It is impossible for the Parish Councils to assess where the settlement boundaries are to start and finish and how the affect of inset is supposed to affect the village.

3. The Borough Council has failed to indicate what level of density will be applied to the development in the Greenbelt areas. Again, it is impossible to effectively comment upon the proposals of the Borough Council without this information. In the Parish Council’s view it is in the interests of all that these density levels are fixed in the Plan

4. The Borough Council is referred to the consultation code issued by the Government which is attached. 12 weeks is the minimum period over which a consultation should be held

5. The Borough Council published their Sustainability Appraisal and Habitats Regulations Assessment on the 7th August with only a 6 week consultation offered alongside the consultation to which we respond. These are essential evidential documents underpinning the ‘Plan’ and should have been available at the outset

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/5054  Respondent: 8596673 / Peta Malthouse  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/2544  Respondent: 8596673 / Peta Malthouse  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A49
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object most strongly to the proposals that Traveller sites in my areas should be ‘inset’

The traveller sites at land to the rear of Palm House Nurseries [Policy A49] plus the travelling show-people site at Whittles Drive, Guildford Road [Policy A50] are proposed for ‘inset’. At present, where such sites are located in the Green Belt, they are subject to the planning restrictions associated with the Green Belt. ‘Insetting’ will create small islands of ‘urban’ land in the Green Belt which is irrational.

The land at Palm House Nurseries and Green Lane East was identified at appeal by the inspector as contributing to the ‘openness’ of the Green Belt and this argues strongly that it should remain ‘washed over’ by the Green Belt, as all other surrounding land in the submission Local Plan is proposed to remain in the Green Belt.

The traveller sites are all assessed as being located in Green Belt land of “high sensitivity” that is quoted as a main reason Policy A46 and A47 were withdrawn (Sustainability Appraisal 2017, Table 10.1: Commentary on proposed Traveller site allocations, including Green Belt sensitivity) indicating a further argument against ‘inset’ boundaries for such small plots being established in this area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/942   Respondent: 8596673 / Peta Malthouse   Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy P2 Green Belt

- I object to the changes to Policy P2 because they have not addressed many of the very large number of comments made to the 2016 plan.
- I object to the new para (1) “The Metropolitan Green Belt will continue to be protected as shown designated on the Policies Map, against inappropriate development. In accordance with national planning policy, the construction of new development will be considered inappropriate and will not be permitted unless very special circumstances can be demonstrated.” The words “as shown designated on the Policies Map” should be deleted. The Policies Map has effectively ignored huge areas of Green Belt protection and the new para (1) is therefore a mess. I am aware that many others including myself made this point in previous responses to consultation. I can only conclude that the Borough have no ‘very special circumstances’ to demonstrate as they have failed to address this

I object to the proposed change that Normandy settlement, Flexford settlement and Walden Cottages should be inset from the Green Belt due to the fact that:
There is evidence in past planning appeals APP/Y3615/W/15/3002308, APP/Y3615/A/10/ 2140630 and APP/Y3615/A/10/ 2131590 that the land here contributes to the “openness” of the Green Belt

There is evidence in the Sustainability Appraisal para 10.4.7 that the agricultural land between the settlements is of BMV (Grade 3a farmland) quality, exhibits ‘openness’ and contributes to the rural economy

The land in and around the settlements of Normandy and Flexford contributes to views into and from the Surrey Hills AONB (Hog’s Back)*

Policy P2 also fails to appreciate the importance and permanence of the Metropolitan Green Belt and the fact that it needs to be permanently protected. The Green Belt is intended to check the unrestricted sprawl of built up areas; to prevent neighbouring towns from merging into one another; to safeguard the countryside from encroachment; to preserve the setting and special character of historic towns; and to assist with urban regeneration by encouraging the recycling of derelict and other urban land. The land around Normandy Flexford, Christmas Pie, Wyke, Pinefields and Willey Green consists presently of a series of Hamlets washed over by the greenbelt and providing the greenbelt space preventing urban sprawl between Aldershot and Ash (which is a development area) and Guildford

Policy P2 omits any assessment of the Green Belt’s value. The Green Belt is not just empty space but is an inhabited, working environment that safeguards a certain stock of natural capital. In my area farmland is used for cattle other livestock cereal and rape and corn

It is incorrect to argue, as the Council do, that the plan would involve the loss of “only” 1.6% of the borough’s Green Belt. In reality the figure is nearer 7% when insetting, infilling and settlement boundary extensions are included. More importantly, there is no “acceptable” percentage (in the NPPF or anywhere else) of land that may be removed from the Green Belt.

I object to the statement in the submission Local Plan under Green Belt Policy P2 (4.3.13) which claims that Normandy, Flexford and a further list of 12 villages are “now inset from the Green Belt”. This statement is untrue as GBC is proposing to “inset” these villages. No decision has been made by an Inspector, therefore the villages remain in the Green Belt.

I object to the changed “insetting” of 15 villages from the Green Belt, and at “infilling” 12 of the borough’s Green Belt villages.

I am concerned that settlement boundaries are to be hugely extended in many villages and that infilling is also proposed outside the settlement boundaries of 11 further villages. This is completely unplanned and unmeasured development outside the OAN.

Many Guildford villages are elongated in outline, reflecting the effect of ribbon development (often along just one side of existing roads) permitted between the Wars. It is all too easy to square off boundaries by including countryside bounded on only one or two sides by existing development, claiming it contributes nothing to the “openness” of the Green Belt, a term which neither the plan nor the NPPF defines. The NPPF’s other 4 tests of Green Belt status, including the prevention of urban sprawl, are ignored.

Effectively, this policy makes all villages within the Green Belt vulnerable to large blocks of new development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID:  pslp171/946  Respondent:  8596673 / Peta Malthouse  Agent:  
Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

To remove land from the Green Belt, effectively re-drawing the Green Belt boundary, the council must again provide evidence of “exceptional circumstances” as required by NPPF para. 89. The council has provided no such evidence in the proposed submission documents. I am aware that many others including myself made this point in previous responses to consultation. I can only conclude that the Borough have no ‘very special circumstances’ to demonstrate

Although I welcome the Boroughs decision to remove the proposed sites of development at A46 and A47 from proposals for development.. the first because it was accepted to be Grade 3a farmland and the second for reasons to include that it is an area of SNCI ..........my objections to the re designation of Greenbelt land to include insetting in respect of all of the policies in the administrative area of Normandy Parish Council, have not been accepted but they are nevertheless set out again set out above.

I object most strongly to the proposals to inset.

The Borough has no real policy proposals to limit the height and type of construction in the inset areas. We have seen some poorly made decisions recently of properties being built with high roof levels and inappropriate density.

* It is very important to remember that the views from the Hogs Back (ANOB) northwards are uninterrupted to a large degree because most of the property in Flexford is of low roof height and the street lighting is minimal. The openness of the countryside and the trees in ancient woodland act as an effective screen of the existing buildings

Indeed the views remain uninterrupted to Ash Ranges which has SSSI and TBH status..other land between the ANOB and Ash Ranges has SNCI status and yet the insetting will result , if approved , infilling to the point that these protected spaces which adjoin them will be harmed for proximity

These areas are also of huge historical importance and contain 22 Grade 11 listed buildings in their context of open farmland. William Cobbett (Rural Rides) lived and died here

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
please log this as an objection to the current proposal to inset (i.e. remove from the Green Belt) the villages of Chilworth Shalford and Peasmarsh.

I am well aware that this is very likely going to be initially approved and therefore go on to consideration by the Planning Inspectorate and The Courts.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** PSLPP16/12530  **Respondent:** 8596897 / Roseacre Gardens Residents Assoc. (Peter Stage)  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Unfortunately box ticking number counting of objections plays a disproportionate part in the process (in addition to the legitimate planning etc. objections of which there are many - already made and to be made). EG. nature and character of a unique environment which is worthy of special protection to name but a few.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** PSLPA16/2779  **Respondent:** 8597025 / Mr Peter Bennett-Davies  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Former Wisley Airfield

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

4) Additional Objection
I object to the continued inclusion in the Local Plan of site A35 (land at the former Wisley Airfield, - now known as Three Farm Meadows) Wisley Property Investments Ltd’s outline planning application for development of 2,100 dwellings on Site A35 was unanimously rejected by GBC’s Planning Committee in April 2016, after some 14 months of consideration (and various extensions and amendments), Serious concerns about this site and the proposals were raised by a broad number of authoritative sources across the UK, including Highways England, Surrey County Council, Thames Water, National Air Traffic Services and the Environment Agency.

It is very clear indeed to me that development along the lines proposed in the Draft Local Plan 2016 is completely unsustainable and a betrayal of the Green Belt concept. I, together with many residents do recognize the need for a limited amount of additional housing, but not on the scale set down in the Draft Local Plan. Such homes building, represents inappropriate development in the Green Belt.
There is no alternative for Guildford Council but to
1) investigate the errors in the West Surrey SHMA which if found to be correct will bring a significant drop in the number of homes required to 2033.
2) amend the Local Plan to make greater use of brownfield/previously used land rather than target rural villages for removal from their current ‘washed over’ Green Belt status.
3) identify credible, evidence-based plans for sustainable development sites in the Borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11645  Respondent: 8597025 / Mr Peter Bennett-Davies  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

3. Infrastructure – Transport (Policies I1, I2 and I3)
The words “Roads and Transport Infrastructure” are mentioned in Definitions under Policy I1 (Infrastructure and Delivery), but there no are detailed proposals for the Horsleys in any of the Local Plan documents, including the Infrastructure Delivery Plan. This is extremely surprising, the more so when one reads Thames Water’s advice re its lack of capacity to deal with wastewater, given that the DLP proposes development in the Horsleys in years 1 to 5 of the Plan Period.
a) Infrastructure – Waste Water (Policy I1)
I object to the lack of coherent proposals relating to waste water infrastructure for the Horsleys.
Waste water infrastructure receives a mention in each of the A37 to A41 Site Reviews and in Reasoned Justification under Policy I1, but no detail for the Horsleys has been found in any of the Local Plan documents, including the Infrastructure Delivery Plan.
There are known sewage overflow problems in the Ockham Road North / Green Lane area.
Thames Water has advised Guildford Borough that the area’s wastewater network is unlikely to be able to support the demand anticipated from one or all of the proposed developments. The foul drainage system from West Horsley to the treatment works north of Ripley it is understood will need to be upgraded to cope. Thames Water advises ‘a 2 to 3 years lead-in period’ to install the necessary waste water network and treatment capacity after planning permission for a development site is granted.
b) Policy I3 provides that developers “will be expected” to propose and secure travel plans for their developments and contribute to transport arrangements for the able and disabled. Legally, this is meaningless - this proposed policy lacks ‘teeth’ and is unrealistic where development and major housebuilding companies are involved.
c) Whilst Horsley station has frequent trains to London and Guildford seven days a week, the station car park is normally full on weekdays. An increase in village population will increase pressure on station parking and traffic movements to/from Horsley station, to drop off/ collect travellers to London and school children going to Guildford and Leatherhead.
d) Infrastructure – Schools and Medical Facilities (Policy I1)
I object to the lack of coherent proposals relating to schools and medical facilities for the Horsleys.
There is a continuing lack of state primary school places in the Horsleys. The Raleigh School which serves both East and West Horsley is full every year and this has been the situation for many years. Secondary school places are limited in number at the Howard of Effingham School and other secondary schools involve a much longer journey of time and distance from the Horsleys to reach them. Glenske and Cranmore private schools are well supported by many families living in Guildford and other villages up to 14 miles away. Each of these private schools during term time, receives high volumes of traffic going to and from each school at each end of the school day, on Ockham Road North and the A246 respectively.
Kingston Avenue Medical Centre, serving all of East and West Horsley and areas beyond, is always extremely busy and residents experience difficulty in making appointments. The planned population increase (in excess of Government ONS forecasts) for the borough will require a major extension of the Royal Surrey Hospital to cope.

e) I object due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1). There is too much traffic in our villages already and this plan will give rise to super congestion in East Horsley, West Horsley, West Clandon, Ockham, Normandy, Ripley, Send and Worplesdon with no plans displayed or any stated intent to improve the non A roads. The rural roads in this area are narrow, in poor condition and few have footpaths. 5000 plus houses in such a small area will spawn dangerous and unsustainable traffic growth.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11636  Respondent: 8597025 / Mr Peter Bennett-Davies  Agent:  

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1) Green Belt (Policy P2)
The Green Belt is an extremely important asset not only to Guildford Borough but to all the counties surrounding London. It protects London from urban sprawl; it contributes to air quality; it absorbs rainfall into the ground; it is the open space that millions of people enjoy for recreation within an hour of central London. It is protected now and needs to remain so.

The National Planning Policy Framework para 80 states that Green Belt serves five purposes
• to check the unrestricted sprawl of large built-up areas;
• to prevent neighbouring towns merging into one another;
• to assist in safeguarding the countryside from encroachment;
• to preserve the setting and special character of historic towns; and
• to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

The Draft Local Plan (DLP) puts forward no rational case or justification for building on the Green Belt as it proposes. The National Planning Policy Framework (NPPF) states that the introduction of new Green Belt boundaries (and many are proposed in the DLP) requires the Local Authority to demonstrate that ‘exceptional circumstances’ exist to justify such proposals. Unmet housing need as such is NOT an exceptional circumstance. From my review of the Sites Listed in the DLP between pages on pages 122 to 126, 65% of the proposed housing is planned for land currently in the Green Belt. The NPFF and Government Ministerial statements have emphatically said that Housing need in itself is not an ‘exceptional circumstance’ for protected Green Belt land to being used. Clearly, the Green Belt has not been applied as a constraint. The need for a Local Authority to apply constraints is clearly stated in Government advice, planning policy guidance and the NPPF. Policy P2 is flawed as it fails to meet NPPF policies.

I object to the proposed removal of East and West Horsley from the Green Belt by insetting and in addition extending the 2003 Local Plan Settlement Area boundaries.

No exceptional circumstances exist or other justification is made for these proposals. The Green Belt & Countryside Study is flawed and the Key Evidence document ‘Guildford Borough Economic Strategy 2013-2031’ makes no case for locating large numbers of new homes in East and West Horsley. The number of new dwellings and density of housing proposed would be totally out

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
2. Number of new houses and density (Policies S1, S2, H1 and H2)
I object to the proposals relating to the number of new dwellings and the density of such housing.
A 13,800 homes increase is proposed across the Borough over the Plan Period to 2033, representing a 25% increase approximately in the Borough’s housing stock. This increase is too high and for West Horsley in particular, the proposed increase of 385 homes translates to 35% growth which is grossly disproportionate. For East and West Horsley, the 533 homes proposed to be delivered in the first 5 years of the Plan Period on the six proposed sites (ref A36 to A41) are calculated at much higher densities than currently exist within the villages and if allowed would be totally out of character with the existing mix of different housing styles and layouts within the villages.
The home building proposals for the Horsleys are unsustainable in terms of schooling, drainage, roads capacity, shops, parking and public transport.
I have recently received and thoroughly read two independent Assessments of the West Surrey SHMA’s Objectively Assessed Number (OAN), one prepared by Neil McDonald for a grouping of residents associations and parish councils located in the Borough and the other by Clandon & Horsley Ward Councillor David Reeve. Both studies report on finding the same error in the G L Hearn West Surrey SHMA document. The effect of the error results in an overstatement of the number of homes needed through the Plan Period by a significant quantity, possibly by 2,745 homes. Other independent individuals have stated on numerous occasions to GBC, that the OAN is flawed but the Borough Council has chosen neither to listen nor to scrutinise the SHMA. The population growth assumed, will be excessive and unsustainable for Guildford, a gap town with many environmental, physical and infrastructure constraints.
I object to the disproportionate allocation of housing to (a) East and West Horsley (b) rural villages, particularly on the eastern side of the Borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to the proposed building of 2000 homes and associated development at the Former Wisley airfield.

My reasons are:

The roads in the area are already very busy.

Access to the A3 at Old Lane would lengthen my journey. This is a road that I use at least 4 times a week.

Effingham & Horsley stations are very busy already at peak times.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/10611</th>
<th>Respondent: 8597281 / Guildford Freiburg Association (Peter Slade)</th>
<th>Document: Proposed Submission Local Plan: strategy and sites 2016 / Key facts</th>
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<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
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<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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</table>

I have the following comments on the Local Plan:

Para 2.13

1. There needs to be a greatly expanded network of cycle routes, as far as possible separated from vehicular traffic.
2. In many cases footpaths need to be improved and maintenance enhanced

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
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<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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</table>
Para 3.2

Retail provision

The 40% extra retail provision proposed for the High Street and especially North Street is both unnecessary and undesirable. What should be provided instead is more residential development in those areas.

Transport strategy

Additional and more frequent and cheaper public transport is needed throughout the Borough.

Much more renewable energy, especially solar, should be installed throughout the Borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>PSLPA16/1450</th>
<th>Respondent: 8597313 / Guide Dogs for the Blind (Mr Peter Hattersley)</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North</td>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire):</td>
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Proposed Submission LOCAL PLAN

I write to strongly OBJECT to the Local Plan which has been published for public consultation. Mainly, I do not agree with East and West Horsley being taken out of the Green Belt. Also, the housing needs survey conducted by West Horsley Parish Council showed a much lesser need than has now been proposed and justification of removal from the Green Belt is not argued. If implemented it will destroy the character of the villages, the infrastructure is already overloaded and there are no plans for improvement in line with the proposed increase in housing. The inflated number of houses has been generated by a mathematical model which has not been made available by the sub-contractor, consultant and Guildford Borough Council and cannot therefore be justified.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>PSLPP16/2163</th>
<th>Respondent: 8597601 / St Catherines Village Association (Philip Mansley)</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1</td>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
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</tbody>
</table>
Infrastructure: Strict application of the policy not to sanction any development which has infrastructure issues is vital. There is some scepticism about the policy and a belief that developers will be able to find ways of getting round these strictures. The Council must ensure that permission for development until road and other infrastructure is in place or guaranteed is not granted.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>SQLP16/426</th>
<th>Respondent:</th>
<th>8597601 / St Catherines Village Association (Philip Mansley)</th>
<th>Agent:</th>
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<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): (No)</td>
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There appear to be very strong grounds for suspecting the validity of the SHMA on which the Housing Requirement is based and which appears to be inflated by unreasonable estimates of student accommodation requirements. I know the Guildford Residents Association have made representations on this point and their findings appear to hold water. I urge you to review the annual target of 693 dwellings which I believe may be over-inflated.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
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<th>Comment ID:</th>
<th>SQLP16/427</th>
<th>Respondent:</th>
<th>8597601 / St Catherines Village Association (Philip Mansley)</th>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): (Yes)</td>
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</table>
The strategic sites selected to meet the assessed housing requirement. But the SHMA figure has been challenged. As some of the sites encroach on Green Belt land planning permission for those sites should not be granted unless the SHMA estimates are borne out by actual statistics.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<table>
<thead>
<tr>
<th>Comment ID: PSLPA16/574</th>
<th>Respondent: 8597761 / Mrs Pippa Fleming</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<tr>
<td>I object to the number of 693 new houses proposed in the Local Plan for each year. The numbers calculated in accordance with the SHMA do not reflect true local need and have been inflated by the way students, economic need and affordability have been calculated.</td>
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<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Ripley</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<tr>
<td>I object to the insetting of Ripley</td>
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<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Clandon</td>
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Page 1078 of 3335
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the insetting of West Clandon

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/575  Respondent: 8597761 / Mrs Pippa Fleming  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to all sites in West Horsley for over 5 homes. The proposed sites will merge the villages of Ockham, West and East Horsley creating urban sprawl.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/796  Respondent: 8597761 / Mrs Pippa Fleming  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A25

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the inclusion of the planned development of 2000 houses at Gosden Hill Farm, Merrow (Policy A25) in clear contravention of the Government's and Conservative councillors' election manifesto promises to protect the Green Belt. I object to the unsustainable nature of the site, the poor air quality and noise pollution levels that will result and the infrastructure deficit that will result.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: PSLPS16/801  Respondent: 8597761 / Mrs Pippa Fleming  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to proposed development of 1,800 houses at Blackwell Farm.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/795  Respondent: 8597761 / Mrs Pippa Fleming  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the inclusion of Three Farm Meadows (Policy 35) due to the proposed removal of the site from the Green Belt when no exceptional, very special or special circumstances exist. In particular, I object to the unsustainable nature of the site, the poor air quality and noise pollution levels that will result, the Infrastructure deficit that will result and the impact on views to and from the Surrey Hills.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/798  Respondent: 8597761 / Mrs Pippa Fleming  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A42

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
15. I object to the building of 45 houses at Clockbarn Nursery, Tannery Lane (Policy A42) on the grounds of inadequate access to and from the site. The roads surrounding the site are already hazardous, narrow and windy. Tannery Lane has already had planning permission granted for 64 houses and a marina and the location will not be able to cope with any more traffic.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<tr>
<th>Comment ID:</th>
<th>PSLPS16/794</th>
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Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the inclusion of policy A43 of 7000sq m of industrial warehousing as the Latest Employment Needs Assessment 2015 (ELNA) shows a reduction of 80% in required employment floor space from the previous draft. Slyfield Industrial Estate still has spare capacity and could accommodate any additional warehousing need if required.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<thead>
<tr>
<th>Comment ID:</th>
<th>PSLPS16/793</th>
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Answer (if comment is on questions 1-7 of the questionnaire): ()

In particular, I object on the following basis.

1. I object to the creation of a new 4 way interchange onto the A3 on the A247 (Policy A43A) as this would add to the ever increasing levels of traffic on the A247, A3 and through Send and Clandon. Send would become a through route to and from the A3 and will become gridlocked all day.

2. I object to the impact that Policy A43A will have on the air quality for those living in the surrounding areas and for future generations.

3. I object to the impact on residents that the resulting noise pollution of Policy A43A will have.
4. I object to the inclusion of land at Garlick’s Arch, Burnt Common and the proposed 400 houses and 7000 sq m of industrial warehousing on that site (Policy 43). Policy A43 and A43A were included at the last minute. They were not in the Regulation 18 draft and had not been consulted upon prior to the inclusion 2016 Local Plan.

5. I object to the impact of Policy A43 on ancient woodland on that site, on noise pollution and air pollution levels. The site is also prone to flooding.

6. I object to the impact of Policy A43 and A43A on local infrastructure. Congestion levels on A247 are already increasing at an alarming rate and will be further exacerbated by the development of Garlick's Arch as the residents will have to rely on the use of private cars.

7. I object to the unsustainable nature of the site at Garlick's Arch (Policy 43).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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11. I object to the inclusion of land west of Wind Ridge and Send Hill designated for 40 homes and 2 Travellers' Pitches (Policy A44). The site was not included in Regulation 18 draft and has not been consulted upon prior to the inclusion in the 2016 Local Plan.

12. I object to the impact of Policy A44 on an area of beautiful Green Belt countryside.

13. I object to the impact of Policy A44 as the subsoil of the existing site contains documented unsafe land fill waste which is currently vented.

14. I object to the impact of Policy A44, which includes 2 Traveller's Pitches, on the local infrastructure. The narrow width single track country road provides insufficient access for the pitches.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Objections to the 2016 Local Plan

Following the approval of the revised Local Plan by the full council of Guildford Borough Council on 24th May, I would like to make it clear that I object to the provisions set out in the Local Plan as they threaten to destroy the established nature and identity of our villages by building on Green Belt land and will add considerably to the already unacceptable levels of traffic on the A3, A247 and M25 and any other roads in the borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>PSLPP16/1649</th>
<th>Respondent: 8597761 / Mrs Pippa Fleming</th>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

29. I object to the impact that additional residents will have on local roads, health services, education spaces and policing needs.

30. I object to the failure of Guildford Borough Council to include the Town Centre Masterplan 2015 in the Local Plan and to find sufficient brownfield sites for development prior to considering sites within the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
17. I object to the impact of further congestion on local village roads and lanes.

18. I object to the impact of excessive development on the A3 and M25 on air quality. The air quality in many parts of the borough is greater than EU permitted levels and will damage the health of residents and future residents.

19. I object to the fact that 70% of the proposed 13,860 houses are designated on Green Belt land along the A3. This will result in gridlock on the A3, the A247 and the surrounding roads which are already at capacity.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/1642  **Respondent:** 8597761 / Mrs Pippa Fleming  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy ID4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )

20. I object to the inadequate protection of the environment.

21. I object to the fact that insufficient consideration has been given to the harm that will be caused to the Special Protection Area, the Sites of Special Scientific Interest and the borough's Conservation Area and heritage assets.

22. I object to the impact of poor air quality on the Special Protection Area.

23. I object to the erosion of the Green Belt in clear contravention of the Government's and Conservative councillors' election manifesto promises to protect the Green Belt. In particular, I object to Send being removed from the Green Belt (Policy P2) as Send provides a buffer between Woking and Guildford.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/1647  **Respondent:** 8597761 / Mrs Pippa Fleming  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )
28. I object to the allocation of sites in unsustainable locations.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPP16/15579  **Responder:** 8597793 / Pirbright Parish Council (Lindsay Graham)  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

**Policy H1 Homes for All**

**Pirbright**

We would support the proposed identification of Pirbright as a village that remains washed over by Green Belt on the Proposals Map. The open and linear nature of the village, centred around the junction of a number of roads at the heart of which is the village green and associated community facilities, forms an essentially open character much of which is also designated as a conservation area. As such, it lacks the required scale and form to support development and is also constrained by the SPA/SAC heathland. These factors are important in maintaining the character and quality of the village.

As such we would also support policies that are proposed to protect the character and quality of the Borough including policies P2 Green Belt, P3 Countryside, P4 Flood Risk, P5 Thames Basin Heaths and D3 Historic Environment.

**The Pirbright Institute**

We are concerned at the proposed boundary of the Pirbright Institute and its insetting from the Green Belt. While we have for many years supported the work undertaken at the institute, it has to be recognised that this is a site that is surrounded by Green Belt and exists within the main core of Green Belt within Guildford Borough. It is not on the margins of the Green Belt or on the edge of a town where it might be appropriate to remove the site from the Green Belt in terms of the form or function of the surrounding land. The Green Belt in this location is essential in providing the setting of the historic village of Pirbright and is on one of the key approaches to the south of the village, between Pirbright and the conservation area in Worplesdon. As such the Green Belt serves to protect the countryside from encroachment, preserve the historic setting of settlements and is important in the separation of villages. The campus style of the existing site keeps the overall impact of the Institute within the character of the wider area. Any intensification that altered this character, which would be likely to follow its release from the Green Belt, would threaten this low density, campus character.

The countryside forming part of the Green Belt in this location is key to the understanding of the matrix of woodland, heathland and open land forming a key part of the character of the area. The site is also visible from its surrounding context and has the potential to have an impact on the Green Belt well beyond its boundaries, including from elevated views within the nearby Commons, including Hangman’s Hill. It is vital that this impact on the wider Green Belt around the site is not prejudiced by more intensive development that might result if the site were removed from the Green Belt and such controls were relaxed. The only basis on which the development of the Institute has been permitted in recent years is as a result of the very special circumstances that have applied that have justified the redevelopment or replacement of buildings at the site. It is important that its primary importance as an international research institute is retained as its principal rationale for development at the site.
If the site is removed from the Green Belt there is nothing to retain its special importance as a research institute and its campus style character and appearance, which in turn limits its impact on the Green Belt and on perceptions of urbanisation of the countryside and setting of the Thames Basin Heaths and villages such as Pirbright.

We therefore, request that the Institute is retained as being an important part of the Green Belt in this location.

Pirbright Parish Council also consequentially, objects to paragraph 4.3.14 of the Local Plan as proposed which incorrectly in our view, concludes that sites that are previously developed within the Green Belt should be excluded from the Green Belt and inset. This is not a logical or necessary interpretation of Government Policy. Several of the sites identified including the Pirbright Institute, are defined in terms of their character by their presence within the Green Belt - they should be treated as previously developed land within the Green Belt under the terms of paragraph 89. As such, importantly, development may be appropriate provided it would not have a greater impact on the openness of the Green Belt and the purpose of including land within it than the existing development.

The Green Belt boundary should not be used simply to exclude any area of previously developed land for these reasons, policy already allows for their redevelopment if it is consistent with the maintenance of the Green Belt function. Local planning authorities with Green Belts in their area should establish Green Belt boundaries in their Local Plans that set the framework for Green Belt and settlement policy and deliver sustainable patterns of development. When drawing up or reviewing Green Belt boundaries local planning authorities should take account of the need to promote sustainable patterns of development. The insetting of the proposed sites is inconsistent with these aims and the maintenance of the character and purposes of including the surrounding areas within the Green Belt and pays no regard to the impact of future intensification of such sites.

**Henley Business Park, Normandy**

While we have concerns over the removal of the site from the Green Belt, since its relationship and impact on the surrounding function of the Green Belt is clear, we note that the site is now largely fully developed and hence there is little further purpose in its removal from the Green Belt. Its status as a protected employment site should be retained whatever its Green Belt status.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>PSLPP16/15580</th>
<th>Respondent:</th>
<th>8597793 / Pirbright Parish Council (Lindsay Graham)</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1</td>
<td></td>
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</tbody>
</table>

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ( )**

**Policy I1 Infrastructure and Delivery**

Pirbright Parish Council note the very extensive infrastructure requirements associated with the scale of development identified within the proposed Local Plan. It is essential that this infrastructure is delivered in a timely manner to support the development proposed, particularly where those locations are less than ideal at present in terms of their location or the availability of supporting services and infrastructure. Where improvements to rail services, roads, footpaths and cycleways cannot be secured in advance of the population that depend on such services, development should be restricted. In some cases this may mean the principle of development in some locations must be questioned where the roads or other infrastructure cannot be provided at a time and in a manner that can support sustainable living.
We are concerned that inadequate attention has been given to the effects of rural development in and around the villages of Pirbright, Worplesdon and Normandy on the infrastructure of the area, including schools, social infrastructure, sewers, water, roads and rail.

We would note that this is particularly important in rural areas where there isn’t a network of safe cycleways and alternatives to car transport and where villages, such as Pirbright bear the impact of decisions elsewhere. We are concerned that allocations such as A46 and A47 Normandy and Flexford are not sustainably located and would object to the allocation. Even with the small range of services proposed as part of the proposed allocation, most of the new houses will be served by cars travelling to Guildford, Brookwood Station and other locations, imposing a burden on Pirbright and Worplesdon that exacerbates the existing traffic problems experienced by the rural areas. Although this is not as high profile as the congestion within Guildford, it must be recognised that the rural villages such as Pirbright are suffering increasing congestion and the adverse impact of traffic brought about by development (such as Deepcut, Pirbright Institute, Henley Park and now proposals at Normandy/Flexford) and other pressures. The junctions within and around Pirbright, including Fox Corner, Cemetery Pales and Pirbright Arch to Brookwood are under particular peak-hour stress. As the mainline service from Brookwood into London, the roads within the area will suffer further pressure with development to the west in Normandy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15577  Respondent: 8597793 / Pirbright Parish Council (Lindsay Graham)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy S1 Sustainable Development

While we support the commitment of the Local Plan to sustainable development, we would note that this should only apply where development is genuinely sustainable in terms of its location and in the effects on the environment, on communities and the economy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15578  Respondent: 8597793 / Pirbright Parish Council (Lindsay Graham)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
**Policy S2 Borough Wide Strategy and Spatial Vision**

The need to provide for the housing, employment and infrastructure needs of the Borough is understood and supported, which is important in ensuring the quality of life and availability of life chances for all of the Borough’s current and future residents, but given that the effect of this on the environment and quality of life within the Borough, care needs to be taken to ensure that the level of provision is no more than is necessary to meet those needs. Hence Pirbright Parish Council would ask for the housing and other proposals set out within the Plan be further reviewed to ensure that:

- the level of housing and other development proposed is no more than is necessary to meet the needs of the Borough (and the demographic model giving rise to the housing forecasts is fully tested);
- that the scale and location of housing and other development proposed is the most sustainable possible in terms of its location and distribution;
- should ideally be concentrated within and around the main towns to reduce the need for car travel and promote sustainable patterns movement using pedestrian, cycle, bus and rail;
- that preference is given to brownfield sites where they are sustainably located and would otherwise be acceptable;
- should have regard to the need to protect the character and quality of the Borough.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPA16/1376  **Respondent:** 8597825 / Mr P J Colborne-Baber  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The Housing Need. I do not believe that the planned provision for housing over the next 20 years needs to be anything like the figures proposed. Much work has been done on this subject by many people and I was shown a report at an Open Day briefing at the West Horsley Village Hall on the 9 July that supports how most of us feel and makes the need for such numbers unproven.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

---

**Comment ID:** PSLPA16/1377  **Respondent:** 8597825 / Mr P J Colborne-Baber  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Beyond the Horsleys. Around the Horsley boundaries there are other sites such as Wisley where huge developments are also proposed. I understand that this Wisley proposal was turned down by the Council unanimously about six weeks before this latest plan was published. Then why is it still in the plan? The council was absolutely right to refuse it there being so many reasons apart from why do we need all these houses? The total lack of infrastructure being another big reason. Horsley and Effingham stations could not cope and that is if they could get to the stations on the roads that can't cope. We have no desire to see traffic lights in our villages either. Move south along the totally overcrowded A3 to Gosden Farm and another huge proposal. They are talking about a new station but will there be the trains to service it? The A3 will not be able to cope, of that there is no doubt because almost every day now there are jams trying to get through Guildford, and if you are in Guildford trying to join in the A3 going south it's a nightmare! All these infrastructure problems for any development must be in place before a development can proceed, but they do not have to proceed as with the Horsley Plan and the incorrect housing numbers, that probably applies to the other Parishes as well.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/2458  Respondent: 8597825 / Mr P J Colborne-Baber  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

For Wisley why not consider a lovely country side park, a place where people could come to play games have picnics, enjoy nature. It could be linked to the R.H.S. over the A3 perhaps; with more consideration from those with such experience, I would have thought it would be a great solution.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5445  Respondent: 8597825 / Mr P J Colborne-Baber  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Infrastructure. Roads, schools, doctors surgeries, hospitals and public transport are all overstretched now let alone with the addition of all these new houses. Roads are busy especially at school times and HGVs of huge sizes use the roads as 'through' roads. Where are all the weight limit signs these days? That would prevent much of the damage that is occurring and save money. The schools are always full, both state and private. Doctors surgeries are always busy and look at the state of the Royal Surrey County Hospital in Guildford at present. Public transport, particularly the railways just now, are in an awful mess and buses don't really count as they are so few and far between.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5444  Respondent: 8597825 / Mr P J Colborne-Baber  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The Green Belt. This should be sacrosanct and indeed I was always brought up to believe it was. Yes there will always be the exceptional situations where planning should be allowed but never the removal of whole areas. It was always meant to be the lungs of London and I am convinced that the Green Belt should be preserved for the very best reasons, not least of which is the Nation's health. I shall return to the Green Belt later.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5446  Respondent: 8597825 / Mr P J Colborne-Baber  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Back to the Green Belt. The Conservatives have said that they would support the Green Belt and David Cameron made a point of this quite early on in this Parliament, so why is a Conservative Council riding roughshod over this policy? [Response has been redacted due to statements being considered defamatory, derogatory, inflammatory or offensive in nature] the production of this dreadful plan gives me little confidence in the Council or the Conservatives.

I believe the Green Belt is the hub of the matter as everyone I talk to is in complete agreement. When I was in Guildford the other day I was looking at the High Street thinking what a great job they are doing with the relaying of the granite blocks to restore the very lovely and historic High Street. The Council are to be commended for taking this action. That I thought, is how they should approach looking after other important parts of the Borough and that includes the Green Belt. The High Street with its lovely buildings and clock would be completely ruined with a nice new smooth tarmac surface, quieter for cars to run on and easier for ladies to walk on. The countryside would equally be ruined with more houses, wider roads, less trees etc etc. Preserve our countryside and wildlife for all to enjoy and for future generations.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
The changes to the plan appear go against the “Countryside Vision Strategy” adopted by the Borough Council and published in the Summer 2017 edition of “About Guildford”. The strategy talks of protecting the countryside, not insetting large areas from the Green Belt and building houses, traveller pitches and industrial sites on it. The strategy talks of aligning the countryside management with “national policy” - and national planning policy dictates that the Green Belt should be protected.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

The housing numbers that have been suggested have not been substantiated as requested and therefore most of the suggested development sites should be removed. I am not saying no development but it has to be in line with the facilities and infrastructure that exists. Words to imply that infrastructure will be improved with absolutely no detail or time schedules is quite unacceptable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (Yes)

We have comments regarding the evidence base documents:

- Draft Infrastructure Delivery Plan
- Flood Risk Sequential and Exceptions Test

As these are comments regarding the soundness of the Plan we have submitted them in Question 3: Soundness.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/574  Respondent: 8598049 / Environment Agency (Jonathan Fleming)  Agent:

Summary of Soundness

We welcome and support a number of the changes that have been incorporated into the Plan since we reviewed the Draft Guildford Borough Local Plan: strategy and sites dated July 2014. However, we consider the Plan to be UNSOUND in its current form due to issues relating to:

- Infrastructure Delivery Plan – Water quality
- Flood Risk Sequential and Exception Tests - site allocations and the justification for promoting certain sites
- Policy P4 – Flooding, flood risk and groundwater production zones
- Site Allocation Policies – safe access and egress of allocated sites A5 and A13

In its current form the Plan does not meet the tests of soundness in terms of being justified, effective or consistent with national policy. These points are summarised below:

- With regards to water quality the Plan does not reflect the evidence submitted in the Infrastructure Delivery Plan for wastewater capacity issues, which may result in an adverse impact on water quality. The Plan is not consistent with the National Planning Policy Framework (NPPF), paragraph 109, and is not justified by a robust evidence base.
- With regards to the Flood Risk Sequential and Exception Tests, we do not consider that sufficient evidence has been presented in this supporting document to justify the conclusions drawn in the Plan with respect to the allocation of certain sites. Without this evidence the Plan is not justified.
- With regards to Policy P4 we do not consider that sufficient reference has been made to the impacts of climate change on the flood risks associated with development. We consider that without specific mention
of the flood risks associated with climate change that the Plan is not consistent with paragraph 99 of the NPPF.

- With regards to flood risk three of your allocated sites; A5: Jewsons, Walnut Close, Guildford; A13: Kernal Court, Walnut Close, Guildford; and A14: Wey Corner, Walnut Tree Close, Guildford, do not have the evidence on access and egress to support their allocation in the Plan. **Without this evidence the deliverability of these sites is questionable and their inclusion is not consistent with NPPF paragraphs 100-102 of the NPPF.**

Further details regarding these points are within our letter submitted 18 July 2016.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Comment ID: SQLP16/576  
**Respondent:** 8598049 / Environment Agency (Jonathan Fleming)  
**Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

Answer (if comment is on questions 1-7 of the questionnaire): (Yes)

As a statutory consultee we would be pleased to participate in the Examination.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/3824  
**Respondent:** 8598561 / Sarah Belton  
**Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

Answer (if comment is on questions 1-7 of the questionnaire): ()

*I object* to the local plan as a whole, on grounds that the Borough has failed to provide sound evidence of need for much of the development. In just ten minutes reviewing plan documents, I found a consultant report (in the Traveller Accommodation Assessment) dated as having been undertaken in June-July 2012 by Mill Field Services, whom I then discovered had been dissolved in January 2011 (according to the Companies House website). How many other errors or untruths are in the plan?

I believe the Local Plan 2016 is deeply flawed; lacks adequate, unbiased research and evidence of need; lacks infrastructure improvement already needed without there being any further development; and I believe is being rushed through to serve some hidden agenda. It must be properly reviewed under legal requirements using Regulation 19.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

| Comment ID: PSLPP16/16098  Respondent: 8598561 / Sarah Belton  Agent: |
|-----------------------------|---------------------------------------------------------------|
| Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2 |
| Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( ) |
| Answer (if comment is on questions 1-7 of the questionnaire): () |
| I object to both these developments as there was improper use of Regulation 18; no local consultation; that Garlick’s Arch is green belt land which includes an area of ancient woodland, and that alteration to the A3 junction at Burnt Common is not appropriate without holistic infrastructure review and consultation. I wrote to the Council to this effect before the Council meeting in which they were included. |
| What changes (2016)/further amendments (2017) do you suggest should be made to the document? |
| Attached documents: |

| Comment ID: PSLPP16/16097  Respondent: 8598561 / Sarah Belton  Agent: |
|-----------------------------|---------------------------------------------------------------|
| Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2 |
| Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( ) |
| Answer (if comment is on questions 1-7 of the questionnaire): () |
| I object to removal of Send and other villages from the green belt. This can only be done in exceptional circumstances according to law, for which none exist in this area. Urban development is not an exceptional circumstance, nor is lining the pockets of developers. Any weakening or exceptions made to green belt protection will lead to its ultimate demise, and once it is gone there is no going back. The green belt must be protected in its entirety in perpetuity as the law intended. Developers avoid brown-field sites as the location may be less desirable and cost of development can be higher, resulting in a lower rate of return. There are many such sites in the Borough which it should be mandatory to develop before any other sites are even considered. |
| I will be accused of not wanting development in ‘my own back yard’, but my concerns are more far reaching than my local area. I believe the south east of England is at capacity, and want to see vision and innovation in development practice for the future good of all. Our elected representatives at all levels must conduct themselves with due diligence and integrity, for the long term future of all. |

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/1782  Respondent: 8598561 / Sarah Belton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Having reviewed the Local Plan I am deeply disturbed that the Council has ignored concerns raised by Borough residents in the 2014 consultation, showing a clear agenda for development at any cost. It shows a complete lack of consideration for the impact of such extensive development in the most densely populated county (Surrey) and most densely populated region (South East) of England.

I object to the Council making last minute, significant changes to the plan, such as the Garlick’s Arch development in Send and addition of a major alteration/enlargement of the junction on the A3 at Burnt Common. There are also many other new sites and changes to the 2014 plan. Therefore, full consultation according to Regulation 18 is required, not the short cut form of Regulation 19.

It is also clear that that Plan’s consultation has been timed when many people take holidays, to minimise residents’ opportunity to fully review the extensive documentation and make any appropriate objections. As a result I have had to limit my comment to my local area rather than the Borough as a whole.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/2987  Respondent: 8598561 / Sarah Belton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A42

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to policy A42 - both to the original 45 homes and the latest increase to 60 homes, on the basisthat it is on green-belt land; that local roads are unsuitable and unable due to existing congestion to take further traffic increases, in particular the A247 Send Road. Tannery Lane is a narrow lane requiring single lane traffic in parts and unsuitable for increased traffic flow. I am also aware as a resident of Send for 14 years, that the proposed site in Tannery Lane is low-lying and subject to flooding, as are a number of other areas in Send and Send Marsh, and hence it is entirely unsuitable for housing.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/2992  Respondent: 8598561 / Sarah Belton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A58

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to policy A58 - on the grounds that again it is part of the green-belt and hence development is not permitted, and further, that such development is inappropriate when other industrial sites in the Borough have empty space (e.g. Slyfield Industrial Estate) and there is no proven need for further industrial space. I object to the wording minimum' replacing maximum' of 7000 sq m, deliberately opening up any approved development to unlimited expansion. This is an appalling abuse of the planning process.

I would add weight to my overall objection to the proposals, identifying that the A247 Send Road is a narrow and residential road, in spite of the fact that it links the A3 and M25 to Woking town centre and its mainline station to London, and coach service to Heathrow Airport. It is congested in peak times, carrying heavy vehicle and commuter traffic through bottle necks of parked cars and the narrow bridge at Broadmeads. This bridge is not wide enough to allow two heavy vehicles to pass over it at the same time. The road is also heavily used by cyclists commuting into Woking, creating further congestion and hazards. It is madness to add to this traffic from hundreds of local houses and industrial sites, plus traffic from other huge proposed developments such as the massive number of houses proposed at Wisley Airport and nearby Ockham, Clandon and Horsley wards, (policies A35, A37, A38, A39 and A40 - at least 2500 homes) is madness.

Currently on a daily basis, the A3 from Burpham to the M25 is almost at a stand-still in both the morning and evening peak times due to the sheer weight of traffic. When there is a major hold up on the M25 or A3, the traffic can back up as far as the A247 at Broadmeads. Adding more commuter and industrial traffic will only exacerbate this, while changing the junction at Burnt Common is unlikely to improve the situation, and may actually add to the problem.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/1363  Respondent: 8598561 / Sarah Belton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to the local plan as a whole, on grounds that much of the development encroaches into the green-belt; that the Borough has failed to provide sound evidence of need or exceptional circumstances for most of the development, and has failed to provide guaranteed and appropriate infrastructure improvement already needed without additional local development.

I object to removal or so called ‘inset' from the Green-belt of Send and other villages in the Borough, or sections of land such as Send Business Park (Policy 2 at paragraph 4.3.15). This can only be done in exceptional circumstances according to law, for which none exist. Urban development is not an exceptional circumstance, and this practice is erosion of the green-belt by stealth. Any weakening or exceptions made to green belt protection will lead to its ultimate demise, and once it is gone there is no going back. All green belt land must be protected in its entirety in perpetuity as the law intended and stands today.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp17q/257  Respondent: 8598561 / Sarah Belton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Question 6: Any other comments?

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

As Britain prepares to leave the EU, it is entirely possible that the population, especially in the home counties like Surrey, may see a reduction as some EU nationals return home, thus relieving some of the perceived need for increased housing. The Local Plan needs to take this into account. Developers avoid brown-field sites as the cost of development can be higher, resulting in a lower rate of return, while green-belt land is cheap to both purchase and develop to maximise profit. There are many brown-field sites in the Borough, and it must be mandatory to develop these before any other sites are even considered.

I will be accused of not wanting development in my own back yard', but my concerns are more far reaching than my local area, I believe the south east of England is at capacity. and I want to see vision and innovation in development practice for the future good of Britain as a whole. Our elected representatives at all levels must conduct themselves with due diligence and integrity, for the long term future of all, including their own children, not for the short term profit of a few.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/2398  Respondent: 8598785 / Mr Roger Parslow  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A34

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to removal of Brownfield site (A34) from the Plan

  • Site A44 in Broadford Business Park has also been removed. This is another brownfield site that has already been developed. The Council’s claims to “have adopted a ‘brownfield first’ approach” (page 5) but this is clearly not the case, and is contrary to national guidelines.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp172/2397  Respondent: 8598785 / Mr Roger Parslow  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to removal of Brownfield sites (A4) from the Plan

  • Site A4 in Guildford has been removed. This is a perfectly good housing site, within the town centre and therefore with sustainable infrastructure, and would make use of a brownfield site that is in need of redevelopment. The Plan has removed housing from this site, in favour of commercial retail – thereby effectively substituting Green Belt land for retail development, which is totally unacceptable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp172/2393  Respondent: 8598785 / Mr Roger Parslow  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A42

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to Policy A42 change at Clockbarn in Tannery Lane because:

  • It will increase access and traffic problems an Tannery Lane and at the A247 junction
  • It will make erosion of the Green Belt in our village worse
  • It will impact open countryside views from the River Wey Navigation
  • The housing proposed has been increased by a third since the 2016 version of the Plan. This will have a significant impact on the already highly congested local rural road network around Send. This is in contradiction to section 2.14a of the Plan which states “Whilst most local roads are single carriageway, with a lane in each direction, it is at their junctions that the free flow of traffic is most often impeded during peak periods, in some
cases resulting in significant delays.” And yet there is no proposals to improve the local roads, only to add more
junctions with the A3, thereby increasing congestion on the Trunk and Local road network.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<td><strong>Document</strong>: Proposed Submission Local Plan: strategy and sites 2017 / Policy A43</td>
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I object to the Policy A43 change at Garlick’s Arch (including the potential of an increase from 400 houses) because:

- It will cause over-development of our village and the number of homes is excessive
- It will generate serious traffic problems at peak times that will block up the local roads of Send and Ripley. We already have serious tailbacks for example on the T junction where Send Marsh Road meets Portsmouth Road
- It ignores the thousands of previous objections made by local people
- The housing targets for the area are unrealistic. If they can only be achieved by erosion of the green belt, then they should not be enforced. The government is imposing these targets whilst at the same time claiming to want to protect the Green Belt. This is highly contradictory and very disappointing for the standards we should expect in this country.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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I object to the allocation of 6 Traveling Showpeople sites in A34 Garlick’s Arch

- The allocation of 6 Travelling Showpeople plots is the designated formula for 1500-1999 homes on the same site according to the 2017 Local Plan. There should be no inclusion of any Travelling Showpeople plots in A43 Garlicks Arch as this development site is for 400 homes and so is not compliant with the minimum of 500 in as stated in section 4.2.24 of the Plan.

I object to the extended development in the Green Belt (Policy P2, Site A43)
• I object to Garlick’s Arch (A43) being extended and the resulting urban sprawl. There are no exceptional circumstances for this site being removed from the Green Belt, as required by the National Planning Policy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/2395  Respondent: 8598785 / Mr Roger Parslow  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy A46

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the unfair imbalance of the Plan across the borough.

• With the removal of site A46 from the Plan (with its proposed 1100 houses) and reductions of housing planned in this version of the Plan in other parts of the borough the Plan has become even more biased against the North East of the borough. Guildford Borough is over 100 square miles. Of the 11350 homes proposed in the Plan, 40.6% (4613) are within 3 miles of Send Marsh, most of them on Green Belt. This is grossly unfair on an already overcrowded part of the borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/2392  Respondent: 8598785 / Mr Roger Parslow  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy A58

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to Policy A58 at Burnt Common because

The word ‘minimum’ is a change from the previous ‘maximum’ in the 2016 plan. Minimum is open-ended and a cause of considerable concern with regard to traffic

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/2399  Respondent: 8598785 / Mr Roger Parslow  Agent:
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<tr>
<td>I object to the proposal for a Waste Management Facility in Green Belt (A58)</td>
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<tr>
<td>• The potential for a Waste Management Facility at site A58 Burnt Common is briefly mentioned, obscurely in policy 4.423a, and does not allow for full and proper consultation. These facilities are always highly contentious and the Council has a duty of transparency in this regard which it is, at best, neglecting.</td>
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<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy H2</td>
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<td>I object the change in policy on affordable homes (Policy 4.2.23)</td>
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<td>The previous version of the plan stated that “Developers will be expected to provide land for affordable homes at nil value”.</td>
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<td>The 2017 version says: Off-site provision or payment in lieu is expected to enable the same amount of additional affordable housing as would have been delivered on site.”</td>
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<td>So the developer doesn’t even have to provide any ‘affordable’ homes, just to make a negotiated payment to the Council. This is very unlikely to result in the construction of these ‘affordable’ homes.</td>
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<tr>
<td>Furthermore, the 2016 Plan used to state (section 4.2.40) “In general, a need to make profit over and above the standard developer’s profit in order to fund other community benefits will not be accepted as an abnormal cost [i.e. a reason for not delivering affordable houses]. That has now been removed, thereby accepting that needing to make greater than normal profit IS to be an acceptable reason not to deliver affordable homes.</td>
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<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy ID1</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the lack of proper infrastructure planning for sites (A43 and A42)

The Foreword to the plan by Paul Spooner includes on page 5:

"We recognise that significant infrastructure upgrades are required to support existing communities and the planned growth of the borough. The delivery of sites allocated in this plan is contingent upon the provision of new infrastructure, which is a key theme of our Local Plan”.

The lack of any plan for either physical or green infrastructure improvement clearly contradicts this in respect of both A43 Garlicks Arch and A42 Clockbarn Nursery, Tannery Lane, Send. Development of these sites without the contingent infrastructure would therefore be contrary to the stated aims and themes of the Plan, and should not go ahead.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp171/798  Respondent: 8598785 / Mr Roger Parslow  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the removing Send Business Park from the Green Belt (4.3.15).

- Send Business park is a very small collection of local businesses in a very rural area in the Green Belt. There can be no justification for its removal from the Green Belt, and indeed GBC have not even attempted one. Therefore no “exceptional circumstances”, as required by the NPPF can be claimed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/936  Respondent: 8599105 / Edwin Road Residents Association (Rhys Beynon)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I write to express my objection to the proposed new Local Plan.

I object, in the strongest possible terms, to the principle of removing West Horsley from the Metropolitan Green Belt. This suggestion above all must be withdrawn from the local Plan. Future generations would see this proposal as a dereliction of Surrey’s duty to protect the health and well-being of the London area and its population.

Having lived in the West Horsley area since 1979 and worked locally I feel I have enough experience of the surrounding area to appreciate the serious detrimental effect the proposed developments would have.

- Our local “infrastructure” is already overstretched.
- Our roads cannot cope with even a small fraction of the likely increase in vehicular movements.
- Our parking areas within the current villages (East and West Horsley) are strictly limited.
- Our population is made up of a high percentage of “retired” folk for whom the car is often the only method they have for getting around the villages so competition for parking places would affect their social mobility with disastrous effect.
- Our local primary school is heavily oversubscribed and may well need to be rebuilt on a new site in an attempt to satisfy the current demand for places.
- Our water table is high in parts of the area and considerable flooding may occur in some of the proposed new developments.
- Our medical services would have to be doubled in size to cope with the likely doubling of our population. A new parking area could not be provided at the current centre in East Horsley and consulting rooms etc. for medical staff would be inadequate for the increased population.

Along with the proposed new housing developments and major infrastructure projects other areas would have to be found for improvements to pavements, road widening, improved junctions, new sewers, services and drains, new parking areas at the railway station at shops and at village halls and at churches.

Our roads cannot cope today with current population/traffic demands and have to be used as “car parks.” With more vehicles trying to use the roads bottle-necks will occur at dozens of places around the villages which were never meant to cope with such numbers.

In my opinion the local plan is applying sticking plaster to try to stem the flow of blood from a major wound.

I'd like to suggest that a way forward be found which would begin with a proper comprehensive plan which begins with the infrastructure necessary to cope with the undoubted need for housing in the area. Building houses wherever one can find a piece of land is NOT the way to cope with today's housing crisis.

I cannot believe that people with professional planning skills and experience cannot see the folly of the proposed local plan.

Surely "cramming a quart into a pint pot" cannot be a serious planning proposal.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

2. The Objectively Assessed Need for housing is too high, and the SHMA from which it is obtained is flawed. The proposed large developments on greenfield sites should be smaller and designed to suit the landscape and infrastructure of the area, while respecting the Green Belt. Please have a rethink before taking this plan forward.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/1879  Respondent: 8599201 / Richard D Jarvis  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

3. The proposal to increase retail space by 40% in the town centre is too large, and should revised, taking into account current trends in retailing.

4. The majority of these comments concern the transport evidence which was produced very late, being published on the day this consultation started, 6 June 2016. While the evidence is useful, it is incomplete and has raised lots of questions that have yet to be answered. There is an infrastructure deficit in Guildford and in Surrey, as the report on the Surrey Infrastructure Study explains, and the cost of meeting needs over the next 15 years is going to be a major challenge.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/1882  Respondent: 8599201 / Richard D Jarvis  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Highways and Traffic

5. The highways network is under stress at peak times in many parts of the borough. Queuing is the daily experience of drivers going to and from work. The Plan recognises the problems in para 2.14. Much of the road network is single-carriageway, and junctions act as constraints.

6. The key evidence on future traffic conditions is provided in the Strategic Highway Assessment Report (SHAR) which summarises the results of the tests carried out by SCC at the request of GBC. The analysis was carried out using SINTRAM, SCC’s strategic traffic model. The model has been revalidated, though this was not stated in the SHAR. The latest version contains less traffic than the previous one. This makes it infeasible to compare results with those or the earlier studies for Guildford, namely the Preliminary Growth Scenarios Transport Assessment and the Options Growth Scenarios Transport Assessment.

7. Five scenarios were examined using SCC’s strategic traffic model. Scenario 1 contains all developments and planning permissions in the borough from 2009 to date. It represents today’s circumstances, with the addition of growth in traffic to 2031 outside the borough and in Waverley in line with their plan. The results for this scenario correspond to the current unsatisfactory traffic conditions in peak periods.

8. Scenario 5 represents the position at the end of the plan period, including all development and highways schemes in the Plan. The Scenario 5 results show that there will be widespread congestion in the morning peak hour across the network in 2031. The key strategic routes, the A3 through Guildford NE bound, and the M25 between Junctions 10 and 11 will be at or over capacity. The summary network statistics presented in the SHAR, while useful, require some interpretation because the analysis of vehicle-hours is derived from link speeds only, and does not reflect junction delays and queues. The tables that show the ratio of flow to capacity and level of service are especially helpful to gaining an understanding of the conditions on the network in the forecast. Where the forecast traffic volume is above or close to capacity, flow becomes unstable and there is congestion. The SHAR results provide evidence that congestion will be worse in 2031 than it is today on much of the network.

9. It is the case, as stated in the report that the traffic modelling does not take into account the potential for increased use of other modes but the trip rates used for developments already have built in the typical level of use of other modes, and services will be required to meet that need. It is also the case that the model does not allow additional ‘park and ride’, which would improve matters in the town centre.

10. In order to gain an insight into conditions across the network, it is necessary to combine information from several tables in the SHAR. Table 4.5 shows that the M25 and A3 will be at capacity in Scenario 5. The other roads that will have poor levels of service include those in Table 4.5 but also those in 4.12 (except the A3), and those in Tables 4.3 and 4.4 with levels of service E and F that will not benefit from the improvement of the A3 in Scenario 5. Paras 4.10.3, 4 and 5 point out that there will be increased congestion. Given that the starting point is unsatisfactory, there can be no expectation that the schemes in the Infrastructure Development Plan will provide an overall improvement. There will be some local benefits, such as the Ash rail bridge for example, but in general conditions will be as bad and in many places worse. So the statement in the SHAR para 4.2.5 that ‘the combined mitigation as reflected in Scenario5...indicates that at the strategic level it accommodates the additional PSLP demand’ needs qualifying – ‘at the cost of a lot of queuing in peak periods’.

11. The cumulative effect of the additional traffic generated by the developments in the Plan will be to increase congestion, even with the proposed highway schemes in place. More detailed analysis of the junctions and queuing is required. So I do not accept the conclusion that the developments would have ‘an acceptable impact on the capacity of the highway networks in terms of the policy test set in paragraph 32 of NPPF’.

12. Appendix 3 of the Transport Topic Paper shows the phasing of housing development and transport infrastructure. The major improvement scheme being studied by Highways England for the A3 between the A31 and the A320 is scheduled for delivery in the period 2023/24 to 2027/28. The strategic developments at Blackwell Farm and Gosden Hill Farm are shown as being phased in from 2021/22 onwards. The Garlick’s Arch development is shown as starting in 2019/20. Therefore there will be a period in which the existing A3 will have to carry additional traffic associated with those developments before extra capacity is provided.

The following comments regarding the strategic sites are taken from the SHAR:
Blackwell Farm – there will be congestion at the A31 junction, and the problems at the Tesco junction, and the Egerton road/Gill Avenue junction (para 4.9.5). Traffic is likely to access the Surrey Research Park and the RSCH through the development (para 4.7.3).

Gosden Hill Farm – there will be an increase in traffic through Burpham. There will be pressure on the A3100/B2234 roundabout (paras 4.7.6, 4.7.7 and 4.7.8).

Wisley Airfield – traffic will increase on minor roads to gain access to the A3 (N and S bound) and to other routes (para 4.7.11). The development will add more traffic to the A3. The Burntcommon slips help alleviate the traffic through Ripley according to the model, but queuing on the A3 could mean this does not happen (para 4.7.14).

Normandy/Flexford – the report has little to say about the impact of this large development. The increase in flow on Westwood Lane is noted (para 4.5.7). Tables 4.10 and 4.11 show junction delay reducing at the Westwood Lane, B3000 junction, but increasing at the Puttenham Hill/Millbrook junction.

Ash – development in Ash is not specifically addressed, but there are large increases in traffic on a number of roads. The new rail bridge will bring relief (but traffic will move to the next junction).

Slyfield – there are no remarks relating to SARP, and as there are no additional trips shown in and out of the Slyfield residential zone in Tables 3.3 and 3.4, it is possible that this development has been omitted in error. If so, this means that further tests should be carried out with the extra trips included. There is a significant increase in trips to and from the Slyfield industrial zone, which will impact on the A320 and Clay Lane.

13. The town centre is extremely important for all residents and for the economy of the town. The Plan provides no policy statement relating to transport in the centre, which means that there is no vision set out, in spite of the work that has been carried out for GBC over the past two years. The SHAR has very little to say about the town centre. The model results forecast severe congestion on the approaches to the town centre including A281 Millbrook, the A31 Farnham Road, and A322 Woodbridge Road for example. There are no highway mitigation measures in the PSLP for the centre. In the Transport Strategy, GBC states that the intention is to adopt Allies & Morrison’s Scenario 2 which would have the effect of significantly reducing the capacity of the town centre road system. The implications have not been examined in the SHAR, but all traffic would be severely affected. That using the A281 to access the west of the urban area, as one example, would face having to find alternative routes. The PSLP does include a new park and ride facility at Gosden Hill and the Sustainable Movement Corridor, which are discussed below.

14. The PSLP does not state an objective for congestion. The two strategic objectives that are included for infrastructure refer to supporting sustainable development and delivering a balanced system. However, in para 2.15 there is an aspiration expressed about opportunities ‘to improve the performance of the road networks through transport infrastructure and service improvements’, which taken with the previous paragraph includes reducing congestion. The evidence provided shows that this will not happen.

15. The mitigation proposed is not sufficient to overcome the problems that will be caused by the level of growth in the PSLP. Congestion will worsen. The network will lack resilience and be vulnerable to disruption due to incidents. Minor roads will have to cope with a lot more traffic (47% more than in 2009), to which they are unsuited.

Park and Ride

16. There is one ‘park and ride’ project in the Infrastructure Development Plan which is a new facility at Gosden Hill Farm. This is to be delivered by the developer of the site and the Transport Topic paper states that the intention is that it will operate without any public funding with 500-700 spaces. It is expected that the site will be use by drivers on the A3 southbound heading into Guildford town centre (Transport Topic Paper para 5.60). It is not evident that this ‘mitigates the traffic impact of the Gosden Hill Farm site’ (PSLP App C P&R1), though of course there may be some residents of the new development who may choose to use the P&R bus service. This facility is not related to the proposed new Guildford East Station at Merrow.

17. There is an absence of any park and ride proposal east of the town centre, although the volume of traffic suggests that a facility warrants consideration.

Sustainable Movement Corridor

18. This is an ambitious concept. Policy 13 in the Plan states that the SMC ‘will provide a priority pathway through the urban area of Guildford for buses, pedestrians and cyclists’. It will link the new developments in the west to those in the...
east via the town centre. It is estimated to cost £70-90m, with funding coming from developers and the Local Growth Fund. The recognition of the importance of sustainable travel is welcome. Connecting new developments to the town centre, as in the case of SMC1 and SMC2, is sensible. The case for a ‘corridor’ has not been demonstrated.

19. The latest information on the project has been supplied in a paper ‘Progress Update on the SMC Scheme’ published by GBC on 6 June 2016. This explains that studies have been carried out for sections 1-5 of the proposed route, and further work is needed. The SMC will use existing roads for the majority of its length, so this means that it will affect the allocation of carriageway between road users. This will be challenging because the road width on several sections will limit what can be achieved without a major impact on other traffic. Two design formats have been identified, ‘type 1’ involving separate lanes for the SMC, and ‘type 2’ in which bus priority measures are introduced at ‘congestion sections and interchanges’. The majority of the route is likely to be ‘type 2’ according to Table 1 of the Progress Update.

20. The Plan states, in para 4.6.24, that ‘journeys will be rapid and reliable by bus and safe and direct on foot and by bike’. The ability to deliver rapid bus services in peak periods has not been demonstrated. There has been no quantification of the potential demand to use the SMC. Securing funding from the Local Growth Fund will require an economic justification.

Bus Transport

21. There are two projects in the Plan relating to buses. The first is labelled ‘New Guildford town centre bus facilities’. This is essential and the absence of a site for a bus station in the Plan is a serious weakness. Providing a focus for town centre bus services and the SMC surely should be a key feature of town centre planning. The improvement of bus connections to the station is also needed.

22. The second project is for bus/rail interchange at Effingham Junction station (or Horsley) is desirable if the Wisley Airfield development proceeds...

Active Modes

23. The schemes listed are welcomed.

Rail

24. There six projects listed in the Plan of which four will be delivered by Network Rail as part of their investment programme. The other two are the new stations, Guildford East and West, which will increase rail access to development sites, and the hospital in case of the West station, and are to be welcomed for that reason.

25. The Plan does not deal with the fact that the Portsmouth/London main line is extremely busy in peak periods. Commuters from Guildford to London frequently have to stand, and this is in spite of longer trains having been introduced. Capacity is limited in the area between Surbiton and Waterloo and this is the focus of Network Rail investment (project NR5) that is scheduled to start in 2029. The growth proposed in the Plan for Guildford will undoubtedly mean more people will want to commute, adding to pressure on the already congested services, in the years before the frequency of services can be increased, which is most of the Plan period.

Information Requests

26. I have requested additional information which it was not possible for GBC and SCC to provide in time for this submission. A list of the items requested is included in my response to Question 1 of the questionnaire, in line with the guidance provided in GBC’s email of 30th June 2016.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8017  Respondent: 8599201 / Richard D Jarvis  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I am writing to object to the scale of development proposed for Guildford in the PSLP. While wanting the town to be successful and vibrant, this should not be achieved at the expense of sacrificing the character of the town and its surrounding countryside. I endorse the submission made by Guildford Residents Association.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/414  Respondent: 8599201 / Richard D Jarvis  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (Yes)

I have submitted comments on the evidence in statement sent by email. In addition I wish to raise a set of questions on the transport related evidence. These are queries asked during the consultation period which I was advised to submit via this questionnaire.

A Strategic Highway Assessment

A1 In the SINTRAM network, how many kilometres are there of each class of road?

A2 Please provide the totals for trips as follows for the AM and PM peak for 2009, Scenario 1 and Scenario 2

   i) intra-borough ii) external to borough iii) borough to external

A3 There are marked differences between peak arrivals and departures in the AM and PM peaks. Table 3.5 shows for Scenario 2 Am pk arrivals of 1,850 and PM peak departures of 3236. Why the large differences? The response by email on 1 July does not answer the question.

A4 Table 4.13 shows outward cross-boundary impacts. Please provide the equivalent for inbound.

A5 Please tabulate link flows and RFCs for Scenarios 1 and 5 for all the links listed in Tables 4.3, 4.4, 4.5 and 4.12, for the AM and PM peaks

A6 Please tabulate junction delays for all the junctions in Tables 4.8, 4.10 and 4.11 for scenarios 1 and 5 for the AM and PM peaks.

A7 In Scenario 5 the RFC for the M25 J10-11 is 1.0 (Table 4.5) what is the link speed for this case? The A3 has an RFC of 1.10 in Table 5. What is the corresponding link speed?
A8 What is the total number of trips (i.e. 2009) to which the extra trips in Tables 3.5 were added?

A9 There are no additional trips in Tables in 3.3 and 3.5 for zone 552 Slyfield Residential which is a zone with a large housing development in the Plan. Is it that case that extra trips should be added to rectify an omission?

A10 Does the version of TEMPRo used for external growth take account of the planned development in Rushmoor called Wellesley (Aldershot Urban Expansion)?

A11 The trips to and from town centre zones in Scenarios 1 and 2 show a marginal increase over 2009 in the AM peak, and a reduction compared to 2009 in the evening peak. I have classed the following as 'town centre zones': 133, 134, 135, 136, 310, 540, 541, 545, 543, 544, 547, 548, 549, 550. The combined increase in the AM peak trips is 90, and the reduction in the PM peak is -341. This is difficult to reconcile with the scale of growth of the town, including the centre, with increased housing and major retail expansion.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

<table>
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<tr>
<th>Comment ID:</th>
<th>SQLP16/523</th>
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The Strategic Highway Assessment Report explains that the distribution of the additional trips generated and attracted to new developments was based on 2011 Census data, with the exception of Wisley Airfield development.

While this is a pragmatic way of dealing with the matter, it is a simplification in that that the distribution is not influenced by either the new developments of the traffic conditions on the network.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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</table>
I have an interest in participating in the Examination on transport issues, to present the interests of Guildford Residents Association.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp173/309  Respondent: 8599201 / Richard D Jarvis  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Appendix C: Infrastructure Schedule

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Schemes SRN1 and SRN6 should be reinstated.

The addition of LRN23, LRN24, and LRN25 is supported.

The funding sources for many of the Local Road Schemes have been changed to 'Developer' only. The high authority, Surrey CC, is not proposing any schemes of its own. Is this due to a lack of funds, or a belief that nothing more is needed?

The addition of BT5 and BT6 is supported.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/2472  Respondent: 8599201 / Richard D Jarvis  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Introduction

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Where is A59?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/860  Respondent: 8599201 / Richard D Jarvis  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Key facts
Do you consider this section of the document; complies with the Duty to Cooperate? ( Yes ), is Sound? ( Yes ), is Legally Compliant? ( Yes )

Answer (if comment is on questions 1-7 of the questionnaire): ()

See attached file.

[text of attachment reproduced below]

The changes to paras 2.13, 2.14a, 2.14b and 2.15 are welcome. In para 2.15, the text now says that there are opportunities improve the capacity of the road network, rather than performance. This is more realistic and fits with the plans. However it does not match the ambition of the Transport Strategy to ‘address the historic infrastructure deficit’.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Para 2.3 quotes the ONS population projection for 2033. There should be an addition stating what population the Plan is designed to serve in 2034.

Attached documents: Chapter 2 Key Facts, 20.7.17.pdf (54 KB)

Comment ID: pslp172/2460  Respondent: 8599201 / Richard D Jarvis  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The addition of a six form entry secondary school will add to morning peak hour traffic demand on a road system that will be under pressure.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/2474  Respondent: 8599201 / Richard D Jarvis  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
The addition of a six-form entry secondary school will add to morning peak hour traffic demand on a road system that will be under pressure.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The addition of point (4) under Requirements is supported.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The addition of point (4) under Requirements is supported.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<td>Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy ID1</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
The strengthening of conditionality in point (3) is supported.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/879  Respondent: 8599201 / Richard D Jarvis  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The change from 'will expect' to 'will be required' in point (2) is supported. The similar revised wording in point (7) is also supported.

The lack of specificity about the Sustainable Movement Corridor makes it difficult to make an informed comments on point (3). It is very likely that the claims made for the SMC exceed what can be delivered, and the plan should be based on a realistic forecast and a sound business case.

Point (11) is noted but it is not clear that any of the town centre sites included in the plan would involve additional off-street parking.

In para 4.6.28, the aim of achieving 'a modest modal shift' is noted, and also that the road schemes in the plan will 'mitigate the principal adverse material impacts of this growth in traffic volumes'. it is realistic to recognise that there will be congestion on the road network in peak periods. However, the problem is that better evidence is required of what conditions will be like both half way through the plan period and in 2034. The risk of them being unsatisfactory (perhaps unacceptable) is significant.

Para 4.6.24 states the aim and means of implementing the SMC. The sentence beginning 'The Sustainable Movement Corridor will be implemented...' should be revised at the end to read '...provision for the corridor, subject to a sound business case'.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp17q/114  Respondent: 8599201 / Richard D Jarvis  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Question 1: The evidence base and submission documents
Answer (if comment is on questions 1-7 of the questionnaire): (Yes)

See attached paper with comments on
Doc Ref T12a Addendum to 2016 Strategic Highway Assessment Report
Doc Ref T13 Transport Strategy
Topic paper : Transport
[text of attachment reproduced below]

Doc Ref T12a Addendum to 2016 Strategic Highway Assessment Report: high level review of potential key changes in the Guildford borough PSLP: strategy and sites June 2017

1. This presents a qualitative assessment of the effect of the changes made to the 2016 plan on traffic forecasts. Essentially, because the amount of development in the plan has been reduced, GBC’s argument is that things will be better than estimated in 2016. We can readily agree that where development sites have been removed, notably as in the case of the Normandy/Flexford strategic site, the forecast traffic level will be lower in the vicinity of the development. However, there are some sites where the planned development is now greater than in 2016. There are also potential changes to plans outside the borough to be taken into account, such as Dunsfold Park, which may have significant consequences for Guildford, as was pointed out by SCC and GBC in their submissions to Waverley in response to that planning application. The trip rates used in the forecast assume a level of public transport use and an appropriate level of bus services.

2. On the evidence provided by the SHAR based on the 2031 traffic forecasts using the SCC traffic model, congestion will be widespread in peak periods across much of the highway network, including on strategic routes. The A3 and M25 are forecast to be at or over capacity. The cumulative effect of the additional traffic generated by the developments in the plan will be to increase congestion, even with the proposed highways schemes in place. Interpreting the model results is not straightforward, as was pointed out in response to the 2016 consultation. Table 4.12 is significant – showing the roads with the ten largest ratios of flow to capacity for Scenario 3, which includes all the planned development but not the major strategic route improvements on the A3 and M25. There is no equivalent for Scenario 5 (i.e. with the strategic improvements), but we can infer that all the roads in Table 4.12 will be at or over capacity in Scenario 5.

3. With regard to the comments on Policy A6: North Street redevelopment (page 9), the model used for the Strategic Highway Assessment is not sufficiently detailed to provide a satisfactory assessment of conditions on the town centre road network. This has been recognised by GBC and has led to the commissioning of more detailed analysis using a simulation model. Added to which, there is uncertainty over the highway capacity implications of the Sustainable Movement Corridor in the town centre and possible changes to the town centre gyratory, as discussed in the draft Town Centre Regeneration Strategy, which indicates that the intention is to reduce the capacity of the town centre network. The experimental closure of Walnut Tree Close is already being planned. Taking into account the demand forecast on the A281, the A322 and A31 in Table 4.12, the consequences of such a reduction will be far-reaching.

4. Policy A26: Blackwell Farm has been amended and now the proposed development includes a secondary school with up to six form entry. This will add to morning peak hour traffic which was not included in the 2016 modelling. The SHAR findings indicate that there will be congestion in peak periods on the network that will serve this development. The A3 will be at or over capacity which means that the network will lack resilience, as it does today. The roads connecting to the town centre will continue to be under pressure. The SMC concept is more advanced on this section than elsewhere, but the effect on capacity has yet to be established. There will be queuing on the A31 on the approach to the new signalised junction that will give access to the Blackwell Farm site. The A31 is regarded as a key route by the LEP and LA partners.
5. The improvement to the A3 is obviously critically important to the Gosden Hill Farm development. We do not have the benefit of analysis of the proposed new slip roads giving access off and on to the A3 S-bound carriageway, nor an understanding of the implications of the SMC for the allocation of highway capacity on the local roads. What is self-evident is that the pressure on local roads in Burpham is already intense in peak periods, and these roads are not suited to carrying large volumes of traffic. Under the plan, congestion is very likely to be worse than today. The proposed Policy A24 Slyfield development will also add demand to the A320 and roads in Jacob’s Well.

6. The change to Policy A29: Land to the south and east of Ash and Tongham involving more houses means that there will be more traffic locally. While this will not be ‘major’ in terms of the borough as a whole, it will be significant locally. Ash and its surroundings will be impacted by the large Wellesley expansion in Aldershot. It is not clear to what extent the modelling reported in the SHAR allowed for this development. The pressure on the A331 and the roads connecting Aldershot to Guildford and Woking will increase.

7. The M25 is forecast to be at capacity after the planned improvements have been introduced, as shown both in the SHAR and also in the recently published DfT/HE report on the South West Quadrant. This is relevant to Policy A35 Wisley airfield. It should be noted that RHS Wisley is expanding its facilities with the aim of significantly increasing visitor numbers. The DfT/HE Stage 3 report concludes that the focus should not be on widening the existing road further beyond currently planned schemes but on how to reduce pressures and provide parallel capacity to relieve this part of the network. If the M25 and A3 are at capacity, then the Wisley development will add pressure on local roads that are not well-suited to carrying higher volumes of traffic. This is also relevant to the proposed developments at Burnt Common. The consequences for Ripley are likely to be serious. It is noted that Policy A35 now includes a requirement for mitigation of impacts in Ripley and on surrounding roads, which is some recognition that there will be a problem.

8. A comprehensive up-to-date analysis is required to inform decision-making. This should include analysis of the mid-term stage of the plan, before the A3 improvement is complete, as well as 2034.

**Doct Ref T13 Transport Strategy**

9. Section 1 Overview. The description of existing conditions and challenges is broadly correct and welcome.

10. Section 2 Surface access to airports. The problem is that the improved A3 will be at or over capacity in peak periods under the Plan, and the M25 SW Quadrant study has concluded that the M25 will be overloaded. So surface access to Heathrow from Guildford will continue to be affected by the weaknesses listed in this section.

11. Section 3 Rail. This section is welcome. However, it is noted that Crossrail 2 has not yet been secured.

12. Section 4 Strategic roads. Surely the strategy should be aligned with the position of Highs England set out in the Topic Paper: Transport, where it is evident that the improvement of the A3 will not be completed until 2026/27, or even 2027/28? The removal of schemes SRN1 and SRN6 from the list of key infrastructure for the plan, and redesignating them as ‘aspirational’ is inconsistent with the safety objectives of the borough and surely of Highways England and Surrey County Council (the highway authority). Under the strategy and the Plan, the issues for Beechcroft Drive and the weaving and merging issues on the existing A3 will not be addressed until half way through the plan period.

13. Section 5 Local roads. While welcoming the aspiration to transform the town centre, the traffic implications have not been dealt with in the strategy or the Plan. Section 1 correctly included the issue of “severance of the town and its constituent neighbourhoods resulting from a combination of the A3 trunk road, railway lines and the River Wey”. The case for a new crossing of the river and railway, relieving pressure on the Farnham Road railway bridge and helping to achieve a better environment on town centre roads, should be taken very seriously and examined in depth. There is a real risk that a significant reduction in capacity in the town centre, both the gyratory and Walnut Tree Close, and on routes carrying the SMC, will lead to road users transferring to minor roads around the town that are unsuited to carrying more traffic.

14. The M25 SW Quadrant study report recommends that alternative routes are developed to carry orbital traffic, and this could mean more use of the A31/A331 in Guildford. There are local roads where capacity is already an issue and planned growth will add to problems that are not mentioned in this strategy. The scope of this element of the strategy is not wide enough. The bus transit strategy is welcome. However, there is insufficient information on the Sustainable Movement Corridor to gauge either what it might deliver or its potential impact on road capacity. The statement under ‘Anticipated improvements’ that the New Sustainable Movement Corridor provides rapid and reliable bus journeys in Guildford urban...
area and links...’ has not been demonstrated. Consultants have been carrying out studies but the results have not been made public in time to inform this consultation.

15. A high quality bus station in the town centre is critical for the future of the town. There is a lack of park and ride on the east of the town and not even an aspiration for future provision.

16. The active modes strategy is welcome. However, many roads in the borough are two-lane carriageways of restricted width, with little scope for allocating space for cyclists, and this has to be either accepted or addressed over the long term.

17. Section 6 Air quality. If traffic is going to increase in aggregate, as the forecasts show, even with the measures being proposed, then air quality will continue to be a concern.

18. Section 7 Road safety. The proposals are welcome, but as stated above, the schemes SRN1 and SRN6 should be reinstated in the Plan for safety reasons.


**Topic Paper: Transport**

20. This is a helpful paper providing context and background to the transport aspects of the Plan.

21. The fact the new supplementary technical work is planned to be carried out prior to the submission of the plan to the Secretary of State (para 3.18) is welcome, but it would have been better if the results had been available for this consultation.

22. It is recommended that the wider evidence base should be expanded to include the following:
   - Local Enterprise Partnerships and Local authorities: Influencing Strategic Transport in the South East, WSP, 2016
   - Surrey County Council: Response to Waverley borough Council on WA/15/2395 Dunsfold Park, Dec 2016
   - Guildford Borough Council: Guildford Town Centre Highway assessment –Town Centre Highway Layout Concept Testing, WSP, April 2016

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents: [Comments on transport evidence,rdj4, 24.7.17.pdf](#) (94 KB)

**Comment ID:** pslp17q/163  **Respondent:** 8599201 / Richard D Jarvis  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Question 1: The evidence base and submission documents

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** (Yes)

The evidence presented on housing need in GLHearn's Guildford Addendum to the SHMA (March 2017) is flawed. The explanation of why it is flawed is set out in the report prepared by Neil McDonald for Guildford Residents Association - Review of GLHearn's Guildford Addendum, July 2017. (This report has been peer reviewed.) There are strong grounds for revising the OAN downwards, which would have fundamental implications for the Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
This comment is about one aspect of soundness - making sure that the infrastructure provision in the plan will be sufficient to meet the needs of the increased population and that of the surrounding area. In the case of transport, this is unlikely to be the case. Achieving soundness in this respect would require a lower rate of expansion of housing and more investment in infrastructure.

The assessment of need for housing in the borough over the plan period adopted by the Council is based on flawed analysis, and this undermines the soundness of the plan.

[Text of attachment reproduced below]

1. In terms of its transport aspects the Plan cannot be regarded as sound. GBC has provided vivid descriptions of the conditions on the network today and the evidence is that these will be as poor, and in some cases worse, at the end of the plan period, even with the mitigation measures. Growth and infrastructure have to be better aligned. While the level of growth in homes in this latest draft plan is somewhat lower than that in the 2016 version, it is still substantial and growth is also planned outside the borough. The evidence provided indicates that congestion will be widespread on much of the highway network in peak periods, even with the proposed highway schemes and with the measures to encourage the use of public transport in place.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents: Q3 Soundness, 20.7.17.pdf (5 KB)
While the text of the final paragraph in the box setting out the spatial vision has not changed, the schemes referred to have. See attached comment.

[text of attachment reproduced below]

The last paragraph in the Spatial Vision statement refers to ‘early targeted improvement schemes to deliver road safety and some congestion relief on the A3 will be delivered within the plan period’. While it is correct that funding has been committed for two improvement schemes – SRN7 (£1.6m) and SRN8 (£2.5m), but the two safety related schemes SRN1 and SRN6, previously regarded as urgent, have been removed from the infrastructure schedule.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

The final sentence of the Spatial Vision should be changed to read as follows:

The rate of delivery of housing in the plan period is conditional on major improvement of the A3 through Guildford and the other highway improvement schemes listed in the Infrastructure Schedule.

**Attached documents:** [Chapter 3 Our vision and ambition, 20.7.17.pdf (89 KB)](attachment)

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**Comment ID:** pslp171/1084  **Respondent:** 8599201 / Richard D Jarvis  **Agent:**

**Document:**  Proposed Submission Local Plan: strategy and sites 2017 / Vision and objectives

Do you consider this section of the document; complies with the Duty to Cooperate? (Yes), is Sound? (No), is Legally Compliant? (Yes)

Answer (if comment is on questions 1-7 of the questionnaire): ()

The number of additional homes to be delivered by 2034 has been changed to 12,426. This number is based on the GLHearn Addendum to the SHMA which is flawed. Further work is needed to arrive at a more soundly based number, but on the assessment made by Neil McDonald, the demographic need is for 404 houses per annum. Allowing for rounding up the calculation for the years to 2034, the provision in the plan should be reduced to 8,000.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** pslp171/1085  **Respondent:** 8599201 / Richard D Jarvis  **Agent:**

**Document:**  Proposed Submission Local Plan: strategy and sites 2017 / Vision and objectives

Do you consider this section of the document; complies with the Duty to Cooperate? (Yes), is Sound? ( ), is Legally Compliant? (Yes)

Answer (if comment is on questions 1-7 of the questionnaire): ()
The scale of comparison retail floorspace provision in the Norrth Street development has been changed to 41,000 sq m which is a move in the right direction, but not enough. The quantity should be scaled back further, in recognition of the trends in retailing and taking into account the existing retail space in the town centre.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/10742
Respondent: 8599553 / Runnymede Borough Council (Richard Ford)
Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy P2 sets out the villages to be inset from the Green Belt and identifies them for limited infilling. However, the NPPF is different from the former PPG2, in that it no longer sets out that villages can be inset and identified for infilling only. The NPPF is concerned with whether a village is either in or out of the Green Belt, and not the type/level of development that may occur.

I hope that you find these comments helpful, but please let me know if any clarification is required.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/10741
Respondent: 8599553 / Runnymede Borough Council (Richard Ford)
Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Thank you for providing this Council with the opportunity to comment on your Proposed Submission Local Plan. The comments below are at officer level; the matter has not been reported to Council members.

Policy S2: The Boroughwide strategy makes provision for 693 dwellings per annum to 2033, and 43 pitches and 6 plots 2012-2017 with an additional 30 pitches and 2 plots to 2017. As such, the policy is meeting economically derived OAN and full identified GTAA needs, as evidenced by the SHMA and the GTAA.

The policy also sets out that housing is needed to support the supply of 3,200 B class jobs, but it is not possible to discover where from the ELR or the Employment topic paper, that this figure has been derived. However, as not in Runnymede’s FEA, this is not a matter of particular concern to us.
Para 4.1.11, as supporting text to Policy S2, states that Table 1 shows development to be delivered between 2018 and 2033, and sums to 10,395 (693 per annum). As such, it has to be assumed that 3,465 (693 per annum) is to be delivered 2013-2018, but there is no identification or breakdown of sites delivered or under construction from 2013 onwards that count towards the target.

Para 4.1.12 states that Table 1 shows that the number of new homes is greater than the target. Table 1 sums to 13,652, which is less than the target, so it is not clear if the 13,652 is for the period 2018-2033 or for 2013-2033.

The list of housing sites sum to 12,630 which, with addition of windfall at 625, gives 13,255. This is less than the figure quoted in Table 1 and the housing target in Policy S2, but the list of sites is not clear if these are for 2018-2033, or if any are under construction.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp171/1007  Respondent: 8599553 / Runnymede Borough Council (Richard Ford)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

It is noted that policy S2, Planning for the borough – our spatial development strategy, of the Local Plan, intends to meet a housing need equivalent to a level of 654 dwellings per annum. This is the figure set out in the Land Availability Assessment (LAA) Addendum (June 2017).

However, it is not the figure set out in the Final West Surrey SHMA (September/October 2015), which identified an overall need for housing over the 2013-33 period for Guildford of 693 homes per annum. This document was prepared by GL Hearn on behalf of Guildford, Waverley and Woking Borough Councils jointly.

Runnymede Borough Council is concerned that Guildford is not proposing to meet its full OAN, with consideration therefore having to be given to the question as to whether the Plan is unsound on that basis, notwithstanding that there has been some joint working with Waverley and Woking in pursuit of the Duty to Co-operate.

Moreover, as Runnymede is not yet in a position to be able to confirm that it is able to meet its own housing needs in its emerging Local Plan, ‘Runnymede 2035’, this Council will continue to request assistance concerning this matter from Guildford (and, indeed, from other Local Planning Authority areas).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Document: Proposed Submission Local Plan: strategy and sites 2016 / Introduction

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Executive Summary

This set of representations are made on behalf of Countryside Properties (UK) Ltd to Guildford Borough Council’s (GBC) Proposed Submission Local Plan: Strategy and Sites. The representations are made in response to the Council’s decision to exclude Land South of New Pond Road Farncombe (Land Availability Assessment Ref: 2241) as a residential allocation in the Regulation 19 Proposed Submission Local Plan. The site was previously identified as part of a residential allocation (number 80) within the 2014 Draft Local Plan.

These representations draw upon the findings of a number of technical reports with regard to the Land South of the New Pond Road, Farncombe, and these reports are attached as appendices. These cover landscape and visual impact, flood risk, sustainability, archaeology, ecology, heritage and transport. We conclude that land to the south of New Pond Road, Farncombe:

- Makes limited contribution to the four assessed purposes of Green Belt and to the (defined) special qualities that are intrinsic to designating an AONB;
- Has no technical constraints preventing the site from being used for residential development;
- Can fully deliver housing in the first 5 years of the plan, thus contributing towards Guildford Borough’s five year land supply; and
- Is sustainable as it is well located to existing local facilities and services, including local public transport infrastructure.

GBC’s strategy relies upon a number of strategic sites, and it is acknowledged that the current backlog of housing provision will not be met within the first five years of the plan. This highlights the critical need to allocate smaller and medium sized sites which are capable of delivering housing in the short term.

NLP have critiqued the West Surrey Strategic Housing Market Assessment (SHMA). The following matters are identified as being of particular concern:

- A failure under the duty to co-operate to address how the housing needs of the West Surrey Housing Market Area (HMA) will be addressed, in particular, with respect to significant unmet housing needs of Woking (which the SHMA identifies as being 3,150 homes between 2013 and 2027);
- A failure to take account of recent London migration patterns which indicate an additional need of 1,200 dwellings across the HMA;
- Market signals and affordable housing demand both point to the need for a substantive uplift being required to the Objectively Assessed Need (OAN) figure; and
- Costly infrastructure requirements (particularly with regard to major road and rail projects) raise doubts about the deliverability of a number of the proposed housing allocations.

The representations also provide a comparison of the New Pond Road site with four similar sites that are proposed housing allocations, and identifies that the New Pond Road site is comparable or preferable in landscape and sustainability terms and should be added to the Local Plan as a residential allocation.

The representations raise concern about the allocation of the land to the south of Normandy and north of Flexford (Policy A46). Key concerns include:

- The site is identified in the Council’s Green Belt and Countryside Study as a highly sensitive land parcel;
- Development would cause considerable harm to the openness of the Green Belt and remove the highly sensitive gap between the two villages; and
Extensive infrastructure provision will be required, and the deliverability of the site is uncertain.

In summary, the representations raise critical concerns about the soundness of the Local Plan as currently drafted, and accordingly Guildford Borough Council are respectfully urged to reconsider the current draft and reinstate the Land South of New Pond Road, Farncombe (LAA Ref 2241) as a residential allocation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: PSLPS16/7854</th>
<th>Respondent: 8599617 / Countryside Properties (UK) Ltd (Richard Kennedy)</th>
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Answer (if comment is on questions 1-7 of the questionnaire): ()

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents: Policy A44 v2.pdf (252 KB)

Comment ID: PSLPS16/7753  Respondent: 8599617 / Countryside Properties (UK) Ltd (Richard Kennedy)
Agent: JB Planning Associates (John Boyd)

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A46

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Representation on Policy A46: Land to the South of Normandy and North of Flexford

Introduction

This representation is submitted on behalf of Countryside Properties in response to the Council’s decision to elevate Land to the South of Normandy and North of Flexford (Policy A46) from a safeguarded site in the Regulation 18 Draft Local Plan to a Strategic Site Allocation in the Regulation 19 Proposed Submission Local Plan.

The site is 67 hectares in areas and comprises numerous fields, 4 parcels of ancient woodland and 2 public footpaths which traverse the site. It has been identified in the Submission Local Plan as a residential led mixed use development allocation for:

- Approximately 1,100 homes (C3), including some specialist housing and self-build plots (C3), and
- A nursing or residential care home (C2) with approximately 60 beds, and
- 6 Travelling Showpeople plots (sui generis), and
- Approximately 400 sq m of comparison retail (A1), and
- Approximately 300 sq m of convenience retail (A1), and
- Approximately 400 sq m of services (A2 – A5), and
- Approximately 300 sq m of community facilities (D1), and
- A secondary school (D1) (up to eight form entry), and
- A village green.

Background

In the Issues and Options Consultation (October 2013) the Council identified that it could consider an option to significantly expand an existing village, with possible areas including land between Flexford and Normandy.
In July 2014 the Council undertook a twelve week public consultation on the Draft Guildford Borough Local Plan: Strategy and Sites. Land between Flexford and Normandy was identified in this document as Safeguarded Land (site reference 119) to meet the longer terms development needs stretching beyond the plan period. The Draft Plan proposed that the land be removed from the Green Belt but would only be considered for development through a local plan review.

In this regard, the Council’s Green Belt and Countryside Study (GBCS) Vol II (February 2013) had identified this land parcel (H12) as being of “high sensitivity” to development when considering Green Belt purposes. The GBCS recognised that the land met 3 of the 4 assessed Green Belt purposes, being that it:

Checks sprawl of Normandy and Flexford;
Prevents Normandy and Flexford from merging; and
Assists in safeguarding the countryside from encroachment.

Whilst only safeguarded for future development in the Draft Guildford Local Plan in recognition of its sensitivity, land between Flexford and Normandy has now been identified as a strategic site in the Proposed Submission Local Plan (Policy A46). In this regard, the Committee Report to Full Council (24 May 2016) explains in para 4.12:

“In considering different sites within these spatial options, we have relied upon the findings of the GBCS. The GBCS identifies Potential Development Areas (PDAs) that could potentially be removed from the Green Belt for development, without harming the main purposes of the Green Belt. The draft Local Plan (2014) treated all PDAs as reasonable options for development. However, following the feedback from consultation and the new evidence available, we have reconsidered how Green Belt is used as a constraint. The draft Local Plan seeks to give weight to the sensitivity of the Green Belt parcel within which each PDA is located. Whilst PDAs have been identified on the basis that they would not fundamentally harm the main purposes of the Green Belt, there would nevertheless be, in relative terms, more harm caused by allocating sites within land parcels assessed as contributing more towards the purposes of the Green Belt.”

The Report goes on to explain in para 4.19 that “whilst the Green Belt sensitivity methodology is applicable as a general principle, consideration must be given to wider sustainability factors”, and then goes on to identify “exception” sites on this basis. This includes the land between Normandy and Flexford which “is located in a red (high) sensitivity land parcel”.

To justify its allocation as an exception, the Report explains in para 19 (bullet 3) that the key factors which have determined the site allocation at Normandy are:

“Green Belt – site identified in the GBCS as a potential development area with defensible boundaries.
Site is promoted for mixed use development, is deliverable and viable.
The location is one that would benefit from additional housing. Both Normandy and Flexford have lost local facilities, such as shops and a public house because there are insufficient populations to support them.
Infrastructure
The site will deliver a local centre with community and retail facilities, and a village green.
Provision of specialist accommodation (care home and Travelling Showpeople plots).
Provision of a secondary school to meet future needs of the west area of Guildford borough (both natural population growth and need arising from the planned new housing).
Proximity to the existing rail station and plans to improve the frequency of the service. This would serve both Normandy and Flexford residents and be used by pupils accessing the secondary school.
Capacity of the site is able to accommodate the level of associated infrastructure.
Educational need arising from our spatial strategy for the west of the borough (up to 8 forms of entry). This is principally development at Ash/Tongham, Blackwell Farm, west Guildford town and the Normandy site itself (1 form of entry).

The secondary school is located in an easily accessible location to both Ash/Tongham and Guildford – it is therefore best able to serve the catchment area.

Such a development could make both Normandy and Flexford villages more sustainable.

In the following sections, we consider the soundness of the key factors that have led to the Council making an exception to its key principles when identifying the land between Normandy and Flexford (Site A46) as a Strategic Site.

**Green Belt**

As identified above, the Council’s GBCS identifies that this land parcel is considered to be of high sensitivity to development. It also confirms that its development would inevitably compromise all but one of the five Green Belt purposes identified in the NPPF.

The GBCS goes on, however, to suggest in Vol V (when considering the land as a potential major development area (PMDA)) that the development would not significantly affect the openness of the Green Belt at this location within the Borough. In reaching this conclusion it identifies that the site “is generally enclosed by woodlands, treebelts, hedgerows and the railway line to the south. Woodland at Waldens Copse and Pusseys Copse provides a high level of visual screening within the PMDA.”

We consider that this simplified consideration of ‘openness’ in relation to general views into Site A46 from the wider area fails to take account of the scale of proposed built development across, what is described in the Council’s Landscape Character Assessment as, a peaceful rural landscape, with a gently rolling landform, substantial areas of ancient woodland of high biodiversity value and a sparse settlement pattern. Having visited the site, we agree with the findings of the Landscape Character Assessment, having noted its tranquil nature and scenic quality but also its function as a rural setting to scattered and fragmented built development. We also identified wide open views across the site from Westwood Lane to the northwest, and from the public footpaths crossing the site.

Built development guidelines within the Council’s Landscape Character Assessment advocate the conservation of this fragmented landscape including the surviving areas of open farmland with scattered farmsteads; the retention of individual settlements avoiding merging these through dense linear development along roads, for instance Flexford and Normandy; the retention of gaps in linear development (for instance between Great Westwood and Flexford); avoiding the location of any new large mass of development or bulky structures where overly visually intrusive on this character area; and the conservation of the views south to the rural, unsettled ridge of the Hog's Back. The Council have therefore clearly been inconsistent with the its own build development guidelines in choosing to allocate Site A46.

Recent proposals for much smaller developments on land in the immediate vicinity of Site A46 have been refused by the Council on grounds that the quantum of urban development would be harmful to the openness of the Green Belt and the landscape character of the area. The first application for 90 units has subsequently been considered by an Inspector at appeal and he also concluded that “given the largely undeveloped nature of the site and the scale and nature of the proposed development, it seems to me that the development would have a considerable impact in this respect [openness] and I attach substantial weight to this harm”4. In dismissing the appeal, the Inspector also concluded that the development would be harmful to the character and appearance of the rural settlement.

The conclusions reached in the GBCS with respect to the insignificant impact of Site A46 on the openness of the Green Belt are therefore clearly questionable in view of recent decisions reached by the Council and the Planning Inspectorate for much smaller developments in the immediate vicinity of the site. We therefore consider that the harm to the openness of the Green Belt has been understated in the identification of the site as a Potential Major Development Area in the GBCS.

**Deliverability and Viability, including infrastructure provision**

It is noted from the Council’s Land Availability Assessment (February 2016) that in order to support the development of Site A46, there would need to be a significant investment in infrastructure. The infrastructure requirements identified in the Infrastructure Delivery Plan (2016) include:
Potential upgrades to the capacity of local electricity, water supply and wastewater networks;
A bespoke SANG to mitigate the impact of the development on the SPA;
Improvements to the B3000/A31 junction (est cost £1 million);
A323 Guildford Road traffic management and environmental improvement scheme (est cost £1 million);
Westwood Lane traffic management and environmental improvement scheme (est cost £0.8 million);
Significant bus network improvements to key destinations;
Provision of an offsite cycle network to key destinations;
Flood risk reduction measures in Orchard Close by railway line at Wanborough Station;
Provision of on-site Sustainable Urban Drainage Systems to minimise flood risk (the site adjoins a surface water flooding hotspot area (Flexford) as set out in the Guildford surface water management plan);
Open space including park, playground and playing fields;
Contributions to the expansion of Wyke Primary School to serve the site (construction costs £5m); and
Contributions and provision of serviced land for a 7fe secondary school (construction costs £20m).

The list of infrastructure required to support the development is clearly extensive and the costs will be substantial. Beyond the above, draft Policy A46 also requires the proposed allocation to deliver a local centre with community and retail facilities, a village green, and the provision of specialist accommodation (care home and Travelling Showpeople plots).

This extensive list of infrastructure is required to drastically improve the sustainability credentials of a rural location currently lacking in service provision. It is therefore evident that the timely delivery of infrastructure at Site A46 is essential if the Local Plan’s fundamental objective of delivering Sustainable Development is to be met. Yet, despite this, we are not aware of any viability study that has been undertaken to demonstrate that the strategic allocation is deliverable and viable with the level of infrastructure required.

Sustainability

We’ve noted above that a significant amount of new infrastructure is needed to support the scale of development envisaged by Policy A46 given the existing deficit in the adjacent settlements of Normandy and Flexford. In fact, Normandy and Flexford scored low (score 9) in terms of the total community facilities and was ranked 10th in terms of the sustainability assessments within the Council’s settlement hierarchy.

To consider this further, we have produced a Site Comparison Table (Appendix 5.1) which compares the sustainability credentials of the site with our Client’s land at New Pond Road, Farncombe. This has been informed by the findings of the Sustainability Appraisal (SA) of the Guildford Proposed Submission Local Plan, although we have, where necessary, amended the scorings to address inaccuracies that we have noted with respect to our Client’s site. This includes correcting the distance to the nearest Primary School as the SA suggests this is less than 2km, when in fact it is less than 1km. We have also identified from available MAFF records that our Client’s land contains Grade 3 agricultural land, as opposed to Grade 1 land which is identified in the SA.

Below we set out our key conclusions when comparing Site A46 with our Client’s site:

Site A44 scored poorly (red) in relation to 5 sustainability criteria, whereas our Client’s site only scored poorly in 3 criteria.

Site A44 is further from a key employment site, recreation facilities, a primary school, and secondary school than our Client’s site.
Site A44 is closer to a European Site (SPA and SAC) than our Client’s site.

Our Client’s site scored worse than A44 with respect to flood risk, and its location within the AONB, however we have demonstrated in our site specific representation in relation to our Client’s site (Section 3) that it makes limited to no contribution to the special qualities and features of the Surrey Hills AONB, and that the area of the site within a flood zone has been agreed with the Environment Agency and will be left undeveloped.

In justifying Site A46 as an exemption the Council contend that the development would make both Normandy and Flexford more sustainable. This may be the case, but as noted above it is at the expense of highly sensitive gap between the two settlements. The separate identity of these villages would also be compromised as, in effect, a new settlement would be formed. We note that the promoter of the site submitted a Concept Masterplan (Drawing No. CSa/2516/101 Rev A) in response to the Regulation 18 Local Plan consultation that sought to address this issue through seeking to locate residential blocks at the edges of the site adjacent to the existing parts of the settlements. However, the result of this is a perpetuation of the disjointed nature of the settlement pattern in the area that would fail to achieve a cohesive and sustainable new development. This is demonstrated by drawing 1325.01 enclosed as Appendix 5.2, which highlights the fragmented layout of the blocks of development proposed on the Concept Masterplan.

Furthermore, we contend that the majority of infrastructure required is there to mitigate the effects of the development, rather than enhance the vitality of Normandy and Flexford as rural communities.

A further justification provided by the Council for a strategic allocation in this location is the proximity to the existing rail station and plans to improve the frequency of the service on the North Downs Line.

In this regard, we consider that Council should take note of the findings of a recent report from the Royal Town Planning Institute (RTPI)5 which challenges the assumption that building in the Green Belt around railway stations would see the majority of new residents using the train to get to jobs in London. The RTPI examined commuting data for five medium-sized towns within the existing Metropolitan Green Belt, towns which are centred around railway stations and have direct connections to central London. It found that in these five towns, only 7.4% of commuters actually travel to inner London by train on a regular basis, despite living within easy walking or cycling distance of a station. The majority of commuters (72%) instead travel by private vehicle, mostly driving to jobs within their hometown and to other places not in London.

The study therefore suggests that new settlement developments next to railway stations are not necessarily sustainable and actually add to traffic congestion because only a small proportion of the population use the station to get to work.

Also, the Council’s LAA (February 2016) notes that opportunities to improve the stations facilities, such as parking and cycle storage, would need to be explored alongside improved connectivity to the station. It is questionable whether this is feasible in view of the limited space available surrounding the existing station.

Summary and Conclusion

Despite being described within the Council’s Green Belt and Countryside Study as a highly sensitive land parcel, Site A46 has been identified as an exception by the Council to its general approach of choosing potential development areas that cause least harm to the Green Belt. It has done so on the basis that it considers there to be key factors concerning the deliverability and sustainability credentials of the site. It has also been suggested by the Council that the development would not significantly affect the openness of the Green Belt at this location within the Borough.

We have demonstrated in these representations that the conclusions reached with respect to the insignificant impact of Site A46 on the openness of the Green Belt are clearly questionable in view of recent decisions reached by the Council and the Planning Inspectorate for much smaller developments in the vicinity of the site. We consider that the harm to the openness of the Green Belt has been understated in the identification of the site as a Potential Major Development Area in the GBCS.

We have also noted that an extensive list of infrastructure is required to drastically improve the sustainability credentials of the proposed allocation in view of the significant deficit in service provision in the local area. The timely delivery of this infrastructure is clearly essential to achieve sustainable development, yet we are not aware of any viability study that demonstrates that the strategic allocation is deliverable and viable with the level of infrastructure required.
Lastly, we have questioned the Council’s contention that the development would make both Normandy and Flexford more sustainable. This would be at the expense of highly sensitive gap between the two settlements. The separate identity of these villages would be compromised and the promoters attempt to address this issue instead would result in a perpetuation of the fragmented nature of the settlement pattern in the area that would fail to achieve a cohesive and sustainable new development.

We have also suggested that the majority of infrastructure required is there to mitigate the effects of the development, rather than enhance the vitality of Normandy and Flexford as rural communities, and also challenged the assumption that the presence of the railway station will achieve the level of sustainable transport use that is anticipated.

Test of Soundness

We consider that there is a risk of the Local Plan being found unsound with the proposed allocation of Site A46 because it is not ‘consistent with national policy, as its development will be harmful to the Green Belt and would fail to achieve sustainable development. It will also not be ‘justified’, or ‘effective’, as it does not represent the most appropriate strategy, when considered against the reasonable alternatives, and there is doubt over its deliverability.

Proposed Changes

In view of the above considerations, we believe that the Land to the South of Normandy and North of Flexford (Site A46) should be removed from the Local Plan prior to submission for Examination.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents: Policy A46.pdf (2.1 MB)

Comment ID: PSLPS16/7857  Respondent: 8599617 / Countryside Properties (UK) Ltd (Richard Kennedy)
Agent: JB Planning Associates (John Boyd)

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A47

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

<documents attached>

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents: Policy A47 v2.pdf (402 KB)

Comment ID: PSLPP16/17290  Respondent: 8599617 / Countryside Properties (UK) Ltd (Richard Kennedy)
Agent: JB Planning Associates (John Boyd)

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H2
**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ()**

**Representation on Policy H2: Affordable Homes**

**Introduction**

Policy H2 sets out affordable housing requirements for the Borough.

**National Policy**

The affordable housing policy wording needs to be amended in order to reflect the implications for the Local Plan in terms of the Court of Appeal judgment in Secretary of State for Communities and Local Government v West Berkshire District Council and Reading Borough Council [2016] EWCA Civ 441, and the subsequent changes made to the Planning Practice Guidance (PPG) as a result.

**Test of Soundness**

In view of the above considerations, we consider that the Local Plan is not sound, because it is not ‘consistent with national policy. The Plan needs to be updated to accurately reflect the recent change to national policy.

**Proposed Change**

Policy H2 needs to be updated to reflect the outcome of the above Court of Appeal decision, and the subsequent changes made to Planning Practice Guidance.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/17288  **Respondent:** 8599617 / Countryside Properties (UK) Ltd (Richard Kennedy)  
**Agent:** JB Planning Associates (John Boyd)  
**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S2  

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ()**

**Representation on Policy S2: Borough Wide Strategy & Table 1 – Proposed Delivery between 2018 -2033**

**Introduction**

This representation relates to the Guildford Borough Proposed Submission Local Plan Strategies and Sites document. Representations were previously submitted at the Regulation 18 stage in November 2013 in relation to the Guildford Borough Local Plan Strategy and Sites Issues and Options document and in September 2014 at the Draft Plan stage.
In terms of Local Plan preparation, the Guildford Borough Draft Local Plan: strategy and sites document (2014) set out the Council’s preferred options for growth. Our client’s site at land south of New Pond Road, Farncombe was identified as part of a residential allocation (number 80) within the Draft Local Plan. It was also proposed that the land be removed from the Green Belt and the Green Belt boundary re-aligned.

The 2014 Draft Plan contained the following reference:

“4.113 In accordance with national policy, Green Belt boundaries need to follow defensible lines that are easily recognisable and likely to be permanent. This includes for instance roads, railway lines, woodlands and hedgerows. We have reviewed and followed the recommendations of the GBCS with the following amendments…:

Farncombe: we have identified a development site that adjoins the settlement of Farncombe and land reserved for future development in Waverley Borough Council’s Local Plan 2002. We will continue to work together to progress this land over the plan period”.

The previously proposed draft allocation comprised of three main parcels of land. The furthest west is the site that is the subject of this representation (Countryside Properties land). To the east is land associated with New Pond Cottage and New Pond Farm. The furthest east is land promoted by Black Onyx on behalf of the Podger Estate. Countryside Properties are cooperating with those with an interest in the land.

Deliverability

Paragraph 14 of the NPPF emphasises that:

“At the heart of the National Planning Policy Framework is a presumption in favour of sustainable development, which should be seen as a golden thread running through both plan-making and decision taking.

For plan-making this means that:

local planning authorities should positively seek opportunities to meet the development needs of their area,

Local Plans should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change, unless:

- Any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole, or

- Specific policies in this framework indicate that development should be restricted…”

Paragraph 47 of the National Planning Policy Framework (NPPF) focuses on the requirement of Local Planning Authorities to significantly boost the supply of housing.

The footnotes associated with paragraph 47 of the NPPF states that for a site to be deliverable, it needs to be available, in a suitable location and viable. It is required that a site is achievable and that there is a realistic prospect of it coming forward in the next five years.

Countryside Properties confirms that the land south of New Pond Road can be delivered within the first five years of the adoption of the Guildford Borough Local Plan and contribute around 90 dwellings to the Borough’s 5 year housing land supply with an estimated average construction rate of about 30 dwellings per annum.

Local Authorities are required to work together to ensure that housing requirements across the whole Housing Market Area are addressed.

The Council identifies the key pieces of evidence base relevant to housing as being:

- West Surrey Strategic Housing Market Assessment (SHMA)
- Green Belt and Countryside Study (GBCS)
- Land Availability Assessment (LAA)
The final joint West Surrey SHMA (September 2015) indicated that the objectively assessed housing need (OAN) for Guildford borough is 693 homes per year, or 13,860 dwellings over the Plan period (2013-2033). The annual figure consists of a demographic requirement of 517 homes with an uplift of 25 homes for student growth, 120 homes for economic growth and 31 homes to address market signals and affordability issues (paragraph 4.3 of the Housing Delivery Topic Paper [HDTP]).

The HDTP states (paragraph 4.4142) that the Council consider it can meet the OAN with flexibility. The total potential provision of new homes across the plan period (including completions since 2013 and outstanding capacity) is 15,844. This is identified as including a buffer of 1,984 dwellings, rather than over-provision. Clearly, not all sites will come forward as expected during the plan period. Furthermore, we believe that in reality the Council lacks the housing supply buffer it claims to exist. We set out further below that we also consider that there are serious deficiencies in the SHMA in terms of the overall OAN identified, and that we consider the actual housing requirement figure to be higher.

Whilst Waverley is currently progressing its Local Plan, which aims to meet its OAN, there is currently unmet need arising within the HMA from Woking Borough Council. It has an adopted housing requirement of 292 dwellings per annum (2010 – 2027) against an OAN of 517. There is therefore a shortfall of 225 homes per year between 2013 and 2027, a total of 3,150 homes (paragraph 4.4 of the Housing Delivery Topic Paper).

NLP – Review and Critique of the West Surrey SHMA

NLP have prepared a review and critique of the West Surrey SHMA. Below we set out the key findings of the assessment. The full report is attached in Section 2 Appendix 1 of our representations.

Paragraph 3.5 of the NLP report refers to the fact that the SHMA models three alternative demographic scenarios as sensitives to the 2012 SNPP (para 4.62)

- a 12 year migration trend,
- a scenario which makes an unattributable population change (UPC) adjustment; and finally
- a scenario which takes into account the London migration patterns planned for in the adopted London Plan (2015).

However, the SHMA discounts the outcomes of these scenarios and concludes on the 2012 SNPP scenario as the demographic starting point for the West Surrey HMA. NLP considered this approach to be wrong.

NLP also concluded that the SHMA fails to properly consider the issue of London migration. It points out that the housing targets within the Adopted London Plan (2015) are based on a ‘central variant’ population projection produced by the Greater London Authority (GLA) which assumed migratory outflows from London will increase by 5% and inflows to London will fall by 3% compared with recent trends over the recessionary period (i.e. those that have informed the 2012-based SNPP). These assumptions have formed the basis for the London Plan, with the Examination Inspector ‘signing off’ these assumptions, inferring that they are likely to happen (paragraph 3.8).

Paragraph 3.9 states that:

“The London Plan (2015) deviates from national projections and, as this assumption influences migration at a national level, this needs to be taken into account. West Surrey’s location within the wider South East means that any assumptions around fewer people moving to London and more people leaving London (some of which to West Surrey) will result in increased population growth and housing need within the HMA as a whole. This will be of most significance to Guildford where historically there has been substantial out migration from Guildford Borough to London. As London is not planning to meet the needs of all of the migrants to London as is currently modelled within the 2012 SNPP, Guildford will have to consider how it will accommodate its current residents who will not be planned for in London. When these assumptions are applied in the London Migration scenario, Guildford has a housing need of 568 per annum (Table 25 of the SHMA),
compared to 517 per annum under the 2012 SNPP scenario. Taking into account the London migration assumptions inherent within the adopted London Plan (2015). Guildford needs to plan for 51 extra dwellings every year, over the plan period this is more than 1,000 homes. For consistency across the HMA, the outcome of this scenario for the HMA as a whole is an additional 60 units per annum over the plan period”.

The above finding is very significant. It demonstrates that over the course of the plan period Guildford would need to find provision for an additional 1,020 dwellings, and that across the HMA as a whole, a further 1,200 dwellings will need to be provided.

The use of different economic scenarios has been questioned by NLP (paragraph 3.21). It has pointed out that a different economic scenario has been used to determine associated housing need in Waverley (recent trends / the LPA’s economic strategy, whereas the economic scenario used for Woking and Guildford is based upon forecasts. As a consequence, the employment growth assumptions are not being made consistently across the HMA.

There is a clear danger that the use of different economic scenarios might result in the failure to ensure that the total number of jobs and their associated housing needs across the HMA are adequately provided for.

NLP states (paragraph 3.25) that it does not consider that the SHMA has suitably addressed the need for a market signals uplift in West Surrey and its adjustment is not compliant with the requirements of the PPG. It reports:

“…To make an uplift for market signals, the SHMA runs a sensitivity scenario to the demographic-led projections whereby the household formation rates amongst the 25-34 age group improves, such that rates return to their 2001 level by 2033 (para 7.53), i.e. it is assumed that more people in this age group will form their own households rather than living with their parents or in house shares. The SHMA concludes that making this adjustment to headship rates would result in the need for an additional 98 dpa on the demographic-led needs or 100 dpa on the economic-led needs (Tables 53-55). In either case this represents a 7% increase/uplift on the starting point across the HMA to address market signals. The SHMA appears to conclude (para 7.58) that this level of uplift is reasonable and would secure an improvement in affordability”.

Reference is made (paragraph 3.30) to the Eastleigh Planning Inspector concluding that a modest uplift of 10% is a reasonable proxy for quantifying an increase demographic based needs to take account of ‘modest’ negatively performing market signals. Whereas, more recently the Canterbury Inspector accepted a 20% uplift for ‘more than modest’ market signals pressure. This represents a more appropriate starting point for considering uplift according to NLP.

It is pointed out in paragraph 3.31 that:

“Based on the cost of housing indicators (house prices, rental values and lower quartile affordability measures), as summarised below in Table 3.2, the market signals pressures in West Surrey are well in excess of those identified in Eastleigh and Canterbury in different respects”.

The report suggests that affordable housing needs equate to an annual housing requirement of 3,106 dwellings per annum to meet affordable housing need in full across the HMA. Whilst it is recognised that delivery of that quantum of housing is unrealistic, the SHMA fails to provide any uplift at all for affordable housing (paragraph 3.39). This is considered to be an incorrect approach. Particularly given that the SHMA is silent upon how the affordability gap might otherwise be narrowed.

Paragraph 4.20 makes mention of the fact that:

“.Paragrah 47 of the NPPF requires that full OAN for market and affordable housing should be met in the HMA, as far as consistent with the policies set out in the Framework. As it stands Guildford are not complying with this requirement because it has not been evidenced that the unmet needs of Woking will be met entirely in Waverley as a result of Guildford taking on none of Woking’s unmet housing needs. Paragraph 14 of the NPPF requires that Local Plans should meet OAN, with sufficient flexibility to adapt to rapid change, unless “any adverse impacts of doing so would significantly and demonstrably outweigh the benefits”. It is not clear from the Guildford SA that this tilted balancing exercise has been undertaken. There is insufficient evidence to show that Guildford meeting even some of Woking’s unmet housing needs would be so significantly and demonstrably outweighed by the negative impacts of doing so. Indeed, the SA itself falls short of concluding that Guildford could fundamentally do no more than its own OAN. It sets out (para 8.2.2 sub-bullet (viii)) its own conclusion that “It is far from clear that Guildford is relatively unconstrained / suited for growth above OAN
in the sub-regional context. This is the finding of the SA work...”; being far from clear cannot be equated to ‘significantly and demonstrably’ outweighing benefits”

In paragraph 5.2 the NLP report concludes that the SHMA significantly underestimates the true scale of housing need in West Surrey and an OAN in excess of 1,729 dpa across the HMA is justified.

Other Considerations

There are a number of constraints which the Council took on board with regard when it sought to determine its ability to accommodate the OAN. This includes:

• The Thames Basins Heath Special Protection Area (SPA) which covers the northern parts of our borough,
• The Surrey Hills Area of Outstanding Natural Beauty (AONB) which covers the southern half of the borough,
• The Metropolitan Green Belt which covers 89 per cent of the borough,
• Flood risk across the borough, and which is high within areas of the town centre,
• Infrastructure capacity where appropriate mitigation is not possible.

Reference is made in paragraph 4.19 of the Housing Delivery Topic Paper to the fact that the southern half of the borough is designated as part of the Surrey Hills Area of Outstanding Natural Beauty (AONB) and that the NPPF affords this land the highest status of protection (paragraph 115).

There is a current commitment by Natural England to undertake an AONB boundary review. A study has been undertaken by landscape consultants Hankinson Duckett Associates, through Surrey County Council, reviewing the Surrey Landscape Character Assessment and looking for candidate areas within the AGLV that contribute to natural beauty. The study identifies a number of recommended additional areas of Surrey Hills AONB and one secondary potential additional Area of Surrey Hills AONB within Guildford borough. However, a review of the AONB will need to consider both areas for inclusion and deletion in order to be considered robust.

In paragraph 4.21 of the Housing Delivery Topic Paper the Council refers to the fact that it has:

“...sought to strengthen the level of protection afforded to the AONB within the Proposed Submission Local Plan. In accordance with the NPPF, we are not proposing any major development unless there is a strong and over-riding justification for doing so. As a result of this, the plan no longer proposes to allocate a site for 100 homes on the edge of Farncombe, at New Pond Road which is located in the AONB”.

Paragraphs 115 and 116 of the NPPF are particularly relevant in terms of the AONB

“Great weight should be given to conserving landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty, which have the highest status of protection in relation to landscape and scenic beauty. The conservation of wildlife and cultural heritage are important considerations in all these areas, and should be given great weight in National Parks and the Broads” (paragraph 115).

“Planning permission should be refused for major developments in these designated areas except in exceptional circumstances and where it can be demonstrated they are in the public interest. Consideration of such applications should include an assessment of:

• the need for the development, including in terms of any national considerations, and the impact of permitting it, or refusing it, upon the local economy;
• the cost of, and scope for, developing elsewhere outside the designated area, or meeting the need for it in some other way; and
• any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which that could be moderated” (paragraph 116).

Evidently at the previous stage of the Draft Local Plan the Council considered that the proposed allocation of our client’s site in an Area of Outstanding Natural Beauty (AONB) was justified due to the overriding need to meet the overall housing requirement, and due to the fact that development of the site was not deemed harmful to the overall protection of the Surrey
Hills AONB. This position is reinforced by the work conducted by Barton Willmore on behalf of Countryside Properties and included in the site specific representation.

The Council has dropped the proposed allocation in the Pre Submission Local Plan on the basis that it is able to deliver its overall housing requirement without the need to utilise any AONB land. However, as we have indicated above, we do not believe this to be the case as we consider the actual housing requirement figure to be significantly higher than specified in the OAN.

It is the case that the Thames Basin Heath SPA covers a large area across the northern part of the Borough, and the Surrey Hills AONB stretches across its southern parts. It is clearly appropriate for these to be afforded great protection. However, in relation to the latter, reference should be made to the forthcoming AONB Boundaries Review to be undertaken by Natural England. This will need to consider not only what other sites might merit AONB status, but also which sites might no longer warrant such status. This will ensure that it is the most valuable landscape that is afforded the strongest protection.

Urban Capacity Proposals

Guildford town centre is identified in paragraph 4.37 of the HDTP as being likely to be a source of housing supply that will deliver 1,172 dwellings to 2033, with a further 1,570 dwellings being delivered over the wider Guildford urban area (paragraph 4.41).

Guildford’s housing delivery rate has been poor in recent years. Over the recent 7 year period between 2008/9 and 2014/15, housing completions only averaged 202 dwellings per annum. Given this, it seems unrealistic to assume that sites in and around Guildford Town Centre will deliver substantial quantities of housing completions. Whilst it is entirely appropriate for the Council to seek to bolster residential accommodation in and around Guildford Town Centre, any allocations and assumptions concerning future housing land supply must be realistic and based upon likely market demand, rather than on aspirations alone. Furthermore, there are a number of technical and financial constraints, not least flood risk from the River Wey, but also ownership, access and viability (including CIL), which are also likely to impede early delivery.

The unanimous rejection in June 2016 by the Council’s Planning Committee of the £150 million Solum proposal to redevelop Guildford’s railway station and construct a new residential quarter of 445 apartments casts further doubt upon whether the delivery of significant amounts of new town centre housing provision is realistic.

We have submitted a separate representation in respect of proposed housing site allocation Policy A46 (land to the south of Normandy and north of Flexford). We note that the Council states in paragraph 4.130 that:

“…The site is deliverable and is able to deliver more homes in the earlier years than other individual strategic sites, and complete prior to those sites. The quantum of homes provided on this site is needed to contribute towards the OAN – the absence of this site would leave little overall flexibility. As set out above it is important that where sustainable to do so, we seek to boost significantly the supply of housing in the first five years. The delivery of this site is not dependent on A3 infrastructure timescales, and can start to deliver within the first five years following adoption of the Local Plan”.

We believe that there are other better sites, including land at New Pond Road, Farncombe (see our separate site based representation in Section 3) that are better able to contribute towards the OAN and 5 year housing land supply. We do not consider that the development of the Normandy site, which has been identified as being located in a red (high) sensitivity land parcel represents an appropriate strategic housing allocation site. It is apparent that the Council’s motivation for the allocation is that it will deliver a high quantum of housing on a single site, and that sustainability considerations have been put to one side.

Windfalls

The Land Availability Assessment (February 2016) seeks in Appendix D to justify the inclusion of 625 dwellings over the plan period as windfall. The windfall allowance being 50 homes per year in years, 6-10 and 11-15, and 25 homes in years 1-5. However, the justification for this seems to be largely based upon the recent rate of prior approvals. We do not consider that this provides any sound justification for the proposed windfall allowance. Clearly, there has been a rush of applications to convert offices to residential accommodation in the recent past, but suitable sites are likely to dry up
relatively quickly. Furthermore, garden land developments are likely to contribute less towards the windfall allowance than was the case in the past.

Housing Delivery

The following table in the HDTP (paragraph 4.169) shows that housing completion rates over the last decade have been low. It also demonstrates a record of under delivery of new homes against the OAN, leading to a significant backlog accruing over a short period of time.

### Housing Completions

<table>
<thead>
<tr>
<th>Year</th>
<th>Net Completions</th>
</tr>
</thead>
<tbody>
<tr>
<td>2006/07</td>
<td>357</td>
</tr>
<tr>
<td>2007/08</td>
<td>478</td>
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<td>2008/09</td>
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<td>2012/13</td>
<td>234</td>
</tr>
<tr>
<td>2013/14</td>
<td>137</td>
</tr>
<tr>
<td>2014/15</td>
<td>242</td>
</tr>
</tbody>
</table>

The envisaged housing backlog at the point of adoption is 2019 dwellings (HDTP, paragraph 4.156). It is stated in the following paragraph that:

“4.157 Neighbouring authorities cannot meet this backlog, and it cannot be met in the first five years of the plan without significant harm to the Green Belt, and other harm (as considered in the Sustainability Appraisal, Option 5). It can however be met within the first 10 years from adoption, and this is considered the most sustainable approach to development within the borough, whilst not restricting development coming forward earlier, anticipating that accrued backlog will not be met until year 2027/28”.

The Council argues in the HDTP that it would be unreasonable for it to deliver a 5 year housing supply that addresses the current housing backlog, and also provides a 20% buffer to the supply:

“4.171 To take this deficit, plus an additional year’s supply (693, 20% buffer) would require provision of 2712 homes. Add to this the five year requirement (693*5 = 3465) in this period, and this totals a required provision of 6177 homes over a five year period (1235 per year). This is not possible to achieve during this period (2018/19- 2022/2023) without significant harm to the Green Belt and other harm. This would require development of many high sensitivity Green Belt sites, which we do not consider a reasonable option. As set out, the SA has considered an option that seeks to maximise early delivery (option 5)”.

Given the acknowledged fact that housing delivery will be weak in the early years of the Plan period, it will be important to bring forward smaller and medium sized sites such as the site at New Pond Road, Farncombe rather than being dependent upon much larger sites such as proposed housing allocation A46 at Normandy / Flexford, which will need to deliver major new infrastructure. This is demonstrated by the Table below which forms part of Policy S2. It shows that it will take until the late 2020’s before housing delivery rates rise significantly above the OAN target of 696 dpa.

### Annual Housing Target

Annual Housing Target
### Summary and Conclusions

The housing target proposed to meet Guildford’s housing needs based upon the OAN figure identified in the Strategic Housing Market Assessment (SHMA) is inadequate. The NLP report produced for our client has highlighted the following key deficiencies, which suggest that the OAN needs to be increased:

- In-migration from London indicates that more than 1,000 dwellings will be required in Guildford and up to 1,200 dwellings across the West Surrey HMA;
- At least a 20% uplift is required to the initial demographic requirement to take account of market signals;
- No uplift has been made to take account of the very high affordable housing requirement that has been identified; and

Consequently, we consider that ‘Table 1 – Planned delivery between 2018 and 2033’ is deficient in terms of the identified components of housing supply for the reasons set out above. Furthermore, it fails to ensure that the Local Plan delivers a 5 year housing land supply from the outset.

In the case of ‘Normandy and Flexford village expansion (Policy A46) which is identified in the table for 1,100 dwellings, we have submitted separate representations explaining why we consider this to be an unsustainable housing allocation. We have also submitted additional representations in respect of the following proposed housing allocations: A38, A41, A44 & A47.

The identified housing land supply is unlikely to be fully deliverable due to the substantive infrastructure requirements relating to a significant number of proposed housing allocation sites.

As a consequence of the necessity to bring about a step change in housing delivery rates, the Council will need to ensure that it makes provision for necessary Green Belt revisions and the allocation of sites, such as the land to the south of New Pond Road, Farncombe, which can deliver 90 dwellings as part of one of the Council’s preferred allocations in the Draft Local Plan (Regulation 18) in 2014.
Test of Soundness

In view of the above considerations, we consider that the Local Plan is not sound, because it is not ‘consistent with national policy, as it fails to ensure that a 5 year housing land supply is provided from the start of the Plan, it also fails to identify how the wider needs of the Housing Market Area (HMA) will be addressed, and finally its OAN fails to make provision for all relevant housing needs. It is not compliant with the duty to co-operate. It will also not be ‘justified’, or ‘effective’, as it does not represent the most appropriate strategy, when considered against the reasonable alternatives, and there is doubt over its deliverability.

Proposed Changes

The following amendments are proposed:

1. The Plan should identify a 5 year housing land supply from the outset, to which our client’s site at New Pond Road, Farncombe can make a contribution.
2. The Plan needs to specify how the wider unmet needs of the Housing Market Area are being addressed; and
3. The OAN needs to be increased to take account of in-migration from London, market signals and the affordable housing demand.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

- 071816 Cover Letter.pdf (41 KB)
- S4 - App 4.2 SA Comparison Table.pdf (363 KB)
- S4 App 4.1 Pt 4.pdf (1.6 MB)
- S3 App 3.3 Pt 3.pdf (7.2 MB)
- S3 App 3.3 pt 4.pdf (1.6 MB)
- S4 App 4.1 Pt 1.pdf (320 KB)
- S3 App 3.2 Pt2.pdf (9.4 MB)
- S3 App 3.3 Pt 1.pdf (320 KB)
- S3 - App 3.9 Farncombe-Sustainability-Appraisal- Final JP.pdf (1.3 MB)
- S4 App 4.1 Pt 3.pdf (7.2 MB)
- S4 App 4.1 Pt 2.pdf (9.3 MB)
- S3 - App 3.4 - Archaeological DBA, Sept14.pdf (5.9 MB)
- S4 App 4.1 Pt 5.pdf (58 KB)
- S3 - App 3.7- Phase I Habitat Survey.pdf (1.8 MB)
- S3 - App 3.1 Promotional Brochure.pdf (1.8 MB)
- S3 - App 3.2 Pt 1.pdf (97 KB)
- S3 - App 3.5 - Heritage Statement.pdf (4.3 MB)
- S3 App 3.3 Pt 2.pdf (9.3 MB)
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
- S4 App 4.3 Pt 1.pdf (320 KB)
- S4 App 4.3 Pt 2.pdf (9.3 MB)
- S4 App 4.7 Pt 2.pdf (9.3 MB)
- S4 App 4.3 Pt 5.pdf (58 KB)
- S4 - App 4.6 SA Comparison Table.pdf (363 KB)
- S4 App 4.3 Pt 3.pdf (7.2 MB)
- S4 - App 4.8 SA Comparison Table.pdf (363 KB)
- S4 App 4.5 Pt 4.pdf (1.6 MB)
- S4 App 4.5 Pt 1.pdf (320 KB)
- S4 App 4.7 Pt 5.pdf (58 KB)
- S4 App 4.5 Pt 5.pdf (58 KB)
- S4 App 4.7 Pt 4.pdf (1.6 MB)
- S4 - App 4.4 SA Comparison Table.pdf (363 KB)
- S4 App 4.7 Pt 3.pdf (7.2 MB)
- S4 App 4.5 Pt 3.pdf (7.2 MB)
- S4 App 4.5 Pt 2.pdf (9.3 MB)
- S4 App 4.3 Pt 4.pdf (1.6 MB)
- S4 App 4.7 Pt 1.pdf (320 KB)
- S3 -App 3.6 - Flood risk (Part 1).pdf (8.1 MB)
- S3 -App 3.6 - Flood risk (Part2).pdf (7.6 MB)

Comment ID: SQLP16/1926  Respondent: 8599617 / Countryside Properties (UK) Ltd (Richard Kennedy)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 4: Duty to cooperate

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Introduction

This representation relates to the duty to co-operate which is a legal duty that a local authority has to have fulfilled in order for a Submission Draft Local Plan to be allowed to move forward for Examination.

The Legal Duty

The importance of the ‘Duty to Cooperate’ is highlighted in the PPG in (Reference ID: 9-002-20140306) which states:

“The duty to cooperate is a legal test that requires cooperation between local planning authorities and other public bodies to maximise the effectiveness of policies for strategic matters in Local Plans. It is separate from but related to the Local Plan test of soundness.

The Local Plan examination will test whether a local planning authority has complied with the duty to cooperate. The Inspector will recommend that the Local Plan is not adopted if the duty has not been complied with and the examination will not proceed any further” [our emphasis].
The PPG goes on (Reference ID: 9-008-20140306) to advise that:

“The duty to cooperate seeks to ensure that local planning authorities lead strategic planning effectively through their Local Plans, addressing social, environmental and economic issues that can only be addressed effectively by working with other local planning authorities beyond their own administrative boundaries. For example, housing market and travel to work areas, river catchments and ecological networks may represent a more effective basis on which to plan for housing, transport, infrastructure, flood risk management, climate change mitigation and adaptation, and biodiversity. The aim is to encourage positive, continuous partnership working on issues that go beyond a single local planning authority’s area” [our emphasis].

With regard to what actions constitute effective cooperation under the duty to cooperate, the PPG states (Reference ID: 9-011-20140306):

“…The actions will depend on local needs which will differ, so there is no definitive list of actions that constitute effective cooperation under the duty. Cooperation should produce effective policies on cross boundary strategic matters. This is what local planning authorities and other public bodies should focus on when they are considering how to meet the duty. Local planning authorities should bear in mind that effective cooperation is likely to require sustained joint working with concrete actions and outcomes. It is unlikely to be met by an exchange of correspondence, conversations or consultations between authorities alone.

Authorities should submit robust evidence of the efforts they have made to cooperate on strategic cross boundary matters. This could be in the form of a statement submitted to the examination. Evidence should include details about who the authority has cooperated with, the nature and timing of cooperation and how it has influenced the Local Plan [our emphasis]

Paragraph 159 of the NPPF states that LPAs should collaborate with neighbouring authorities to prepare a SHMA. We comment further in the following section regarding our concerns about the accuracy and findings of the West Surrey SHMA.

Local Authorities are required to demonstrate that they have sought to meet not only their own full objectively assessed housing needs, but also addressed any unmet needs arising from their Housing Market Area or beyond if relevant (e.g. accommodating a proportion of London’s unmet needs). This is obviously a highly important strategic cross boundary matter.

The Council’s Duty to Cooperate Topic Paper (June 2016) refers in paragraphs 4.16 – 4.18 to liaison with the Mayor of London through the Greater London Authority. Mention is made of the fact that the Council has been represented by the Head of Planning Policy from Mole Valley Council on the Strategic Spatial Planning Officer Liaison Group (SSPOLG) which was set up to address strategic planning matters across the wider South-East. It has also been represented on its officer working group successor and also on the Political Steering Group attended by Members.

Whilst it is evident that the Council has engaged with other local authorities by attending meetings and workshops, it is not apparent what specific actions and outcomes have resulted from this co-operation. In the context of London, in terms of whether adequate provision has been made to assist in meeting London’s unmet housing needs, it is clear from reading paragraph 4.33 of the Duty to Co-operate Topic Paper that no uplift has been made to the Council’s overall housing requirement.

The Topic Paper goes on in paragraph 4.42 to state that pursuant to the Memorandum of Understanding (MoU) the three local authorities that constitute the West Sussex HMA (Guildford, Waverley and Woking) are:

“…in the process of agreeing a Statement of Common Ground on housing delivery. This recognises that there is unmet need within the HMA and commits the three authorities to continued future joint working to ensure as far as possible, and subject to the policies in the NPPF, housing needs across the HMA are met in full”.

We note that the Council states in paragraph 4.43 that it does not consider that it can sustainably accommodate any unmet housing need arising from Woking. However, no further justification or explanation of why this is considered to be the
case, is provided. It is apparent that there is currently considerable uncertainty with regard to the final overall housing figure for Guildford, if it will be required to address unmet housing needs from Woking and Waverley. This demonstrates the importance of ensuring that an adequate buffer exists of deliverable housing supply over the course of the Plan period.

Paragraph 4.45 refers to the fact that the delivery of the former Wisley Airfield (2000 dwellings), Gosden Hill (2000 dwellings) and Blackwell Farm (1800 dwellings) are all dependent upon the delivery and timing of key infrastructure requirements on the A3, with the majority of provision expected post 2027.

Furthermore, the Topic Paper states in paragraph 4.65 that the former Wisley airfield site includes land which is allocated in the Surrey Waste Plan 2008 for waste development and safeguarded in the Aggregates Recycling Joint Development Plan Document 2013 as having potential for production of recycled and secondary aggregates, and for an aggregate recycling depot. Surrey County Council submitted comments to the recent planning application for this site (Ref: 15/P/00012) that the proposal would have an unacceptable impact on the provision of such facilities and is therefore contrary to these development plans.

This demonstrates that considerable uncertainty exists regarding the deliverability timescale for a very substantial component of the Council’s overall housing land supply.

We note that the Council has stated its commitment to the future preparation of a Joint Housing Trajectory across the HMA as part of its Land Availability Assessment update work. However, in the absence of this it is difficult to see how the Council is now able to demonstrate the soundness of its Proposed Submission Local Plan.

The Test

The Duty to Co-operate is a legal duty that has to be complied with. It has far more weight and importance than the test of soundness that is applied to individual policies and proposals within a draft Local Plan.

Proposed Change

We consider that in order for the Council to demonstrate that it has complied with the duty to co-operate, the Local Plan must contain a commitment to ensuring that the unmet needs of the Housing Market Area will be addressed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents: Duty to Cooperate.pdf (476 KB)


Document: Proposed Submission Local Plan: strategy and sites 2016 / Vision and ambition

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )
Representation on Spatial Vision

Introduction

The Spatial Vision makes provision for 13,860 dwellings by 2033. Over 2800 units are proposed in the urban areas which take advantage of the existing infrastructure and services, reduce the need to travel and offer alternative modes of transport to the private car.

The Plan also proposes almost 1200 dwellings on non-strategic sites within and around existing villages, some of which are now inset from the Green Belt, and over 750 dwellings as extensions to existing villages.

Reference is made to the fact that the growth proposed in this plan is predicated on the delivery of the necessary infrastructure. The Infrastructure Schedule accompanying the plan (Appendix C) outlines the key infrastructure needed to support the development planned, focussing particularly on the first five years of the plan period and the strategic development sites.

Delivery

It is evident that the delivery of a number of allocation sites will be dependent upon the provision of major new infrastructure such as new railway stations and associated works to boost network capacity, and highway improvements. We note that in terms of the A3 Guildford both the A320 Stoke Interchange Junction to A31 Hog’s Back Junction (SRN2) and the M25 Junction 10 / A3 Wisley Interchange
‘Road Investment Strategy’ (SRN3) are both costed at £100-250 million. We consider that highly expensive infrastructure provision requirements for major allocations means that there will need to be much more of a focus on the allocation of smaller and medium sized sites to ensure housing delivery is boosted over the early years of the Plan period.

Whilst the Vision refers to meeting the identified growth needs of the Borough in terms of housing, employment, retail and leisure, it fails to mention the Duty to Co-operate, and the need to ensure that the unmet housing needs across the wider West Surrey Housing Market Area are met (Guildford, Waverley and Woking), which in the case of Woking, has been identified as being 3,150 homes to 2026/27 (paragraph 4.4, Housing Delivery Topic Paper). It is also worth pointing out that the Guildford Local Plan period will run on for a further 6 years beyond that date, and that additional housing provision will likely be required for this period as well. The Vision must include a commitment to meeting housing need in the housing market area, as required by the NPPF.

The Vision suffers from a failure to articulate the strategic priorities that the Local Plan must address. Furthermore, it fails to specify how these challenges may differ in different parts of the Borough, or how the Vision may respond to different needs within the borough. It is the case that the Thames Basin Heath SPA covers a large area across the northern part of the Borough, and the Surrey Hills AONB stretches across its southern parts. It is clearly appropriate for these to be afforded great protection. However, in relation to the latter, reference should be made to the forthcoming AONB Boundaries Review to be undertaken by Natural England. This will need to consider not only what other sites might merit AONB status, but also which sites might no longer warrant such status. This will ensure that it is the most valuable landscape that is afforded the strongest protection.

Test of Soundness

In view of the above considerations, we consider that the Local Plan Vision is not sound, because it is not ‘consistent with national policy, as it fails to address how the wider needs of the Housing Market Area (HMA) will be addressed. It is not compliant with the duty to co-operate. It will also not be ‘justified’, or ‘effective’, as it does not represent the most appropriate strategy, when considered against the reasonable alternatives, and there is doubt over its deliverability. The vision also needs to be amended to include reference to the future AONB Review.

Proposed Changes

The Spatial Vision needs to be amended by inserting a specific commitment to ensuring that the unmet housing needs across the wider West Surrey Housing Market Area will be properly met.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp172/2653  Respondent: 8599937 / Development Planning Consultants (Richard Cooke)
Agent: Development Planning Consultants (Richard Cooke)

Document: Proposed Submission Local Plan: strategy and sites 2017 / Introduction

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy A34 and policy E3 generally

Little recognition of permitted development rights of B1 etc to residential.

Very little assessment in the Plan as to how the likely contribution to housing stock (and the corresponding diminution of employment space) will be achieved by the exercise of permitted development rights and by the wider changes in shopping practice that will see many more retail areas seeking change of use.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp17q/165  Respondent: 8599937 / Development Planning Consultants (Richard Cooke)
Agent: Development Planning Consultants (Richard Cooke)

Document: Proposed Submission Local Plan: strategy and sites 2017 / Question 1: The evidence base and submission documents

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (Yes)

The evidence base is acceptable.

What is not acceptable is the analysis of that base. In particular the Green Belt and Countryside study assesses GB and its fundamental principles and produces a hierarchy of sites where GB releases might be considered. The policies that you are deriving from this study do not take into account the work of that study. The major releases at Gosden Hill, Wisley, Blackwell Farm and Garlicks Arch will produce a ribbon of development almost the entire length of the Borough. The public perception of the national protection afforded by the London Green Belt (whilst travelling on the A3 for example)
will be of a continuous built up zone. The LAA base reflects developer submissions and not an independent planner led assessment of suitable sites.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID:  pslp17q168  Respondent:  8599937 / Development Planning Consultants (Richard Cooke)  
Agent:  Development Planning Consultants (Richard Cooke)

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Question 4: Duty to cooperate

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (No)

Fails the test of soundness and duty to cooperate

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID:  PSLPP16/1252  Respondent:  8600929 / Roger Newland  
Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

In response to the latest draft local plan I comment as follows:-

I object to the latest draft of the local plan which I believe is not fit for purpose.

I object to the lack of transparency in the calculation of the housing numbers. A "secret" formula prepared by property professionals whose interest is in a increasing housing market is not to be relied on without proper scrutiny. This is particularly relevant in the context of the country leaving the EU and changing demand.

I object to the Plan being developed around offers from developers rather than a structured view of how the borough should develop.

I object to GBC's lack of commitment to recognise that that Guildford's location in the green belt presents the need for significant constraints to their policies to limit growth policies and housing numbers to protect the green belt. Housing need is not considered as "special circumstances" to utilise the green belt.
I object to the focus on growth assumptions that focus on regional growth rather than local need.

I object to the proportion of housing proposed in the green belt. By planning just for local need, utilising green belt constraints, using land proposed for retail and industrial uses (where there is no proven demand) it should be possible to present a plan based on the premiss that all local housing can be accommodated without using the greenbelt.

I object to the large scale developments proposed and in particular at Wisley, Burpham and Hogs Back. These proposals cut through the green belt along the A3 corridor, and Wisley in particular is just unsustainable.

Having said that if all other options for saving greenbelt land are exhausted then an urban expansion of Guildford's boundaries seems the more logical and sustainable way forward. Whilst I believe the scale of developments along the A3 are inappropriate and far too large I don't understand why Lord Onslow's proposal at Merrow is not included, at least in part. I suspect big business is sponsoring the other sites and has influenced the Council. If all efforts to avoid green belt development had been exhausted and there remained a local need then a small proportion of the Burpham development and a small proportion of Lord Onslow's Merrow proposal would at least have a chance of being sustainable and could provide an appropriate mix of smaller unit size housing.

I do not believe the Council's promise that development will be limited if the relevant infrastructure is not provided. The current infrastructure can't cope with existing need and there are no firm or deliverable plans to add extra capacity. The National Highways schemes are already well back in the plan and there can be no certainty that the funding will ever arrive for whatever the improvement proposals are.

On a more local level I object you the late introduction of Garlic Arch based on infrastructure "bribes" whereby junctions to the A3 trunk road are offered in exchange for designating green belt land for housing. There are no studies to show the impact on the local road network and no commitment by the highway agencies to support the proposal. Garlic Arch which is agricultural greenbelt land and has ancient woodland, flooding and environmental pollution issues given its proximity to the A3 is not appropriate as a housing site. The site sits between two parishes but it will have the impact of doubling the size of Send Marsh and Burnt Common and changing the rural nature of the villages for ever.

The more logical option of utilising the Burnt Common site, proposed in the last local plan, has been removed. Although the scale and uses that had previously been proposed were inappropriate the Burnt Common site could be considered as having some areas of brown field and therefore makes a far more logical option. Garlic's Arch site should be removed from the plan.

I object to the proposal for a four way junction to the A3 without impact studies on Send and surrounding areas. However safeguarding the land makes sense but this does not mean we have to sacrifice large areas for green belt to "pay" for it. Garlic's Arch is an inappropriate site and GBC should look at their own planning refusal on a part of the site only two years ago for the reasons.

I object to the proposal to remove green belt from the western end of the borough, particularly along the A3, whilst adding it at the eastern end (Councillor Spooner's Parish).

I object to the blanket removal of villages from the green belt. The protection afforded currently does not mean that appropriate infill development can occur but it does allow respect for the fact that the surrounding areas are greenbelt. The removal of greenbelt status from villages will over time change the character of villages to wholly urban environments. Further open spaces within villages need protection, e.g. Send Marsh Green, which currently is protected by greenbelt status.

I believe that behind this draft of the local plan there is a political objective of driving growth at the expense of the green belt. GBC are not supporting the majority view of residents by fighting to protect the green belt but rather responding to national political incentives and developers interests.

Whilst perhaps this version of the local plan might be considered a minor improvement on the last one, once again the Council has failed to put a convincing draft local plan together at considerable expense to the rate payer. GBC need to listen to the people who live in the borough and reissue the draft local plan indicating they are prepared to fight for the borough not responding to regional or national blanket policies.
Although the cost of producing these unacceptable plans is no doubt vast, please try again.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/2281  Respondent: 8600929 / Roger Newland  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A42

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. The latest changes to the proposals to inset villages into the green belt are only minimal whilst the principle of inserting is not adequately substantiated and is objected to in principle. There is no protection for open areas within the villages.
2. The plan continues to be contrary to the principles of the green belt in that it proposes urban spread along the A3 corridor. The proposals at Three Farms Meadows, Wisley; Garlies Arch, Send; Gosden Hill, Burpham/Merrow and the housing towards the Hogs Back will break down the Green Belt along the A3. Any changes are only minor and there remains no special circumstances to support this development.
3. The plan still fails to explain the methodology behind the housing numbers and whilst making minimal changes these in no way reflect the constraints that could be applied given the proportion of green belt within the borough.
4. Policy A42 & Policy 2 para 4.3.15 – I object to these policies as Tannery Lane cannot support additional housing or commerce, it is a narrow country lane set in an attractive green belt area close to the Wey Navigation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/2282  Respondent: 8600929 / Roger Newland  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy A43 – I object to this policy as -

1. The changes to the current village boundary to create Garlic's Arch are only minor so this housing proposal remains disproportionate and unacceptable.
2. Changes to Garlic's Arch boundary do not address the impact on the infrastructure around Send Marsh, Burnt Common and Send.
3. The development would have a negative impact on the green belt, the ancient woodland, natural water courses and will have a negative effect on the whole area effectively doubling the size of Send Marsh. The proposed
access points to the A3 at Burnt Common takes no account of the impact on the immediately surrounding road network nor the local infrastructure. The junctions will only serve to congest the whole area rather than relieve it and as such can not be seen as a benefit to justify further development.

4. The Garlic's Arch changes do not address the gross over development of the Send Marsh area on a green field site that is an environmentally unsuitable area so close to the A3. As such the site remains unsustainable.

v. There are no special circumstances that justify the loss of this green belt.

1. The provision of traveler/showperson pitches is inappropriate and will be abused. Better to associate the minimum number to an industrial area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp172/2283  Respondent: 8609929 / Roger Newland  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A58

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. Policy A58 – I object to the proposal to create a large employment area in the Green Belt at Burnt Common which is inappropriate with no identified demand. Setting a minimum square meterage is disingenuous and will lead to developer led spread. Redevelopment of existing brown field industrial sites could be supported especially if it is for small commercial units.

Overall the Council's proposals are deplorable and therefore I object to the plan being submitted to the Inspectorate.

I have not re-addressed the points made previously but they remain relevant making the current iteration Local Plan a travesty which I object to in the strongest terms.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/880  Respondent: 8601121 / Roger Collett  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( Yes ), is Sound? ( Yes ), is Legally Compliant? ( Yes )

Answer (if comment is on questions 1-7 of the questionnaire): ()
This seems a sensible way to attempt to meet the necessary housing target

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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Do you consider this section of the document; complies with the Duty to Cooperate? (Yes), is Sound? (Yes), is Legally Compliant? (Yes)

Answer (if comment is on questions 1-7 of the questionnaire): ()

Given the demonstrable need for additional housing in the village, I believe this proposal is sensible

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

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Do you consider this section of the document; complies with the Duty to Cooperate? (Yes), is Sound? (Yes), is Legally Compliant? (Yes)

Answer (if comment is on questions 1-7 of the questionnaire): ()

This comment also relates to proposal A43a. While I have no objection to the proposal, which makes a significant contribution to the required housing total, I am disappointed that there is no recognition either here or in the more general documents, of the proximity of Woking, and particularly the Rail Station. There is understandable concern about the generation of increased traffic on the A247 from both the increase in housing and the new slip roads. As was pointed out at the consultative meeting, it is difficult to see how the A247 can be improved, even with the sum of money allocated, to meet this demand. Can there not be more imaginative solutions, in conjunction with Woking Borough Council and Railtrack, leading to

- safe (i.e. separated from vehicles) cycle routes through Send and;
- a park and ride facility to the west of Burnt Common roundabout, on land previously suggested for light industrial and housing?
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPP16/1793  **Respondent:** 8601121 / Roger Collett  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? (Yes), is Sound? (Yes), is Legally Compliant? (Yes)

Answer (if comment is on questions 1-7 of the questionnaire): ()

I think this is an entirely sensible and sound policy in relation to the green belt

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPA16/4049  **Respondent:** 8601345 / Mr & Mrs R Masset  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North

Do you consider this section of the document; complies with the Duty to Cooperate? (), is Sound? (), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I would like it known that I object most strongly to the proposed New Local Plan for Guildford Borough specifically relating to the Horsleys and my reasons are as stated below.

- The removal of East and West Horsley villages from the Green Belt. The value of having the Green Belt is immense and to keep areas free of bricks and mortar. The reason we have lived in the area for so long is because we value open spaces and the freedom to walk unhindered in a green, open environment, rather than suburbia which the Horsleys would become.
- The number of properties proposed 533 (with an additional 60+ houses on smaller sites) – an increase of 35% on the current number of homes – is so out of proportion in a village community with inadequate infrastructure – that it is ludicrous and ill thought out.
- The Horsleys do not possess the infrastructure for such intense development: in fact, to date we barely cope. The state primary school in West Horsley is always oversubscribed; parents have great difficulty in getting their children into the nearest state secondary school at Effingham; the doctors’ surgery always has waiting times for appointments, drainage in the area is completely inadequate and during periods of heavy rain the system does not cope – raw sewerage is seen floating down our neighbour’s drive and into the road from overflowing drainage.
system. Traffic is a nightmare and parking near the station and local shops is inadequate and for the increased population proposed with an additional 533 homes and resulting cars, it would become unbearable to travel.

- I would specifically mention the proposed 120 houses at Ockham Road North. We live on this road (the B3029) which has a 40 mile speed limit – I would suggest at least 50% of traffic exceeds this limit all the way from its junction with the A3 to East Lane (where it becomes 30mph). From our driveway to proceed onto this road can prove ‘hair raising’ with bends in the road giving very limited sight lines. The likelihood is that with an additional 120 homes and the prospect of two cars (at least) per household progressing onto this road safety would be a great factor.

- I would also add from a personal viewpoint, I have lived here for almost 60 years with an open environment of trees, fields and open skies. I do not wish for a view of bricks and mortar.

- I would like to know why West Horsley is to be saturated with new building 35% in proportion to its existing number of houses, whereas those in Guildford Town equates to 11% and the Ash/Tongham region 16%.

- There should be more consideration given to building on brown field sites within the Borough and to definitely leave the Green Belt protected.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/4092  Respondent: 8601345 / Mr & Mrs R Masset  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I am of course more concerned with the proposed developments in the villages of east and west Horsley partly because that is where I live but equally because the proposal to combine the two and remove them from the green belt would open the door to much further construction leading eventually to a virtual new town. The Horsleys would suffer the greatest percentage increase (35%) totally out of keeping with the area and overwhelming all of the local services.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16987  Respondent: 8601345 / Mr & Mrs R Masset  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I wish to object to the local plan on the following grounds -

1. A) Apart from infilling the proposed large scale developments will all utilise much green belt land which was set up many years ago with the express purpose of halting the expansion of the metropolis and to provide green space for relaxation and enjoyment.

1. B) The sites at Wisley Airfield, Garlic Arch and Burpham would each result in vast increases in population numbers which would result in unbearable strains on local services. Rush hour trains are grossly overcrowded and the roads, particularly around Guildford are usually at a standstill during the mornings and evenings and the Royal Surrey Hospital has almost reached full capacity. Many local schools would be totally unable to accept extra pupils with each needing sizeable extension work.

1. C) Much of this land is currently arable and if lost would result in the need for yet more food imports - hardly desirable in view of increased import costs resulting from the country’s EU departure.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/4210  Respondent: 8601473 / Cranley Road Area Residents Association (Rose Davies)

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the use of inconsistent and inaccurate evidence for housing expansion and transport.

The evidence upon which expansion is advocated in the proposed Local Plan is inaccurate or circumstantial.

Evidence fails to demonstrate the need for so much additional housing – except and unless the officers are planning for massive future inward migration....

Transport evidence is not fit for purpose. Moreover the proposed Local Plan does address past concerns, such as another river crossing and an improved central bus station.

The proposed Local Plan demonstrates reliance on creating many acres of new housing now to pay the bill for inadequate infrastructure plans, whilst ignoring the obvious consequences that large housing developments generate more traffic, air pollution, require more roads, more public transport, increasing demand for health and education services.

It must be observed that, since Guildford Borough Council is not responsible for paying for many of these extra services, it appears that the tenet of general social responsibility has been completely abandoned.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: PSLPP16/17234  Respondent: 8601473 / Cranley Road Area Residents Association (Rose Davies)
Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the proposals for Green Belt development.

I oppose all unjustified development of our precious Green Belt spaces.

The current government is encouraging development of the Green Belt, in particular “nibbling around the edges” and for very dubious reasons.

Guildford Borough Council’s proposed Local Plan includes redevelopment of every remaining green field site, with no thought for the future.

Guildford Borough Council should have policies which enable it to act as guardian of the area’s heritage and should not play into the hands of those who will indirectly or directly profit from destruction of that heritage.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/17235  Respondent: 8601473 / Cranley Road Area Residents Association (Rose Davies)
Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the proposals to expand Guildford .

The town is large enough already. It cannot support expansion by a quarter or more.

In recent years it has accommodated many thousands of newcomers.

Additional house building will lure even more of these people to the town, placing even greater strain on its infrastructure, which is already buckling under the weight of demand from the influx

Panic responses by an incompetent and suspect central government should not have been taken up with alacrity and reflected in Guildford Borough Council’s sycophantic proposed Local Plan.
It is the professional duty of Guildford’s staff and councillors to resist outside pressures and consider the future good of the town.

This does not include planning towards creation of a new “outer London borough”.

Further housing expansion should be circumscribed and avoided whenever possible.

The character of Guildford and its surrounding countryside should be preserved for present occupants and future generations.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/2703  Respondent: 8601537 / Downsedge Residents' Association (Rosemary Morgan)

Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. The SHMA and the Calculation of the OAN (Objectively Assessed Need) for future Housing Numbers

The OAN figure of 693 homes per annum is not only double the figure in the previous, 2003 Local Plan (322 homes per annum), it is also based on flawed calculations within the SHMA report:

- by failing to correct for errors in the historical for international migration flows
- by failing to build a separate case for student housing OAN
- by failing to take into account the fact that the “affordability uplift of 321 homes per annum would not result in a noticeable improvement in affordability but simply in more people who can afford high prices moving to the area”
- and by failing to correctly estimate the number of homes required to support future job growth: even before the Brexit vote, evidence suggests that homes to support future jobs should be included in the demographic OAN

These flaws have been thoroughly exposed by a recent report carried out by Neil McDonald, of NMSS, and commissioned by Guildford Residents’ Association1. **NMSS have calculated a more realistic OAN of 510 homes per annum, and claims that if a separate student OAN were also calculated, this figure might even need to be reduced still further.**

We also agree with the findings of NMSS, that it is not enough to simply reduce the OAN in the light of the Brexit decision, but that the flaws in the method of calculation should also be taken into consideration.

2. The OAN figure should also be constrained by a number of factors before the final Housing Target is set:
DOWNSEDGE RA believes that, as well as being reduced to correct for errors (see above), the OAN figure should also be constrained by a number of factors (as per paragraph 14 of the NPFF) to reduce the overall Housing Target, namely:

- the lack of infrastructure (particularly transport infrastructure) affecting road travel and causing serious congestion, within the Borough
- the risk of flooding in a large number of key areas of the Borough
- the large amount of Green Belt land within Guildford Borough, which limits the amount of available land for development (see below)
- the fact that Guildford is both an historic town and a “gap town”, both of which reduce its ability to easily correct the infrastructure deficiencies

The National Planning Policy Framework (NPPF) allows for the Overall Housing Target to be reduced to take into account all of the following before arriving at the final figure:

- Protected wildlife area (e.g. Thames Basin Heath SPA)
- Landscape areas (e.g. Surrey Hills AONB)
- Green Belt
- Flood risk
- And significant infrastructure constraints

All of the above factors could be applied in Guildford Borough, and yet the GBC Housing Target has not been reduced by such constraints in the Submission Local Plan. We note that all other councils in Surrey, apart from Guildford, have applied constraints to reduce their overall housing figures and urge GBC to do the same.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11160   Respondent: 8601537 / Downsedge Residents' Association (Rosemary Morgan)
Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Green Belt land should only be considered for development in Exceptional Circumstances

The Metropolitan Green Belt was originally created, not just for the benefit of its own residents, but for the benefit of residents of the whole of the London Urban area as well as visitors from outside the area. As such, it should not be up to any individual Borough Council to remove any of the Green Belt for development as it benefits a much wider population than simply our own. We are merely the trustees of such land for use by others. This fact was clearly understood by GBC councillors at the time of the 2015 local elections, as suggested by their promises at the time.

The government has already given written guidance to suggest that Green Belt land should only be considered for development “in Exceptional Circumstances and after the use of brownfield urban sites has been fully explored”. **However, this Submission Local Plan suggests building on Green Belt land before exploring all the opportunities to build on brownfield land.** We therefore urge GBC to carefully reconsider this policy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Attached documents:

**Comment ID:** pslp171/2621  **Respondent:** 8601537 / Downsedge Residents' Association (Rosemary Morgan)  **Agent:**

**Document:**  Proposed Submission Local Plan: strategy and sites 2017 / Policy E7

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy E7: Guildford Town Centre Downsedge RA is disappointed that the paragraph describing the Vision for Guildford has been removed, and that the documents entitled “Allies and Morrison, draft Town Centre Vision 2015” and “Allies and Morrison, draft Guildford Town Centre Masterplan 2015” have both been removed as pieces of Key Evidence to the Local Plan. These documents, prepared at considerable expense to Guildford Borough Council, and after considerable lobbying by groups such as the Guildford Vision Group and the Guildford Society, provided an opportunity to plan for our town centre in an imaginative and integrated way, and which could also address the many challenges arising from the developments envisaged in the Local Plan. Although Guildford Borough Council has replaced these two documents with their Draft Guildford Town Centre Regeneration Strategy 2017, this appears to remain a draft document and the conclusions and aspirations do not appear to be comprehensively brought forward into the Local Plan. Without a fully fledged integration, between major housing development on the urban fringe and a substantial redesign of the town centre transport network, as envisaged by Guildford Vision Group and others, Guildford clearly risks becoming permanently blighted by traffic problems.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

**Comment ID:** pslp171/2620  **Respondent:** 8601537 / Downsedge Residents' Association (Rosemary Morgan)  **Agent:**

**Document:**  Proposed Submission Local Plan: strategy and sites 2017 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy H1: Homes for all Para 4.2.8 Density: Downsedge RA is concerned that the two previous paragraphs on Density have been removed. Housing density is an important factor when assessing the character of a particular area, and this needs to be protected going forward, especially when addressing potential Planning Applications.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**
Comment ID: pslp171/2619  Respondent: 8601537 / Downsedge Residents’ Association (Rosemary Morgan)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The new paragraph 2.10a stating that “Pressure on existing infrastructure and additional stress caused by planned growth must be addressed if we are to maintain and enhance the borough's prosperity and quality of life. Many people are attracted to Guildford by the quality of life and environment. This places a high demand on school places and access to amenities such as open spaces. The Local and Strategic road networks, rail network and local facilities in village settlements are also facing increasing pressure.” is to be commended but is not specific enough.

Downsedge RA is concerned that the traffic situation in and around Guildford is already at breaking point (e.g. the A3 regularly jams and results in substantial traffic flows through the town centre). The above paragraph states that “pressure on existing infrastructure and additional stress caused by planned growth must be addressed if we are to maintain……..”. We would have preferred to see a statement such as “pressure on existing infrastructure and additional stress caused by planned growth will be addressed if we are to maintain……..”

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp17q/480  Respondent: 8601537 / Downsedge Residents' Association (Rosemary Morgan)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Question 1: The evidence base and submission documents

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (No)

Downsedge Residents’ Association supports the evidence provided by Guildford Residents Association, namely the “Review of GL Hearn’s Guildford addendum to the West Surrey SHMA”, produced by Neil McDonald (attached alongside this document). In particular, we are concerned that:

• The population forecasts produced by the Office for National Statistics (ONS significantly over-estimate the district’s population and hence future housing need, due to the under-recording of students leaving Guildford at the end of their studies. The housing need figures have therefore been over-estimated by the use of invalid population forecast.
Despite the Objectively Assessed Housing Need (OAHN) figure having been reduced from 13,860 homes in total (2013-2033) to 12,426 homes in total (2015-2034), since the earlier draft of the Local Plan, this revised figure, of 654 new dwellings per annum, is still substantially higher than the typical new housing figure achieved for Guildford over recent years.

This ambitious new housing figure also relies on building on Green Belt land at a number of locations, including the strategic sites of Gosden Hill Farm and Blackwell Farm and a new settlement at Wisley.

While we were pleased to see some reduction in scope of both the Gosden Hill Farm and Blackwell Farm developments, we were disappointed that the figure for new homes in the urban areas remains little changed at 3,000 units. We would have preferred to see some improvement in infrastructure take place before the development on these new greenfield sites, in order to address existing issues, especially on transport infrastructure. In relation specifically to transport infrastructure, and the Guildford Borough Transport Strategy, 2017, Downsedge RA has a number of concerns, including:

- If the Dunsfold Park development of 1,800 homes goes ahead, the main access to this site from the north would be the already congested A281, through Guildford town centre. The only improvements to the A281 in the Local Plan are some improvements to the Shalford roundabout (A281 / A248), which are probably required anyway. Downsedge RA would like to see further improvements to the A281 into and through Guildford, in order to reduce the likelihood of increased traffic through Chilworth and into Guildford via Halfpenny Lane, One Tree Hill Road and Tangier Road (a well-known rat run).

- The traffic on the urban section of the A3 through Guildford regularly blocks to a complete standstill, and when it does so, traffic tends to exit either at the A322/A323 Wooden Bridge Roundabout (northbound) or at the Burpham exit (southbound), causing congestion in and around the north and west of Guildford, and often through much of the town centre. Downsedge RA believes that this issue needs to be resolved.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<tr>
<th>Comment ID: pslp17q/481</th>
<th>Respondent: 8601537 / Downsedge Residents' Association (Rosemary Morgan)</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2017 / Question 2: Legal Compliance</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (No)

Downsedge RA notes that the methodology and models used by G L Hearn to calculate the Objectively Assessed Housing Need (OAHN) for Guildford has not been made available to the public, so that others can check it. This OAHN figure is a key input into the calculation of the number of new homes required in the Borough going forward. In order to be legally compliant, we understand that the “Sustainability Appraisal, a tool for appraising the plan to ensure it reflects social, environmental and economic factors, should be made public”. Although a Sustainability Appraisal has been produced and made public, critically it does not contain, the method by which the OAHN has been calculated from the population forecasts.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
**Document: Proposed Submission Local Plan: strategy and sites 2017 / Question 3: Soundness**

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (No)

To meet the Test of Soundness, the independent Planning Inspector is required to consider if our Local Plan has been positively prepared, is justified and effective and is consistent with national policy. As the need for the release of Green Belt land is entirely dependent on an over-inflated housing need figure (see above), we would question the justification for the development being proposed for Gosden Hill Farm and Blackwell Farm. According to the National Planning Policy Framework (NPPF), “A local planning authority should regard the construction of new buildings as inappropriate in Green Belt.” (NPPF paragraph 89 – see above, subject to certain exceptions)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Document: Proposed Submission Local Plan: strategy and sites 2017 / Question 4: Duty to cooperate**

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (No)

The duty to cooperate is a legal test that requires cooperation between local planning authorities and other public bodies to maximise the effectiveness of policies for strategic matters in Local Plans. It is separate from but related to the Local Plan test of soundness. While there is evidence of some co-operation with both Waverley and Woking Borough Councils during the Local Plan process, notably in relation to Housing need, there seems to be very little acknowledgement of increased traffic flows through Guildford Borough which would arise from potential new large scale developments such as the proposed new development of 1,800 homes at Dunsfold Park (see above).

The Guildford housing market is also strongly related to the London housing market, with a regular flow of families out of London into the Borough. Downsedge RA has seen no evidence of any co-operation with housing authorities within the Greater London area, nor any appraisal of the possible implications of future changes to the London property market.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35**
We object to the removal of the Green Belt land at Wisley Airfield.

We understand that Guildford Borough Council has rejected this scheme as being unsuitable, but it is still in the draft plan. This scheme must be removed from the final plan. In addition to the fact that this scheme involves the building of 2,000 homes on Green Belt land, there are no plans for road improvements and inadequate services.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: PSLPS16/7026</th>
<th>Respondent: 8601601 / Mr Roy Dyer</th>
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We object to the plans for building houses and industrial units on the Green Belt land at Garlicks Arch.

Ripley does not have the facilities needed to cope with 400 additional homes. We don’t have sufficient schools, there is already a serious lack of car parking in the village and despite the plans for the a new slip road on to the A3 at Burnt Common, this will increase the traffic through the village in the long term.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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</table>
We object to the proposals at the rear of the Talbot as the development would be on Green Belt land.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/7029  Respondent: 8601601 / Mr Roy Dyer  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A57

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to the development at The Paddocks, Rose Lane, as this development is also on Green Belt land.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15588  Respondent: 8601601 / Mr Roy Dyer  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to any loss of the green belt.

There should be no building on green belt land as proposed in this plan. We do not believe that there are exceptional circumstances as required by the National Planning Policy, as there is sufficient non Green Belt land (including brown field sites) within the borough. The main aim of the Green Belt policy is to prevent urban sprawl. If these plans were to go ahead, then that is just what we are going to end with – an urban sprawl and the villages would lose their individual identity and just be part of a large suburbia.

1. We object to the removal of Clandon, Wisley, Send and Ripley from the Green Belt

This is totally unnecessary and we believe that this is the thin edge of the wedge. If the villages are removed, then there will be more pressure for building on the green belt land outside the villages, which we totally object to.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
<table>
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<th>Comment ID: PSLPA16/398</th>
<th>Respondent: 8601761 / Albury Parish Council (Roy Hogben)</th>
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<td>5. I Object to the lack of immediate provision for new schools.</td>
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<td>6. I Object to the lack of any immediate provision for Doctors Surgeries.</td>
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<td>I sincerely hope that this time around common sense will again prevail over the mercenary driving force that has once again been displayed by this second attempt. This version seems to be a rerun, with very little difference to the previous one that was publicly dismissed.</td>
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<td><strong>Answer (if comment is on questions 1-7 of the questionnaire): ()</strong></td>
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<td>1. I Object to the lack of evidence for the alleged housing need numbers.</td>
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</table>
As a direct response to GBC’s Draft Local Plan I would comment as follows:

1. I Object to all erosion of the Green Belt.

1. I Object to any “in-setting” of any villages from the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1173  Respondent: 8601761 / Albury Parish Council (Roy Hogben)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I Object to the disproportionate amount of development in one area of the Borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/3628  Respondent: 8601793 / Roy Proctor  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I am writing in response to your invitation to comment on the Guildford Borough Proposed Submission Local Plan.

I believe that the numbers which you derived for the Objectively Assessed Housing Need (OAN) and the SHMA have been inflated either in error, or in pursuit of the aims of GBC to expand the borough in an aggressive manner. The requirements of the National Planning Policy do not result in the need to use a population forecast which is in excess of those issued for Guildford by the Office of National Statistics. I realise that the Evidence Base documents are not the subject of this consultation. However, since Policy S2 is based on forecast population numbers which are unsound, I object to Policy S2.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
In addition I would observe that the existing infrastructure in the East and West Horsley area - in particular the roads and drainage - are not functioning in an acceptable manner at the present and the prospect of the addition of the potential number of houses in the villages and close by, with the addition of 2,000 at Ockham, 400 at Burnt Common and 2,000 at Gosden Hill Farm requires more than a passing reference to "traffic management" as a solution to the impractical outcome of adding these large numbers of vehicles. I object to the strategic site proposals indicated and to the larger land areas within the villages.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to the proposal to inset the villages of East and West Horsley from the Green Belt. Nowhere in your documents do you produce evidence to support the existence of exceptional circumstances which would support this being carried out. All the objective evidence seems to derive from the need to release land for building development, and the study carried out by your consultant is inconclusive, subjective, and fails to take adequate note of the fact that the original aims of the Green Belt are still met in the cases of villages like East and West Horsley. This requirement for development is again based on unsound population forecasts.

Similarly, the proposal to change the boundaries of the current settlements of East and West Horsley appears solely aimed at releasing land for development. The arguments for changing specific boundaries are in some cases contradictory, and in some cases fail to meet the test of identifying more sustainable boundaries than those currently defined. I therefore object to the proposal to change the boundaries of the settlements.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/15250  Respondent: 8601793 / Roy Proctor  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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I object to the proposal to inset the villages of East and West Horsley from the Green Belt. Nowhere in your documents do you produce evidence to support the existence of exceptional circumstances which would support this being carried out. All the objective evidence seems to derive from the need to release land for building development, and the study carried out by your consultant is inconclusive, subjective, and fails to take adequate note of the fact that the original aims of the Green Belt are still met in the cases of villages like East and West Horsley. This requirement for development is again based on unsound population forecasts.

Similarly, the proposal to change the boundaries of the current settlements of East and West Horsley appears solely aimed at releasing land for development. The arguments for changing specific boundaries are in some cases contradictory, and in some cases fail to meet the test of identifying more sustainable boundaries than those currently defined. I therefore object to the proposal to change the boundaries of the settlements.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/6362  Respondent: 8601793 / Roy Proctor  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I am writing in response to your invitation to comment on the Guildford Borough Proposed Submission Local Plan.

I believe that the numbers which you derived for the Objectively Assessed Housing Need (OAN) and the SHMA have been inflated either in error, or in pursuit of the aims of GBC to expand the borough in an aggressive manner. The requirements of the National Planning Policy do not result in the need to use a population forecast which is in excess of those issued for Guildford by the Office of National Statistics. I realise that the Evidence Base documents are not the subject of this consultation. However, since Policy S2 is based on forecast population numbers which are unsound, I object to Policy S2.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/11209  Respondent: 8602337 / Cross Group (Mr Colin Cross)  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy D1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy D1 - Making Better Places

I object to GBC not listening to their residents, who know better than GBC what is needed to make their areas better places, as the last consultation clearly showed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/11211  Respondent: 8602337 / Cross Group (Mr Colin Cross)  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy D3 - Historic Environment

I object to GBC not respecting the historic environment of the rural villages when considering inappropriate large developments. These areas need protecting, not destroying due to the effects of increased traffic, parking problems and wholly inappropriate development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Policy E1 - Meeting Employment Needs

Permitted development allows commercial properties to be converted to residential use, but at a loss of employment opportunities. **I object** to development of brownfield sites without some commercial activity being included, proportionate to the size of development, unless exceptional circumstances prevail.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

Policy E2 - Location for New Employment Floorspace

**I object** to excessive commercial development anywhere in the borough when brownfield sites area available in suitable locations.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

Policy E4 - Meeting Employment Needs

**I object** to excessive commercial development anywhere in the borough when brownfield sites area available in suitable locations.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:
Policy E4 - Surrey Research Park

I support the Research Park and its specialism, but I object to the current need to expand. The land hungry current ground level car parking for Research Park should be utilised for shared multi-storey or underground parking and the freed-up car parks used for the Park development. All new Research Park development should include underground car parking, as in other countries.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11202  Respondent: 8602337 / Cross Group (Mr Colin Cross)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E7

Policy E7 - Guildford Town Centre

I object that GBC do not accept the town centre as the ideal place for sustainable residential development. Internet shopping has changed the retail landscape and that will continue in the future so limited new shops are required. Guildford has ample opportunity to provide sustainable homes over the Local Plan period on brownfield sites in its centre.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11205  Respondent: 8602337 / Cross Group (Mr Colin Cross)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E8
Policy E8 - District Centres

I object to rural villages becoming District Centres when they are already viable and sustainable local centres. District Centres are preparing the infrastructure for large scale development and ignore the wishes of residents in those local centres.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11207 Respondent: 8602337 / Cross Group (Mr Colin Cross) Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E9

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy E9 - Local Centres

I object to Local Centres being considered for large, inappropriate, developments nearby. Local Centres are rural, not urban and that needs more recognition

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11179 Respondent: 8602337 / Cross Group (Mr Colin Cross) Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy H1 - Homes For All

I object to the SHMA including student housing. The university obtained planning permission many years ago to build student accommodation, but has not honoured this. Freeing up private housing in the town currently used for student accommodation would provide affordable housing for local people. A new development at Blackwell Farm (2,000 houses) providing accommodation, including student accommodation, is a selfish move by the university when it still has 1,000’s of units to be built on land it already owns.

After the 1st World War ‘Homes for Hero’s’ were provided countrywide, as was the case for council housing after the 2nd
World War. I believe GBC should adopt the same strategy, even in areas of AONB albeit on a reduced scale, to provide sustainable homes borough-wide and of a proportional nature.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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<td><strong>Policy H2 - Affordable Homes</strong></td>
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<td>I object that developers can be released from their obligation to provide affordable homes (clause 4.2.40). If planning permission is granted to include affordable homes, that must be enforced to ensure the developer provides them.</td>
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<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy H3</td>
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<td><strong>Policy H3 - Rural Exception Homes</strong></td>
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<td>I am in favour of Rural Exception Homes to provide homes for local people who cannot afford 'affordable' homes but not as a means for developers to sell commercially priced homes.</td>
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<td><strong>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</strong></td>
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<th>Comment ID:</th>
<th>PSLPP16/11213</th>
<th>Respondent: 8602337 / Cross Group (Mr Colin Cross)</th>
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<td><strong>Document:</strong></td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1</td>
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Policy I1 - Infrastructure and Delivery

I object to any development without the necessary strategic infrastructure being put in place prior to development. I object to developments not providing their planned peripheral infrastructure, i.e. schools, health centres as part of the development, prior to properties being sold.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Policy I2 - Supporting the Dept of Transport's Road Investment Strategy

I object to this policy only relating to the strategic road network, the A3/M25, without ensuring any development includes the necessary local road infrastructure being implemented. I object to developers funding road infrastructure which suits their wishes, i.e. south bound slip road and north bound slip roads at the Burnt Common roundabout. Such provision at Burnt Common will not alleviate increased traffic on the local roads and villages should the 2,000+ houses be built at the former Wisley Airfield, as local villages already suffers traffic log-jams on a daily basis without such a development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Policy 13 - Sustainable Transport for New Developments

I strongly object to any development being built that does not have existing sustainable transport. Blackwell Farm, Wisley Airfield, Gosden Hill and Garlicks Arch do not have such facilities. The former Wisley Airfield is absolutely isolated and can only be accessed by car. Even if a bus service is provided, few will carry shopping, etc., by bus. Walking to Ripley or East Horsley is unrealistic as there are no footpaths, cycle paths or street lighting. (Blackwell Farm and Gosden Hill are in the same situation). New developments should take place alongside existing sustainable transport facilities. The Merrow Golf Club, recently proposed for housing, is adjacent to a Park and Ride and new rail links so that is an example of sustainable transport.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11186  Respondent: 8602337 / Cross Group (Mr Colin Cross)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy P1 - Surrey Hills Area of Outstanding Natural Beauty

I object that the AONB areas are excluded from taking a proportion of new housing developments. Large developments are inappropriate but these areas should provide homes for local people and their families. Policies H2 and H3 should apply throughout the borough, including AONB, but proportionate and sympathetic to each location. Everywhere should be allowed some growth.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11189  Respondent: 8602337 / Cross Group (Mr Colin Cross)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Policy P2 - Green Belt

I strongly object to GBC considering building strategic new developments of 2,000+ houses in Green Belt. I object to Gosden Hill, Blackwell Farm and the former Wisley Airfield becoming new towns 'dumped' in the Green Belt for reasons of economy and convenience. I particularly object to the former Wisley Airfield being considered for a new town as this is right in the middle of a critical green belt area on the edge of London and totally unsustainable, as accepted by the recent Planning Committee who recently unanimously rejected a planning application on various NPPF and other grounds. This site is far too close to Cobham (1.5km), Pyrford (1.5km) and Woking (2.5km) not to become a suburban sprawl over time which will totally wipe out the Metropolitan Green Belt in this area.

Developments of 2,000+ houses in the Green Belt are exploitation and fulfil developer's dreams who can escape their their affordable homes targets (clause 4.2.40) and provide houses for those from outside the borough. I object to GBC realising those developers’ dreams and ignoring those of the residents.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11191  Respondent: 8602337 / Cross Group (Mr Colin Cross)  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy P3 - Countryside

I believe brownfield sites in all areas, including AONB, should be utilised and all areas in the borough should provide some affordable and Rural Exception Homes.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11193  Respondent: 8602337 / Cross Group (Mr Colin Cross)  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Policy P4 - Flood Risk and Water Source Protection Zones

All development sites must have consideration to flood risk, not just on the development, but the effects on the surrounding areas. I object to P4 being used as a blanket reason for taking large tracts of development land out of the system willy-nilly.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/11177  Respondent: 8602337 / Cross Group (Mr Colin Cross)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy S1 - Presumption in Favour of Sustainable Development

I object to GBC not using sustainable brownfield sites in Guildford town and all the villages in the borough, but wish to use Greenbelt sites to create 3 'new towns' each of approx. 2,000 houses. These sites are not sustainable, but will cause chaos to surrounding areas in terms of lack of infrastructure, i.e. roads, parking, flooding, and will not provide adequate health services, education, shopping/pubs/restaurants/cafes, etc., on-site, as does Dickens Heath, Solihull, of which the GBC Pegasus report cites as its model.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/11175  Respondent: 8602337 / Cross Group (Mr Colin Cross)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I wish to object to the 2016 version of the GBC Draft Local Plan as, even though we are told the 2014 version has been redrafted after 'listening to the people', I cannot see evidence of this. I also object to the PR film at the online form link, claiming to 'represent the people' as it does not. It represents the University of Surrey, the Royal Surrey Hospital and the GBC Executive and has no representation at all for the rural areas of the Borough, therefore is a biased PR exercise. (I wish the above to be recorded as objections).

I also wish it to be noted that the objections below are not to be taken solely as site location objections if sites are mentioned, but general objections to the draft Local Plan.
Policy S2 - Borough Wide Strategy

I object to GBC using SHMA housing figure which are almost double those of Woking and Waverly. I object to these figures as they were prepared by consultants with a property interests, G L Hearn, and the calculation has not been scrutinised by GBC an independent body. Who are all these homes for? Not local people but a nett SE England ‘migration’. There is no generic evidence to back this up but we are told ‘GBC has faith in it’.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/93  Respondent: 8602465 / Sallie Hair and Beauty (Ms Sallie Hone)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Lack of ANY evidence for the alleged housing need numbers

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/245  Respondent: 8602465 / Sallie Hair and Beauty (Ms Sallie Hone)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT TO THE 2016 DRAFT LOCAL.

I object to the following plans.

Disproportionate amount of development in one area of the borough

As an owner of a hair and beauty salon Parking is already a big problem and if people cant park they will not use the village

Shops will become extinct.
Lack of immediate provision for schools and medical doctors as if both of those problems are not already present in Surrey ??

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/246  Respondent: 8602465 / Sallie Hair and Beauty (Ms Sallie Hone)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The removal of any villages from Green Belt, who gives the Council the right to do this, they have always been Green Belt ???

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/2332  Respondent: 8602625 / S R Grainger  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A46

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We acknowledge the need to build more housing to meet the need of the population, but we must object strongly to the large scale developments planned for Normandy and Flexford.

We are not opposed to in-filling, utilising brown-fill sites or very small scale developments. Young people of the village cannot afford the existing housing and need one or two bedroom properties.

Our objections are based on :-

Geology

Normandy lies on the northern slopes of the Hogs Back. The soil on this side is clay which does not drain well when there are the frequent heavy storms. To add to this problem there are seven springs which mean that the risk of flooding can occur in days after a storm.

At the moment the water table in this area is very high, so exacerbating the flooding issue. The evidence of the high water table is obvious along the south side of the A323 where the trees on the verge are permanently in water. This is a potential danger to traffic using the road, as the roots of the trees are being undermined. They could fall at any time not only blocking the road, but causing an accident by falling on a passing car.
The sewage system in Normandy is under perpetual strain and after heavy rain properties have been flooded not only with water but, with raw sewage. Large scale development and the increased areas under concrete would have repercussions not only for the existing properties, but would cause more disruption to the frequently flooded Wanborough Station which serves the Reading to Gatwick Airport line.

2:- Infrastructure

1. Roads

Normandy is served mainly by two fairly narrow roads, Glaziers Lane and Westwood Lane. The railway crosses both.

Westwood Lane has a low railway bridge with a height restriction, which means that it cannot accommodate double decker buses or high sided lorries.

Glaziers Lane crosses the railway by a road bridge which has a bend on its apex. A potentially dangerous condition exists on the south side of Wanborough Station. Station Road joins Glaziers Lane at an acute angle. Large vehicles cannot turn into the station safely if driving along Glaziers Lane from the A323 direction and cannot turn towards the A323 when leaving the station. Station Road is a blind turning for vehicles driving along Glaziers Lane towards the Hogs Back. The railway bridge has just been repaired after it started to crack from the weight of heavy vehicles travelling over it.

Glaziers Lane would not be suitable for the large vehicles from the proposed Showman site. There is a Showman site at present on the A323 at Worplesdon. They have not been able to negotiate either Glaziers Lane or Westwood Lane with any of their vehicles. The siting of a showman site on the proposed A46 site would be totally impractical.

A sixty bedded residential home would also create problems of parking. Unless staff and visitors arrived by train the only access to the proposed site would be by car, thus more traffic for our already congested roads.

In order to accommodate the increased traffic which would arise from the number of houses, the residential home and the showman site, Normandy's roads would have to be widened and up-graded.

The A323, Aldershot to Guildford Road. This road is always busy, especially at peak times. If there is an accident on either the A31 Hogs Back or the A3. Traffic congestion is a real problem for Normandy.

School Lane and Hunts Hill are used as a "cut through" from the Hogs Back to get to the A324, Pirbright Road. This is a link to Woking and the A322 which connects with the M3 and Bracknell.

Wyke Primary School is situated in School Lane. The school takes pupils from the surrounding areas of Worplesdon and Ash. This means traffic is particularly heavy in the mornings and afternoons because a lot of parents have to drive their children to school.

Hunts Hill is a narrow unlit lane not suitable for large vehicles as it has steep sides and bends.

Any more traffic would put a severe strain on the existing A323. I used to work at the Royal Surrey County Hospital and on days when the A31 Hogs back is blocked, it has taken me over an hour to drive at 7am in the morning before the "rush hour" has even begun. I think, adding potentially to this scenario could prove catastrophic and even life threatening, unless very major improvements to the existing roads in Normandy,

Most residents of Normandy who do not commute by train to Guildford or Aldershot have to use cars. The very reliable bus service from Guildford to Aldershot travels along the A323. The A46 and A47 sites are both over a mile from the nearest bus stop, making the bus travel option impractical. The 520 bus service which passes near to both these sites only runs three times a day on Monday, Tuesday, Thursday and Friday to Guildford and Aldershot. On Wednesday, it goes from Aldershot to Woking. This means that this service could not be used for regular commuting.

To get to any shops, particularly supermarkets, it is necessary to use a car. This also applies to getting to the main Doctors Surgery at Fairlands and the Royal Surrey County Hospital.
1. Trains: Wanborough Station

South West Trains run a local service from Guildford to Aldershot. However this station is not suitable for the disabled as it only has access to the Aldershot side. To get trains to Guildford the disabled have to go to Ash Station in order to access trains to Guildford.

First Great Western Trains use the line for the Reading to Gatwick Airport trains. The trains do not stop at Wanborough Station, and the service is often disrupted by the Station being flooded.

1. Electricity

Most of Normandy's electricity supply is by overhead lines. This means the village is subject to frequent power outages in high winds and stormy weather. The power lines are either cut by falling trees or their branches cause an interruption of current. The developments planned would probably have underground cabling on the sites, but that doesn't mean a more reliable electricity supply as most of the village has overhead lines. To upgrade the electricity supply by underground cabling would be a very major and costly project.

Normandy roads are not well lit.

1. Water supply and sewage

The water supply is metered and the pressure is fairly reliable.

The sewage system, however, is not so reliable. Most houses in Glaziers Lane and Westwood Lane and adjoining roads are on mains sewer. However, after heavy rainfall some houses have been flooded with raw sewage on a regular basis.

The roads are subject to flash floods because road drains are poorly maintained and ditches allowed to be blocked. Wanborough Station is frequently flooded because of the poor maintenance of the road drains and causes major disruption to the railnetwork.

3:- Amenities

1. School

Wyke Primary School is situated in School Lane. It is a single class entry taking children from Normandy and the surrounding areas from rising five years to eleven years.

All children in year six leaving Wyke School have been accommodated in the existing Secondary Schools in the area. There would seem no need for another secondary School in this area as the local existing secondary schools are under subscribed.

1. Doctors

Normandy is lucky to have a branch surgery and dispensary in Glaziers Lane, the main surgery being on the Fairlands estate. However, it is almost impossible to get appointments without having to wait days, sometimes weeks if a patient wishes to see a particular doctor.

1. Normandy Therapy Garden

This is an award winning facility providing courses for disabled and Special-needs students. It does run a shop where produce grown in the garden is sold, however it is limited by the growing season for its vegetables and fruit and of course the weather.

It is the only shop in the Village.
1. c) Manor fruit farm
Normandy has an excellent Village Hall on this site. It has a main Hall with Kitchen, a small hall also with kitchen and a further meeting room on the first floor. Nearly all the village clubs and societies use the hall for their meetings. It is also available for private hire.

The site is also used by the Bowling Club and Archery Club, both have club houses.

1. e) On Normandy common there is a thriving tennis club and a cricket The cricket pitch is unique in that seen from the air it is a complete circle.

4) Environment
Normandy is a Village situated in the Green Belt. It has ancient woodland and grassland areas within the village boundaries. There is varied fauna and flora found in these areas. Surveys within these habitats have revealed a diverse ecology, many of which are rare animals and plants. To have a large development would not only destroy many species, but do away with vital "green corridors" needed by the animals.

The proposed development A47 is situated on a designated SNCI and has been identified as a Water Vole Alert Area. Great crested newts and several species of dragon flies are found in the ancient Linen Pond This pond has existed from medieval times when flax was grown in the surrounding area for the production of linen. It is essential this Social historical site be preserved

Both A46 and A47 sites have populations of hedgehogs, roe and fallow deer, foxes, badgers, water voles, little owls, yellow hammers, sparrow hawks, fieldfares, red kites, slow worms, adders, grass snakes, frogs, toads, great crested newts, as well as many more common species like robin, sparrows, blue-tits, great tits, coal tits, starlings, black birds, collared doves, wood pigeons, house martins and most of the corvid family. The diverse plant life provides habitats for many types of insects, including the endangered stag beetle. Many butterfly and moth species rely on this plant diversity.

Pipistrelle bats are found in both these areas and can be seen in the gardens of Glaziers Lane regularly during the summer evenings.

Normandy's flora is also very diverse and includes many species of orchid, especially the common spotted orchid. Much of the flora found in Normandy, particularly in the two areas A46 and A47 earmarked for large scale development, are plants which need marshy or damp conditions, this, I hope, illustrates the point that geologically, Normandy is not an ideal place for major development as it would exacerbate the problem of further flooding. There are more than fifty different wild flowers and plants found in Normandy. Insects, birds and bees need these plants. If they were to disappear not only would Normandy lose many of its wild plants and trees, but whole species of wild fauna which depend on them.

It would be a "Nature Disaster Area" to lose our fauna and flora.

The present population of Normandy at the 2011 census is 2981. The historical definition of a village is "a collection of houses and associated buildings, larger than a hamlet and smaller than a town situated in a rural area". The proposed large scale developments would probably more than double the population and mean Normandy ceases to be a village and become a commuter suburb of Guildford and so lose its identity.

It has been proved by many studies by psychologists, environmentalists and many of the medical profession that green areas are important for our good health and well-being.

I hope our arguments opposing large scale development within the boundaries of Normandy will be considered by the planning Committee. We are proud to be a village, but any large scale development would have repercussions to the ecology and ambience of Normandy.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/1155  Respondent: 8603201 / Guildford Allotments Society (Andrew Simmonds)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Response to Guildford Proposed Submission Local Plan

This response is on behalf of Guildford Allotments Society, who manage approximately 650 allotment plots within Guildford town, all of them on land leased to us by GBC. There are two issues that concern us.

Firstly, the Local Plan involves building 13,860 homes within the borough by 2033, two thirds of which will be on sites at Ash/Tongham, Blackwell Farm (on the Hogs Back); Gosden Hill Farm, and Wisley airfield. The remainder appear to be smaller developments within Guildford town and the surrounding villages. Yet the plan makes no mention of a need for allotments, nor whether there is a requirement for additional sites. I believe that there is, and that this is a notable omission of the Local Plan. Indeed, GBC has a responsibility under S23 of the Small Holdings and Allotments Act 1908 to provide sufficient allotment plots if there is a demand. We believe that this omission of allotments from the Local Plan is a substantial oversight.

Attached as attachment 1 is our reasoning as to why around 140 additional allotment plots, within some 4.4 hectares in total, should be provided on several new sites within the Borough to ensure that the number of plots is broadly sufficient when these additional houses are built. The sites need to broadly be in the right locations, close to where the tenants live, to comply with your planning policies.

Secondly, our site at Bellfields. It has been suggested that part of this site, along with the neighbouring waste water treatment works, should become a housing development. Yet this does not feature in the plan. I therefore assume that it is beyond the 2033 planning horizon, and I am therefore not discussing the issue further; but for reference, details are set out as attachment 2. Should that for any reason not be the case, there is an opportunity for undertaking a strategic review of our allotment sites and their sizes to ensure that they provide the plots required to meet the demand, in areas accessible to tenants and complying with the policies laid out in the Local Plan. We recognise that there is a need to optimise the location of the additional houses and allotment sites.

Please do not hesitate to contact me should you wish to develop these issues further.

Yours sincerely

Andrew Simmonds

Attachment 1

Issue 1 - Reasoning in support of the additional allotment provision.
Current allotment provision within the Borough is roughly 1 plot for every 100 homes. Currently there are 137 on the waiting list, so arguably the current provision is inadequate; although the waiting list tends to fluctuate between 50 and 250. What is certain is that we are not over-provided for; but this is not an exact science.

The current waiting list is weighted towards Burpham, Merrow and the eastern town centre, and the Westborough / Rydes Hill area. However, we believe that there is no reasonable site available or likely to become available within these areas. Park Barn and Westborough have a higher proportion of allotment holders than the average; our sites at Farnham Road and Aldershot Road (Westborough Allotments) are full, and a number of other tenants resident in these areas are accommodated at Bellfields, our largest site.

With 13,860 additional homes, it seems reasonable to suggest that an additional 140 plots should be made available. In terms of land space, 40 plots require 1.25 hectares (to allow for access paths between plots, storage facilities for equipment, and sheds along the boundaries). Thus 140 plots = 4.4 hectares.

To comply with the policies within the plan; five stand out as being relevant. These are: policies D1 (Making Better Places), D2 (Sustainable Design), I1 (Infrastructure & Delivery), I3 (Sustainable Transport) and I4 (Green and Blue Infrastructure). Together, these infer that the four major development sites should each have their own dedicated allotment spaces within the curtilage of the development – say about 100 plots in all, or about 3.15 hectares in total – and that the remaining additional plots – about 40, or 1.25 hectares – should be identified within the town and surrounding villages broadly relative to the developments. The most important aspect is that the plots need to be on a secure site, readily accessible from people’s homes.

There is a potential for additional demand - in that if the additional houses have small gardens, they will not be large enough for people to grow their own, and hence likely that more residents will want allotments. So maybe the suggested demand above is inadequate.

I do not expect this Society to manage all of these sites; those at Ash/Tongham, and at Wisley, are outside of the area we currently serve; although there is no reason why we should not if it were felt appropriate.

A site at Blackwell Farm would prove popular, both for the new residents there and the additional demand from Park Barn / Westborough. Similarly, a site within the Gosden Hill development would be welcomed; both these sites need to be sized to match the local demand, taking into account current local unmet demand.

**Legal References**

Small Holdings and Allotments Act 1908

Relevant Sections:

S23 – Duty of councils to provide allotments

S25 Acquisition of land for purpose of Act

S26 Improvement and adaptation of land for allotments

**Attachment 2**

Issue 2 - The Bellfields site.

This site is currently the largest we operate, with 109 tenants. Should this site be proposed for housing development, or indeed any other development, the future we believe can comprise of three groups, each roughly a third of the total.

The first third are relatively elderly and live locally, and we believe that this situation will be ongoing. We would wish to retain around a third of the current area in that location, at Bellfields.

A second third live further away, primarily in the Stoughton / Rydes Hill / Westborough areas. There is scope to develop further land at the Aldershot Road (Westborough Allotments) site which is currently unused and outside of our current...
lease from GBC, which could simply relocate these tenants at Bellfields to be closer to their homes; this potential land
swap would involve around a third of the current Bellfields site.

The final third need reprovision elsewhere; ideally close to Stoke Park as being the best area for where our tenants live,
although we cannot identify a suitable site for allotment use. An area of Burpham Court Farm has been suggested as a
potential swap for this final third. Whilst not rejecting the idea, it is not the optimal location in that it is not near to
people’s homes; it is not accessible by public transport; and it is adjoining and would have access via a busy road that will
become busier if/when the link road from Slyfield is built. The Gosden Hill development is likely to further add traffic to
the area, and to Burpham itself. The Burpham Court Farm site simply does not meet the policies set out in the Local Plan,
and our preference would thus be to not move these tenants from the Bellfields site.

Thus in conclusion, unless another site more local to Stoke Park can be identified, our preference would be to retain around
two thirds of the current site at Bellfields, with the other third being released upon development of the unused land at the
Aldershot Road (Westborough Allotments) site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
We believe that it is essential that they be included within the Blackwells Farm, and Gosden Hill developments; and whilst that intent would indicate two other sites in Guildford Town Centre should have allotments too, we recognise that may not be achievable in practice. There is a shortage of allotment provision in Guildford Town Centre, and thus additional provision should be made in the Urban Area to compensate for this. Whilst Stoke Park would be an excellent location for additional plots logistically (as you suggest), being close to where our demand is highest, we recognise that in practical terms it may not possible.

With regards to the SARP development, the timescale seems to have slipped. We are experiencing a degree of planning blight already, in that it is the only site we have with a few vacant plots, and no waiting list; people are not keen to take on a plot with limited future. We would welcome the plans to become better defined, and progress plans to relocate some tenants to alternative sites closer to their homes.

Finally, a request to note that in recent years houses have been built with smaller gardens than in earlier times, and more flats have been developed. These have lead to increasing numbers of applicants for allotments in recent years. This trend of smaller gardens is likely to continue. Thus the national standard of 0.25Ha (above) may need to increase, and hence allotment provision need to be increased. This is particularly pertinent to the developments at Blackwells Farm, and Gosden Hill.

We feel we have a good working relationship with GBC, and note that this version of the local plan has incorporated much of the consultation response of last year; we look forward to continuing to work together in a spirit of co-operation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/4352  Respondent: 8603201 / Guildford Allotments Society (Andrew Simmonds)  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We note too the inclusion of allotments in the SARP plans; but whilst there is a note in table 23 of on-site provision of allotments for sites of 250+ homes, there is no mention of allotments in other sites of 250+ homes in Guildford Town Centre or Guildford Urban Area. We believe that it is essential that they be included within the Blackwells Farm, and Gosden Hill developments; and whilst that intent would indicate two other sites in Guildford Town Centre should have allotments too, we recognise that may not be achievable in practice. There is a shortage of allotment provision in Guildford Town Centre, and thus additional provision should be made in the Urban Area to compensate for this. Whilst Stoke Park would be an excellent location for additional plots logistically (as you suggest), being close to where our demand is highest, we recognise that in practical terms it may not possible.

With regards to the SARP development, the timescale seems to have slipped. We are experiencing a degree of planning blight already, in that it is the only site we have with a few vacant plots, and no waiting list; people are not keen to take on a plot with limited future. We would welcome the plans to become better defined, and progress plans to relocate some tenants to alternative sites closer to their homes.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I write to provide an objection from Shackleford Parish Council (SPC) to the inclusion of the proposed Blackwell Farm development in the draft Local Plan (Policy A26).

The development at Blackwell Farm was discussed at the July meeting of the Parish Council and the councillors unanimously decided to object to the proposal.

SPC believes that it will be impossible to minimise the impact of the development on the local road network. Traffic is at a daily standstill where the A3 and A31 enter Guildford. Despite traffic improvement measures included in the proposal, SPC believe the infrastructure and network will not be able to cope with the sheer scale of the proposed development (as independent traffic reports confirm).

Shackleford, Puttenham and Compton in particular already suffer with peak time traffic problems as people access the A3 and A31 or divert from those routes when there is the inevitable daily congestion. Introducing more schools, offices and homes to that area will lead to more ‘rat-running’ through these little villages, whose roads are unsuitable and cannot deal with the congestion. Air pollution in the area is already above safe EU limits and this is due to the volume of traffic and because it is frequently at a standstill.

The site of the proposed development lies within the Green Belt and in an AONB. There are no exceptional circumstances that have been shown to demonstrate the benefits outweigh the harm of the development; therefore there is no exception to the presumption against development in the Green Belt and AONB.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
The A2Dominion Group has a ground lease on land within site Policy 16. A2Dominion are supportive of the proposed allocation for Policy A16 and A17. It is a core principle of the Group to continually look to improve their accommodation and services across all of it’s sectors which include key worker, student, social and market accommodation. Policy sites A16 and A17 provide the potential to provide high quality key worker accommodation for the hospital’s need, and much needed market accommodation. The A2Dominion Group in principle would support collaboratively working with Royal Surrey County Hospital to explore opportunities to improve the existing environment within the site.

A proposal that could incorporate strategically relocating existing key worker accommodation for hospital staff, and indeed potentially increasing the quantum of such accommodation is something A2Dominion wholly support, as it
also provides the opportunity to deliver the highest standard of modern accommodation going forward. This is key for attracting and retaining the highest quality of staff for the hospital for the services and care it provides for the local community.

If you are proposing a change to the Proposed Submission Local Plan: strategy Yes No

and sites, do you wish to express an interest in participating at the Examination? Yes

? Why do you wish to participate at the Examination?

It is important that A2Dominion are represented at the Examination in order to support the identification of the site for development, confirm the land is available and developable to enable the allocation to proceed with confidence and provide evidence on any general matters regarding the site which may arise at the Examination.

Site A17 Land

south of RSCH

Do you consider this section of the plan is legally compliant? Yes

Do you consider this section of the plan is sound? Yes

Do you consider this section of the document complies with the Duty to cooperate? Yes

The A2Dominion Group has a ground lease on land within site Policy 16. A2Dominion are supportive of the proposed allocation for Policy A16 and A17. It is a core principle of the Group to continually look to improve their accommodation and services across all of its sectors which include key worker, student, social and market accommodation. Policy sites A16 and A17 provide the potential to provide high quality key worker accommodation for the hospital’s need, and much needed market accommodation. The A2Dominion Group in principle would support collaboratively working with Royal Surrey County Hospital to explore opportunities to improve the existing environment within the site.

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If you are proposing a change to the Proposed Submission Local Plan: strategy Yes No

and sites, do you wish to express an interest in participating at the Examination? Yes
Why do you wish to participate at the Examination?

It is important that A2Dominion are represented at the Examination in order to support the identification of the site for development, confirm the land is available and developable to enable the allocation to proceed with confidence and provide evidence on any general matters regarding the site which may arise at the Examination.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment ID: SQLP16/1035  Respondent: 8604321 / Barton Willmore (Simon Potts)  Agent: Associate Vail Williams (Chris Wilmhurst)</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Question 2: Legal compliance</td>
</tr>
<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
</tr>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): (Yes)</td>
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**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

<table>
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<th>Comment ID: SQLP16/1036  Respondent: 8604321 / Barton Willmore (Simon Potts)  Agent: Associate Vail Williams (Chris Wilmhurst)</th>
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<tbody>
<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness</td>
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<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): (Yes)</td>
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</table>

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

| Comment ID: SQLP16/1037  Respondent: 8604321 / Barton Willmore (Simon Potts)  Agent: Associate Vail Williams (Chris Wilmhurst) |
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (Yes)

N/A

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: SQLP16/1039  
**Respondent:** 8604321 / Barton Willmore (Simon Potts)  
**Agent:** Associate Vail Williams (Chris Wilmhurst)

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (Yes)

N/A

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: SQLP16/1040  
**Respondent:** 8604321 / Barton Willmore (Simon Potts)  
**Agent:** Associate Vail Williams (Chris Wilmhurst)

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 7: Any other comments?

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (No)

N/A

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
My detailed objections are:

1. I object to the Policy A42 change at Clockbarn Tannery Lane because the increase to 60 homes in place of 45 homes is 33% more and too much. It also ignores the hundreds of previous objections made by local people and it will make erosion of the Green Belt in our village even worse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

In regard to the final consultation of the Local Plan 2017 I have a number of detailed comments and objections listed below but first I’d like to make three general points. Firstly, our local MP, Sir Paul Beresford, has been re-elected in part on his commitment to the preservation of the Green Belt as expressed in his response to the draft last year and yet, you as a Council, have chosen to ignore not only that but also the views of many many people. You may be trying to play a game by insetting from the Green Belt first and so claiming that any subsequent building is not on the Green Belt, but that is frankly dishonest. Secondly at a time when your overall target homes numbers have reduced you have chosen to increase the allocation to Send in this version of the plan. Thirdly, the central government planning guidance against which your Local Plan should have been prepared includes the following:

"Local planning authorities should seek opportunities to achieve each of the economic, social and environmental dimensions of sustainable development, and net gains across all three. Significant adverse impacts on any of these dimensions should be avoided and, wherever possible, alternative options which reduce or eliminate such impacts should be pursued. " (my emphasis)

The final Plan you have now created, especially in regard to my first two points and my objections below, has significant adverse impacts in respect of at least two of these (social and environmental) and is highly questionable on the third (economic).

I object to the policy A43 change at Garlick's Arch because:

(a) It is beautiful Permanent Green Belt and no "exceptional circumstances" exist
(b) It will cause over-development of our village and the number of homes is excessive
(c) It is exquisite ancient woodland that existed at the time of Elizabeth I
(d) It will join up Ripley and Send and defeat the key purpose of the Green Belt
(e) It will generate excessive traffic that will block up the roads of Send and Ripley
(f) It ignores the thousands of previous objections

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp172/849  Respondent: 8604481 / Mr Steve Minter  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A58

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to Policy A58 at Burnt Common because
(a) It was deleted from the 2014 draft because of all the objections made previously
(b) There is no need to build industrial or warehouse development in the middle of the Green Belt when Slyfield and Guildford still have empty sites and industrial units
(c) The 2017 Employment Land Need Assessment shows a reduction in demand to 3.9 hectares for industrial land for the whole borough not a huge overallocation of 10 hectares at one location, Send, in the Green Belt

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp171/101  Respondent: 8604481 / Mr Steve Minter  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to the proposal to inset Send Business Park from the Green Belt because

(a) It is effectively an old non-conforming user in an area of outstanding countryside adjacent to the historic and beautiful Wey Navigation

(b) There is highly restricted vehicular access along vehicular access along Tannery Lane in both directions

(c) Further expansion or development at this location detracts from the openness of the Green Belt and is inappropriate

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Introduction

We are instructed by Astenbell Ltd to make the following submissions to the Guildford Borough Proposed Submission Local Plan: Strategy and Sites, in respect of two parcels of land in Send that we feel should be safeguarded or allocated as dedicated sites for the Custom and Self Build market in order to satisfy the demand generated for this type of housing in the early stages of the plan.

The first site is known to the council and identified in the GBCS as potential development area B16/A The Vineyard, Tannery Lane, Send and the second site is known to the Council as Hillside Farm, Sandy Lane, Send.

Representations regarding the Tannery Lane site were made to the Head of Planning in the middle of May 2016 but may have been received too late to incorporate into the Proposed Submission Plan.

The recently enacted Housing and Planning Act 2016 places a duty on planning authorities not only to keep a register of interested parties who wish to find plots for custom and self-build but also to ‘give suitable development permission in respect of enough serviced plots of land to meet the demand for self-build and custom housebuilding in the authority’s area arising in each base period’.

We understand that the council’s approach to comply with this requirement is to allocate serviced plots on the four strategic sites as set out in Policies A25, A26, A35 and A46 to satisfy the self-build register. However, we consider there are limitations to this approach in that it doesn’t deliver a wide range of choice as required by the NPPF, and fails to take into account the length of time it is going to take to get the strategic sites to a stage where they can offer plots.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/7634  Respondent: 8605793 / Astenbell Ltd (Nigel Sturgess)  Agent: Vail Williams LLP (Jane Terry)

Document: Proposed Submission Local Plan: strategy and sites 2016 / Introduction

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Our comments in relation to the two sites sought for specific allocation for Custom and Self-build are set out below.

1. The Vineyard, Tannery Lane, Send

The first site is a 5 acre site in Tannery Lane in Send. This site was dropped from the Reg.18 draft in part due to the council’s change to its spatial strategy and also due to the fact that it sat in a land parcel B16 that was deemed to be highly sensitive. Representations on this site were submitted to the council on the 17th May 2016 for a 60% dedicated Self Build site 40% affordable and whilst this was a late submission, the site is not contained within the discounted list of sites in the...
LAA so it is assumed that the Council is still considering the submission. In addition to the 40% affordable, the landowners also expect to contribute towards infrastructure reasonably related to the scheme and necessary to make the scheme acceptable in planning terms.

The site is Suitable, Available and Deliverable.

Planning history of the site

The site was first identified in the Greenbelt and Countryside Study (GBCS) as Potential Development Area B16-A in land parcel B16. The GBCS stated that “Land parcel B10 provides opportunities to accommodate development without significantly compromising the purposes of the Greenbelt” and that PDA B16-A is surrounded by defensible boundaries and unconstrained in terms of environmental capacity.

Potential development area B16-A shown bordered in red, proposed greenbelt in setting boundary shown in green:

[IMAGE 1]

A full sustainability appraisal of the site was carried out as part of the GBCS and the site was ranked no 1 in terms of its sustainability of all the proposed village extension sites that made it through to the Reg. 18 Draft Local Plan consulted on in the Summer of 2014. More importantly the site is more sustainably located than any of the village extension sites proposed in the s19 Draft Local Plan as per the table below:

<table>
<thead>
<tr>
<th>Land Parcel</th>
<th>PDA</th>
<th>Village extension</th>
<th>Average walking distance to facilities</th>
<th>Sustainability score</th>
<th>Sustainability ranking</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td>West Horsley</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>C14</td>
<td>C</td>
<td>Land West of W Horsley Manor Farm</td>
<td>1901</td>
<td>5</td>
<td>5=</td>
</tr>
<tr>
<td>C14</td>
<td>A</td>
<td>Land North of W Horsley Waterloo Farm</td>
<td>1818</td>
<td>3.75</td>
<td>7</td>
</tr>
<tr>
<td>C14</td>
<td>D</td>
<td>Land to the South of W Horsley</td>
<td>1581</td>
<td>5</td>
<td>5=</td>
</tr>
<tr>
<td></td>
<td></td>
<td>East Horsley</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Not identified in GBCS</td>
<td>Land near Horsley Railway Station</td>
<td>1238</td>
<td>9.5</td>
<td>2</td>
<td></td>
</tr>
</tbody>
</table>
In 2014 the site was given the reference no. 41 and consulted on as part of the Issues and Options consultation. The site faired well in this: The Parish Councils consultation response was;

“Site 41 is the most sustainably located near to existing shops, schools and public transport. Sites 56, 57 and 58 are not within easy walking distance of shops and schools in either Send or Ripley and would be certain to generate significant traffic movements. Development of these sites would also have a large effect on the visual separation of Send and Sendmarsh along Send Marsh Road - which itself would need significant engineering work to remove the narrowed section of bridge half way along it. Site 59 would seem a sensible development which would provide the opportunity to remove nuisance lorry parking along the old London Road and provide employment opportunities for local people”.

The Councils’ response was: ”We are currently considering options across the borough, to find the most suitable location for the development we need over the next 15 years. Land at Send and Send Marsh/Burnt Common are options under consideration. We note your preference for sites 41 and 59”.

The site however was dropped from the Council’s plans between the Reg. 18 and the Reg. 19 drafts due in part to a greenbelt sensitivity assessment that assessed general land parcels not individual sites. It is worth noting that land parcel B16 is 270 hectares compared to this village infill site of 2.1ha.

**Site Facts**

- Total area 1ha.
- Potential developable area 1ha with defensible greenbelt boundaries as stated in the Green Belt and Countryside Study.
- Detailed in the SHLAA 2014 as being able to accommodate circa 47 homes
- Poor quality Grade 3 Agricultural land (source Magic Map)
- Flood Zone 1 (source Environment Agency mapping)
- “Very Low” risk of flooding from Surface Water (source Environment Agency mapping)
- The site is in single ownership, with no legal covenants restricting development.
- The site is bordered on three sides by the proposed village settlement boundary of Send and is a natural infill village extension
- The site has good road access to Tannery Lane and will be able to contribute to road infrastructure improvements

**Comment on the Greenbelt Sensitivity Analysis**

The Green Belt and Countryside Sensitivity assessed land parcels as to whether they fulfilled the main
purposes of the Green Belt. Land Parcel B16 is shown in the image below bordered in purple. It has an area of 270 hectares and encompasses half of Send, half of Ripley and part of Send Marsh:

The Vineyard sits in the South West Corner of Land Parcel shown bordered in red and has an area of 2.1Ha which represents less than 1% of the land parcels area.

The green line represents the settlement boundary of Send and the blue Lines represent the proposed development sites at Garlicks Arch Copse and Wisley airfield.

Land Parcel B16 was assessed by the GBCS as below:

<table>
<thead>
<tr>
<th>Land Parcel</th>
<th>Purpose 1</th>
<th>Purpose 2</th>
<th>Purpose 3</th>
<th>Purpose 4</th>
<th>Number of Purposes Met</th>
<th>Green Belt Sensitivity</th>
</tr>
</thead>
<tbody>
<tr>
<td>B16</td>
<td>Checks the sprawling from Send, Send Marsh and Ripley</td>
<td>Prevents the settlements of Send, Send Marsh and Ripley from merging</td>
<td>Does not assist in safeguarding the countryside from encroachment</td>
<td>Preserves the setting of the Ripley historic village and conservation area</td>
<td>3</td>
<td>High</td>
</tr>
</tbody>
</table>

|     |                                             |                                             |                                             |                                             |                      |                      |
|     |                                             |                                             |                                             |                                             |                      |                      |

(page 1193 of 3335)
The Greenbelt and Countryside Study VIII para 12.39 and para 12.41 states: “Land parcels B10 and B16 provide opportunities to accommodate development without significantly compromising the purposes of the Green Belt. However, land parcel B16 scored highly with regards to the Green Belt Purposes Assessment (Score 4). PDAs have been identified to the north and south of Send that would not effect the overall land parcel with regards to the Green Belt purposes as follows:

B16-A is surrounded by defensible boundaries with partial visual enclosure including hedgerows following Tannery Lane and open fields to the north and west; tree cover following May’s Grove to the east; and residential gardens on Send Road to the south. B16-A is relatively unconstrained in terms of environmental capacity terms

B16-A scored 9.75 and was ranked 6th according to current sustainability credentials. The estimated residential development capacity of B16-A is 47 dwellings.”

We agree with this assessment and consider that a well designed residential scheme that respects the transition from town to countryside would not compromise the main purposes of the green belt. Furthermore, In view of the sites exceptionally sustainable location, we have carried out a site specific Green Belt assessment to confirm the conclusions of the GBCS that development at PDA B16-A would not affect the overall land parcel with regards to the Green Belt purposes.

The GBCS used the following definitions to consider what criteria was used to assess the land parcels and we propose to use these same definitions to assess the Vineyard site referred to as PDA B16-A:

**Purpose 1 - Restrict Sprawl of Urban Areas**

- One of the Green Belt purposes is to check the sprawl of built-up a Urban sprawl is seen as the creeping advancement of development beyond a clear physical boundary of a settlement. Where the Green Belt is adjacent to a clear physical boundary defined by built form, the landscape performs a role in safeguarding against unrestricted sprawl (scoring 1). In contrast, a land parcel which lies away from built development within the countryside would contribute less to this purpose (scoring 0). (Pegasus GBCS Volume II chapter 7)

- We consider that PDA B16-A is next adjacent to a clear physical boundary defined by built form and by this definition the PDA B16-A does perform a role in safeguarding the Green Belt against unrestricted sprawl therefore scoring 1 against this purpose

**Purpose 2 - Prevent Towns Merging**

- This purpose is concerned with preventing neighbouring towns from merging into one another and seeks to avoid coalescence of built for Coalescence can be perceived or actual, and physical or visual. Some areas of land contribute more effectively in maintaining separation than others depending on the local environmental or site conditions, such as topography and tree cover. An open, expansive landscape which contributes towards significant separation between two settlements will contribute less in terms of anti-coalescence (scoring 0) whereas a land parcel which forms a narrow gap between two settlements would have a significant anti-coalescence role (scoring 1).

- We consider that there is significant separation distance between PDA B16-A and the nearest neighbouring town of Send Whilst Send and Send Marsh have a small separation distance that needs to be protected the location and infill nature of PDA B16-A means it does not actually protrude any further into the strategic gap than currently exists from existing development. (see image below) The site also has tree cover to its North Eastern boundary that restricts any perceived coalescence and there are other tree belts between Send and Send Marsh. The image above shows the relationship of the site to the strategic gap. The village of Ripley is over 2 miles away and therefore it is not felt there is any danger of actual or perceived coalescence between the PDA and Ripley.

[IMAGE 3]

In conclusion it is not considered that site PDA B16-A acts decisively in preventing actual or perceived coalescence between Send and Send Marsh and as such scores 0 against this purpose.
Purpose 3 - Safeguarding the Countryside from Encroachment

In order to assess whether land parcels perform this purpose, consideration will be given to the extent to which the countryside within a parcel has already been built upon. If the parcel is strongly influenced by built development or urban influences, it will be assumed that this part of the countryside has already been notably encroached by development, and as a result is no longer able to perform this purpose. If however the parcel remains primarily free of development, possessing predominately unspoilt countryside / or uses defined as appropriate in the Green Belt, then it may be considered that encroachment has not yet occurred and the parcel continues to perform the purpose.

The site, whilst not developed itself, is bordered on three sides by development and consequently has as its backdrop the built form of the village of Send. The site is therefore strongly influenced by built development and urban influences and is therefore already noticeably encroached by development.

Purpose 4 - Preserve Setting and Character of Historic Towns

Conservation areas associated with towns and villages within Guildford Borough are considered significant when assessing land parcels against this purpose. In addition, the potential impact upon the setting and special character of historic elements of Guildford, through cross reference to the Landscape Character Assessment (rural / urban fringe assessment 2007) and the likely impact upon Historic Parks and Gardens and Scheduled Monuments, will also be taken into account when assessing whether a parcel performs this purpose. Where a land parcel is considered to notably contribute to the preservation of such historic settings relating to settlements, it will be assumed to serve the purpose.

The nearest conservation area is in Ripley Village over two miles from the PDA. For this reason we believe development of PDA B16-A would not have any effect on the preservation of the Historic Village of Ripley and scores 0 accordingly.

The result of our site specific Green Belt assessment is shown on the table below:

Potential Development area B16-A assessed against the main purposes of the Green Belt

<table>
<thead>
<tr>
<th>PDA</th>
<th>Purpose 1</th>
<th>Purpose 2</th>
<th>Purpose 3</th>
<th>Purpose 4</th>
<th>Number of Purposes Met</th>
<th>Green Belt Sensitivity</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>To check the unrestricted sprawl of large built-up areas</td>
<td>To prevent neighbouring towns from merging into one another</td>
<td>To assist in safeguarding the countryside from encroachment</td>
<td>To preserve the setting and special character of historic towns</td>
<td></td>
<td></td>
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<tr>
<td></td>
<td>Does Not Prevent the settlements of Send, Send Marsh and Ripley from merging</td>
<td>Does not assist in safeguarding the countryside from encroachment</td>
<td>Does Not Preserves the setting of the Ripley historic village and conservation area</td>
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<td>Checks the sprawl from Send, Send Marsh and Ripley</td>
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<td>Low</td>
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<td>1 Sensitivity</td>
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</tbody>
</table>

The Proposal (Concept Plan set out at A)
To offer a dedicated scheme of serviced custom build plots with highway access onto Tannery Lane including connections to mains drainage, gas, water and electricity.

- 60% Self Build plots
- 40% Affordable housing
- Public open Space provision
- Improvements to Green infrastructure
- Additional Parking for the existing Residents of Tannery Lane (to ease existing capacity issues)
- Contribution by developer of local infrastructure costs by way of s106 in lieu of lost CIL from Self Build exemptions

Conclusion

The site is sustainably located on the edge of Send village bordered on three sides by built form. It will not have a significant impact on the openness of the surrounding Green Belt; it can come forward quickly and easily in single ownership and will make a significant contribution to the Government’s initiative for custom and self build housing.

The site should therefore be allocated or safeguarded for custom and self build housing as set out in the proposal above.

2. Land at Hillside Farm, Sandy Lane, Send

The second site is land at Hillside Farm, Sandy Lane, Send under the same terms set out above for The Vineyard site. This land would make an ideal self-build site being sustainably located on the edge of Send and sitting within land parcel B10 classified as being of low sensitivity. This was not identified as a PDA in the GBCS and it is believed this was due in part to the designation of some adjoining land as a Site of Nature Conservation Interest (SNCI). Recently Guildford BC has confirmed that the SNCI status on adjoining land is to be removed.

The site is Suitable, Available and Deliverable.

Hillside farm shown bordered in red, proposed greenbelt in setting boundary shown in green

Site Characteristics

- Total area 15 Ha. Potential developable area 4.7Ha
- 80% of the land (5.7 ha) at Hillside Farm was identified as falling within the “Perceived Village Area” by the GBCS.
- The site is well screened from neighbours to the North and East by woodland and hedgerow and to the South by a ridge which would help minimising the visual impact of any development
- The site is not subject to any statutory or non-statutory landscape designations
- The site is not subject to any statutory or non-statutory nature conservation designation
- The SNCI status of the land to the North is being delisted as part of the Local Plan revi
- The site is not subject to any statutory or non-statutory cultural heritage designations
- Poor quality Grade 4 Agricultural land (source Magic Map)
- Flood Zone 1 (source Environment Agency mapping)
- “Very Low” risk of flooding from Surface Water (source Environment Agency mapping)

Relevant facts from the Green Belt and Country Side Study (GBCS)

The site is situated in Land Parcel B10, classified in the GBCS as a 2* (Low Sensitivity) land parcel. This is a relatively small land parcel of 77ha with much of it containing the settlement of Send.

The GBCS states: “The parcel B10 provides opportunities to accommodate development without significantly compromising the purposes of the Green Belt”.

The site is in a very sustainable location. Assessed using the methodology in the GBCS the site scores 10.25 which would rank the site as more sustainably located than any other village extension site in the Reg 18 & 19 Draft Local Plan.

**Sustainability Criteria**

<table>
<thead>
<tr>
<th>Walking Distance to the nearest:</th>
<th>Metres</th>
<th>Score</th>
</tr>
</thead>
<tbody>
<tr>
<td>Local Centre</td>
<td>398</td>
<td>2</td>
</tr>
<tr>
<td>Secondary School</td>
<td>3000</td>
<td>0</td>
</tr>
<tr>
<td>Primary School</td>
<td>792</td>
<td>2</td>
</tr>
<tr>
<td>Healthcare Facility</td>
<td>1349</td>
<td>1</td>
</tr>
<tr>
<td>A Road</td>
<td>496</td>
<td>3</td>
</tr>
<tr>
<td>Railway Station</td>
<td>3000</td>
<td>0</td>
</tr>
<tr>
<td>Recreational facility</td>
<td>611 av</td>
<td>2.25</td>
</tr>
</tbody>
</table>

**Total Sustainability score:** 10.25
The Proposal (Appendix B Concept Plan)

To construct a link road between Sandy Lane and Potters Lane including connections to mains drainage, gas, water and electricity to service:

- 60% Self Build plots
- 40% Affordable housing
- 6 Acres of Private Woodland (Currently with no Public Access) handed over to be used for Public Open Space offer blue-green infrastructure improvement
- Additional Parking for the existing Residents of Sandy Lane (to ease existing capacity issues)
- Contribution by developer towards local infrastructure costs by way of s106 in lieu of lost CIL from Self Build exemptions
- Local community benefit from provision of blue-green infrastructure Improvements

Conclusion

The site is sustainably located on the edge of Send village bordered on other side by residential development. It will not have a significant impact on the openness of the surrounding Green Belt; it can come forward quickly and easily being in single ownership and will make a significant contribution to the Government’s initiative for custom and self build housing.

The site should therefore be allocated for custom and self build housing as set out in the proposal above.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
- IMAGE 4.jpg (75 KB)
- IMAGE 1.jpg (60 KB)
- IMAGE 2.jpg (71 KB)
- IMAGE 3.jpg (67 KB)

Comment ID: pslp171/1143  Respondent: 8605793 / Astenbell Ltd (Nigel Sturgess)  Agent:
**Demand for self build in Guildford**

Guildford’s self-build register was set up in March 2016.

From March 2016 to 31st October 2016 (8 months) which is the first base period 87 people were entered on the list as being eligible.

From 1st November 2016 to April 30th 2017 (6 Months) a further 57 people were registered.

In total for the first 14 months 144 persons were entered on the list as eligible an average of 10 registrations per month. In a growing market such as self build It would not be unreasonable to expect that by **December 2018 (33 months) at current levels there could be 330 persons eligible on the register.**

**Proposed Provision of plots**

A table analysis of the councils planned provision of plots has been carried out and **for the whole life of the plan up to 2034 we consider provision has only been made for 312 plots. (see table below)**

Information has been extracted from the Guildford borough Proposed Submission Local Plan: strategy and sites document June 2017 together with further data from the Guildford Land Availability Assessment 2016 LAA document as well as the councils current and past planning application web portal.

The councils emerging policy looks to rely on large sites of over 100 dwellings to make 5% of their total homes available and priced and marketed appropriately as self-build or custom build plots for at least 18 months.
The table below summarises the sites and how many self build plots they are expected to provide and information from the LAA has indicated likely timescales.

<table>
<thead>
<tr>
<th>Policy No</th>
<th>The Sites below have been allocated to provide 5% of their plots to be offered as self build plots</th>
<th>Number of Self Build at 5%</th>
<th>Anticipated Self Build Plots delivery timeframes</th>
<th>Estimated delivery</th>
</tr>
</thead>
<tbody>
<tr>
<td>POLICY A22</td>
<td>Land north of Keens Lane, Guildford The site is allocated for approximately 150 homes (C3), including some self-build and custom house building plots and a care home (C2) with approximately 60 beds</td>
<td>8</td>
<td>It is anticipated from the LAA2016 that this site could be delivered in the first five years of the plan which could make available 8 self-build plots</td>
<td>1-5years 6-10 years 11-15 years</td>
</tr>
<tr>
<td>POLICY A25</td>
<td>Gosden Hill Farm, Merrow Lane, Guildford This is a residential lead mixed use development, allocated for: (1) Approximately 2,000 homes of which a minimum of 1,700 homes (C3) will be delivered within the plan period, including some specialist housing and self-build plots.</td>
<td>85</td>
<td>This site is dependent on the delivery of major highway infrastructure improvements. The LAA 2016 spreads this large strategic development over the life of the plan</td>
<td>45 20 20</td>
</tr>
<tr>
<td>POLICY A26</td>
<td>Blackwell Farm, Hogs Back, Guildford This is a residential lead mixed use development, allocated for: (1) Approximately 1,800 homes of which a minimum of 1,500 homes (C3) will be delivered within the</td>
<td>75</td>
<td>This site is dependent on the delivery of major highway infrastructure improvements. The LAA 2016 spreads this large strategic development over the life of the plan</td>
<td>35 20 20</td>
</tr>
<tr>
<td>POLICY</td>
<td>Land to the south and east of Ash and Tongham</td>
<td>This land is in multiple ownerships of differing size land parcels with development proposals anticipated to come forward at different stages throughout the plan. One consented scheme for 400 homes contained no provision for self build another for 254 under appeal contains no self build plots and another for 154 awaiting decision contains no provision. There are very few other sites large enough to support the 100 home threshold therefore current proposed policy would suggest that no self build plots are likely to come forward from this strategic allocation.</td>
<td>0</td>
<td></td>
</tr>
<tr>
<td>POLICY</td>
<td>Surrey Police Headquarters, Mount Browne, Sandy Lane, Guildford</td>
<td>It is anticipated from the LAA2016 that this site could be delivered in the 6-10 year bracket which could make available 6 self build plots</td>
<td>6</td>
<td></td>
</tr>
<tr>
<td>POLICY</td>
<td>Land at Former Wisley airfield, Ockham</td>
<td>This site is dependent on the delivery of major highway infrastructure improvements and overcoming several contraints. The LAA 2016 spreads this large strategic development over the life of the plan</td>
<td>100</td>
<td></td>
</tr>
<tr>
<td>POLICY</td>
<td>Land to the west of West Horsley</td>
<td>It is anticipated from the LAA2016 that this site could be delivered in the first five years of the plan which could make available 8 self-build plots</td>
<td>7</td>
<td></td>
</tr>
</tbody>
</table>
### POLICY A39

**Land near Horsley railway station, Ockham Road North, East Horsley**

The site is allocated for approximately 100 homes (C3), including some self-build and custom house building plots.

<p>| | | | |</p>
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<tbody>
<tr>
<td><strong>POLICY A39</strong></td>
<td>Land near Horsley railway station, Ockham Road North, East Horsley</td>
<td>5</td>
<td>It is anticipated from the LAA2016 that this site could be delivered in the first five years of the plan which could make available 8 self-build plots</td>
</tr>
</tbody>
</table>

### POLICY A40

**Land to the north of West Horsley**

The site is allocated for approximately 120 homes (C3), including some self-build and custom house building plots.

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</thead>
<tbody>
<tr>
<td><strong>POLICY A40</strong></td>
<td>Land to the north of West Horsley</td>
<td>6</td>
<td>It is anticipated from the LAA2016 that this site could be delivered in the first five years of the plan which could make available 8 self-build plots</td>
</tr>
</tbody>
</table>

### POLICY A43

**Land at Garlick’s Arch, Send Marsh/ Burnt Common and Ripley**

The site is allocated for approximately 400 homes (C3), including some self-build and custom house building plots.

<p>| | | | |</p>
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</thead>
<tbody>
<tr>
<td><strong>POLICY A43</strong></td>
<td>Land at Garlick’s Arch, Send Marsh/ Burnt Common and Ripley</td>
<td>20</td>
<td>It is anticipated that due to the size of this allocation and the adjoining highway infrastructure improvements it could be delivered over the first 10 years of the plan which could make available 20 self-build plots</td>
</tr>
</tbody>
</table>

### Total provision based on current policy

<p>| | | | |</p>
<table>
<thead>
<tr>
<th></th>
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</thead>
<tbody>
<tr>
<td><strong>Total provision based on current policy</strong></td>
<td>312</td>
<td>0</td>
<td>161</td>
</tr>
</tbody>
</table>

As can be seen from the table, assuming all the site allocations expected to deliver Self Build plots are granted planning permission then 312 self build plots will be made available over the length of the plan (2017-2034). We feel this number is going to be wholly inadequate to satisfy the growing demand on the register.

It is difficult to estimate delivery of these plots as they are reliant on planning applications coming forward which in turn are reliant on infrastructure improvements. The timeframes for delivery of these plots has been estimated in line with the estimated timelines in the LAA 2016. As per the reasoned justification on strategic development sites, the delivery of a significant proportion of self-build or custom build plots will be expected within the first phase of development.

From the table 161 self build plots might be available in the first 5 years after adoption of the plan, 81 more in the second five years and 70 in the third five years.
There are other sites allocated in the draft over the 100 home threshold but for one reason or other they have not been specifically allocated to provide the 5% self build plots. Many of these are town centre high density flat developments which are planned to be exempt from the requirement to provide plots as reasoned in the justification.

The table below shows these other allocations in the plan over the 100 home threshold.

<table>
<thead>
<tr>
<th>Site Description</th>
<th>Reasons for Discounting Them</th>
</tr>
</thead>
<tbody>
<tr>
<td>Jewsons Walnut Tree Close, Guildford. Flatted development 175 homes</td>
<td>It is not considered that this site is suitable for Self Build plots as it is Town Centre flatted development with an anticipated density of 171dph</td>
</tr>
<tr>
<td>North Street Redevelopment, Guildford. Flatted development 400 homes</td>
<td>It is not considered that this site is suitable for Self Build plots as it is Town Centre mixed use with flats development with an high anticipated densities</td>
</tr>
<tr>
<td>Land and Buildings at Guildford Railway Station Flatted Development 350 homes</td>
<td>It is not considered that this site is suitable for Self Build plots as it is Town Centre high density flatted development scheme with an outstanding appeal pending</td>
</tr>
<tr>
<td>Guildford Car Park Consented Development 160 Homes</td>
<td>This site has already been consented with no provision for self build</td>
</tr>
<tr>
<td>Kernal Court, Walnut Tree Close Flatted Development 100</td>
<td>It is not considered that this site is suitable for Self Build plots as it is a Guildford Urban area flatted development with an anticipated density of 181dph</td>
</tr>
<tr>
<td>Land at Guildford Cathedral 100 houses.</td>
<td>Planning app 15/P/02284 for 134 dwellings on this site was refused in Feb 2017. It is considered that this site could deliver self build plots in any future application however GBC have not included this option in the Policy details</td>
</tr>
<tr>
<td>Land between Gill Avenue and Rosalind Franklin Close 450 homes</td>
<td>It is not considered that this site is suitable for Self Build plots as it is a Guildford Urban area flatted development with an anticipated density of 191dph</td>
</tr>
<tr>
<td>Slyfield Regeneration Project 1000 homes Council land</td>
<td>It is considered that this site could deliver self build plots however GBC the Landowners have not included this option in the Policy details</td>
</tr>
</tbody>
</table>
Out of the allocations in the table above it is only Site A15 and A24 that could realistically offer some self build plots but as these have not been included on the allocation details they have been discounted.

We consider it unlikely that the demand figures will decrease over time as the self build sector gains momentum, however even if demand in this sector were to wane the "over supply" of plots would not cause problems as there is a proposed clause in the policy stating that developers could simply build out any surplus plots after a period of marketing. Undersupply however is likely to cause the Council problems in the future whereby they would have to apply to the Secretary of State for an exemption from the duty to provide serviced plots where demand for serviced plots is high but the supply of land for housing is constrained.

Exemptions are not automatic and there is a test that local demand must be greater than 20% of the total land available to meet an authority’s future housing need. There are time limits when such applications need to be made; and a requirement for evidence to be provided. An exemption only relates to a given base period and does not remove the duty for an authority to have regard to demand on its register when carrying out their housing, planning, land disposal and regeneration functions, as provided for by the 2015 Act.

There would therefore seem to be no downside in over providing for self build plots but plenty of downside for under supply. We therefore believe the most important part of the Councils emerging policy is to make sure that there are enough serviced plots available to satisfy the demand on its register on an ongoing basis.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:  

\(\text{reg 19 2017 reps.docx} (24\ KB)\)
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Appendix C Infrastructure Schedule - SED3
We welcome the amendments made to SED3 for the reasons stated above and we support the specification for the school to be located to the north of the site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>pslp172/4259</th>
<th>Respondent:</th>
<th>8605889 / Surrey County Council (Sue Janota)</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2017 / Policy A26</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy A26 - Blackwell Farm, Hogs Back, Guildford
We note that the Normandy and Flexford site, which included provision for housing and a new secondary school to serve the west of the borough has been removed from the draft Local Plan. Consequently, we welcome the amendment to Policy A26 which provides for a secondary school within the proposed urban extension at Blackwell Farm. The school is required to meet the county council’s forecasted future need, on the assumption that the development proposed in the Local Plan comes forward. We would like additionally to see it specified that the school is required to be located in the northern part of the site. This is considered to be the most sustainable location in accessibility terms and it would be in accordance with the amendment to SED3.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>pslp172/4260</th>
<th>Respondent:</th>
<th>8605889 / Surrey County Council (Sue Janota)</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2017 / Policy A29</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Policy A29 – Land to the south and east of Ash and Tongham We welcome the amendment to this policy which currently states that an appropriate financial contribution is required to enable expansion of Ash Manor Secondary School by additional 1FE. It is felt that this should read “contributions” (plural) as it is likely more than one contribution will be sought towards the costs of the expansion.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** pslp171/3240  **Respondent:** 8605889 / Surrey County Council (Sue Janota)  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

**Paragraph 4.5.42a** should add (for accuracy) "and Potential." at the end ("The County Archaeologist will be consulted on all planning applications on sites of archaeological importance and potential."). This is an important additional point, as the two areas are distinct (see below) are highlighted differently in the NPPF, and can prompt entirely different management and investigative techniques during development.

**Appendix H (Maps)** We are about to supply GBC with an entirely new series of Areas of High Archaeological Potential and County Sites of Archaeological Importance maps. They will need to ensure that their final plan contains the correct 2017 dataset before its publication.

The Listed Buildings' discussion in the table on page 290 refers to PPG15. This document was rescinded in 2012 - they might wish to bring this reference up-to-date.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

**Comment ID:** pslp171/2570  **Respondent:** 8605889 / Surrey County Council (Sue Janota)  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy E1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()
Policies E1 – E3 – we note that the required provision of new office and research & development floorspace and industrial land has been revised based on the updated Employment Land Needs Assessment and that three additional strategic employment sites have been designated. We support this robust analysis and these policies. We would however still be concerned about the delivery of the economy policies if one or more of the key development sites for employment use were not able to proceed due to transport or other reasons.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/2572  Respondent: 8605889 / Surrey County Council (Sue Janota)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy E4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy E4 - Surrey Research Park
To monitor this policy we would still argue that a definition needs to be included on research that is complimentary to the activities of the University of Surrey based on the original outline planning permission or defined in terms of Standard Industrial Classification Codes.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/1810  Respondent: 8605921 / Roger Lindsay  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The huge number of houses proposed it is said is following government guidelines. Yet I read that a large part is due to GBC deciding to for an exaggerated growth. In my view we do not need more growth here, we need less and put the growth elsewhere where it is needed. This looks like a plan designed by builders.

I have great difficulty with any plan like this one which has no associated costing, especially to the taxpayer. Mention is made of major road construction. Who is paying? There are numerous other areas where one way or another infrastructure cost is implied. No idea is given and this cannot be right.

The same is true of timing. No information. Clearly there will be massive interruption, inconvenience, delays etc from a project even if as it must, spans years. This is not spelt out nor is it clear who pays.
While a document that appeared months ago cannot be expected to take account of any impact of e.g. "Brexit" there is no sign of tests of robustness to unexpected changes in circumstances, economic or other.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Finally I object to the revival of the Wisley private plan. The dependence of the GBC plan on that dubious plan already thrown out and the lack of openness in the dealings of GBC with the developers is specially objectionable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The attachment of large numbers of hoses at a high density to communities of completely different character so as to overwhelm the existing communities is not acceptable. Nor is it acceptable to be virtually silent on the infrastructure implications or the timing of providing properly sized infrastructure given that what is there now in terms of roads, lanes, schools, elderly care, medical facilities are already overloaded.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I particularly object to the arbitrary moving of internal existing boundaries e.g. In East Horsley apparently to access green spaces and build on them. I also strongly object to the going back on policy by breaching the Green Belt as part of the plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/1161  Respondent: 8605921 / Roger Lindsay  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I wish to record that I object to the plan as a whole and to that part that affects me most covering the Horsleys, Effingham Junction, Ockham.

I objected to the previous plan and this revision seems little different; in some respects worse. First it is not really a plan. It is only part of a plan. There is a bit about the "what", a lot about the where and nothing about the "when", "how" and "who".

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/2102  Respondent: 8606081 / Susan Greenman  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Send

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Ref: Policy Nos. P2, A43, 30 ha and A44, 1.9 ha Send.

I am writing to strongly object to the above Policies/Planning Proposals.

Guildford Borough Council have been proposing various developments for housing and gypsy sites in Send for a number of years. I have objected previously on these proposals.

It now seems that GBC are not following due procedure and keep changing the size of proposed developments. They have now added a massive road junction - not previously disclosed.

The proposal for 430 houses in 2014 was reduced in April 2016 to 185. Now GBC have increased the number of houses once again to 485. These changes require full consultation under Regulation 1. GBC are now trying to short cut the consultation via Regulation 19. This action completely invalidates any consultation with residents of Send. I object to GBC trying to impose housing development in Send via such misleading short cut practices.

The evidence GBC are providing for employment needs; industrial space and housing for foreign students is highly questionable. Figures are being manipulated and do not represent current needs. Any new homes can be built of the surplus of brown field sites which would accommodate current needs.

I object once again to the green belt areas of Send being built upon. Policy P2 will ruin the semi rural environment of Send. The current infrastructure of Send cannot cope now with the population. Any increase will have serious adverse effects upon the community.

Our current Surgery, School, shops, flooding problems and particularly traffic congestion will be adversely affected. I struggle to get an appointment with a Doctor as the Surgery is over subscribed. More housing will only increase the problems.

I strongly object to Policy A43, 30ha Land at Garlick's Arch, Burnt Common. Another 400 houses and 7,000 sq. metres of industrial and warehousing which is not needed will have huge detrimental effect upon Send.

We do not need another 400 homes on top of the ridiculous number already proposed of over 13,860. Send cannot cope with such numbers. Each house will double the number of residents at least and if not more. Most homes today own at least 2 cars per household. How on earth are the roads around Send going to cope. We are at near grid lock now at peak times of the day. The A3 is permanently blighted with traffic jams currently.

This proposal is NEW and was not included in the Regulation 18 draft and has not been consulted upon. The area is Green Belt permanently protected by the NPPF which prevents the merging of settlements. The area has conservation sensitivity being covered by ancient woodland dating back to the 16th century.

As the latest Employment Land Needs Assessment 2015 (ELNA) shows there is a reduction of 80% in required employment floor space from the previous draft plan - we do not need an industrial development of another 7,000 sq. m.

I object to the horrendous proposal of a new 4 way interchange onto the A3 at Burnt Common.

This is total madness!! Apart from ruining the environment I green belt the extra traffic and in particular pollution will have a huge impact on Send. All traffic from the M25 wishing to travel to Woking will be routed through Send.

Send is a small village and our main road A247 cannot cope now. There will be total grid lock! As a resident of over 40 years I have seen Send deteriorate. Living in [Response has been redacted due to statement containing personal data which cannot be disclosed due to the provisions of the Data Protection Act 1998] has become a nightmare early in the morning and evening with the lane being used as a "Rat Run" for commuters to and from Woking/Guildford.

I object to Policy No. A44 1.9 ha Land west of Winds Ridge and Send Hill. Another 40 homes on top of the 400 proposed for Burnt Common area is totally unacceptable and not necessary. Brown field sites should be used and the Green Belt
should be retained. The Conservative Party at the last election (GBC being Conservative) promised voters to protect Green Belt land. The current Government and GBC are not fulfilling their promises.

[Response has been redacted due to statements being considered contrary to the Council’s duty under the Equalities Act 2010 to eliminate discrimination, harassment, victimisation against persons with a protected characteristic; and to foster good relations between persons with a protected characteristic and persons who do not share it]

[Summary of redacted paragraph: Travellers should travel and not be provided permanent pitches. The provision of pitches will reduce the value of the properties of the area. Residents have worked hard and paid their taxes to have the homes they have today.]

It is totally unacceptable to pitch such sites in Send. The increase in traffic from these proposed sites via the narrow lane (Send Hill) to the crossroads with Potters Lane, will be extremely dangerous.

There are enough brown field sites. However, I fundamentally disagree with the whole concept of travellers sites. If they want to be part of society - adhere to the rules of society and democracy [Response has been redacted due to statements being considered contrary to the Council’s duty under the Equalities Act 2010 to eliminate discrimination, harassment, victimisation against persons with a protected characteristic; and to foster good relations between persons with a protected characteristic and persons who do not share it]

I am not prepared to standby and watch BGC ruin Send and its surrounding areas to fulfil some brief from the Government who have broken their promises to the people who elected them regarding Green Belt.

I cannot understand why common sense does not prevail within Government and Councils. It is so obvious that the South of England is over populated and at grid lock with traffic and the associated pollution. The infra structure cannot cope, the local surgeries and hospitals are in melt down.

Stop trying to increase the population in this area and think of spreading the load northwards. This will encourage more employment to areas of deprivation in the Midlands and North.

Much more and the South of England will fall into the Channel under the weight of people and traffic and industry.

Please take my above objections into consideration and listen to the residents of Send. We live here!!

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/535  Respondent: 8606081 / Susan Greenman  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A42

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I am writing to file my strong objections to the following amendments made to the Local Plan.

Clockbarn Nursery, Tannery Lane, Policy A42:

I object to Policy A42 as the number of homes planned has been increased from 45 to 60 homes. This is an increase of 33% and ignores all previous objections from local residents.

Tannery Lane is a single track narrow lane which has traffic and access problems onto the A247. Send Business Park traffic is already a problem without increasing this by more homes.

The Policy will erode more Green Belt. As Guildford Borough Council is a Conservative Constituency who promised not to build on Green Belt - this is totally unacceptable.

There is surface water flooding in this area and building homes on this land will add to the problem.

The countryside around Send will be lost and the rural feel of the area which is part of the attraction of Send.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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<th>Comment ID: pslp172/536</th>
<th>Respondent: 8606081 / Susan Greenman</th>
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Land at Garlick's Arch, Send Marsh, Policy A43

I strongly object to Policy A43 change at Garlick's Arch as it ignores all previous objections from thousands of local people.

There is no proven need for plots for "Travelling Showpeople". The shear title of these people indicates they should be "travelling" and therefore do not need a permanent plot. The title is misleading - they are not "show people" which indicates some sort of Circus. Circus people keep moving. [Response has been redacted due to statements being considered defamatory, derogatory, inflammatory or offensive in nature].

This area is a permanent Green Belt site and there are absolutely no "exceptional circumstances" for this Policy.

The Policy Plan will cause over development of our Village and the number of homes is excessive.

Once again 400 homes will amount to another six to eight hundred cars on the local roads. roads are at virtual grid lock now at peak periods.

This Plan will virtually join Ripley and Send villages thus doing away with the Green Belt. The ancient woodland of this area has existed since the 15th Century and the reign of Elizabeth 1st.

The area is also subject to frequent flooding and is currently in a flood zone 2 allocation. Is this to be ignored as well as the Conservative promise of not building on Green Belt.
The land is contaminated by lead shot accumulated over 50 years. That entering the water table is a potential health hazard.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/537  Respondent: 8606081 / Susan Greenman  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A58

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Land at Burnt Common, London Road, Policy A58

I object to Policy A58 at Burnt Common. This plan was deleted from the 2014 draft due to the volume of objections.

The word "minimum" has been changed from the previous "maximum" in the 2016 plan. Since then there has been a decline in demand for industrial land.

There is no need to build industrial or warehousing on Green Belt. This should be built on Brown Belt not in a rural setting. Slyfield and Guildford still have empty sites and industrial units.

The 2017 Employment Land Need Assessment shows a reduction in demand to 3.9 hectares for industrial land for the whole of the Borough not a vast over allocation of 10 hectares at Send on Green Belt.

Once again the increase of traffic from this Policy Plan will cause major traffic congestion in an area which is already suffering.

The pollution will just add to the already existing problem of air quality in the area from the A3, M25 and Heathrow and Gatwick Airports.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/61  Respondent: 8606081 / Susan Greenman  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to the proposal of Send Business Park being taken out of the Green Belt. It is virtually a non-conforming user in a rural setting by the Wey River.

Further expansion of this location will ruin the Green Belt area and increase traffic along a country lane.

When will Guildford Borough Council and the Conservative Government realise that Send and in fact Surrey and the South East of England are at saturation with too many people, homes and businesses.

The impact of traffic congestion, over population impeding on local services and infra structure is making life intolerable for residents. Already the hospitals and doctors surgeries cannot cope. The schools are over subscribed, there is a huge problem with the elderly and their care, there is not enough housing for purchase or rental and the cause of this has increased prices.

As a Conservative voter my entire life, I am angry that GBC is ignoring their pledge not to build on Green Belt land. These plans, policies and proposals are going to ruin life for local residents who, decided to live in Send and Ripley as rural areas.

I have lived in Send for over 40 years and have seen a deterioration in the area and quality of living.

Potters Lane is now a horrendous "Rat Run" each day in the morning and evening. It is like living on the A3. It has become a very dangerous road and GBC plan will only add to the traffic and pollution of Send and Ripley. How are the schools, Doctors and other infra structure going to cope with all these added homes and industries. It will be become even more intolerable.

Stop adding to the over population of Surrey - ENOUGH IS ENOUGH!!

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
The area is an AONB with so many historic buildings, Wisley and National Trust properties.

WHAT ARE YOU THINKING ....... HAVE YOU EVER BEEN TO OCKHAM?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

**Guildford Local Plan – Strategies and Sites June 2016**

Thank you for the opportunity to respond to the Local Plan. I am responding by letter as there are many points which do not fit well into the sections of the questionnaire.

I am very disappointed that the views of myself and a very large number of others from the Horsley and other rural areas surrounding Guildford made during the consultation period following the ‘2014 Draft Plan’ have not been addressed. The Green Belt area of the villages surrounding the urban areas of the Guildford borough is one of its greatest assets. The current plan will destroy the nature of these villages.

I strongly object to the current plan for the following main reasons :-

*‘Green belt’ and Area of Outstanding Natural Beauty (AONB)* - The ‘Green belt is precious. There are five legal reasons for the ‘Green Belt’ and the Surrey ‘Green Belt’ meets them all. The National Planning Policy Framework requires any change in Green Belt boundaries to demonstrate very exceptional circumstances. These ‘exceptional circumstances’ have not been demonstrated. Also I strongly object to the proposed changes in the settlement boundary and the concept of ‘insetting’. The only reason for this would be to allow even further development. This is not a valid reason to change the boundary.

*Scale of development* – An increase of over 385 potential new dwellings is included in the draft plan for West Horsley which currently has just over 1,100 dwellings. This represents an increase of over 35% which is totally disproportionate to the size of the village, and at a density that is significantly above the village at present. This would result in a significant detrimental change in the nature and character of the village. This increase is vastly above the increases in most other areas of the borough. The increase in the urban area of the borough is only planned to be 11%. The pressures on the infrastructure would be completely unmanageable (see further comments below).

*Timing/Speed of development* – I object to the plan that all of the 385 (35%) increase in proposed dwellings are planned to be built within the next 5 years and before the ‘Brown Field’ sites in the urban areas are developed. This will allow no time for any improvements in infra-structure and cause irreversible damage to the Horsleys.

*Evidence Base for housing needs* – The construction of the plan is conceptually flawed as it is based on a supply of land put forward by land-owners/developers. It is not based on a balanced view of the housing needs of the urban area and individual villages. It does not take into account the impact of Britain exiting the EU.
The plan would allow the continued development of large four/five bed-roomed houses on developments of twenty dwellings. However, there is also a natural ‘ratchet’ effect that results in the current stock of homes constantly getting larger as extensions are added and we do not need any more large dwellings. The plan does not address in any detail a better way of prioritising smaller homes for first time buyers and for those downsizing.

**Sustainability and transport** - Allowing significant development in the rural areas of the borough will exacerbate the accepted transport pressures in the area as there will be few jobs in these rural areas causing additional commuting to the urban areas. This would be minimised by more effective development in the urban areas.

**Urban areas and ‘brown field’ sites** – Developments should be made in the current urban and ‘brown field’ sites first before irreversibly destroying green field sites – especially as there is such a large range and uncertainty in the projections of the number of homes needed. The current plan is to develop the easier ‘Green Belt’ areas first and then focus on the ‘Brown Field’ sites. This is the wrong way around. The plan does not effectively exploit the use of the current ‘brown-field sites’, particularly within the urban area of Guildford. For example there is significant scope to enlarge and build more multi-story car-parks in the urban areas which would allow more residential developments.

**Infrastructure** - Current infrastructure in the area is already struggling and needs to be addressed before any additional developments. This Guildford draft plan is meaningless without any Infrastructure Delivery Plan.

The increases in housing proposed in the plan would dramatically increase pressure on schools, medical facilities, roads, railways, drainage, parking etc. In particular, the state primary school is already at capacity, with no room for expansion, and the station car park is virtually full during weekdays. Car parking around the shopping areas is already very restricted, and often full, with little scope for expansion.

There is no evidence in the plan that any required changes to the infrastructure would be in place before any increase in housing/development. This should be addressed in detail within the plan.

**Flexibility** - The plan needs to have significant detail in the short term (5 years) and be very flexible, with a feedback mechanism, in the longer term (6 years and beyond) to allow for i) the uncertainty in the numbers of homes etc. needed and ii) for impact of developments made to be assessed.

For the reasons above I strongly object to the current plan and ask you to reconsider all the proposals concerning Horsley to apply constraints that relate to the very individual village characteristics of West Horsley and change the plan to incorporate a consensus of the views expressed by all Horsley residents and the West Horsley Parish Council.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** pslp173/508  **Respondent:** 8606625 / Mr Tim Bennett  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Appendix H: Maps - East Horsley

**Do you consider this section of the document; complies with the Duty to Cooperate? ( )**, is **Sound? ( )**, is **Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

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I am very disappointed that most of the views of myself and a very large number of others from the Horsley and other rural areas surrounding Guildford made during the consultation period following the ‘2014 Draft Plan’ and updated June 2016 Local Plan still have not been addressed. My overlying concern is that the Green Belt area of the villages surrounding the urban areas of the Guildford borough is one of its greatest assets and the current plan will destroy the nature of these villages.

In addition to the comments I laid out in my letter of 5th July 2016 I strongly object to the changes in the current plan for the following main reasons :-

**Scale of development** – This revision the plan now includes an increase of over 295 new dwellings for West Horsley which currently has just over 1,100 dwellings. This represents an increase of 27% which is totally disproportionate to the size of the village, and at a density that is significantly above the village at present. This would result in a significant detrimental change in the nature and character of the village. This increase is vastly above the increases in most other areas of the borough. The increase in the urban area of the borough is only planned to around 11%. The consequent pressures on the village infrastructure would be completely unmanageable. The increases in housing proposed in the plan would dramatically increase pressure on schools, medical facilities, roads, railways, drainage, parking etc. In particular the state primary school is already at capacity, with no room for expansion, and the station car park is virtually full during weekdays. Car parking around the shopping areas is already very restricted, and often full, with little scope for expansion.

There is no evidence in the plan that any required changes to the infrastructure would be in place before any increase in housing/development. This must be addressed in detail.

**Affordable homes** – The wording of Policy H2 Affordable Homes has been weakened to include phrases such as ‘we will also seek affordable homes on sites providing five or more homes ….’. The original wording is much stronger and better and ensures that the affordable homes policy has no ‘wriggle room’. This is essential as ensuring more affordable homes are built is very important.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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I object to the fact that infrastructure requirements have not been properly considered and are inadequate to deal with proposed housing levels. Roads, doctors and schools will be unable to cope.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/4090  Respondent: 8606977 / Mrs Sarah Tipping  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the removal of Send from the Green Belt because the village and its countryside provides a necessary buffer between Woking and Guildford.

I object to the building on the Green Belt at Send at Garlick’s Arch, Clockbarn Nurseries and Send Hill because it is not justified by any special circumstances and the fact that Green Belt is meant to be permanent and not continually eroded.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/7654  Respondent: 8606977 / Mrs Sarah Tipping  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to building houses at Clockbarn because of inadequate access and traffic volume. Tannery Lane is too narrow a winding road to take more traffic. The junction with Send Road is already fairly hazardous for vehicles emerging into the main road. Planning permission has already been given for 64 houses at the Tannery and the marina will generate heavy traffic too. The road cannot take any more.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
**Comment ID:** PSLPS16/7653  **Respondent:** 8606977 / Mrs Sarah Tipping  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the proposed new interchange onto the A3 at Burnt Common because the Transport Evidence is incomplete; there will be congestion because Send would be used as a cut through to the A3/M25.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

**Comment ID:** PSLPS16/7655  **Respondent:** 8606977 / Mrs Sarah Tipping  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A44

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the development of 40 houses at Send Hill due to its high quality Green Belt amenity within an area of beautiful countryside which would be spoilt. The proposal to include 2 Travellers Pitches is completely inappropriate due to the narrow width single track country road providing insufficient access to the site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

**Comment ID:** PSLPP16/16959  **Respondent:** 8606977 / Mrs Sarah Tipping  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the failure of GBC to identify sufficient brownfield sites within the urban area which should be targeted first for development before the open countryside and the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPA16/4280  **Respondent:** 8607169 / CPRE Surrey Branch & Guildford District (Tim Harrold)

**Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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1. Introduction

CPRE Surrey Guildford District welcomes this opportunity to make this submission concerning the draft local plan. CPRE has the third largest county membership in the country and Guildford and Waverley are its two biggest CPRE Districts in Surrey. CPRE is an Advisory Board Member of the Surrey Hills AONB Partnership and also chairs the Surrey Aviation Group. On both a national and local scale, CPRE has had extensive experience over many years in shaping and interpreting planning policy.

1. Background to this Submission

CPRE is concerned at the uncertain background to this GBC consultation which has been characterised by a number of executive and officer changes and also overshadowed by the recent EU referendum with its as yet unpredictable political and economic outcome. It is not possible, for example, at this time to estimate what impact this might have on inward migration. We are dismayed about the inclusion in the draft Local Plan of so many Green Belt development sites which are considered necessary by GBC if they are to meet the unrealistic ‘Objectively Assessed Need’ (OAN) figure of 693 houses per annum (SHMA). What is required instead is a more careful consideration of the many widespread and serious constraints on development within the Borough, and the need to protect and enhance the countryside adjacent to and around the town of Guildford and its villages, rather than undermining this valued resource through the proposal of urban extensions and over large housing sites.
CPRE does not agree that this consultation should be made under Regulation 19 as a number of wholly new items, which we have indicated in this document, have not been consulted upon under Regulation 18. Additionally, many proposals for policy and development sites have not been able to be assessed fully for consultation as the necessary detail for them is absent. Furthermore, some of the ‘evidence’ in the Pegasus Report on the countryside has not been corrected, and has been used in a subjective quality assessment of the Green Belt to justify recommendations for changing boundaries that do not stand up to detailed examination. We have given an example of this in connection with the Blackwell Farm proposal (page 17).

CPRE has had to select only those sections of the draft Local Plan for comment which are primarily concerned with the countryside as the 6 week period for consultation is too short a time to deal with all the material available for study. We have therefore had to concentrate on those omissions and assumptions made about the borough that we consider need to be reviewed more completely in depth.

1. Fundamental Overall Objection

- Green Belt and AONB

It has been made clear by the Government that they remain committed to protection of the rural environment. When asked to comment on the National Planning Policy Framework, the Minister of State for Housing & Planning Brandon Lewis MP made the following declaration in a letter dated 10th June 2016 to Richard Knox-Johnston, Chairman of the London Green Belt Council:

“The Framework makes it clear that inappropriate development may be allowed only where very special circumstances exist and that Green Belt boundaries should be adjusted only in exceptional circumstances through the Local Plan process and with the support of Local people. We have repeatedly made clear that demand for housing alone will not change Green Belt boundaries.”

This clear policy statement is not reflected in the draft Guildford Local Plan which calls for housing development not only on a number of sites in the AONB and the AGLV but also encroaches on the Green Belt in a wide range of other locations. CPRE maintains that this is a misguided approach and renders the current proposal unsound. CPRE OBJECTION.

- Town Centre Capacity

CPRE believes that the draft Local Plan is also unsound because no complete proposal for the Town Centre or for the development of the urban area has been made available in time for this consultation. This is required so that a coherent assessment can be made of the priority given in terms of the extent and type of housing development proposed, its density and location. Town and countryside have to be considered in parallel. CPRE OBJECTION.
Green Balance Review of Objectively Assessed Need (OAN)

CPRE Surrey has commissioned Green Balance to review and supply an independent commercial opinion on the validity of the OAN housing figure of 693 given in the GLH Hearn West Surrey Strategic Housing Market Assessment (SHMA) for Guildford, Waverley and Woking. Their report makes clear that they judge this document to be flawed and the OAN figure for Guildford to be too high. In view of the Green Balance evidence produced, this puts the credibility of the whole draft Local Plan in question. The over estimation of housing need effectively makes the draft Local Plan unsound. CPRE OBJECTION.

Instead of the OAN recommended in the SHMA of 693, an overall reduction is suggested for this figure of 212 which results in a revised OAN of 481. Other areas for further investigation as to the validity of the 693 figure have been suggested. The summary of reductions recommended for the OAN for all 3 districts covered are shown in Table 1 of the enclosed SHMA Review on page 4.

CPRE does not accept that the constraints relating to development in this draft Local Plan have been properly assessed or taken into account. If they were, the OAN would be radically reduced and we estimate that there would be no need to use Green Belt land. GBC has indicated that the OAN figure which GL Hearn has produced takes account of constraints but gives no explanation of how this has been done. This whole topic needs to be investigated further.

CPRE is also not in agreement with the emphasis given to retail sector expansion and office and warehouse development at Guildford at a time of changing conditions in the market-place and a need for more urban housing. CPRE believes that the focus of attention on building in the countryside has been caused by a too high OAN figure and a refusal to allocate sufficient priority to the supply of affordable housing and flats in the town because building development in this category has been sidelined rather than given the attention it requires. CPRE OBJECTION.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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CPRE OBJECTION TO POLICY A25 : Gosden Hill Farm, Merrow Lane, Guildford

CPRE has many reasons for considering this proposal unsound which are listed below :

1. The land which is proposed for development is all open Green Belt countryside of an attractive character which it is now suggested should be surrendered to urban sprawl. The NPPF states “the essential characteristics of Green Belts are their openness and their permanence”. Boundary changes to the Green Belt can only be made at the time of a Local Plan consultation in “exceptional circumstances”. The draft Local Plan does not provide sufficient detailed evidence of the strategic development proposed to meet this requirement. The Green Belt between Burpham and West Clandon forms part of the green approach to Guildford and provides a clearly defined boundary to the urban area. Much of the building proposed falls within the Parish of West Clandon but the principal impact of the traffic from the new site will be experienced in Burpham which already suffers badly from congestion and air pollution. It is felt that a better solution to these problems is required.

1. The proposal cannot be considered seriously until Highways England have decided how the A3 infrastructure can best be handled in this sector. No decision is likely to be made by them until at the earliest 2020. Their policy requires that 4 way junctions have to be set at a specified distance apart which at the moment seems to rule out the use of land adjoining Potters Lane.

1. It is equally important that a decision is made about a possible tunnel for Guildford as it will be necessary to decide where provision for access should be made in the vicinity of Burpham. It is not known exactly what route the tunnel will follow but Compton has been mentioned as its possible other entrance. As far as we know, there are only estimates available as to its likely cost and the time that it would take to build. If a tunnel were to be used to link Burpham and Compton, substantial additional road infrastructure would be needed for the B3000 both at Puttenham and Compton.

1. Planning as to whether a railway station at Merrow will be built seems to be uncertain and depends on decisions involving Network Rail. We are informed there is no reference to a railway station at Merrow in the Wessex Plan for future railway development. The station can only therefore be considered in an aspirational category as so few details are available as to its design, exact location, operation, car and bus access and parking provision. Space currently occupied by the Surrey depot in Merrow will we understand be used on one side of the track but there is no information as to the rest of the station layout including a bridge over the lines. Road access for the station will probably require the replacement of the railway bridge over Merrow Lane near its junction with New Inn lane (B2234) where lights control the traffic.

1. Before 2000 houses could be built at the site proposed, water supply, the sewage network, and other infrastructure issues would need to be resolved. We are informed that the electricity pylons near the A3 would also need to be changed owing to a capacity requirement.

1. There has been a history of linear development along the A3 in Burpham, The latest example Wey Lea was promised a range of community facilities which we believe never materialised. Burpham residents do not want this experience to be repeated for the proposed new settlement and are doubtful from past experience that undertakings in this context will be honoured.
1. Plans for a Slyfield Link Road also now appear largely aspirational. There is little confidence either in Burpham at present about the value of plans for a “sustainable movement corridor”. It appears that London Road will form part of the SMC with two way traffic in single lanes plus an additional lane in each direction for buses and cycles. It is felt that this will add to an already difficult traffic situation.

1. The Burpham Community Association issued the following statement at a well attended public meeting on 11th July 2016 regarding development of Gosden Hill Farm and its “huge impact” on Burpham:

“Two thousand homes, offices and industrial sites, a Park and Ride for up to 1,000 cars, two schools and the possibility of a new station at Merrow will put thousands more vehicles on to already very congested roads. Access to the proposed development is by a new A3 southbound off/on slip road and the present slip road to Burpham and Merrow will become two way. This means that all traffic from Gosden Hill wishing to use the northbound A3 will have to drive through Burpham to the Clay Lane slip”.

The BCA goes on to say that “the only sensible solution is a four way intersection around Potters Lane as proposed in the 1980s, which would give north and south bound access to the A3. If it is decided that a tunnel is the only answer to Guildford’s traffic congestion, then it is short-sighted to dump homes and all the associated infrastructure on the most suitable land for a tunnel entrance.”

1. The other A3 entrance to the possible tunnel may need to be located at Compton which also suffers heavily from road traffic congestion and air pollution on the B3000. CPRE does not pretend to have the necessary engineering knowledge as to the practicability of such a solution nor of the possible cost and time needed for its implementation. We do, however, know something about the successful introduction of the Hindhead tunnel in Waverley, and we recall that it was clearly indicated when the decision was taken to go ahead there, that the former traffic congestion at Hindhead would reappear at Guildford a few miles down the A3 once the tunnel was built. This has duly occurred. It would seem logical that if an A3 tunnel is considered desirable at Hindhead to keep the traffic flowing and also protect the countryside, then surely it should at least be considered as a possible solution now at Guildford to reduce congestion and improve the urban environment and quality of life of those living in and visiting the county town.

1. The evidence on future traffic conditions which is produced in the Strategic Highway Assessment Report (SHAR) has been produced late and is unfinished. This vital input has not been available in time for it to inform the draft Local Plan or the subsequent consultation. CPRE considers that this whole proposal is not ready for enclosure in the draft Local Plan and is therefore unsound.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/7926  Respondent: 8607169 / CPRE Surrey Branch & Guildford District (Tim Harrold)  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

CPRE OBJECTION TO POLICY A26
BLACKWELL FARM, HOGS BACK, GUILDFORD

We fully endorse and support the comprehensive objection to this site by Green Balance which has been made jointly on behalf of CPRE Surrey and the Save Hogs Back campaign.

1. Description

CPRE objects to this site being described as within the “Guildford Urban Area”. It is in fact within Green Belt countryside in Shalford. We object to the single track driveway to Downs Place with its attractive avenue of trees. This development has been objected to by a wide range of Parish Councils including Artington, Compton, Puttenham, Wanborough, and Worplesdon.

1. Ownership

CPRE does not agree with the categorization of this land as “Private” when it is in fact owned by the University of Surrey, a semi public body.

1. Research Park

The Research Park is owned by the University. It still has room to expand on its existing area which was originally allocated as open space. New offices or other buildings could be built similar in design to the WWF HQ in Woking with parking at ground floor level and offices above.

1. Housing

The amount of housing for this site is 1,800 homes and 6 Traveller pitches, together with a primary school. Added to this is provision for 3,000 additional cars which would further complicate matters in terms of access and sustainability. It is our opinion that heavy existing congestion at the Egerton Road A31 requirement could be achieved by the building of a retirement care home. For some unexplained reason this has been omitted from the plan.

1. Infrastructure
Access to this site from the Egerton Road A3 Roundabout via Gill Avenue will become even more congested were the proposed new road from the A31 to the A3 to become a reality. A technical report by RGP has been prepared concerning this proposed new road link to and from the A31 which questions the viability of the new road with a possible extra bridge would of course be very unsightly. There are also safety considerations that need to be taken into account.

CPRE questions whether the proposals for this junction is a realistic proposition. RGP indicates that the preferred highways solution would have a serious adverse effect on this beautiful natural landscape and protected countryside. This harm will be made even worse at the “exceptional circumstances” required for a Green Belt boundary review which would justify the harm it will cause to this very unique landscape. CPRE OBJECTION.

1. Countryside Harm and Urban Sprawl

From this policy presentation, it is hard to believe that the countryside at stake has been seriously considered. We are talking about an area of beautiful Hogs Back countryside which is recognised by everyone who knows it as a unique landscape location. Its magnificent views stretching away to the North. It would surely be unforgiveable if this were not conserved for the future rather than irretrievably harmed.

The Pegasus Report on Green Belt and the Countryside has taken the totally arbitrary position that this site should be considered only of “medium sensitivity”, and request that the Inspector walk through the site to see for themselves that it will be used by a very large quantity of traffic which will stretch back from the A31/A3 junction and the traffic lights at the A3 and in many areas, that it is premature to submit such an uncertain plan until a better assessment is available of cost and viability.

1. Landscape Evaluation

In 2007 GBC and Land Use Consultants published its Guildford Landscape Character Assessment & Guidance which includes in section 6 the protection of the fragility and beauty of the A31 trunk road along the ridgeline with the visibility of moving vehicles and associated noise. This document includes a detailed description of the protection measures that would need to be undertaken to prevent further harm. This work has already been undertaken by Hankinson-Duckett for Natural England. The Parish Councils of Cobham and Chilworth have a serious adverse effect on this beautiful natural landscape and protected countryside. This harm will be made even worse at the “exceptional circumstances” required for a Green Belt boundary review which would justify the harm it will cause to this very unique landscape. CPRE OBJECTION.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/7928  Respondent: 8607169 / CPRE Surrey Branch & Guildford District (Tim Harrold)
Agent:
CPRE OBJECTION TO SITE POLICY A35 : LAND AT FORMER WISLEY AIRFIELD

CPRE objects to the continued inclusion in the draft Local Plan of the Former Wisley Airfield (FWA) now known as the Three Farms Meadows (TFM). This development was rejected unanimously on 8th April 2016 by the GBC Planning Committee when it was submitted as a planning application prior to the draft Local Plan being published. This decision was recommended by GBC Planning Officers. We can see no justifiable grounds for this development to now be reintroduced. The arguments for its refusal as a planning application are still as valid as before. Our objection to the former Wisley Airfield development reflects exactly our overall opposition to the draft Local Plan in which over 70% of new housing is to be built within the Green Belt. The GBC proposal conflicts with promises made to the electorate in this context. In our view there is ample brownfield land available in the urban area which should be used for housing instead of attention being concentrated on unsustainable sites in countryside outside the town. No exceptional circumstances have been established to warrant removing land from the Metropolitan Green Belt, which is characterised by its openness and permanence, to permit urban sprawl to spread onto agricultural land in attractive countryside.

We object in particular to the disproportionate allocation of housing to Green Belt land in this segment of the borough. Over 23% of the draft Local Plan’s new housing is supposed to be provided in the immediate vicinity of Ockham, Ripley, Send and the Horsleys, and of this total 65% is allocated to the former Wisley airfield.

CPRE objects to the way in which the draft Local Plan for this site will overwhelm the historic rural village of Ockham nearby - which has only 159 residential houses - and destroy its attractive character and identity that depends on its many listed properties, an absence of street lighting, and very few pavements. This charming small community which can only be accessed by narrow sinuous lanes will be sacrificed to the proposed new development in its immediate vicinity of more than 2,000 houses with high density urban buildings of up to five storeys in height spread out in an urban sprawl of unattractive new construction in open agricultural countryside.

We object to the statement that the new development will result in a significant shift to cycling and walking as a means of conveyance. It is incorrect to suggest that such an isolated built-up location would reduce reliance on private cars as a means of transport to Guildford and neighbouring villages and railway stations. A proposed development of 2,068 homes will result in an estimated 4,000 additional cars on the roads. The added congestion that this will cause on the narrow country lanes in Ockham and surrounding areas will be a source of increased safety hazard to any cyclists and walkers. This will be made worse by the likely increase in bus and HGV movements from the new location with its additional school traffic. No footpaths or cycle lanes are present along these rural roads.

We object to any increase as a result of the proposed new development to the already severe congestion on the A3 and M25 which will require significant infrastructure enhancements. Work in this context to the A3 South of the site is not expected to be begun until 2019 at the earliest.
We also object to the way in which concern about the harm caused by traffic on the A3 and M25 to Air Quality has been treated with insufficient attention. Air pollution is already known to be a problem in many parts of the borough which needs to be tackled. We understand that for example the A3/M25 junction exceeds EU permitted levels and is comparable to air pollution in Oxford Street in Central London where only diesel traffic is present. The additional congestion that will be generated by the new development and by the proposed expansion of daily visitor attendance at the Royal Horticultural Gardens will only make this problem worse. The relevant authorities are well aware of the adverse impact on the health of local residents and plant life that increased traffic causes in terms of air pollution and will need to give this more urgent priority.

We object to the lack of consideration given to the environmental and ecological value of the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and a Site of Nature Conservation Interest (SNCI) which will all be harmed. Traffic noise disturbance has been shown to have a negative impact on bird life which is of particular concern with regard to the SPA.

CPRE notes that concern has been expressed by a wide range of authoritative organisations about this development including Highways England, Thames Water, NATS and the Environment Agency.

The Minister of State has made it clear in a recent statement that housing need and/or demand is not sufficient grounds for encroaching onto open Green Belt countryside and that it is up to “local people” to express their objection to development of this kind. The proposed Local Plan does not meet the needs and desires of local communities. The two top responses in the Ockham Parish Plan call for:

1. Access to the countryside and clean air
2. The peace and quiet of wide open spaces

Over 90% of the local people in this community wish to see both the village’s historic features maintained and the former Wisley Airfield now known as the Three Farms Meadows protected.

CPRE agrees with them.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID:</th>
<th>PSLPS16/7931</th>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

CPRE OBJECTION TO HORSLEY SITES A37, A38, A39, A40, & A41

CPRE objects to the proposal for six main development sites in the two attractive communities of East and West Horsley. Altogether these add up to more than some 535 new houses. Both villages are currently washed over by the Green Belt. The new development will be made possible by means of “insetting” which CPRE opposes in the draft Local Plan as it facilitates the growth of communities such as these which are together distinguished by their openness within a rural area. CPRE also objects to the extension of the settlement boundary south of the A246 and the progression of linear development towards Effingham and Ockham where the development of 2,000 houses is being proposed for the former Wisley airfield only some 2 miles away.

There are a range of constraints which have to be taken into account when reviewing these new proposals but have been ignored in the draft local plan. We are informed, for example, that Thames Water has advised GBC that the current wastewater network in this area is unlikely to be able to support the demand anticipated from all this ambitious and unexpected development growth. If this were to go ahead, the foul drainage system all the way to the treatment works North of Ripley will not be able to cope and would have to be upgraded through substantial investment.

The proposed expansion of housing on this scale will lead to major problems in terms of educational school provision. The following schools in the area are already operating at near or full capacity: Raleigh School, the Howard of Effingham School, and the private Glenesk and Cranmore Schools. It should be remembered that children in Ripley are currently having to be sent to schools in Shearwater in Woking and even to Addlestone.

Surrey County Council has published no plans for creating further school places for children of all ages for the Horsleys, or for the traffic management and environmental improvement scheme they have promised between 2019 and 2023.

CPRE objects to the volume of high density new housing proposed for the Horsleys which amounts to some 35% more homes because it will harm the character, identity, and setting of these villages. NPPF requires that new residential development must respect these elements of the community environment which will be entirely lost by building on the scale envisaged and should be limited drastically to take account of the infrastructure deficit.

The heritage buildings at Hatchlands belonging to the National Trust, and at West Horsley Place, where the new proposal for the Grange “Opera in the Woods” has been approved by GBC, must be protected against what appears likely to be unsustainable development which will overwhelm the local community environment for ever. West and East Horsley will be swamped with extra cars and people using the shops, stations, village halls, sports facilities, medical services, parking space and public transport. Paragraph 87 of the NPPF makes clear that inappropriate development is by definition harmful to the Green Belt and should not be approved except in very special circumstances. We do not agree with the draft Local Plan that this community should be a candidate for “insetting” to facilitate development on the scale suggested. We object to what is proposed and will oppose any suggestion that “exceptional circumstances” justify amending the Green Belt boundary in the way described at this draft Local Plan consultation as we consider this approach unsound.
CPRE OBJECTION TO SITES RELATING TO POLICIES A43 & A43a: GARLICK’S ARCH, SEND MARSH BURNT COMMON & RIPLEY

The proposal regarding Garlick’s Arch was only submitted at a very late stage just before the consultation on the draft Local Plan began. It therefore needs to be considered under Regulation 18 rather than Regulation 19 rules.

It appears that an as yet unspecified developer has offered a new North facing slip road with access to the A3 in exchange for approval in principle to build at least 400 homes and an industrial estate on Green Belt land adjacent to this strategic highway for which Highways England are responsible. CPRE considers that a greater degree of transparency is required for this proposal to be assessed properly. It would for example be valuable to know when and how this offer has materialised and whether it is linked in any way with any other current proposal being considered in this locality in connection with the draft local plan.

It seems to us that this application has to be considered alongside several other development proposals which involve the A3 and depend on Highways Agency overview and agreement. These include the Wisley Airfield site (A35) for 2000 homes, which was unanimously refused by GBC at an earlier date before the draft local plan was available, the Gosden Hill site at Clandon/Burpham (A25) for 2,200 houses, the Slyfield Area Regeneration Project (A24) for 1,000 houses, and the Blackwell Farm site (A26) with its A3 and A31 access at the Hogs Back for 1,800 homes. The common element to all these applications is that they depend on the input of the Highways Agency.

Additionally, we should bear in mind that the Royal Horticultural Gardens at Wisley, which is one of the largest tourist attractions in this part of England, have announced their plans to expand visitor attendance from 940,000 to 1,400,000 in the years ahead which will be a further A3 traffic consideration that needs to be addressed. Without clarification from the Highways Agency as to how they intend to improve the traffic flow on the A3, which is already badly affected by peak hours congestion, and manage its various junctions with the M25, the B2251, the B2039, the A247, the A3100 and the A31 in particular, further assessment is premature. Altogether over 7,000 houses are involved which seem certain to cause not only a crippling extra traffic burden for the A3 but also for our local road network.

It is not clear as yet how a 3 or 4 way on/off ramp at Burnt Common would work. It seems unlikely that it would alleviate traffic damage on a major scale for Clandon, Send or Ripley. CPRE therefore objects to this proposal which involves the loss of Green Belt to housing development, and is therefore directly against the Minister’s statement that this would not be acceptable if local people were opposed to this and considered it inappropriate. CPRE OBJECTION.

CPRE further argues that it would be premature to include this proposal in the draft local plan as the overall implications of what is being considered are insufficiently described.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/7930  Respondent: 8607169 / CPRE Surrey Branch & Guildford District (Tim Harrold)

Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A46

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

CPRE OBJECTION TO POLICY A46

LAND TO SOUTH OF NORMANDY & NORTH OF FLEXFORD

1. INTRODUCTION

As Policy A46 was only added to the draft Local Plan at a very late stage and without prior consultation or adequate evidence, CPRE believes that this whole topic should be subject to Regulation 18 rather than Regulation 19 consideration.

It appears that this late addition to the draft Local Plan was accepted as the result of Taylor Wimpey offering a new school for this mixed use development involving 1,100 houses. GBC seems to have acted opportunistically in accepting this proposal without assessing adequately beforehand how it would fit the policies that relate to the open countryside of the Green Belt.

CPRE has attended two packed public meetings since then at which the Guildford Borough and Surrey County Councillors spoke. At one meeting the local MP was also present. It appears that the whole community was totally taken by surprise at this proposed encroachment onto Green Belt countryside for which as residents they had received no advance warning.

CPRE has enjoyed good communication with the former Chair of the Parish Council and with members of the Normandy Action Group (NAG) over many years. We also have regular contact with the local Councillors concerned.

CPRE has established an additional link to the Friends of Normandy Wildlife since the draft Local Plan was published and have as a result become familiar with the issues which most concern them regarding biodiversity and ecology. We have
also visited the proposed development area which is largely made up of Grade 3 agricultural land and some stretches of ancient woodland.

We have subsequently studied the submission that they have made which we consider thorough and professional. We have every confidence that the information in their submission can be considered as an accurate statement as to the current situation with regard to wildlife of all kinds in Normandy and Flexford.

The Treasurer of the Friends of Normandy Wildlife has also made a submission as an individual resident who is a member of CPRE which we have studied and fully endorse. CPRE agrees wholeheartedly with the views she has expressed which we consider accurately indicate that the proposal is unsound on the grounds listed later in this part of our submission.

1. ISSUES RELATING TO STRATEGY

The massive scale of this proposed development of 1,100 houses is unacceptable and inappropriate as it will encroach on the permanence of the Green Belt and damage the openness of the rural environment at this location by the introduction of high density urban sprawl. The Minister has made clear that housing demand is not sufficient grounds for altering the Green Belt boundary and therefore cannot be considered as “exceptional circumstances” justifying change in this context in the draft local plan. CPRE OBJECTION.

The site is overlooked from the South by the Hogs Back ridge which is located in the Surrey Hills Area of Outstanding Natural Beauty (AONB) and is also an Area of Great Landscape Value (AGLV). The Surrey Hills Management Plan to which GBC is a signatory states in Policy LU2 that “Development will respect the special landscape character of the locality, giving particular attention to potential impacts on ridgelines, public views, tranquillity and light pollution.” Policy LU5 states that “development that would spoil the setting of the AONB, by harming public views into or from the AONB, will be resisted.” Natural England are to undertake a boundary review of the AONB at the Hogs Back to evaluate whether adjacent countryside can be rated as equivalent in quality to the AONB and therefore of national importance. This long standing strategy to which GBC has agreed should be observed and not obstructed.

Westwood (C16) and Glaziers (D60) Lanes which will provide access to the site are the rural roads which enclose the proposed development area with the A323 and the railway line. The railway bridge on Westwood Lane reduces traffic flow to a single track. This infrastructure will in our view not be able to cope with the additional traffic which the proposed new development will cause. The draft Local Plan indicates that local highway environmental improvements (which are not specified) would mitigate the transport impact from the development, a statement which we find difficult to believe. However, the Strategic Highway Assessment Report carried out by Surrey County Council on behalf of GBC concludes that the Aldershot Road (A323) which already has little or no spare room for more vehicles at peak times would experience increased traffic congestion. Safety considerations from road accident history do not appear to have been taken into account. Because of development in the Aldershot area in Rushmoor, with more planned for the future, the A323 has had to take steadily increasing traffic as vehicles seek to find a way through to Guildford and the A3. There appears to be no joined-up thinking as to the impact of the proposed Normandy/Flexford development on this deteriorating situation. Proposals regarding more passenger use of the unmanned Wanborough station are over optimistic since passengers wishing to reach London have to change at Guildford. The station can only accommodate a maximum train length of 4 carriages. Access to adequate parking at the station is not at present available.
The sewerage system appears to be already running at capacity and could not cope with the proposed development. Footnote 9 for NPPF policy 14 indicates that development in locations at risk of flooding such as at Normandy/Flexford should be restricted.

The community is not convinced that there is a demand for a secondary school in this part of Guildford. An analysis of vacancies at schools in the Hogs Back area indicates that there is current spare capacity. There appears to be a strategy being promoted in the development sector that building a school in this and other development areas will enable a boundary review to be agreed for the Green Belt on the grounds of “exceptional circumstances”. CPRE rejects this idea which it finds fundamentally unsound. CPRE OBJECTION.

The proposal does not clarify which comes first: the extra housing, the new school, the shops, or the infrastructure. It is a chicken or egg story. It appears that GBC has agreed to remove the Normandy/Flexford proposal from the draft local plan should it be shown that the school is not required. CPRE maintains that this development proposal should not have been submitted in the first place and is in conflict with GBC strategy in many areas. It should be removed from the draft Local Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

| Comment ID: | PSLPP16/17503 | Respondent: | 8607169 / CPRE Surrey Branch & Guildford District (Tim Harrold) |
| Agent: | | |
| Document: | Proposed Submission Local Plan: strategy and sites 2016 / Policy H1 |

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy H1 Homes for All

We consider that this policy should have a sub heading such as:

“The most efficient use of existing urban and previously developed land”.

Development of brownfield sites is the first priority. We also will need to look at the vexed question of higher density whilst having regard to existing character not only in Guildford but also other sustainable locations such as Ash and Tongham. This extra emphasis is necessary in order to lessen the need for the consideration of open land whether within the Green Belt or the countryside.
We must use all the urban land that is available for housing efficiently. We need to look for previously developed land which is no longer required for business or other employment purposes. One important priority is to identify whether there is a backlog of sites in Guildford Borough, for which planning permission has already been granted but not yet been developed. In the past, a great deal of windfall development has contributed towards our planning targets. CPRE sees no reason why this should not be the pattern for the future as well. Many older buildings survive which are still named after their former use. We believe that change will result in individual sites becoming available with the closure for example of small businesses such as local newsagents, post offices, builders yards, and pubs. We would therefore question whether the estimate made in Policy S2 of 625 dwellings from 2018 to 2033 is accurate and sufficient, bearing in mind past rates of achievement in this category. Every effort should be made to include a realistic figure for windfalls which in the past has proved such a valuable element of the housing provision.

It is important that the University of Surrey meets its commitment to build the multi occupancy student housing on its two campuses that it has promised in the past. CPRE maintains that from now on 100% of new student accommodation should be provided on the University of Surrey’s two campuses, both of which have sufficient space to replace sections of surface parking for this purpose. We object to the figure of only 60% of existing students being accommodated on Stag Hill and Manor Park. We consider that the figure should be higher and the policy wording with its use of the words “we expect” strengthened. This would reduce the problem of students using leased housing for multi occupancy in the town that otherwise would be available for year round use by young families with working parents.

The policy does not indicate the density of housing within urban Guildford which should be the objective for future building. Clearly, this is a sensitive issue which will be affected by a wide range of factors including conservation areas, height and design. All surface parking sites should be carefully assessed to evaluate whether more multi storey facilities or underground parking could be considered which use precious space better. We are aware of many individual garages in rear gardens with access to a road which are neither attractive in appearance nor fulfilling an efficient use of land which could be built on. We object that the Policy does not include a density figure, or range, for new housing within the urban area of Guildford, Ash and Tongham. With suitable land so scarce and pressures mounting on open land and Green Belt surely it is time to be pragmatic and realistic by specifying higher densities for building where this can be done without harming the quality of life of the community.

There is a need in the town for more flats which are conveniently located for independent older people that wish to downsize from their current residential accommodation.

The development of the former Surrey Advertiser offices on Martyr Road is an example of what is required. CPRE objects to the excessive amount of retail proposed in the town centre on land which could be regenerated with housing.

POLICY H2 Affordable homes

Defining exactly what is meant by the word “affordable” is as difficult as asking for a definition of “sustainable”. It is hard to believe that 80% of the market value of a house in Guildford would fit this definition and be considered affordable. We do not think that the extensive glossary definition provided will be valid for long, given the Government’s constant tinkering with this difficult area with its tax and other incentives. We also have difficulty with the enthusiasm in political circles for the “right to buy” concept which we believe will eventually have to be reconsidered.
Developers generally prefer to make more money by building larger mansions which bring in more profit for them than affordable home initiatives. The demand for new housing in this county is almost limitless so the impact of what is proposed in the draft Local Plan will not in our opinion have any effect on house price levels.

We support the proposals made for affordable housing being required for sites of 5 or more houses or sites of 0.17 hectares or more regardless of the number of homes involved. We also agree 40% of these homes should be affordable. We agree with the policy which requires for 70% of the affordable homes supplied to be for rent. We wonder how far these objectives will be achievable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17505  Respondent: 8607169 / CPRE Surrey Branch & Guildford District (Tim Harrold)
Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY H3 Rural Exception homes

There is no reference to Paragraphs 87 to 89 on pages 20 and 21 of the NPPF which we believe should be included in this policy. It should also be made clear that rural exception homes are not a loophole for those on the Guildford Borough housing list through which to move into the countryside but are made available only to meet local need for people with a village connection that should be monitored and agreed by the Parish Councils concerned.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17499  Respondent: 8607169 / CPRE Surrey Branch & Guildford District (Tim Harrold)
Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
1. Infrastructure

CPRE objects at the failure to supply a satisfactory infrastructure strategy or delivery plan for Guildford in time for this consultation. In the Surrey Infrastructure Study of January 2016 the total infrastructure cost required was assessed to reach £1.162 billion. The total secured funding was given as £75.8 million and the total expected funding was estimated at £568.2 million. This left a funding gap of £518 million which is equivalent to 55% of the total costs budget. CPRE OBJECTION.

CPRE recognises that many major infrastructure decisions affecting Guildford District are outside the control of GBC and that this makes planning ahead for a long period almost impossible, especially at a time when the economic outlook is so uncertain and difficult to predict. Many decisions which can only be outlined as aspirations depend on infrastructure provision being agreed by Highways England (M25 and A3), Historic England, Natural England, Network Rail, the Surrey County Council, and Thames Water. The constraint of providing SANGS in connection with the Thames Basin Heaths has also to be taken into account.

GBC are making ambitious proposals for housing regardless of the lack of adequate infrastructure in support. Without this being provided before development is begun, there will be a real threat of intensified disruption caused by traffic congestion, particularly at peak times, in many communities. CPRE OBJECTION.

Surrey’s motorways already carry 80% more traffic than the average for the South East and our A roads 66% more than the national average. CPRE has been heavily concerned with traffic management issues across the county for many years. We have served on the M25 Orbit Committee and were involved with the consultation on the Hindhead tunnel, the Cobham Motorway Service Area and the Hard Shoulder Running Initiative for the M25 between Junctions 5 and 7. We have also been concerned for a prolonged period with the various AirTrack rail proposals linking Guildford and Woking to Heathrow which are now in abeyance. We expect to become involved in monitoring the North Downs rail proposal linking Reading to Gatwick via Guildford.

We think it unrealistic for Cross Rail 2 to be discussed at this continuing time of likely austerity as a means of freeing up the overburdened rail link to Waterloo from Guildford and Woking. We do have, however, to recognise the planning challenge that the high percentage of commuters travelling to London for work represents, together with a comparable number coming into both Guildford and Woking for daily employment. It is disheartening to see the inadequacy of the Solum proposal for Guildford’s mainline station which did not sufficiently address the issues that concern commuters or residents most. CPRE OBJECTION.

The detrimental impact of traffic congestion on quality of life across Surrey is a topic of importance to everyone. The location of schools and their school runs are of course a daily cause of traffic problems. The proposal for the Hoe Valley school and its associated Leisure and Sporting facilities will be on Green Belt land and will certainly not improve matters on the A320 at Mayford on the road between Guildford and Woking, even if Paragraph 89 of the NPPF allows for greater flexibility to be shown for outdoor sport and recreation within the Green Belt, as long as it does not conflict with its openness. The Woking Traffic Survey acknowledges that this proposed development will have a damaging effect on congestion on the A320 and A322 as well as other local roads. CPRE OBJECTION.

Congestion on A roads leads to the overuse of B roads by speeding traffic that exceeds the relevant limits which are invariably not enforced. The B367 from Ripley to Pyrford is an example of this problem. Speed limits for the Pyrford Conservation Area and elsewhere along this road are not observed except where traffic lights or the narrowness of the road itself, as at Newark lane in Ripley, slows traffic down.

Other roads such as the B380 serve as a link between the A324, the A322 and the A320 and all carry excessive traffic for their size. An example of a C road which is already under severe traffic pressure is Salt Box Road which forms the link between the A320 and the A322 as well as funnelling through traffic between the M3 and the A3. Burdenshot and Goose Rye Road are examples of D roads where safety is a major concern as traffic seeks to find a way through to Worplesdon station which is located within Woking Borough, where a new Park and Ride location is proposed. The question has to be asked in this context as to how this proposal can be considered given the Kemishford bridge access problem and the unsuitability of the bridge near the station at Prey Heath Road with its long history of flooding issues.
CPRE gives these examples of busy roads where house building on the scale envisaged for Guildford and Woking will only make traffic matters much worse. Further analysis is required in both boroughs of the impact of the huge housing projects proposed and the positioning of the school and park and ride facilities they envisage. CPRE OBJECTION.

CPRE questions whether all the development envisaged for Guildford can be considered sustainable and deliverable in the time required. Paying for all this investment will be very hard to achieve through the Community Infrastructure Levy (CIL) which is one of the motivating forces behind GBC’s attempt to accelerate passage of the draft Local Plan and use as much Green Belt land in the process as they can. CPRE again maintains that this approach is misguided as it places too much emphasis on economic priorities at the expense of environmental policies which have served the community well and need to be supported rather than undermined. CPRE OBJECTION.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** PSLPP16/17506  **Respondent:** 8607169 / CPRE Surrey Branch & Guildford District (Tim Harrold)

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):**

POLICY P1: Surrey Hills Area of Outstanding Natural Beauty (AONB)

The Surrey Hills AONB is countryside of national importance and should therefore be provided with the highest level of protection. The draft policy needs to be strengthened so that it includes a more robust defence of natural beauty which must be conserved and enhanced.

We have decided to express our objection to Policy P1 by suggesting the following alternative wording which we believe would be more readily acceptable:

“POLICY P1: Surrey Hills Area of Outstanding Natural Beauty (AONB) and of Great Landscape Value (AGLV)

4.3.1 The Surrey Hills AONB is countryside of national importance and has equal statutory protection to a National Park. The whole of the AONB is classified as an Area of Great Landscape Value (AGLV) and this extends beyond the AONB boundary with the objective of protecting its distinctive landscape character. AONBs were originally identified via the National Parks and Access to the Countryside Act 1949, with the primary purpose to conserve the natural beauty of the landscape

4.3.2 The Surrey Hills offers some of the most beautiful and accessible countryside in England. The North Downs National Trail runs along their length and is characterised by its important views across distinctive landscape which includes chalk...
grassland, woodland, heaths, commons and agricultural land. An important objective of planning is to conserve and enhance the natural setting of the AONB and to protect its unspoilt character and tranquillity.

4.3.3 Dark skies at night and the lack of air pollution and noise disturbance are for example a feature of the Surrey Hills countryside at the Devil’s Punchbowl near Hindhead since the A3 tunnel with its traffic has gone underground. Protecting a sense of remoteness and natural beauty in the landscape should be reinforced in all parts of the Surrey Hills AONB within Guildford Borough.

4.3.4 Natural England are scheduled to make a review of the AONB boundary with the intention of extending the size of the Surrey Hills. While the AGLV has acted as a buffer to the AONB, it also has its own inherent landscape quality, which contributes to the rural environment in its own right and preserves views from and into the AONB. It should continue to provide long standing protection across the county to important countryside and is to be considered equivalent in quality to the AONB.

POLICY P1: Surrey Hills Area of Outstanding Natural Beauty (AONB) and Area of Great Landscape Value (AGLV)

The Surrey Hills Area of Outstanding Natural Beauty (AONB) will be conserved and enhanced to reinforce its special landscape qualities and protect it from development. All such proposals will be assessed against the provisions of the current Surrey Hills AONB Management Plan. There will be a presumption against major development in the AONB. Proposals within the AGLV will be required to demonstrate that they would not result in harm to the AONB or to the distinctive character of the AGLV itself.

Reasoned Justification

4.3.5 Paragraph 115 of the NPPF makes it clear that AONBs should be afforded the highest level of protection in relation to landscape and scenic beauty. Any and all development proposals within and adjacent to the AONB will be expected to conserve and enhance its special qualities.

4.3.6 Paragraph 116 states that planning permission should be refused for major developments in these designated areas unless exceptional circumstances are demonstrated.

4.3.7 No change will be made to AGLV status pending completion by Natural England of its review of the AONB boundary. The role that the AGLV plays in protecting this nationally important countryside should then be confirmed and its importance in maintaining landscape character and quality recognised both within and outside the AONB boundary.

4.3.8 The policies outlined in the Surrey Hills AONB Management plan apply not only to Guildford but to all relevant districts and boroughs across the county. This document is a key tool in the decision-making process regarding AONB and AGLV countryside. The management Plan is also an important material consideration in determining planning applications within and adjacent to the AONB."
OBJECTION TO DRAFT GUILDFORD LOCAL PLAN : POLICY P2 & D4: GREEN BELT & INSETTING

I wish to object at the way in which so many villages in Guildford Borough are to be inset from the Green Belt presumably when and if the draft Local Plan is approved.

I should like to know why NPPF does not include the definition of “insetting” in its Glossary.

I note, however, that it is included in the draft Guildford Local Plan Glossary which refers to insetting as follows:

“Where a village is excluded from the Green Belt boundary. Currently the villages of Guildford are washed over by the Green Belt and form part of it”.

I feel that this is an insufficient explanation of what is happening. There is no adequate description for example as to the decision process whereby some villages continue to be “washed over” with Green Belt and some not. Nor is it apparent how such a major change can be introduced arbitrarily in this way when NPPF clearly indicates that the characteristics of the Green Belt are its permanence and its openness. We know that NPPF policy states that changes to a Green Belt boundary have to be made at the time of a consultation on a Local Plan and will only be justified in exceptional circumstances. What is not clear is whether so many changes can be justified at one time and whether legitimate “exceptional circumstances” apply on the grounds that the Green Belt is preventing inappropriate development. Surely, this is exactly what it is supposed to be doing. What we are being asked to accept is that because some parts of a village have been built-up in the past then this should be allowed to extend onto additional open areas of the village settlement which Green Belt policy maintains should be kept open.

The Introduction to Policy P2 states in paragraph 4.3.13 on page 48 that :

“The following villages are now inset from the Green Belt : Chilworth, East Horsley, Effingham, Fairlands, Flexford, Jacobs Well, Normandy, Peasmarsh, Ripley, Send, Send Marsh/Burnt Common, Shalford, West Horsley and Wood Street Village”.

In addition paragraph 4.3.15 lists a number of major previously developed sites which are also to be inset from the Green Belt which include the two nationally important AONB sites at Mount Browne and the University of Law, a decision which is subject to objection by Artington PC and CPRE.

Paragraph 4.3.17 also refers to the fact that land at the former Wisley Airfield has been inset as well and will therefore be removed from the Green Belt. CPRE has lodged an overall objection to this development which we consider falls into a totally different category as a strategic site.
It seems apparent that insetting is being used in a number of different areas to change Green Belt boundaries in villages, urban locations, strategic sites and major existing developments such as the Henley Business Park, HM Prison at Send, Pirbright Barracks and the Pirbright Institute.

The way in which this topic has been announced hardly suggests that this is still a matter for consultation as we are told that Regulation 19 now applies. However, we maintain that there has been insufficient transparency on this matter because of how the draft Local Plan has been edited, and that clarity of presentation on this new policy has not been handled adequately.

CPRE has had to spend some time finding the relevant policy references and considers that they are not clearly laid out for easy comprehension as one would normally expect for a policy change of considerable impact and importance. This is a major issue as the failure to clarify the policy in one place in the draft Local Plan will serve to deter investigation and/or understanding by those communities most involved owing to the difficulty of locating all the relevant text concerned.

Surprisingly, one has to turn to paragraph 4.5.50 in Policy D4 on page 106 to obtain further information relating to insetting and the policy which is to be followed in this context in urban and inset village areas. This states that 15 villages are to be affected.

A provisional decision has apparently been made that these villages do not qualify in terms of openness to remain in the Green Belt. This will mean that the Green Belt boundary will have to be amended in no less than 15 communities. However, it is unclear if or when this issue was discussed with Parish Councils and how far Local People in the villages concerned have been involved in the consideration of this decision. Furthermore, so many changes to the Green Belt boundary at one time hardly qualify to be justifiable under “exceptional circumstances” since 15 different individual sites are involved. We also question whether “openness” should be the only consideration to take into account when Green Belt has no less than five other purposes that ought to be met.

It is our concern that the justification for removing villages from being washed over by the Green Belt boils down to a desire to increase development which would formally have been considered “inappropriate” because other unspecified development management policies will apply that are less effective and robust. We are not convinced that many of the villages concerned would welcome this approach. If this proposal were to go ahead, it has been reported that no less than 105 kilometres of new Green Belt boundary would be involved.

We also have serious reservations as to whether these proposed changes stand up to closer examination. We assume that this proposal is based on the “evidence” given in the revised version of volume 4 of the Pegasus Green Belt & Countryside Study upon which we are reluctant to place much weight. We do not have confidence in the “evidence” that this document contains. We also note that an attempt is being made to increase the settlement boundaries of several villages without clarifying clearly what is being done.

So let us have a look at a few examples of what is proposed.

I know Effingham well and am familiar with its Conservation Area and the open land at the King George V playing fields, Browns Field, Effingham Golf Club, Effingham Lodge Farm and Effingham Common. All of these areas are distinguished by their openness as is the land beyond the Little Bookham boundary adjacent to Manor House School. Land to the South of Effingham also includes open countryside. I am not clear whether it is acceptable for Guildford to make changes in the Green Belt at Effingham without first advising Mole Valley Council of what they intend to do just over the borough boundary. It is a community which is already in danger of merging with the villages of Little Bookham and East Horsley through linear development along the A246 and the Lower Road. Surely, we do not wish to weaken the protection afforded by the “washed” over Green Belt provision in the circumstances we have described.

It is easy to point out the openness of the villages of Flexford/Normandy, and the Horsleys as they are today. The problem relates to the inappropriate development that is proposed in the draft Local Plan which is determined to force through what we consider incipient urban sprawl in these communities and transform their current rural environment. This will require an extensive boundary review for the Green Belt to take place so that they can absorb more housing. CPRE has already objected to this elsewhere with respect to these sites. The draft Local Plan is not acceptable because it is seeking to undermine the long established implementation of successful Green Belt policy.
Moreover, we are aware of numerous amendments which have been surreptitiously made to settlement boundaries in order to facilitate further building development for the draft Local Plan. We do not consider that these changes have been made in such a manner that they will be immediately understood by the public because they are not easily “transparent” in the information available.

It seems to us that the draft Local Plan as it stands is unsound because it is based on too high an “Objectively Assessed Need” (OAN) figure for housing, a refusal to deduct constraints, and it consciously seeks to undermine the Green Belt to facilitate the unrealistic achievement of reaching this target. CPRE believes in the value of the Green Belt which it is determined to defend and accordingly adds this objection to the others it has submitted already. We consider that what we have discussed in this letter and the other submissions we have made amounts quite simply to bad planning.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17507  Respondent: 8607169 / CPRE Surrey Branch & Guildford District (Tim Harrold)

POLICY P2 : Green Belt

CPRE objects to the way in which the draft Local Plan proposes to allow development of the Green Belt which has been so successful in protecting Surrey’s countryside from urban sprawl and suburban encroachment. It is our view that the general public in Guildford regard it as part of their heritage and that this policy should express more clearly its positive support for the role it plays in maintaining openness from development.

The NPPF states clearly in Chapter 9 that it attaches great importance to Green Belts and that “the fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence.”

Paragraph 80 of the NPPF reads as follows:

“Green Belt serves five purposes:
+ to check the unrestricted sprawl of large built-up areas;;
+ to prevent neighbouring towns merging into one another;
+ to assist in safeguarding the countryside from encroachment;
+ to preserve the setting and special character of historic towns;
and to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.”

The draft Guildford Local Plan is in conflict with this list of the five purposes of the Green Belt, and also seeks to challenge the fundamental aim of Green Belt policy which is to prevent urban sprawl by keeping land permanently open. CPRE OBJECTION.

Paragraph 14 makes clear that “the presumption in favour of sustainable development” is to be limited where “specific policies in the framework indicate development should be restricted”. These policies are listed in Footnote 9 to Paragraph 14 and include sites protected under the Birds & Habitats Directives, Sites of Special Scientific Interest, land designated as Green Belt, Areas of Outstanding Natural Beauty, Local Green Space, designated heritage sites and locations at risk of flooding. All of these categories apply to the Guildford District. Constraints should be taken into account in the Housing Need Figure (OAN) and the figure of the Housing Target in the draft Local Plan lowered accordingly.

Paragraph 83 states that “once established, Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan” which is of course the process with which we are now concerned. CPRE maintains that “exceptional circumstances” is a far stronger requirement than the “very special circumstances” referred to in Paragraphs 87 and 88 when considering regular planning applications as to whether they are appropriate or not. The definition of “exceptional” is much more specific and relates to rare occasions which are outside normal policy planning process. “Exceptional circumstances” have to be regarded as not the norm. They are to be characterised as unique and permanent, and the opposite of required general practice which is concerned with planning interpretation and implementation for specific applications. That is one of the reasons that a boundary change can only be considered when a new plan is being prepared and discussed.

It follows that a boundary review of the Green Belt is a unique and rare occurrence which is “exceptional”. The draft Local Plan, however, seeks to make numerous boundary reviews of the Green Belt in many different Guildford borough locations at one time, which clearly infringes the permanence rule which applies to the Green Belt designation. Moreover, the Guildford Borough Local Plan which was adopted in January 2003 agreed to a major change in the Green Belt boundary when the University of Guildford Manor Park campus was permitted. It is clear to us that it was not intended that any further changes to this permanent boundary would be allowed a few years later at a subsequent Local Plan. We maintain that this renders the proposed draft Plan unsound because it follows an incorrect policy approach.

CPRE OBJECTION.

We also do not accept the arbitrary way in which the Pegasus Study has concluded that Green Belt sites which fulfil only 2 of their 4 “purpose assessment tests” are categorised as only of “medium sensitivity” and therefore available for possible development should they meet other policy requirements. This is a fundamentally flawed policy approach which is designed to accelerate erosion of the Green Belt in a totally unacceptable manner for the purposes of housing development and will result in urban sprawl encroaching onto open countryside. CPRE OBJECTION.

CPRE is additionally concerned about how Paragraph 85 of the NPPF should be interpreted with its reference to “defining boundaries” and “safeguarded land between the urban area and the Green Belt”. We support the concept of villages being “washed over” by the Green Belt as part of the approach to be followed in Guildford but it is our impression that the term “safeguarded” is rather the opposite of its normal dictionary definition when it comes to the long term permanent protection of the Green Belt. Nor do we agree with the use of “insitting” in sensitive locations such as at Mount Browne and the University of Law in Artington PC which are within both the Green Belt and the Surrey Hills AONB, or its use in a policy change which will effectively remove 14 villages from any real Green Belt protection. It is important that Local PCs can
reach decisions regarding the openness of their village communities rather than have to accept a centralised judgement on this issue. This extra element in influencing local decision-making is undesirable. CPRE OBJECTION.

Guildford has a Parish Council heritage with a well informed knowledge of the countryside in its local areas. We believe that as the Minister states “local people” will and should be making decisions about the numerous changes proposed in the draft Guildford Plan as regards the settlement boundaries in their communities and not being advised of this “from a distance” which avoids the use of fully informed local input. Changes as well to conservation area boundaries are a sensitive matter that needs careful local attention. Elsewhere in this document, we have referred in addition to the interpretation of draft Policy H3 regarding Rural Exception Homes which we find not tightly defined sufficiently.

It is important that Guildford and its neighbouring communities do not merge into one another through the steady erosion of the Green Belt in the way proposed in the draft Local Plan now under consultation. They should rather be encouraged and seek to retain their separate character, identity and setting. It is essential that these elements of planning are recognised and supported by GBC rather than allowed to be undermined bit by bit. The green gaps between villages should be retained and not succumb to linear “ribbon” development along roads and railways. The green approaches to Guildford’s villages, such as for example Effingham, should be protected so that they remain as far as still possible distinct from their neighbouring communities at Bookham and East Horsley. CPRE objects to the way in which Guildford also is in danger through its draft Local Plan of merging into neighbouring towns such as Godalming. The constant unbalanced emphasis on economic growth will harm the countryside that so many residents and visitors value and cherish. CPRE OBJECTION.

CPRE objects to the continued reliance on the “evidence” in the Pegasus Report for the new draft Local Plan which was shown to be inaccurate in many aspects during an earlier consultation process to which the public expressed their objection in large numbers. We deplore the way in which value judgements made for this discredited report – which has not been changed – are being used for the “traffic light” evaluation of 4 of the 5 Green Belt purposes listed above. We object to this method of approach using these often misinformed evaluations which define the sensitivity value of the Green Belt into the 3 categories of Red, Yellow and Green. This is an unacceptable basis upon which to justify a wide range of Green Belt boundary revisions which cannot be considered adequate for the draft Local Plan with its “exceptional circumstances” requirement. It deliberately ignores the NPPF policy which emphasises the importance of the Metropolitan Green Belt and its permanent nature. The policy also makes clear that its boundaries are designated to prevent urban sprawl by protecting openness. The boundaries of the Green Belt were established for this purpose and are as valid now as they were when first introduced. They were not intended to be altered by an onslaught of changes each time a Local Plan was brought forward for consideration. CPRE therefore objects most strongly to this proposal and believes that the draft Local Plan has to be considered unsound on these grounds. “Exceptional circumstances” by their definition do not encompass a multiplicity of changes along the lines envisaged. CPRE OBJECTION.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
IN CONCLUSION

The following information appears on the web site dated June 7th 2016 of Brandon Lewis MP, the Minister of State for Housing and Planning:

“Many people contact me about development on the Green Belt, particularly when it is on land near our villages. I am exceptionally fond of the British countryside. While it is up to local authorities to determine the development of new homes through local plans, I would like to reassure you that the Government is acting to protect the Green Belt from inappropriate development. National planning policy is explicit that key protections such as the Green Belt cannot automatically be overridden by the presumption in favour of sustainable development. Planning Policy also guarantees strong protection for National Parks, Areas of Outstanding Natural Beauty and Sites of Special Scientific Interest. Powers have also been given to councils to resist unwanted garden grabbing and to protect valuable local green spaces from caravan and traveller sites.”

In view of this informal statement of national policy, we should like to see GBC reconsider the draft Local Plan that is now under consultation which undermines and erodes the Green Belt in Guildford Borough extensively. CPRE has major objections to the way in which Green Belt policy is being ignored by GBC using the “Objectively Assessed Need” figure for housing of 693 houses per annum as a justification for their recommendations. We object to this approach since we believe it is linked to evidence that is flawed as indicated by Green Balance and other specialists in this field.

The web site goes on to state that “latest statistics show that the level of Green Belt development is now at its lowest rate since modern records began in 1989.” This is an achievement which underlines the permanence of the Green Belt policy in stark contrast to what is proposed for Guildford. CPRE therefore objects strongly to the draft GBC Local Plan which it finds to be unsound.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

| Comment ID: PSLPP16/17508 | Respondent: 8607169 / CPRE Surrey Branch & Guildford District (Tim Harrold) |
| Agent: |
| Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P3 |
| Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( ) |
| Answer (if comment is on questions 1-7 of the questionnaire): () |

POLICY P3 Countryside

CPRE supports the need for a policy that protects countryside outside the Green Belt from development and greater physical and/or visual coalescence between settlements. We also recommend an additional introductory sentence calling
for “the landscape character of the countryside outside the areas covered in Policy P2 to be protected and enhanced, and any new development to be designed and sited to minimise any adverse impact on this character”. This phrasing has been successfully used in another district plan in Surrey to cover the same issue. It is suggested that the policy wording to be used might usefully be discussed with Waverley, if this has not already been done, as they have a far larger area of “land beyond the Green Belt” to consider than Guildford.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17509  Respondent: 8607169 / CPRE Surrey Branch & Guildford District (Tim Harrold)
Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY P4 Flooding, flood risk and groundwater source production

CPRE is regularly in communication with the National Trust with regard to the Wey Navigation and with CPRE Kent where we have access to expertise on the topic of water supply. We hope that the Brexit decision will not reduce EU input to this sector. CPRE is concerned about the pattern of increased flooding over recent years which seems to be linked with climate change. It appears that storm severity is a factor in increasing water run-off which is partially due to housing growth. It appears to us that many areas of Guildford Borough are being increasingly affected by flooding and that reduced maintenance of rural roads has added to local problems in this context. It is anticipated that should building on the Green Belt countryside proceed as envisaged in the draft Local Plan, flooding problems will increase and the Environment Agency and Thames Water will be put under more intense pressure as they attempt to tackle major infrastructure problems relating to flooding, water supply and sewage issues. This increased activity will start at a moment when manpower cuts at these key organisations in this area are being implemented.

At the same time, the Environment Agency has warned much of Surrey that the balance of water supply and demand is “seriously stressed”. It is important, therefore, that aquifers are not used excessively for water irrigation purposes for the 140 golf courses in the county. Many of the major Guildford housing developments could be affected by water supply problems such as occurred when the National Trust heritage building of Clandon House was burnt down. The scale of housing projects outlined for the years ahead could certainly present a problem in this context.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17510  Respondent: 8607169 / CPRE Surrey Branch & Guildford District (Tim Harrold)
Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P5
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

<table>
<thead>
<tr>
<th>POLICY P5 Thames Basin Heath Special Protection Area</th>
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<tr>
<td>It is a serious mistake that GBC has not taken this constraint into account when arriving at its OAN housing figure.</td>
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<td>CPRE has reservations as to how this policy is working but sees little prospect of any change being introduced as its wording does not really fall within local authority control. The principal difficulty is to do with the system of SANGs that has been developed and the way this is being implemented by GBC and other neighbouring districts. Many SPA sites are still being visited by dog walkers in large numbers even when SANGs are supplied, and if these are located near SPA boundaries, damage is quickly done to any ancient woodland and good agricultural land bordering the protection area such as at Blackwell Farm. We have viewed the income generated in Guildford for SANGs at Chantry Woods in the AONB and the Registered Common at Effingham. Greater transparency is required as to how this money is to be spent and where. A key application is to be heard at Worplesdon on 20th July after a long delay as something of a test case at which a proposed SANG application will be consulted upon in the Planning Committee.</td>
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GBC are making ambitious proposals for housing regardless of the lack of adequate infrastructure in support. Without this being provided before development is begun, there will we believe be a real threat of intensified disruption caused by traffic congestion, particularly at peak times, in many communities. CPRE OBJECTION.

Surrey’s motorways already carry 80% more traffic than the average for the South East and our A roads 66% more than the national average. CPRE has been heavily concerned with traffic management issues across the county for many years. We have served on the M25 Orbit Committee and were involved with the consultation on the Hindhead tunnel, the Cobham Motorway Service Area and the Hard Shoulder Running Initiative for the M25 between Junctions 5 and 7. We have also been concerned for a prolonged period with the various AirTrack rail proposals linking Guildford and Woking to Heathrow which are now in abeyance. We expect to become involved in monitoring the North Downs rail proposal linking Reading to Gatwick via Guildford.

We think it unrealistic for Cross Rail 2 to be discussed at this continuing time of likely austerity as a means of freeing up the overburdened rail link to Waterloo from Guildford and Woking. We do have, however, to recognise the planning challenge that the high percentage of commuters travelling to London for work represents, together with a comparable number coming into both Guildford and Woking for daily employment. It is disheartening to see the inadequacy of the Solum proposal for Guildford’s mainline station which did not sufficiently address the issues that concern commuters or residents most. CPRE OBJECTION.

The detrimental impact of traffic congestion on quality of life across Surrey is a topic of importance to everyone. The location of schools and their school runs are of course a daily cause of traffic problems. The proposal for the Hoe Valley school and its associated Leisure and Sporting facilities will be on Green Belt land and will certainly not improve matters on the A320 at Mayford on the road between Guildford and Woking, even if Paragraph 89 of the NPPF allows for greater flexibility to be shown for outdoor sport and recreation within the Green Belt, as long as it does not conflict with its
openness. The Woking Traffic Survey acknowledges that this proposed development will have a damaging effect on congestion on the A320 and A322 as well as other local roads. CPRE OBJECTION.

Congestion on A roads leads to the overuse of B roads by speeding traffic that exceeds the relevant limits which are invariably not enforced. The B367 from Ripley to Pyrford is an example of this problem. Speed limits for the Pyrford Conservation Area and elsewhere along this road are not observed except where traffic lights or the narrowness of the road itself, as at Newark lane in Ripley, slows traffic down.

Other roads such as the B380 serve as a link between the A324, the A322 and the A320 and all carry excessive traffic for their size. An example of a C road which is already under severe traffic pressure is Salt Box Road which forms the link between the A320 and the A322 as well as funnelling through traffic between the M3 and the A3. Burdenshot and Goose Rye Road are examples of D roads where safety is a major concern as traffic seeks to find a way through to Worplesdon station which is located within Woking Borough, where a new Park and Ride location is proposed. The question has to be asked in this context as to how this proposal can be considered given the Kemishford bridge access problem and the unsuitability of the bridge near the station at Prey Heath Road with its long history of flooding issues.

CPRE gives these examples of busy roads where house building on the scale envisaged for Guildford and Woking will only make traffic matters much worse. Further analysis is required in both boroughs of the impact of the huge housing projects proposed and the positioning of the school and park and ride facilities they envisage. CPRE OBJECTION.

CPRE questions whether all the development envisaged for Guildford can be considered sustainable and deliverable in the time required. Paying for all this investment will be very hard to achieve through the Community Infrastructure Levy (CIL) which is one of the motivating forces behind GBC’s attempt to accelerate passage of the draft Local Plan and use as much Green Belt land in the process as they can. CPRE again maintains that this approach is misguided as it places too much emphasis on economic priorities at the expense of environmental policies which have served the community well and need to be supported rather than undermined. CPRE OBJECTION.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Policy S.2 Borough Wide Strategy

It is difficult for anyone to predict at this stage what the impact of the Brexit decision will be. What we do know is that most of Guildford should be highly protected from development thanks to long established planning policies such as the Green Belt which are defined and understood by the general public as permanent. It appears that this is not the intention in the draft Local Plan. 44% of the nationally important countryside within the Surrey Hills AONB lies within the Green Belt and about 75% of the area of the borough is further protected by the Thames Basin Heath SPA. Other land such as Registered Commons and Ancient Woodland are also not available for development.

CPRE objects to a draft local plan which calls for an increase in the number of residential dwellings by a quarter. This requirement for a housing figure of 13,860 dwellings is based on the West Surrey Strategic Housing Market Assessment (SHMA) prepared by GL Hearn for GBC which is shown to be flawed. Green Balance has prepared for CPRE a review of this document for Guildford, Waverley and Woking Districts which maintains that the annual housing figure upon which the Borough Wide Strategy is based for Guildford is far too high. This renders the whole Local Plan for the District unsound.

GBC has not been able to prepare in time an acceptable plan for the Town Centre and the urban area of Guildford, causing undue emphasis to be switched to building on Green Belt countryside around the town. It is in our view unreasonable to embark on a radical transformation of the borough on the basis of an uncertain housing target which may well prove increasingly unreliable. CPRE OBJECTION.

It is in our view essential to reconsider the proposals made regarding the priority given to retail and office development, which we believe to be overstated, rather than to housing at an appropriate density on brownfield sites in the town. We question the allowance for the provision of other business employment land such as warehousing. It seems to us that retailing is undergoing a transformation illustrated by the loss of Austin Reid and BHS, the incursion of Aldi, M&S foodshops at rail and petrol stations, and on line purchasing and delivery of all kinds.

We maintain that the gap town of Guildford is a “special case” and should be recognised as such from a planning viewpoint because of its widely protected countryside which should be an ongoing constraint on development and preclude major structural change along the lines proposed. We feel obliged to emphasise again the permanence of the Green Belt, the Surrey Hills AONB and the SPA in this district. CPRE OBJECTION.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Answer (if comment is on questions 1-7 of the questionnaire): ()

1. Fundamental Overall Objection

   • Green Belt and AONB

   It has been made clear by the Government that they remain committed to protection of the rural environment. When asked to comment on the National Planning Policy Framework, the Minister of State for Housing & Planning Brandon Lewis MP made the following declaration in a letter dated 10th June 2016 to Richard Knox-Johnston, Chairman of the London Green Belt Council:

   “The Framework makes it clear that inappropriate development may be allowed only where very special circumstances exist and that Green Belt boundaries should be adjusted only in exceptional circumstances through the Local Plan process and with the support of Local people. We have repeatedly made clear that demand for housing alone will not change Green Belt boundaries.”

   This clear policy statement is not reflected in the draft Guildford Local Plan which calls for housing development not only on a number of sites in the AONB and the AGLV but also encroaches on the Green Belt in a wide range of other locations. CPRE maintains that this is a misguided approach and renders the current proposal unsound. CPRE OBJECTION.

   • Town Centre Capacity

   CPRE believes that the draft Local Plan is also unsound because no complete proposal for the Town Centre or for the development of the urban area has been made available in time for this consultation. This is required so that a coherent assessment can be made of the priority given in terms of the extent and type of housing development proposed, its density and location. Town and countryside have to be considered in parallel. CPRE OBJECTION.

   • Green Balance Review of Objectively Assessed Need (OAN)

   CPRE Surrey has commissioned Green Balance to review and supply an independent commercial opinion on the validity of the OAN housing figure of 693 given in the GLH Hearn West Surrey Strategic Housing Market Assessment (SHMA) for Guildford, Waverley and Woking. Their report makes clear that they judge this document to be flawed and the OAN figure for Guildford to be too high. In view of the Green Balance evidence produced, this puts the credibility of the whole draft Local Plan in question. The over estimation of housing need effectively makes the draft Local Plan unsound. CPRE OBJECTION.
Instead of the OAN recommended in the SHMA of 693, an overall reduction is suggested for this figure of 212 which results in a revised OAN of 481. Other areas for further investigation as to the validity of the 693 figure have been suggested. The summary of reductions recommended for the OAN for all 3 districts covered are shown in Table 1 of the enclosed SHMA Review on page 4.

CPRE does not accept that the constraints relating to development in this draft Local Plan have been properly assessed or taken into account. If they were, the OAN would be radically reduced and we estimate that there would be no need to use Green Belt land. GBC has indicated that the OAN figure which GL Hearn has produced takes account of constraints but gives no explanation of how this has been done. This whole topic needs to be investigated further.

CPRE is also not in agreement with the emphasis given to retail sector expansion and office and warehouse development at Guildford at a time of changing conditions in the market-place and a need for more urban housing. CPRE believes that the focus of attention on building in the countryside has been caused by a too high OAN figure and a refusal to allocate sufficient priority to the supply of affordable housing and flats in the town because building development in this category has been sidelined rather than given the attention it requires. CPRE OBJECTION.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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1. Duty to Cooperate

In the past CPRE has been very aware of the requirement for local authorities to demonstrate evidence of having cooperated to plan for issues with cross boundary impacts (NPPF 181). Now NPPF includes a chapter dealing with ‘Planning strategically across local boundaries’ on page 42 and GBC has followed this up with a Topic Paper on ‘Duty to Cooperate’ which explores the implications of this strategy. Sections in the Topic Paper under the headings “Enterprise M3 LEP” and “Meeting Needs” raise a number of issues about the newly established Strategic Economic Plan (SEP) and the choice of Guildford as one of four growth towns which are considered to be key to driving economic expansion across the Enterprise M3 area. As part of preparing the draft Local Plan, GBC has had regard to the SEP by seeking to meet both identified housing and employment needs. The emphasis on a “Sci:Tech Corridor” has also encouraged a focus on research, development and design activities and the provision of valuable knowledge-based employment. This in turn led to the proposed “allocation” of Blackwell Farm, which is owned by the University of Surrey, to be partly used as an extension...
to the Surrey Research Park and for 1,800 houses to be built on Green Belt land in a mixed use development. CPRE has objected to this proposal in its response to Policy A26 on page 17 of this submission. Policy E4 gives further details of the aspirational development concerned.

Little or no account is taken when making the Blackwell Heath proposal of the permanence of the Green Belt, the national importance of the AONB countryside, the problems of traffic congestion, and the lack of adequate infrastructure to provide easy access by either train to a new Guildford West station, or by road to and from the A31 on the Hogs Back. No consideration is given either as regards whether there is really a need to expand the Research Park onto Green Belt land in view of the very low density of buildings on this site, and the generous space allowed for surface parking. Surely, the provision of multi storey and/or underground parking should be given priority so that more space is made available for building this on the Research Park, the other two University campuses and at the Hospital.

- Wider Implications on Meeting Needs

The NPPF now requires that local plans meet objectively assessed needs, and where possible any unmet needs from neighbouring authorities as well where it is reasonable to do so and consistent with achieving sustainable development (NPPF 182).

Although Woking has indicated that it will have a substantial unmet need for housing, GBC has stated that Guildford Borough cannot assist them. Nonetheless CPRE is concerned that this new strategic policy approach suggests that the requirements of the economy are being given an unbalanced cross boundary ascendancy over well established environmental policies that are needed to protect the Green Belt and the Surrey Hills AONB at Guildford. This would seem to be influencing GBC planning in its adoption of the unusually high housing target of 693 from the GL Hearn West Surrey Strategic Housing Market Assessment (SHMA) whose recommendations are being questioned as flawed in the enclosed Green Balance review.

We find the draft Local Plan unrealistic not only because of its over ambitious onslaught on Green Belt policy but also because of the £3 billion shortfall in infrastructure backlog across the county which is recorded in the Surrey Infrastructure Study dated January 2016. This backlog has to include infrastructure issues relating to roads, rail, water as a finite resource, waste disposal and sewage treatment, flood issues, air pollution, and a range of other environmental and social considerations.

An example of a cross boundary impact includes the proposed development at Cranleigh and Dunsfold in Waverley which is clearly unsustainable and will cause major congestion problems all along the A281 to Guildford and will affect communities such as Bramley, Chilworth, Shalford, Shamley Green, and Wonersh as well as adding to the severe congestion in Guildford town centre and the junctions of the A3 serving the town. CPRE OBJECTION.

Proposals for development of the North Downs rail line will affect AONB countryside in a number of districts and will need to involve the Surrey Hills AONB Partnership. A range of issues concerning rights of way, level crossings, bridge infrastructure, stations, footpath crossing safety and passenger service will need consultation. The protection and enhancement of nationally important countryside will be a major consideration.
The River Wey Navigation requires that the National Trust is consulted across district boundaries. Agreement is needed not only with Natural England concerning water quality standards but also how the flood plain is protected and not harmed by the proposed housing development in relevant boroughs. The effect of run-off from new building sites and of climate change has to be considered as a priority.

The emphasis on school provision is a repeated feature of the draft local plan in connection with new site proposals within the Green Belt. This has led CPRE to review catchment areas for schools (and the associated road traffic problems) near the borough’s boundaries with Mole Valley, Waverley and Woking. Communities such as Effingham, Leatherhead, Mayford, Ripley and Sheerwater are all affected. The planning for schools on new sites seems to be linked with the flawed concept that this is a means of obtaining Green Belt boundary revision as they represent “exceptional circumstances”. CPRE OBJECTION.

Another current problem relates to the fact that Surrey is already the most overflown county in England and aviation noise disturbance is increasing within the Surrey Hills AONB due to the number of active airports around the county and this affects Guildford. In addition to Gatwick and Heathrow, for which no runway expansion decision appears likely before mid October at the earliest, we refer in particular to proposals for expansion at Biggin Hill, City, and Farnborough. The CAA absolves itself from control of low flying movement below 4,000 feet as this is considered an LPA responsibility. The noise implications of Farnborough’s controlled airspace proposal affects all landing and take-off flight paths in the surrounding area. CAA policies have endorsed the concept of narrower flight paths until recently, and this resulted in severe noise implications for some communities, and harmed the remote character and tranquillity of nationally important countryside. The plans for Farnborough are also of particular concern as they will affect the use of the largest centre for gliding in the country at Lasham. Growth in aviation activity at these airports, whether for passengers or freight, will also lead to yet more road congestion. CPRE OBJECTION.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** pslp172/3882  **Respondent:** 8607169 / CPRE Surrey Branch & Guildford District (Tim Harrold)

**Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy A25

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ( )**

CPRE welcomes the change made to reduce the housing figure to 1700, although this is still far too high, and is in fact a minimum figure and not the end of the story. The text makes clear that the intention is to build at least 300 additional houses, as and when possible, after the plan period.

It appears that little attention has been paid to the criticism expressed over a year ago by many Guildford residents and the Burpham community in particular. CPRE considers that its objections made at that time are still valid and feels obliged to express its additional concern about the subsequent proposals under discussion.

There is no adequate resolution of the complaints about road infrastructure and traffic congestion. Every car driver travelling through Burpham knows that this is frequently one of the worst bottlenecks on the approaches to Guildford with...
its multi roundabout layout. Local residents are even more conscious of the deteriorating traffic situation with the opening of Aldi, and this will not be improved in our opinion by what is now proposed for the Sustainable Movement Corridor. As the Burpham Community Association points out this proposal will not be successful as the roads are too narrow and have pinch points. The prospect of how the London Road will be transformed into having four lanes of traffic where only two exist at present is daunting. It is not enough to recognize that a key consideration may be air pollution from the new building development envisaged. CPRE would like to know how this can be avoided given the additional diesel road traffic consisting not only of slow moving cars but also more HGVs which will service new schools, businesses, shops and a Park & Ride.

CPRE notes that the A3 Tunnel is still an “aspirational” topic in the plan. If this is to be taken seriously, then Gosden Hill Farm cannot be considered for development along the lines proposed as those responsible for planning will have to know first what Highways England intend for the A3, and secondly, where any access points to a new tunnel would need to be located in this vicinity. Planning without this information first would be irresponsible.

All of the land proposed for development in the Policy A25 sector currently falls within the Metropolitan Green Belt at Gosden Hill Farm. CPRE is concerned that any building on the scale envisaged would lead to further congestion problems and additional severe road infrastructure issues.

CPRE is particularly concerned with the need to avoid further linear development along the A3 which amounts to urban sprawl and threatens the eventual merging of Burpham with West Clandon. The attractive open Green Belt countryside on this A3 approach to Guildford, with its clearly defined natural boundary, is a major asset which should be retained and not lost.

CPRE fully endorses the submissions made by the Burpham Community Association and the West Clandon Parish Council in this context.

The two-way junction proposed for Gosden Hill Village does not resolve the problems of Burpham and will add road traffic to the neighbouring communities of both Merrow and West Clandon.

CPRE does not believe that the proposal to add a new railway station at Merrow is a practicable proposition given the presence of existing stops in both Clandon and London Road.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
CPRE Surrey has worked closely from the outset with Save Hogs Back and Compton and Worplesdon Parish Councils. We fully endorse the additional submission now made by them which concentrates in particular on the questions relating to road infrastructure and traffic congestion. This has been prepared by Green Balance. It is apparent that the Council has not been able to find a convincing solution to these problems. The CPRE objections to the draft local plan in this context have not been in any way overcome. No input of any kind has as yet been supplied from Highways England who are concentrating their main attention exclusively on the M25/A3 junction rather than the A3 connection to Guildford and beyond where it joins the A31 at the Hogs Back. The proposals put forward by the Council for the link road to the A31 through Blackwell Farm are in our view wholly unconvincing.

CPRE is conscious of the already unacceptable degree of congestion on the A31 and A3 at Guildford. The development of any additional traffic on these major roads is likely to promote severe infrastructure difficulties. The continued mention of a possible tunnel solution is only an “aspiration” and therefore outside the current plan consideration, which depends in any case on Highways England assessing what is practicable, and this will be linked to cost viability. CPRE nevertheless were involved in the Hindhead Tunnel decision, which took years to achieve because it was thought too expensive for consideration. The success of this development is generally accepted now and the countryside was saved as a result. No doubt this is still a possible outcome at Blackwell Farm which should not be ruled out entirely.

In the meantime the concern of Compton inhabitants is well justified at their experience of air pollution from slow moving diesel traffic of all kinds. CPRE understands that the levels of Nitrogen Dioxide pollution are consistently well above EU legal limits on the main street in Compton (B3000) and that this problem has been recorded over a period of two years. No wonder then that the community is concerned and has objected so strongly to the proposed Blackwell Farm link road to the A31 which it is anticipated will seriously add to the unacceptable traffic and pollution already being experienced by this community. It is surprising that Guildford itself appears not to have in addition more pollution measurement evidence that can be relied on for evaluation of its crowded road system.

CPRE has also seen the report submitted by Worplesdon Parish Council with regard to Surface Water Flood Risk Assessment which was prepared by JBA Consulting. This was needed to review the impact of the proposed development at Blackwell Farm on the downstream communities of Wood Street Village, Fairlands, and parts of Park Barn which have all previously experienced surface water flooding problems. The JBA conclusion is that past experience suggests that development at Blackwell Farm will represent an additional obstacle in terms of flood water control.

The CPRE Surrey objection to Policy A26 and paragraph 4.1.9 therefore remains. In summary it is based on the following additional points:

- It disregards an expert independent landscape study which demonstrates that part of the of the site merits AONB status following Natural England’s forthcoming boundary review (4.3.8)
- It directs more office space to an extended business park (Policy E4) which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- It ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development (2.14a)
- It will add to air pollution in neighbouring areas such as Compton, which already exceeds safe EU limits for Nitrogen Dioxide.

CPRE Surrey should like to add that the London Green Belt Council has become an active partner with CPRE Guildford in defending the Metropolitan Green Belt against the threat to Blackwell Farm. Their support for CPRE Guildford’s defence of this nationally important countryside reflects the fact that the Green Belt was established on a permanent basis to prevent urban sprawl and protect openness around London and the Home Counties. This reflects too the fact that the Green Belt should act as the lungs of our capital city, where town dwellers can come to breathe fresh air, and that its defence is part of the responsibility of us all including Guildford residents who will benefit from its better protection and enhancement.

The critical importance attached to saving Blackwell Farm and the Hog’s Back is reflected in a short video prepared by CPRE’s National Office that forms an integral element of a national campaign covering different parts of the country.

We stand by the following letter written by Karen Stevens which appeared in the Surrey Advertiser on 30th June 2017:

“The proposed Blackwell Farm development will change the shape and character of the western side of Guildford forever,
transforming it from a beautiful (and historic) rural landscape to a suburban housing estate and low-density business park which will be visible along the Hog’s Back. This site, surrounding one of the former manors of Compton (and later the residence of Lord Dennis) is currently high-grade arable farmland. It is criss-crossed with ancient hedgerows and bounded by ancient woodland to its east, an Area of Outstanding Natural Beauty (AONB) to the south, a Site of Nature Conservation Interest (Broadstreet Common) to the north, and open countryside to the west.” CPRE Surrey wishes to see this recognized by the Local Plan which at the present time is unsound.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

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Answer (if comment is on questions 1-7 of the questionnaire): ()

CPRE has to point out that these applications were added late to this consultation and are only now being considered for the first time.

Garlick’s Arch and Burnt Common are within the Green Belt and both sites adjoin the A3. If progressed, these proposals would amount to urban sprawl and objectionable linear development.

The 400 houses proposed at Garlick’s Arch involves the loss of Ancient Woodland and would be subject to flooding. The communities at Ripley, Send and West Clandon would all suffer from increased traffic congestion as a result and the rural identity of these villages would be substantially harmed.

CPRE is concerned at the way in which provision is made for Travelling Show people at this site when it is clearly still uncertain as to whether the proposal will advance further. It has been suggested that this development depends on financial support from the developer at the former Wisley Airfield whose planning application was refused unanimously by the GBC Planning Committee and is now the subject of an Appeal in September. CPRE considers it premature to make any proposed development decision at Garlick’s Arch before the Appeal decision is known.

It is also premature to take these policies further before the Highway England plans for the A3 are known. It is only then that it can be reviewed whether “exceptional circumstances” would apply to justify the housing proposed and the provision of the Travelling Show People site on Green Belt land.

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Housing Mix (2) : CPRE suggests that the first sentence should be further amended as the use of the word “all” appears inappropriate.

Student accommodation (5) : CPRE would suggest that the word “about” is removed at the start of the second sentence. CPRE argues that all first year students should be accommodated on campus and overall 80% of students should be living there each year rather than the 60% promised figure which has not been met.

Gypsy, Traveller and Travelling Showpeople pitches and plots (6) : CPRE objects to the words “as well as to cater for the potential additional needs of households of unknown planning status” and the sentence “Sites are also allocated within the Local Plan to contribute to meeting the assessed needs of Gypsies, Travellers and Travelling Showpeople who do not meet the Planning Policy for Traveller Sites definition.” We accordingly object to the words in Paragraph 7 “(whether they meet the Planning Policy for Traveller Sites definition or not)”. Reasoned Justification 4.2.3: We suggest that the word “projected” or “estimated” is included in an appropriate location in the first two bullet points.

Density 4.2.8: We object to the removal of this paragraph.

Student accommodations 4.2.18: CPRE believes that the University of Surrey should provide 100% of first year students with accommodation on campus and that the current agreed policy requiring 60% of its overall student accommodation to be on campus should first be met and secondly increased to 80%.

Gypsy, Traveller and Travelling Showpeople 4.2.22 CPRE objects to the wording of the last 2 additional sentences.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/1984  Respondent: 8607169 / CPRE Surrey Branch & Guildford District (Tim Harrold)

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy ID1

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Answer (if comment is on questions 1-7 of the questionnaire): ()

CPRE has seen the questionnaire response made by Richard Jarvis on Transport Infrastructure which we endorse with respect to the current plan process. Richard Jarvis is a former senior executive of Atkins with a great deal of experience in this sector. CPRE is confident that his judgement is based on fully up to date information and regular dialogue with those involved at GBC, SCC, and Highways England. He is a member of the Tyting Society Committee and the Guildford Residents Associations Coordination Committee. He is also in regular communication with the Guildford Vision group and the Guildford Society as well as CPRE.
CPRÉ is concerned with planning ahead in the longer term and wishes to make clear that this would involve safeguarding land for projects which are currently listed as aspirational such as a proposed A3 tunnel at Guildford.

CPRÉ was involved in a Committee dealing with Modal Shift and the M25 during the preparation of the former draft South East Plan. More focus should be given to this topic now with regard not only to Guildford’s current road traffic problems, both in town and countryside, but also its rail connections to Gatwick and it is to be hoped eventually Heathrow. The proposal to improve the North Downs line will involve a range of complicated issues regarding the introduction of a surface rail electric supply, level crossings, pedestrian rights of way, bridge maintenance, noise disturbance and air pollution within the Surrey Hills Area of Outstanding Natural Beauty (AONB).

We have been advised of an objection that is to be made by the Beechcroft Drive Residents Association at the omission of any reference in the draft plan to the removal of access for their road to the A3 (Ref SRN1 and SRN6). No alternative access route has yet been proposed. This would probably need to involve the use of a narrow lane running over University of Surrey land to the North which is located near ancient woodland within the Green Belt that is outside the urban area to the West. This topic has been on the agenda for resolution over many years and all stakeholders have recognized that the problem of A3 road access needs addressing, and is essential infrastructure for the Beechcroft Drive community. This is why this topic has always previously been included in the plan. In the CPRÉ view, it should not have been removed. There is in any case general concern about the whole safety aspect regarding Beechcroft Drive access to the A3 which is long overdue to be tackled. It is not just a question of safety for the residents of Beechcroft Drive but also the highway safety of all users of the A3 driving past this junction which is made dangerous by heavy road and HGV traffic with poor visibility speeding past a blind bend. There are more than 100 daily entries and exits into and out of Beechcroft Drive. The risk of a serious accident involving fast moving traffic is therefore repeated approximately 200 times a day. It is apparent that in these circumstances priority must be given to resolving this issue before a fatality occurs. CPRÉ would suggest that an on site visit is called for. This is not an “aspiration” matter.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** pslp171/1981  **Respondent:** 8607169 / CPRÉ Surrey Branch & Guildford District (Tim Harrold)

**Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy P1

**Do you consider this section of the document; complies with the Duty to Cooperate?** ( ), **is Sound?** ( ), **is Legally Compliant?** ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

CPRÉ welcomes the inclusion of “Area of Great Landscape Value” in the heading of this Policy.

CPRÉ would like to have seen a reference to the current public objection to development at Newlands Corner. It should be made clear that any proposal for this site from the Surrey County Council, Surrey Wildlife Trust, and the Albury Estate will be subject to review by the GBC Planning Committee and the AONB Board.

No reference is made to the Surrey Hills AONB Board or its Planning Adviser which is regrettable as the Surrey Hills Management Plan for the period 2014-2019 is a material consideration, and approval has to be secured for this plan every 5 years for all relevant districts across Surrey, and not just for Guildford alone.
Part of the AONB countryside value to the community is its tranquility which should be protected against road, rail, and air traffic noise. Nationally important countryside should also benefit from “dark skies at night” which requires strict control over all forms of lighting. For example, any proposal for a roundabout on the Hogs Back would go against policy as it would require street lighting that would be visible over a long distance and undermine nationally important countryside.

CPRE notes the revised housing number for the Blackwell Farm development but still regards the figure as too high and merely sees the reduction as a postponement in timing allowed for completion of the original target figure. Erosion of the Metropolitan Green Belt on such a scale is made even worse by the proposed road link up to the A31 which CPRE considers will be unsightly, harmful to nationally important countryside both by day and by night, and excessively impracticable both in terms of cost and traffic congestion. CPRE endorses the study prepared by Green Balance for Save Hogs Back in this context. We also endorse the submissions made by Artington, Compton and Worplesdon Parish Councils on this topic.

Another remaining point relates to the lack of any reference in P1 to the fact that Mount Browne and the University of Law are both located within the AONB as well as the Green Belt. The policy governing any proposed development for these sites must therefore be considered in an AONB context.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/1982  Respondent: 8607169 / CPRE Surrey Branch & Guildford District (Tim Harrold)
Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

CPRE expressed its major objections to this Policy on pages 13 to 15 of the submission it made to the draft Local Plan 2016. It appears that no major apparent attention was taken of our views.

CPRE objects again to Policy P2 which demonstrates the frustration that so many of the public feel at the failure of the Council to respond to their submissions or listen to their objections. Such changes as have been made to Policy P2 by the Council amount to only a few words and very minor corrections.

This is in conflict with the repeated references made to the size and implications of the Green Belt on planning, where it is alleged to represent no less than 89% of the total land area of Guildford. This claim does not of course explain that a substantial proportion of the Green Belt in Guildford covers Surrey Hills AONB and AGLV countryside and also other...
notable development constraints such as ancient woodland, heathland, registered commons and MOD land which are protected anyway.

We object that Mount Browne and the University of Law are mentioned as if they were subject to Green Belt policy alone whereas in fact they are within the Surrey Hills AONB. This is presumably a mistake in drafting.

We object also to the addition of Ripley to the list of 12 villages where Limited Infilling will be permitted following the introduction of insetting, a process to which we have already expressed our opposition. Ripley is a village where Green Belt openness is very apparent and is currently working on its Neighbourhood Plan which we feel confident will seek to reinforce Green Belt protection.

It appears that the Green Belt Supplementary Planning Document (SPD) is not as yet available (4.3.20) which we should be reviewing at this juncture as part of the Local Plan consultation process.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>pslp171/1983</th>
<th>Respondent:</th>
<th>8607169 / CPRE Surrey Branch &amp; Guildford District (Tim Harrold)</th>
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<td>Document:</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

+ CPRE is concerned about the development of countryside beyond the Green Belt. Policy RE4 of the Guildford Borough Local Plan has been progressively disregarded because of the pressure to develop Ash and Ash Vale. We maintain that every effort should be made in particular to protect the village of Ash Green, with its heritage buildings, against the current proposals for its progressive phased development (Application 17/P/00513). We estimate that the existing boundary of the Surrey Hills Area of Outstanding Natural Beauty is less than a mile from the site under consideration and is due for review by Natural England in 2018. Views to and from the AONB are an important material consideration that also needs to be taken into account in this policy.

+ CPRE is concerned about the “relative sustainability” claimed for the road infrastructure in this area (4.3.29). Because of the development of Aldershot and Farnborough in Rushmoor District outside Guildford Borough, and the growth of Ash and Ash Vale, which now is to be extended to include Tongham, we maintain that making this “a strategic location for development” will add unacceptably to existing traffic congestion on the A323 in particular and the A31 Hogs Back as well.

+ CPRE recognizes that the existing policy may need to be amended but does not believe that the policy proposals made are acceptable, and still require further review.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**
CPRE objects to the amended policy S2. It is disappointing that the OAN selected is still so high and that no constraints have been applied as required under the NPPF and NPPG. This contrasts with the Woking Core Strategy which has selected a constraint of no less than 50%. It appears that the draft local plan for Guildford has deliberately chosen to ignore the huge opposition of the public to loss of the Green Belt and of other open countryside to housing development. The Council has not given sufficient priority either to the potential for housing and flat development on brownfield sites in the urban part of Guildford, and has not insisted that the University of Surrey honours its commitments to build much more student accommodation on their campuses. CPRE agrees that it is more realistic to follow a phased approach towards development...
as plan fulfillment will have to depend on infrastructure provision. It is unrealistic to talk about the need to meet rapid change as required by the NPPF since planning ahead is virtually impossible when so many of the requirements for development to be successful depend on elements over which the Council has little or no control.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/3514  Respondent: 8607169 / CPRE Surrey Branch & Guildford District (Tim Harrold)
Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

CPRE remains as concerned as ever about the background to this Guildford Borough consultation which is overshadowed by the EU referendum decision and the recent national election with its as yet unsettled political and economic outcome. It is of course impossible to predict the likely impact of the BREXIT negotiations on a wide range of issues including migration, agriculture, climate change, and other policies regarding economic, environmental and social matters. The fact that the whole of the South East is however subject to water stress remains a constant background to decision-making.

It is very difficult to draw up a local plan when so many decisions depend on independent bodies such as Natural England, Highways England, Thames Water, and the Environment Agency. One also has to add to this list other uncertainties relating to Network Rail, the franchise companies which operate within the Guildford area, and the as yet unresolved future development of both Gatwick and Heathrow airports.

All will be influenced by government budgeting, interest rates, and other factors outside local council control. We also have to take into account the involvement of a new Housing and Planning Minister in this sector. The involvement of Surrey County Council adds a further dimension.

CPRE has already made clear that the ‘Objectively Assessed Need’ (OAN) figure proposed for housing in the draft 2016 version of the GB Local Plan was in our view far too high and was based on inaccurate data that needed further analysis and review involving up to date statistics. The revised proposal now made in the draft 2017 document remains in our view unacceptable. In addition to the work already submitted by Green Balance for CPRE Surrey, CPRE wishes to draw attention to the further analysis by Neil McDonald issued in April 2017 regarding “Waverley Borough Council in response to Inspector’s Questions”, and to the “Review of GL Hearn’s Guildford Addendum to the West Surrey SHMA” in June 2017 which confirm our views.

CPRE feels obliged to repeat our earlier request that a more careful consideration is made of the many widespread and serious constraints on development within the Borough, and the need to observe Green Belt policy which requires that the countryside around the town of Guildford and its villages is protected and enhanced rather than undermined by inappropriate urban extensions, large housing sites and widespread “insetting” in Green Belt villages.

CPRE has also to add to this objection the way in which a number of new proposals relating to Garlick’s Arch, Burnt Common and Gosden Hill have appeared for late consideration, which have not been reviewed previously at the regulation 18 stage. We are particularly concerned about the harm which will be done to the Green Belt by ribbon development along the A3 and the associated impact to traffic in Burpham, Merrow, West Clandon, the Horsleys, Send and Ripley.
CPRE has concentrated its comments and objections in this latest consultation on the issues that most affect the countryside and the Wey Navigation, but feels obliged to point out that we have major reservations about the proposals made for the development of Guildford as a whole. We cannot agree that “rapid change” as required by NPPF, can be envisaged along the lines proposed without a breakdown in road infrastructure. This is especially true with regard to the A3, but also applies to the access routes to Guildford from Cranleigh/Dunsfold (A281/B2128), Farnham (A31), Godalming (A3100), Rushmoor/Aldershot (A323), and Woking (A320). It is apparent that a major issue is the limited funding resources available in this road development context from Highways England, Surrey County Council and Guildford Borough Council itself. There appears to be an over reliance on developers for funding that is influencing decision-making and leading to unsustainable “solutions” at for example Dunsfold, Wisley and elsewhere.

Plans for new railway stations near Guildford and the North Downs line to Gatwick remain largely aspirational at this stage. CPRE supports in principle the new station at Park Barn in proximity to the hospital for obvious reasons. However, the case for a station at Merrow is not so clear cut, especially as Clandon and London Road stations are comparatively nearby.

CPRE recognizes that there is a need for affordable housing in Guildford but believes that this shortfall could be largely overcome if the University of Surrey would give priority to the building on their campuses of the multiple occupancy accommodation for students they have promised. This would free up cheaper priced housing already located within the town and incidentally lead to an increase in tax income for the Council. It is apparent that housing development in Guildford Borough is directed towards supplying larger more expensive dwellings which give a higher return on investment than the provision of lower cost houses. CPRE maintains that priority should be given to the development of brownfield sites for housing which could include land now allocated for surface parking in some urban locations.

The CPRE London Green Belt Council (LGBC) have expressed their objection to the proposed development at Blackwell Farm by the University of Surrey on the grounds of the permanence of the Green Belt and that “exceptional circumstances” do not apply for an additional boundary revision to be made beyond that agreed for the Manor Farm campus in 2003. Their involvement indicates the concern of those who support the Metropolitan Green Belt which was created for the benefit of London inhabitants just as much as for those of Surrey and Guildford. The statement in the Corporate Plan that Guildford is “on London’s doorstep” is hardly reassuring to those in CPRE who do not wish the environment of Guildford put under threat by an attempt to go for economic expansion rather than limit its ambitions to “smart growth” which does not endanger the countryside by the development of rural villages through Green Belt erosion. LGBC has also expressed concern about Green Belt intrusion at Gosden Hill and Three Farms Meadows at the former Wisley airfield site.

SUMMARY LIST OF MAJOR OBJECTIONS

- **Green Belt:**

CPRE is disappointed that the GBC draft local plan continues to insist on further Green Belt erosion. The recent decision made by the Secretary of State (S of S) in this context does not appear to have been taken into account. This decision relates to the dismissal of an appeal at Benfleet, Castle Point in Essex in a letter dated 21st April 2017 (APP/M1520/A/14/2216062). The decision involves a council that does not have a 5 year supply of deliverable housing sites. Whereas the Inspector’s view was that the appeal should be allowed under NPPG, the S of S ruled that it is national policy that personal circumstances and unmet need are unlikely to clearly outweigh harm to the Green Belt, and any other harm, so as to establish “very special circumstances” justifying a boundary review. He therefore disagreed with the Inspector’s view that this is NPPG “guidance” and as a result of his decision, a “policy” has now been established in this context which is directly relevant to Guildford.

- **Town Centre Capacity:**

CPRE has already made clear that it considers this draft Guildford Local Plan unsound because no complete proposal or Master Plan for the Town Centre, or for the development of the urban area, has been made available. This is still required so that a coherent assessment can be made of the priority given in terms of the extent and type of housing development proposed, its density and location. Town and countryside should be considered in parallel in order for a sound plan to be established. CPRE maintains that not enough brownfield sites have been set aside in the town for housing accommodation. Issues relating to bus services within the town and to and from communities in the surrounding countryside remain largely unresolved.
• Reviews of Objectively Assessed Need (OAN):

It is CPRE’s view that the over estimation of housing need makes the draft Local Plan unsound. Green Balance has already submitted a critical review of the GLH Hearn West Surrey Strategic Housing Market Assessment for Guildford, Waverley and Woking. Now Neil McDonald has issued two further studies relating to Waverley (September 2016) and Guildford (April 2017) which question further the soundness of the draft plan submitted. CPRE believes that the focus of attention on building in the Green Belt countryside has been caused by too high an OAN figure and a refusal to allocate sufficient priority to the supply of affordable housing and flats in the town because building development in this category has been sidelined in favour of office, business and retail growth rather than given the attention it deserves. In particular CPRE maintains that more emphasis should have been placed on the use of brownfield sites within the town for higher density housing and the University should supply more accommodation for students on its campuses.

CPRE is particularly concerned about the wide use and large areas of surface car parking in the town which appear to be a waste of valuable space where multi storey or underground parking should be more often considered. The hospital indicated at one stage that the use of multi storey parking was being planned by them but this still remains outstanding. Car parking at the University campuses and the Research Park could be better employed either for multi storey use or under buildings for student or office accommodation. The HQ for the WWF on Brewery Road in Woking is an example of what can be done successfully in the centre of a town and near the river if good architecture is employed. A range of valuable sites of this kind exist and should be investigated in consultation with the Wey Navigation as they are needed in this context. We are disappointed that the proposals for underground parking at Bright’s Hill have been scaled back. This sustainable location is within easy walking distance of the town centre and car parking could we believe be provided underground because of the chalk geology.

Other heritage towns in this country and particularly in the EU recognize the importance of providing underground parking for new development. Priority at Guildford is given to the under utilised Onslow Park & Ride at the University next to land where a commitment to restrict traffic was made which has not been kept. Surely, it is necessary to look again at how we are using precious land space in the town for surface parking so that erosion of the Green Belt is cut back in our countryside.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Localism Act 2011, before Woking made their decision to go ahead with a policy allowing the 50% constraint in question to be introduced.

CPRE expressed its reservations from the outset regarding the way in which the West Surrey SHMA was constituted at a meeting in 2009, when it was pointed out that Guildford, Waverley and Woking did not have much in common as a Market Area. The “Duty to Cooperate” requirement has been made even more difficult by the housing growth now being implemented in other areas outside Guildford such as Rushmoor, Waverley and Woking which appear to be disregarding Green Belt policy. We give below some examples of the problems to be faced in this context.

• DUNSFOLD: We have requested CPRE Waverley to summarise their current assessment of the potential impact of building proposals in Cranleigh and Dunsfold on Guildford. The Waverley Borough Local Plan draft locates 2,600 new houses at Dunsfold Park (the former Dunsfold Aerodrome) which depends on the A281, the only A road in this area. The road is already heavily congested on a daily basis, particularly in the morning and evening peak periods with traffic impacts on Shalford village to the South of Guildford town but within Guildford Borough. In the morning peak period, the traffic congestion is typified by long queues forming in Bramley (within Waverley Borough) at the roundabout in the centre of the village. The delay to pass this point can typically take up to 20 minutes. From here, there is a slow moving column of traffic up to Shalford, a mile to the north, where a further roundabout collects traffic from Cranleigh, Wonersh and Chilworth. Delays here are typically ten minutes for traffic entering from the Cranleigh direction and similar for traffic already on the A281. From Shalford Common, traffic is nose to tail daily up into the Guildford gyratory via Millbrook. The proposal for new housing at Dunsfold Park will add a significant volume of extra traffic to this scenario since the development is likely to be mainly made up of daily commuters seeking to enter Guildford, either as a through route to the A3 and M25 national trunk route or the mainline railway station for the onward journey to London. The scale of the development at 2,600 houses would be likely to generate some 5,200 to 6,500 additional vehicles (assuming 2 to 2.5 cars per household) of which a significant proportion would seek to access Guildford via the A281, and the gyratory system in the centre of the town. Added to this are further proposals within the Waverley Local Plan draft to locate an additional 1,520 houses in Cranleigh, adjacent to the Dunsfold aerodrome, which will again generate significant additional traffic volumes, of which a large proportion would seek to access Guildford via the A281 or the B2128. Waverley Borough are seeking to locate some 40% of their future development in the east of the borough, an area with no close railway access and therefore highly dependent on car transport. With the A281 being the only A class route out of this part of Waverley, it is inevitable that there will be a significant impact on Guildford in terms of congestion and air quality. And in addition to car use, there is also a large quantity of daily HGV traffic from firms such as Axtell and Cranleigh Freight Services to be considered.

• MAYFORD: CPRE is also concerned about the impact of the new Hoe Valley school and athletics facilities and additional housing development at Mayford being built within the Green Belt in the Heathlands District of Woking which will add to the road traffic problems on the A320 in Guildford at Slyfield and the associated Link Road which is designed to facilitate access to the A3. Woking Council seem determined to disregard the policy regarding the Green Belt which we do not repeat here as these have been outlined in our last submission.

• RUSHMOOR: CPRE is further concerned about additional development in Rushmoor in Hampshire at Aldershot and Farnborough which again is causing road infrastructure problems across the boundary in Guildford. BORDON: CPRE Guildford would have expected more attention to have been given to the possibility of assessing with East Hampshire Council the potential of the eco-town Bordon for business and housing development now that the army has left. This is land which is not in the South Downs National Park nor in an Area of Outstanding Natural Beauty (AONB) or within the Metropolitan Green Belt. We would argue in favour of the rail link from Bordon to Bentley being reinstated with a view to reducing commuter road traffic across the boundary to Wrecklesham and Farnham in Waverley and to Guildford via the Hogs Back. A rail connection could make Bordon significantly more attractive for business development and employment potential. This could relieve pressure for expansion of the Research Park at Guildford which should in our view be reserved for businesses associated with research that are linked to the University. Commuting by train to and from Guildford would be further facilitated if a new station is opened at Park Barn.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Submission Local Plan: Strategy and Sites - June 2016

1. Introduction

1.1 Guildford Borough Council are currently consulting Submission Local Plan (Regulation 19) on the Proposed

1.2 Within the document provides list of allocated sites which were considered based on their individual merits

1.3 White and Sons have been employed by The Tyman Pension Scheme to provide general comments on the spatial strategy of the Submission Local Plan in view of further promoting residential development at land at two sites comprising of land north of Gravetts Lane, Guildford and two separate parcels of land at Crickets Farm, Normandy. This letter should be read in conjunction with the attached plan

2. The Guildford Borough Proposed Submission Local Plan: Strategy and sites

2.1 As suggested within the document, it states that the policies and site allocations contained within the Proposed Submission Local Plan are informed by an up-to-date, extensive and robust evidence base. The borough’s specific housing and employment needs have been determined through our published Joint Strategic Housing Market Assessment and Employment Land Needs Assessment.

2.2 The Council’s Land Availability Assessment determines the availability, suitability and viability of sites for development. The evidence base will also continue to be updated throughout the plan period to ensure that the plan remains flexible and adaptable to change.

2.3 We would like to take this opportunity to suggest that the following sites are given consideration during this process. In the interests of comprehensiveness, there is scope to consider other sites at this stage of the Local Plan process. It is understood that the Council at this pre-submission stage propose a housing delivery target of 13,860 new homes to be provided during the plan period which roughly equates to 693 homes every year, when taking the average. Such a figure cannot be achieved on pure reliance on brownfield sites and so it is inevitable that other sites will need to be considered. It also equally bores down to a site’s availability for development.

2.4 The Tyman Pension Scheme have previously put forward sites in Wyke Lane, Normandy and at Gravetts Lane, Guildford for residential development and these remain available for residential development and supporting open space (including SANGs). Justification for these sites is given below.

3. Potential Development Site Allocations

Potential Residential Allocation at Land at Crickets Hill Farm, Normandy
3.1 The proposed submission Local Plan identifies that Normandy and Flexford Village as being capable to accommodating 1,100 new homes under new site allocations A46 and A47.

3.2 It is suggested that the two parcels of land at Crickets Hill Farm, Normandy would help to assist future housing allocations in the area as shown on the enclosed plan. My clients are offering both plo The largest plot measuring 8.7 ha falls to the south of Guildford Road and the other, totalling 2.5 ha, falls to the west of Wyke Lane and shares its northern boundary with housing belonging to Wyke Avenue.

3.3 Both locations are located in the Green Belt and are in this sense in the same designation as the existing local settlements, including the allocated plots covered by policies A46 and A47, located to the west Both allocations require the release of Green Belt in order to meet housing need in the borough and to meet the plans for expansion of Normandy and Flexford.

3.4 It would be appropriate to attach weight to both locations on the basis that the land to the south of Wyke Avenue abuts a sizable estate with the land being bordered by access roads, therefore offering the opportunity to amalgamate development to the same extent to that already observed to the north. It is suggested that the plot would lend well to a repeat density and configuration seen to the north in view of ensuring efficient and effective use of the plot, should it be allocated.

3.5 The larger plot of land carries with it a Site of Nature and Conservation Importance (SNCI) designation together with part of the site being donated to a disused Sewage Station, with the definitions of the previously developed land therefore falling in its favour. The area is largely characterised by sporadic residential development, and whilst this was perhaps how the area has evolved overtime, it sets the precedent to character. Any new development proposed on the larger parcel of land would be sensitive to the site’s biodiversity requirements with the consensus in policy terms being one of enhancement. There would also be opportunities to provide substantial landscaping to promote lower density development to ensure that any built form is screened from the public highway.

3.6 The weighting for a SNCI against the other biodiversity related designations identified by Policy 14 ranks SNCIs below SACs, SPAs and SSSI. It is fully expected that a proposal for development will demonstrate how benefits could be brought about to the land. My client would agree to enhancements of the SNCI should the plot to the south be considered in isolation for development.

3.7 It is suggested that sites which are available should come forward as suitable alternatives to those considered to meet a substantial housing figure in this area. The reliance which is almost solely placed on site A46 is significant. Should it transpire that any of the parcels of land which fall within this designated area are not available for redevelopment, then it would be difficult to implement all the area’s housing requirement. The suggestion that the other sites should be considered is one that carries merit and it is suggested that the allocation of sites being put forward in this instance represent a suitable alternative.

Potential Residential Allocation at Land to the North of Gravetts Lane

3.8 Turning attention to Gravetts Lane, the subject plot site is situated behind existing housing that fronts the lane and measures 4 ha. In general the site is located between Stoughton, to the east and Fairlands to the west However, its distance from both villages would ensure that there is no cohesion between the two with the site being more accessible to Stoughton.

3.9 It is suggested that the land at Gravetts Lane that was also previously proposed for development and shown on the enclosed plan would be clearly linked to these potential residential allocations, and the potential Built Up-Area Boundary (BUAB) of Guildford. It is suggested that there are limited physical/environmental designations affecting the site, although the western boundary of the proposed allocation is considered to be in a Flood Risk Zone 3. There is also an existing vehicular access onto the site.

3.10 As with the sites above, this potential allocation is located within the Green Belt and is also within 400m to 5km of the Thames Basin Heath SPA, where the impact of development can be avoided. In terms of Green Belt policy, the site is partly enclosed to the south and east by residential development along Gravetts Lane, to the north by substantial tree coverage and partially to the west by buildings at Gravetts Lane Farm. If the potential allocations Land north of Keens Lane, Guildford (Policy A22) were to proceed, then this potential allocation would border the BUAB of Guildford to the south and east, such that it would be a modest extension to the town. The A22 site is earmarked as achieving 140 new home
Comparatively, the subject site would offer scope to provide just as many units, based on a mixed provision being brought to the fore. We would suggest that if the aforementioned site allocation were to proceed, then the allocation of this land for residential development should be considered satisfactory, given that the site has permanent physical and defensible boundaries.

3.11 In response to early criticisms that Gravetts Lane might be inappropriate on highway grounds, the site area shows there to be adequate provision to provide access on the outside of bend in the road. This therefore means that it would be highly probable that a safe arrangement could be applied in addition to offering traffic calming measures to reassert any misconception This aspect should not deter the prospect of the site being considered.

3.12 In addition, we would suggest that this land is not readily visible from public highways and is enclosed by existing development substantially to the south and east and partly by buildings to the west Consequently, the land is not necessary to keep the Green Belt permanently open and the release of Green Belt land for residential development should be considered suitable in this location, particularly if considered as part of a larger housing scheme that would include allocation of site A22 of the Submission Local Plan Strategy and Sites.

I trust that the above and enclosed is satisfactory, but if you have any comments or queries, then please do not hesitate to contact me.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents: [GBC Representation letter July 2016 - Tyman Pension Scheme.compressed.pdf](#) (643 KB)
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9]. The proposed Blackwell Farm development will change the shape and character of the western side of Guildford forever, transforming it from a beautiful (and historic) rural landscape to a suburban housing estate and low-density business park, which will be visible along the Hog’s Back.

This site, surrounding one of the former manors of Compton (and later the residence of Lord Dennis), is currently high-grade arable farmland. It is criss-crossed with ancient hedgerows and bounded by ancient woodland to its east, an Area of Outstanding Natural Beauty (AONB) to the south, a Site of Nature Conservation Interest (Broadstreet Common) to the north and open countryside to the west.

Blackwell Farm was supposed to be opened up by the University of Surrey to provide greater public access to the countryside at the 2003 Local Plan when the “permanent” green belt boundary shifted and part of the former Royal Park was swallowed up to allow expansion of the University.

Instead of doing this, the University now has plans to spread Guildford 4km to the west and to build a 3,250-home estate along the Hog’s Back. As part of this, Guildford Borough Council has put forward the site for 1,800 homes in its latest draft Local Plan and has taken the unprecedented step of planning to move the permanent green belt boundary twice in less than 15 years. These plans will be to the detriment of Guildford and should be resisted for the following reasons:

● More roads, but even more traffic:
  ○ The site is dependent on a new access road from the A31 (Hog’s Back) to the Hospital roundabout at Egerton Road, with a new signalised junction on the A31 at Down Place (just east of the A3 slip road).
  ○ An independent traffic study commissioned by Compton Parish Council has shown that this new junction would result in more queuing on the Hog’s Back and on the A3 during the morning peak-hour, and as a result the villages of Puttenham, Compton and Artington would see a surge in traffic numbers as Guildford-bound drivers seek out the fastest route and divert along the B3000 and B3100.
  ○ There would also be more congestion at the Egerton Road (Tesco) roundabout, which would impede access to the Hospital’s A&E unit and cause increased rat running through Onslow Village and Park Barn - This problem was identified by the Planning Inspector who presided over the previous Local Plan and who put a cap on traffic increases in the area of 5%. That cap has been exceeded (despite the University’s claim that construction traffic and buses don’t count). Guildford’s underlying traffic modelling is flawed and simply tweaking the Hospital roundabout and/or providing a new rail halt at Park Barn will not mitigate against the traffic generated by 1,800 homes, two schools, and an extended business park.
  ○ The Local Plan directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas.

● More pollution - Levels of nitrogen oxides that are consistently well above the EU legal limit have been recorded at the A3 end of the B3000 over the past two years (GBC Air Quality Annual Status Report, September 2016). Any traffic intervention that increases traffic levels through Compton (such as the proposed access road to Blackwell Farm), will make this situation worse and potentially have an impact on the health of residents.

● Loss of nationally important countryside - The new access road would cut through the Surrey Hills Area of Outstanding Natural Beauty (AONB), uprooting centuries old trees and scarring the north face of the Hog’s Back. It would also pass through an Area of Great Landscape Value and through, or next to, a belt of ancient woodland. The housing development itself and the proposed extension to the Research Park, would harm the setting to the Surrey Hills AONB (the views into and out of the Hog’s Back ridge). The Local Plan disregards an independent expert landscape study, which demonstrates that part of the site merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
• More flooding - The Hog’s Back acts as a soak-away for surface rainwater. Once its slopes are concreted over, this water will flow north, adding to existing flooding in Wood Street Village, Fairlands and Whitmore Common (an EU protected habitat).

More reasons to protect Blackwell Farm are set out in a document/brochure produced by Save Hogs Back in 2014 (see Annex B).

The provision of low-density executive homes across green fields is an inefficient and highly destructive way to meet housing needs. With more than 10% of Guildford’s population comprising students, I believe that the University should do much more to provide dedicated, purpose-built and safe accommodation for those wanting to study and enjoy living in Guildford. This would free up much needed space for key workers and families in existing homes closer to the town centre, helping to regenerate these areas and avoiding problems with student homes identified by GBC.

Whilst the University of Surrey seeks to improve its standing in the rankings of universities in the UK (it currently stands around 270 worldwide) so it would do well to emulate those at the top of the world league tables, which provide dedicated residences to over 95% of their students. The University of Surrey provides around half of this.

**Traffic**

My overall thoughts on traffic were spelt out in a presentation to Guildford Borough Councillors in the council chamber at Millmead in 2014. My comments made at the time are summarised below:

“Traffic disruption and road congestion is a problem in Guildford and the A3 and the A31 get most of the blame. However congestion on these roads is mostly the symptom of infrastructure problems elsewhere, for example:

- the lack of alternative routes west to east across Surrey, means that most journeys pass through the centre of Guildford,
- cars travelling west to east through Guildford can take one of only 3 routes across the A3 and one of only two routes across the river, and
- the roads and junctions through Guildford itself don’t have sufficient capacity at peak times.

These problems cause congestion and tailbacks onto the A3 and A31. This is a particular issue at the Tesco roundabout - the very point where the proposed entrance for the new Blackwell Farm development will emerge and where ambulance access to A&E is vital.

Extra traffic from this massive development built to the west of Guildford (and on the wrong side of the A3) would make the A3 and the A31 grind to a halt. The whole of Guildford would come to a standstill along with any aspirations for economic growth.

The planning inspector recognised this problem more than 10 years ago when Manor Farm was removed from Green Belt. He stipulated that traffic growth generated on University land should be limited to 5%. Today, there is a general perception that traffic is worse than ever and the proposed new development will add many extra cars - adding to the traffic misery throughout the day.

Unfortunately the proposed road through Blackwell Farm from the A31, won’t help either. It will just allow cars from the west to jump the queue to join the Tesco roundabout and then continue on the same route into Guildford (but now joined by hundreds of more cars).

And if this link is intended to simply make life easier for users of the Research Park then, wouldn’t measures to reduce the reliance on cars be better (as the planning inspector’s 5% threshold was trying to achieve)?
We need links to connect between the west and the east of Guildford, but any major scheme (such as a tunneled southern bypass to the A3) would take many years to materialise. Properties built at a reasonable density above the University’s vast surface car parks would provide extra homes in places which are genuinely walkable. Walkable to the existing train station, to the University, to the Research Park and the town. This would allow the University to provide all the benefits it wants to provide to Guildford - without the loss of beautiful countryside and without as much disruption on the roads.

Building hundreds of new homes on Blackwell Farm simply isn’t the answer.”

None of these fundamental issues has been addressed in different drafts of the Local Plan. Despite more evidence being presented by Save Hog’s Back and Compton Parish Council (including the RGP reports), the Local Plan ignores independent expert traffic studies, which show the adverse impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]. The scheme also adds to air pollution in neighbouring areas, which already exceeds safe EU limits for nitrogen oxides [Policy A26].

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
- Annex B - Save Hogs Back Brochure (electronic).pdf (2.0 MB)
- Annex A - GBCS Feedback Local Plan (Dec 14).pdf (2.4 MB)
- Local Plan Consultation 2017 response - TES.pdf (225 KB)

Comment ID: PSLPS16/4133  Respondent: 8608225 / Valerie Jenner  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Garlick’s Arch is at risk of flooding and is classified by the Environment Agency as being at higher risk than the Council's assessment. I object to development in areas which are at risk of flooding (Policy P4). The original plan had included land at Burnt Common where there was a brownfield site this new site is absolutely wrong as it has ancient woodland and GBC's Green Belt & Countryside Report does not even cover this site (A43)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8653  Respondent: 8608225 / Valerie Jenner  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Ripley and Send together only have about 3000 households and the development would damage the historic environment as a result of the scale of the proposed development (Policy D3).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8651  Respondent: 8608225 / Valerie Jenner  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the lack of planned road infrastructure. (PolicyI1). I live on the Portsmouth Road which runs through Ripley and Send adjacent to Garlick's Arch. We are already coping with large amounts of traffic which is often diverted onto our road when an accident closes the A3. The A3 from the junction north of the village to the M25 is almost at a standstill during the rush hour both going north in the morning and coming south in the evening. All of the above developments are sited along the A3 and with the number of houses proposed probably in the region of an extra 5000 cars will be wishing to use our local roads. Congestion will be even worse and at present Highways England has no plans to start considering improving the A3 before 2020. There should therefore be no development until this has been considered (Policy I2).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8654  Respondent: 8608225 / Valerie Jenner  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

With lack of good air quality due to congestion especially in the construction stage, although even now there are problems with the numbers of diesel vehicles especially HGVs, I have concerns about healthy living. (Policy I3) This is a great place to live, but GBC is intent on destroying it.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8650  Respondent: 8608225 / Valerie Jenner  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
I object to removing Ripley, Send and Clandon from the Green Belt (Policy P2) together with the proposed development sites at Wisley Airfield and Garlick's Arch. I understand there have to be exceptional circumstances for these areas to be removed as required by National Planning Policy. We are providing large areas of countryside where people can walk and ride cycles and horses and generally enjoy the open air. Why cannot existing brownfield sites such as the one at Burnt Common which was removed from the original plan, be used instead of Green Belt?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8649  Respondent: 8608225 / Valerie Jenner  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the Local plan (Policy S1) on the grounds that the development proposed is not sustainable. How on earth can the total development of new houses some 13,860 be accommodated in the borough with no improvements to the infrastructure. We are already at bursting point with access to schools and doctors, inadequate bus services, sewage removal etc. and the road network is fast becoming gridlocked at rush hour.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8652  Respondent: 8608225 / Valerie Jenner  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
These developments will inevitably lead to a merging of all the areas which are at present separate entities, Wisley Airfield, Ripley including Garlick's Arch to Send and on to Clandon and Burpham. We wish to remain villages - we all live here because they are villages. The development is far too concentrated in this part of the borough and GBC has made it a feature of their plan with larger numbers than other Borough Councils in Surrey. I therefore object to the Borough Wide Strategy (Policy S2) and the SHMA figure of 693 houses per year as being too high (Appendix D).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp173/635  Respondent: 8608225 / Valerie Jenner  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Appendix H: Maps - Send Marsh/ Burnt Common

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object very strongly to the Guildford Borough Proposed Submission Local Plan (June 2017) and in particular to the changes affecting Ripley and Send, which make the Plan even worse than the 2016 proposals.

These are my main reasons:

I object to the extended development in the Green Belt (Policy P2, Site A43)

I object to Garlick's Arch (A43) being extended and the resulting urban sprawl, half a mile away from where I live. There are no exceptional circumstances for this site being removed from the Green Belt, as required by the National Planning Policy.

I object to the allocation of 6 Travelling Showpeople sites in A43 Garlick's Arch as the development only includes 400 houses and therefore no provision is necessary as this is not compliant with the minimum of 500 as stated in section 4.2.24 of the plan.

I object to the hiding of development by "deferment" for sites A24, A25, A26 and A43. I object to the potential and ill-defined increase in housing allocation at A43 Garlick's Arch. The potential of an increase at site A43 will be extremely harmful to the rural natures of the surrounding villages of Ripley, Send and Clandon and will cause an urban site as buildings abut local boundaries.

I object to the imbalance of the Plan across the borough. With the removal of site A46 from the Plan and reductions of housing planned in this version of the Plan in other parts of the borough, 40.6% of the 11,350 homes proposed in this Plan are sited within 3 miles of where I live, most of them in the Green Belt. We are already suffering from traffic chaos when accidents or roadworks are causing problems on the A3 or M25. This is grossly unfair on an already overcrowded part of the borough.

The inclusion of site A58 Burnt Common now proposed once again, removes the need for A43 Garlick's Arch, surely only one site is needed, especially as they are so close to one another.

I object to the removal of brownfield sites from the Plan (Sites A4, A34 and A44). The Council claims to have adopted a "brownfield first approach"(page 5 of Plan) but this is clearly not the case and is contrary to national guidelines.
I object to the proposal for a Waste Management Facility in the Green Belt site (Burnt Common A58) which is mentioned but does not allow for full and proper consultation. (More traffic on our road).

I object to the increase in housing proposed in Tannery Lane (site A42) which has been increased by a third since the 2016 version of the Plan. Local rural roads are unable to handle this type of increase in traffic.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to removing Send Business Park from the Green Belt (4.3.15), this is only a small collection of local businesses and there are no exceptional circumstances as required by the NPPF.

I object to the lack of proper infrastructure planning for sites A43 and A42. The lack of any plan for either the physical or green infrastructure improvement clearly contradicts this in respect of both A43 Garlick's Arch and the A42 Clockbarn Nursery in Tannery Lane, Send. Development of these sites without the contingent infrastructure would therefore be contrary to the stated aims and themes of the Plan and should not go ahead.

I wish these objections to be fully taken into consideration and that the Plan is amended accordingly.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: PSLPS16/99</th>
<th>Respondent: 8608865 / WBDRA. (David Bird)</th>
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<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Introduction</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Policy A21 - WBDRA supports this unreservedly having campaigned for more than 10 years to have this land returned to Allotment Use.

Policy 19 - WBDRA has concerns about this policy as the proposed development could well impact the access of tenants and vehicles to the adjoining allotment site. WBDRA and its members were in favour of housing on this site until we received concerns about restricting or removing allotment tenants' main access gate. At present we cannot support development on this site until both pedestrian & vehicular access and associated car parking guarantees have been resolved.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/571  Respondent: 8608865 / WBDRA. (David Bird)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

WBDRA is in SUPPORT of this policy

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/1012  Respondent: 8608865 / WBDRA. (David Bird)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A19

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

WBDRA would like to comment further on this policy.

Yes we are in favour of housing on this site especially as the landowners indicated that the said homes would be smaller scale and possibly affordable homes as opposed to 38 x 3-4 bed homes which the area does not need.

What WBDRA OBJECTS to is the threatened loss of the Allotment Main Access gate which is situated in the Car Park area. Yes there are rights & easements of passage which we hope will be observed and retained BUT it is apparent from discussions between Guildford Borough Council & Guildford Allotment Society that this may not be so. WBRDA
INSISTS that the main Allotment Site gate (often referred to as the "lower gate" will stay where it is with passage remaining for both vehicles and pedestrians

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/6067  Respondent: 8608865 / WBDRA. (David Bird)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A19

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to this policy not because of the intended housing development but because of the loss of the Aldershot Road Allotment Site main access gate and our 6 Car Parking Spaces.

Despite what it says in Policy A19, I understand that Guildford Borough Council in tandem with Guildford Allotments Society have plans to remove the gate and relocate the Car Parking spaces as part of the Housing Development Delivery

I and many other Allotment tenants hope this will not be the case but we have seen Council correspondence which suggests it has been or is being considered.

Accordingly I cannot support any Housing development which will deprive a great many Allotment tenants, myself included, of their primary access to the Allotment Site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/1016  Respondent: 8608865 / WBDRA. (David Bird)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A20

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

WBDRA SUPPORST this policy which will provide much need community assets.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<th>Comment ID: PSLPS16/572  Respondent: 8608865 / WBDRA. (David Bird)</th>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<tr>
<td>WBDRA OBJECTS to this policy.</td>
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<tr>
<td>The main issue here is lack of infrastructure including waste water infrastructure to facilitate any development on this site.</td>
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<tr>
<td>The narrow road cannot be widened without demolishing a local heritage interest property called &quot;Timbers&quot; and there would be a significant impact on a Grade 2 listed property called Pitch Place House.</td>
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<tr>
<td>Additionally it is too close to Whitmoor Common which is classified as an SPA &amp; an SSSI.</td>
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<tr>
<td>WE OBJECT to the proposed relocation of the urban boundary which would result for from this proposed development</td>
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<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A24</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<tr>
<td>WBDRA does SUPPORT this policy BUT SUBJECT TO full infrastructure improvements prior to any development.</td>
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<td>Any development MUST take into account the findings of the Strategic Highway Assessment Report carried out by Surrey County Council on behalf of Guildford Borough Council relating to increased traffic both on Moorfield Road and the A320.</td>
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<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A25</td>
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</table>
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

WBDRA COMMENTS that as with other development proposals in the Draft Local Plan, there is an urgent need to implement full infrastructure improvements before any development takes place. Once such improvements have been effected then WBDRA would SUPPORT this development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/1015  Respondent: 8608865 / WBDRA. (David Bird)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

WBDRA SUPPORTS this policy. It is a good use of otherwise disused/unused brownfield land and will provide a substantial number of new homes for the Borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1265  Respondent: 8608865 / WBDRA. (David Bird)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

WBDRA COMMENTS that there should be an inclusion of Grey Water Usage (using Attenuation Tanks) and Grey Water Recovery.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<th>Comment ID: PSLPP16/1266</th>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<tr>
<td>WBDRA SUPPORTS this policy and suggests the inclusion of a list of listed building</td>
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<tr>
<td>WBDRA SUPPORTS this policy</td>
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<tr>
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WBDRA SUPPORTS this policy

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SUPPORT

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<tr>
<td>WBDRA agrees that there should be a higher density &amp; increased provision of sustainable residential development including a high proportion of Affordable Housing being no less than 40%.</td>
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<tr>
<td>In principle we SUPPORT this policy</td>
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<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
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Comment ID: PSLPP16/1269  Respondent: 8608865 / WBDRA. (David Bird)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E7

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

WBDRA would like to see both a higher density and an increased provision of sustainable residential development with a proportion no less than 40% of Affordable Homes/Housing.

Subject to this, WBDRA could SUPPORT this policy

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1263  Respondent: 8608865 / WBDRA. (David Bird)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E8

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

WBDRA SUPPORTS this policy

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1264  Respondent: 8608865 / WBDRA. (David Bird)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E9
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

WBDRA SUPPORTS this policy

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/1044  Respondent: 8608865 / WBDRA. (David Bird)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

WBDRA is in SUPPORT of this policy and firmly believes that there should be a higher housing density in the town centre

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/1042  Respondent: 8608865 / WBDRA. (David Bird)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

COMMENT

WBDRA in general supports the concept of homes which are reasonably priced and affordable by those who need such housing most in the Borough who are Key Workers and young families.

What WBDRA would like to see is a bold building approach taken by our council in partnership with a developer to build a great number of starter homes - Guildford has the brownfield sites to do this.

The last thing we need in the Borough are more 3/4 bed executive home developments favoured and generally built by developers.
Coupled with this our Council should take a much tougher stance with Surrey University and insist that the University gets on with building the homes for students for which it has planning approval. This would mean all students live on campus which would free up hundreds of family houses for sale or rent to Guildford families.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<th>Comment ID: PSLPP16/1043</th>
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SUPPORT - WBDRA supports Policy H3

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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WBDRA SUPPORTS this policy

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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This policy sounds a reasonable statement of intentions but like most residents groups in Guildford, WBDRA is concerned about the specifics and delivery of much need infrastructure improvements.

Most important of all are Roads and Drainage - what the Council Tax paying residents want is extensive improvements now not to wait until we've added another few hundred house to our already congested roads and overloaded (often overflowing sewage pipes/systems).

There have already been a number of major housing developments in Guildford Borough in the last few years yet no visible improvement to easing the traffic flow is in existence yet. Roads connecting new housing developments to existing roads DO NOT ease traffic flow.

Many parts of the borough experience routine flooding - a combination of (1) inadequate/overloaded drainage systems and (2) increased surface water run-off due to concreting over vast amounts of natural soakaway through the earth.

Several parts of the Borough routinely suffer overflowing sewage both in the streets and in homes (Fairlands Estate is one such example) as the existing pipework and sewage plant cannot cope. This type of Public Health issue must be addressed before even thinking of adding more house to the piped services.

To sum up, Infrastructure improvements first please then the housing development can start.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
WBDRA OBJECTS to this policy as it fails to make clear the pressing need to deliver Infrastructure improvements PRIOR to any further development taking place.

The policy needs redrafting to reflect the urgent requirement to enhance & improve the Borough's Infrastructure as a matter of urgency.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1046  Respondent: 8608865 / WBDRA. (David Bird)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

WBDRA is in SUPPORT of this policy and would COMMENT that improvements to the A3 road are needed immediately before any more housing development takes place.

Guildford already has been rechristened by WBDRA as Gridlock

Infrastructure improvements MUST come before any more housing development

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1047  Respondent: 8608865 / WBDRA. (David Bird)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

WBDRA is generally in support of this policy BUT it should include the amendments proposed by Worplesdon Parish Council

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1045  Respondent: 8608865 / WBDRA. (David Bird)  Agent:
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WBDRA SUPPORTS this policy

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WBDRA would SUPPORT this policy BUT ONLY SUBJECT TO the recommendations made by Land Management Services Ltd which specifically dealt with the Hogs Back are implemented.

These recommendations were contained in their report called "Hog's Back Natural Beauty Evaluation" published in May 2016

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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WBDRA COMMENTS that all measures to retain Guildford's Green Belt and to limit infilling must be implemented.

Policy P2 must be expanded to include Para 80 of the NPPF.

We OBJECT to any policy or planning initiative allowing the coalescence of the urban areas of Guildford & its surrounding villages with surrounding Boroughs.

Guildford is a medium size market town restricted for major development by its roads, flood plain, AONBs and lack of adequate infrastructure Piped services, sewage etc). The London/Thames Valley Mega City concept is not one WBDRA can support.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1229  Respondent: 8608865 / WBDRA. (David Bird)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

WBDRA is generally supportive of this policy BUT there should be some reference of Para 119 of the NPPF (maybe a footnote?) which says "The presumption in favour of sustainable development (para 14) does not apply where development requiring appropriate assessment under the Birds of Habitats Directives is being considered, planned or determined".

This addition would clarify the issue beyond reasonable doubt!

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
WBDRA along with many other Residents Associations and Local Interest Groups in Guildford OBJECTS to the proposed SHMA figures.

We were present at the first public meeting where consultants G L Hearn announced their SHMA findings to a stunned and shocked audience. Their methodology and resultant housing numbers seemed to have been based on the flimsiest of evidence, totally ignoring the high population of transient students in the borough and failing to address known statistical predictions about population movements and the local Housing market.

The slightly modified SHMA figure now offered by GBC has been the subject of much debate and challenge since its publication and GBC have steadfastly refused to publish the bases of calculation for their figure of 690+ homes to be built per annum.

No constraints appear to have been applied such as Flood Plain, Green Belt infrastructure limitations etc etc)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
SITES - POLICIES A1 TO A57

Each of these objections relates to each of the sites in the Green Belt.

1. We object to the identification and allocation of sites in this plan without regard to Green Belt, infrastructure or other constraints. The plan says that “allocating these sites does not grant planning permission for development” However, each of the sites will be removed from the Green Belt and will be available in principle for development and non-Green Belt uses. The inclusion of these sites without detailed site by site justification shows contempt for the thousands of detailed comments the Council have received about individual sites ever since the Issues and Options consultation in 2013. The plan has hardly changed since the Council received 20,000 objections to its first draft plan in 2014. The Inspector considering the plan may conclude that the consultation has not been properly conducted.

1. The housing needs assessment is flawed in various respects and overstates housing need. In addition since it was produced, the referendum Brexit decision has almost certainly reduced future housing need and rendered the previous assessment seriously out of date. As a result any assessment of Green Belt sites which took place to consider whether “exceptional circumstances” existed to outweigh the harm to the Green Belt was based on false premises and should be reconsidered.

1. Having determined housing need the Council was entitled to consider constraints before determining the housing number. We believe that as well as being entitled to do this the Council was required to give proper consideration to constraints. The scarcity of sites outside the Green Belt as well as infrastructure (most notable roads) considerations all represented constraints which should have been taken into account in determining the final housing number. Accordingly in this regard our objection to the allocation of Green Belt sites is twofold. First we believe constraints should have been applied. Secondly we believe the Council did not properly consider constraints and that their decision making process was flawed and thus subject to being set aside by the Inspector.

1. Even if having properly applied constraints there is a need to develop in the Green Belt then specific Green Belt sites should not be included in the plan unless “exceptional circumstances” for development are proven in relation to that specific site, as stipulated repeatedly in the NPPF. The Green Belt should trump short-term considerations such as perceived housing need, as case law has established. There needs to be a specific balancing exercise conducted on each Green Belt site weighing the harm to the Green Belt against the very special circumstances which are argued in favour of development at that particular site. There is no evidence this has been done. Instead the council have appeared to say that having chosen a housing needs figure and decided it cannot be met without building on Green Belt then there is no need for any further consideration and any convenient Green Belt site can be allocated for building at will.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
POLICY A25 - Gosden Hill Farm

We object to Policy A25 with proposals for Gosden Hill Farm.

The Green Belt at this point serves the important function of separating West Clandon from the edge of urban Guildford. Development here will cause the two to coalesce defeating one of the objectives of the Green Belt. If this development proceeds we believe the narrow strip of Green Belt remaining between Guildford and Clandon at this point will be too narrow and will come under further pressure.

It will represent an undesirable ribbon development along the A3. It will be highly visible from the A3 when approaching Guildford and will, in conjunction with A43a at Garlick’s Arch give the appearance of almost continuous development from Send through to Guildford.

The Plan does not put forward any evidence that exceptional circumstances exist to justify removing this site from the Green Belt.

The development will overburden the local road network and increase congestion on the A3 through the centre of West Clandon. This is already very heavily used whilst being unsuitable for designation as an A road. In places it is too narrow for two lorries to pass causing them to mount the pavement (see also below).

We object most strongly to the proposal for a link road to bring traffic from the Gosden Hill development to the proposed 4 way junction at Burnt Common. This has the potential to generate large volumes of traffic (including commercial vehicles) on the A247 through West Clandon-a road which is already under traffic stress (see also below).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/1205  Respondent: 8609217 / West Clandon Parish Council (John Stone)  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY A43 AND A43a – Garlick’s Arch

We object to Policy A43 and A43a on Garlick’s Arch.

The site was only inserted in the draft plan at a late stage just before publication of the consultation draft which is a shabby way for the Council to proceed. The site is not a sustainable site being far from any infrastructure facilities and transport links. The bus service is infrequent and it is almost certain any future residents will rely almost entirely on cars for journeys. Similarly any employees at the employment areas will almost undoubtedly arrive and leave by car.

The site is susceptible to flooding and will not make a suitable site.

The Green Belt at this point serves the important function of separating West Clandon from Send. Building here will cause the two to coalesce defeating one of the objectives of the Green Belt.

We have seen no evidence that exceptional circumstances exist to justify removing this site from the Green Belt or that this important issue has been addressed. The Green Belt and Countryside study did not even consider this site.
It is understood the Council's eyes may have been turned by the possibility of receiving for free the land which might be used for new A3 slip roads in return for allowing this development, thus justifying it as some form of enabling development. However the slip road land if needed could be safeguarded in the plan and acquired by compulsory purchase when required. Lack of current funding for the slip road is not a justification for allowing the development of this site. If the slip road is genuinely needed then government funding will be available for it. (One of the reasons for turning down the so called enabling development proposal intended to fund the rebuilding of the Howard of Effingham school was that the redevelopment of the school was not essential. As and when it became essential Government funding would become available. Accordingly enabling development was not necessary. The same principle applies here.)

The A247 running south past this site through the centre of West Clandon is already very heavily used whilst being unsuitable for designation as an A road. In places it is too narrow for two lorries to pass causing them to mount the pavement- often at speed. It has narrow bends with poor sight lines, a primary school and a hump-backed bridge concealing the entrance road to the station for southward traffic. In addition, there are no continuous footpaths which forces pedestrians to cross and re-cross the road. Development at Garlick’s Arch will only exacerbate the problem and make the road even more congested and unsafe for pedestrians.

The development will cause harm to the ancient woodland on and by the site.

Taken together with the Gosden Hill site, there will be a ribbon of development along the A3 in contrast to the current “soft” edge approach to Guildford.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2393  Respondent: 8609217 / West Clandon Parish Council (John Stone)  Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY D3 - Historic environment

We object to this policy as it is very weak and we do not think it is clear enough in its support for the conservation of the historic environment. It provides for development which will “enhance” heritage assets which we fear is a developer’s charter as it leaves plenty of room for abuse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2394  Respondent: 8609217 / West Clandon Parish Council (John Stone)  Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D4
POLICY D4 - Development in urban areas and inset villages

We object to this policy:

1. The policy should place much greater emphasis on residential development in the existing urban centres. In this way housing needs can be met without resorting to large developments in the Green Belt. There are urban areas in need of regeneration but these are ignored in favour of Green Belt development.

1. The policy should not be applied to the villages which should remain in the Green Belt. Unrestricted application of this policy to the villages intended to be inset will change their characters radically and for the worse. The development it encourages will increase traffic and congestion disproportionately.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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POLICY E1 - Meeting employment needs

We object to this policy.

1. We object to the inclusion of a strategic employment site at Garlick’s Arch. It is in a non-sustainable location remote from any facilities of any kind and with poor public transport links. It is unlikely jobs there will be taken by local residents and it is likely all travel to and from work will be by car adding to local congestion. Employment sites should be concentrated on previously developed land in more sustainable locations with good transport links where the infrastructure can support development.

1. The site is in any event subject to frequent flooding and unsuitable for development.

1. We object to the inclusion of a strategic employment site at Gosden Hill Farm. Employment sites should be concentrated on previously developed land in more sustainable locations with good transport links where the infrastructure can support development. Warehousing, distribution and industrial premises cause considerable commercial traffic, noise, pollution and general disruption. They are not good neighbours for schools and 2000 houses. Many of the jobs will be taken by people outside the area leading to additional congestion in Burpham and on the A3.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: PSLPP16/2390  Respondent: 8609217 / West Clandon Parish Council (John Stone)  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY E2 - Location for new employment floorspace

We object to this policy. It would be more sensible to confine new office and research and development floor space to the urban Guildford area. We also oppose the policy of expanding the Research Park onto Blackwell Farm. No exceptional circumstances, as defined under the NPPF, have been advanced to justify incursion into this permanent and high-quality area of Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2391  Respondent: 8609217 / West Clandon Parish Council (John Stone)  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E6

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY E6 - The leisure and visitor experience

We object to this policy. The policy should acknowledge that whilst in some areas new and enhanced leisure facilities are valuable (for example the new Opera House at West Horsley Place), much tourism depends on the undeveloped nature of Green Belt areas surrounding Guildford. Accordingly the policy should recognize that in many rural areas new and enhanced visitor facilities may be unnecessary and counterproductive, particularly away from existing buildings and development. For example the attraction of Newlands Corner is its undeveloped nature. Significant development of visitor facilities there is likely to diminish rather than increase its attractions. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment. Heritage sites and the Green Belt are particularly vulnerable to harm.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2392  Respondent: 8609217 / West Clandon Parish Council (John Stone)  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E7
POLICY E7 Guildford Town Centre We object to this policy.

1. The policy does not address any of the major issues raised by the Council’s own Town Centre Master Plan, the Guildford Vision Group’s proposal for new river and rail crossings or plans for the redevelopment of Guildford Station, all of which are already the subject of public discussion.
2. There is an urgent need for a strategy to focus on brownfield redevelopment before considering development outside the existing urban area.
3. There should be a much greater focus on residential use of the town centre where many people would like to live and where the necessary amenities and infrastructure exist. The policy misses the opportunity to propose forward looking sustainable residential development plans in, for example the Walnut Tree Close area, where very significant numbers of new homes could be provided. Such town centre sites could meet much of the housing need over the plan period without harming the countryside.
4. The policy “vision” describes protecting the Guildford’s unique setting and historical character and sets out some of the ways this will be done. However none of this is included in the formal Policy wording in the blue box. We suspect the Vision wording is effectively of little or any force. These principles should be included in the formal policy.
5. The policy also fails to provide guidance on design requirements, as required by the NPPF.
6. The policy and surrounding text concentrates too much on shopping without regard to its nature which risks a proliferation of dull high-street chain stores. The policy should seek to enhance Guildford’s character and encourage a wider variety of small shops including locally owned businesses and shops of use to consumers.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2384  Respondent: 8609217 / West Clandon Parish Council (John Stone)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

POLICY H1 – Homes for all We object to this policy.

A greater proportion than 60% of Surrey University students should be housed in university accommodation. The university should be encouraged through this Plan and the planning process to increase provision of university accommodation. It is not appropriate to release Green Belt land to house students who could be accommodated on the Surrey campus or other university sites. The plan should take account of the university's ability to house its own students and reduce the housing number accordingly.

Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan period. It fails to set rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions.
The housing mix is based on out-of-date, pre-Brexit projections and on assumptions set out in a flawed SHMA that has not been scrutinized or evaluated.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/2385  
Respondent: 8609217 / West Clandon Parish Council (John Stone)  
Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY H2 – Affordable homes

We object to this policy on the grounds it should be more firm and explicit on unviability in paragraph 4.2.40.

In particular a scheme is only unviable if the value of developing the land (including some allowance for development risk and a normal level of profit) falls below the sale vale of the land for alternative non-premium uses such as agriculture. The price paid for the land is not relevant. The possibility of avoiding the affordable housing obligation through use of unviability arguments only serves to inflate land values. It will become clear that developments are unviable when developers start selling land for alternative non-development uses.

It should be noted in the plan that because of Guildford's relative popularity as a place to live combined with its location close to others towns and within the London Commuter belt no amount of building will meet demand. Similarly no amount of affordable housing will ever meet demand.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/2386  
Respondent: 8609217 / West Clandon Parish Council (John Stone)  
Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
POLICY H3 – Rural Exception Homes

We object to this policy for a number of reasons:

1. The wording of the policy is far too wide and drives a coach and horses though all other aspects of planning policy. As drafted the planning authority could be obliged to grant permission for inappropriate and unsuitable developments.

1. The wording provides no ability to balance the desirability of the development against other considerations including harm to the Green Belt or the AONB. (If the housing would meet identified need and adjoins a settlement under this policy wording permission would have to be granted even in the most sensitive AONB location, even if more suitable locations were avail) The policy should include the need for a balancing exercise including consideration whether more suitable locations exist.

1. The policy wording should not allow market housing. The ability to include market housing is likely to inflate land values, leading to a self-perpetuating need to include market housing. It may lead to spurious developer led proposals which will be difficult to resist.

1. The policy wording should define small, either in land size or number of u We are concerned that if small is left undefined the policy could be used to justify significant developments. In the context of the plan a development of 150 homes might be argued as small. (If Wisley at 2,500 homes is a big development then 500 homes might be a medium development and 150 could be small.)

1. The policy wording should be restricted to adjoining sites or define the concept of being "closely related". In particular we believe adding the concept of safe and easy walking distance extends the potential radius within which sites will be argued to be “closely related” Many people would regard a mile or so as an easy walking distance. (School children are expected to walk further than that before being eligible for free school travel.)

1. The wording of the policy itself does not require the local connection requirement for tenants to be secured in perpetuity - only the affordability must be secured in perpetuity. (For example housing could be built for retired Cabinet Ministers under this policy so long as the first tenant was required to have a local conn) The introduction to the policy mentions this point, but it is not part of the policy itself and may carry little weight at appeal.

1. The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove “exceptional circumsta” The size and location of sites should be better defined and it should be clear market housing cannot be included.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
POLICY I1 - Infrastructure and delivery

We object to this policy as it is inappropriate and inadequate and fails to respond to the challenges raised by the proposed significant Green belt developments. The borough’s infrastructure is already heavily strained. However the plan’s determination to build large housing estates across the Guildford countryside significantly increases the need for infrastructure investment without securing the means for its provision. Placing housing in the established urban areas would reduce the need for enhanced infrastructure as would a more realistic housing number.

The policy wording says nothing about roads and traffic. The Council’s methodology for assessing traffic congestion - averaging it over periods of several hours and ignoring the effects of junctions - simply hides the problem, which will get worse as development proceeds. The schemes referred to in this policy will not solve existing congestion and the local road network has not been given sufficient consideration. Some proposed development locations would require highway schemes that are unlikely ever to happen.

Adequate infrastructure provision is a pre-condition of sustainable development. But in this plan it is an afterthought buried away in Policy I1. By prioritizing greenfield over urban, brownfield regeneration, the plan creates insurmountable (and unnecessary) obstacles for itself. Common sense suggests a local plan should first assess the borough’s infrastructure capacity for sustainable development, and then tailor development accordingly. This plan, however, assumes infrastructure will follow on the heels of housebuilding as if by magic. It makes implementation critically dependent on providers outside the Council’s control and on the vagaries of CIL income. Instead of recognizing this as a key constraint, the plan is based on hope. It is also highly likely that developers faced with the imposition of large infrastructure requirements will go to court to invoke the NPPF provision that prevents authorities from imposing conditions that make a development non-viable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2396  Respondent: 8609217 / West Clandon Parish Council (John Stone)  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY I2 - Supporting the Department of Transport’s “Road Investment Strategy”

We object to this policy as it is too vague and optimistic. Significant improvements to the road infrastructure are like to be many years away even if they ever happen. The draft plan, however, commits to building massive housing estates in the countryside before any of these road improvements are in place. This is inappropriate and will lead to massive traffic disruption during the construction phase and will add permanently to an already congested network (about 3,000 private cars from the 2,100 new homes at Wisley Airfield alone).

Road infrastructure represents a major constraint that should have been applied to the housing target at a much earlier stage in the plan process and not left as an unresolved difficulty in the draft plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
POLICY P1 – Surrey Hills Area of Outstanding Natural Beauty

We object to this policy as we are concerned it policy weakens existing protection when it should strengthen it. It is dependent on the Surrey Hills Management Plan. This welcomes housing development. Even major (undefined) development in the AONB would be permitted if exceptional (undefined) circumstances could be demonstrated. It should be tightened up.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

POLICY P2 – Green Belt We object to this policy.

1. It does not sufficiently safeguard the Green Belt even though Green Belt constitutes 89% of the borough and should be the cornerstone of all local planning policy. The Green Belt is not the Council’s to give away and once it is gone it is gone forever. Sacrificing areas of the Green Belt to a developer influenced growth agenda is a betrayal of future generations and does not constitute sustainable development.

1. The Green Belt should be protected in perpetuity, but Policy P2 seeks to justify excessive development in supposedly protected are This is in breach of party manifesto commitments and contrary to previous responses to public consultation. It is disreputable to argue, as the Council does, that the Plan would involve the loss of “only” 1.6% of the borough’s Green Belt. Leaving aside the reliability of that statistic, the NPPF does not set an “acceptable” percentage. The fact remains that the plan proposes that 65% of the housing plus industrial development be built on land to be taken out of the Green Belt

1. Paragraph 3.16 is seriously deficient in simply stating that the Council considers that exceptional circumstances exist to justify amendment of green belt boundaries. The exceptional circumstances are not identified. It is clear from national guidance that unmet housing need is not on its own an exceptional circumstance. Even to the extent that exceptional circumstances exist, these have to be balanced against the harm to the Green Belt in the specific sites proposed to be taken out of the Green Belt. This balancing exercise appears not to have been done.

1. The Countryside Study which the Council may argue fulfilled the need to demonstrate the exceptional circumstances required to justify removal of areas from the Green Belt was a simplistic tick box exer Within
limits it may have answered certain questions about different attributes of different areas of Green Belt but it did not carry out the balancing exercise needed to determine whether specific exceptional circumstances justified removal of specific areas of land from the Green Belt. We believe that each of the identified Green Belt site proposed to be removed from the Green Belt should be carefully assessed against any exceptional circumstances in deciding whether it should be removed from the Green Belt in the final plan. This exercise should bear in mind that housing need in itself is not an exceptional circumstance and nor is the Council’s growth aspiration. An important consideration is that more housing need could be met on urban sites than is currently planned. The Plan has fallen into the developers’ hands and developers prefer building on undeveloped land rather than brown field sites.

1. As mentioned above we note that the Summer 2016 edition of “About Guildford” (published by the Council) on page 5 states that “… the Plan rejects any schemes that would have a detrimental impact on the Green Belt.” This is demonstrably untrue and we consider this to be a deliberate untruth which compromises the consultation. We would ask that this untruth be corrected and the consultation period restarted after the correction has been given the same distribution as the original statement. (We assume the document was delivered to most houses in the Borough.) We reserve the right to argue before the inspector that the consultation process was flawed and ineffective because of this.

1. We object to the “insetting” of 14 villages from the Green Belt. Contrary to assertions made in the Plan process many of these villages do contribute to the openness of the Green Belt and there is no need to inset them. We also object to the wholesale extensions to the settlement boundaries in many villages to allow for infilling and that infilling is also proposed outside the settlement boundaries of 11 further villages. Many Guildford villages are linear. It is all too easy to square off boundaries by including countryside bounded on only one or two sides by existing development, claiming it contributes nothing to the “openness” of the Green Belt, a term which neither the Plan nor the NPPF defines. The NPPF’s other 4 tests of Green Belt status, including the prevention of urban sprawl, are ignored. Effectively, this policy makes all villages within the Green Belt vulnerable to large blocks of new development and seems almost calculated to secure the rejection of the plan as a whole.

1. To “inset” two-thirds of the borough’s rural villages on the grounds that they no longer contribute to the purposes of the Green Belt is extreme and inherently implausible, given the borough’s location on the edge of Metropolitan Lond. We cannot see how such extensive areas fail to contribute to the purposes of the Green Belt under the NPPF but this could quickly be the case if the proposed “insetting” and boundary extensions go ahead. This policy is wildly disproportionate in terms of any foreseeable development need and has caused tidal waves of opposition from residents. It flies in the face of NPPF paragraph 17’s aim of “empowering local people to shape their surroundings” and other NPPF provisions.

1. Paragraph 3.17 states that “the general extent of the Green Belt has been retained.” We believe this should be deleted as an untruth.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2382  Respondent: 8609217 / West Clandon Parish Council (John Stone)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Comments on specific policies

POLICY S1 – Presumption in favour of sustainable development

We object to this policy. The NPPF states that the presumption in favour of sustainable development “should be seen as a golden thread running through both plan-making and decision-taking.” As the first policy in the Plan, Policy S1 ought to set a clear framework. Instead, no definition of “sustainable development” is given. The policy also fails to set out any principles for applying sustainable development in practice to local planning decisions, which often have serious long-term impacts.

The policy states that it aims “to secure development that secures the economic, social and environmental conditions in the area”. This fails to recognize that economic growth, social justice and environmental protection often conflict. The policy does not say how each element is to be weighted or conflicts resolved. As a practical guide to the planning decision to be taken in the Plan period it is seriously deficient. The policy is likely to be used by developers to justify inappropriate developments on economic grounds. Under this policy, virtually any development will qualify as “sustainable”, in breach of the NPPF’s most important guideline.

Policy S1 is also seriously deficient in making no mention of the Green Belt. The Green Belt is a long term Government policy enshrined in primary legislation to protect green areas in perpetuity. The Green Belt is a living example of sustainable development in practice and is one of the most important factors affecting sustainable development in the area covered by the Plan and should be acknowledged in this policy. Policy S1 should include a commitment to protect the Green Belt from inappropriate development and to uphold Green Belt boundaries and protections. This would set at least one clear boundary to planning decisions. The Plan and the Council have treated the Green Belt as a developable land bank rather than as a constraint to development.

The commitment to approve planning applications “wherever possible” and “without delay” reveals the pro-development bias of the plan. Countervailing references to sustainability are so vague that the NPPF presumption in favour of sustainable development becomes a presumption in favour of any development at all.

This policy also ignores, as if they are inconvenient constraints, most of the 12 Core Planning Principles set out in NPPF paragraph 17.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
impact on the green belt." This is demonstrably untrue and we consider this to be a deliberate untruth which compromises the consultation process. We would ask that this untruth be corrected and the consultation period restarted after the correction has been given the same distribution as the original statement. (We assume the document was delivered to most houses in the Borough.) We reserve the right to argue before the inspector that the consultation process was flawed and ineffective because of this.

General comments

We have serious, general objections to the plan which are summarized below as well as being expanded upon in our comments on numbered policies in the draft plan.

- In common with many others we do not believe the housing figure has been properly calculated and we believe it overstates housing need. The Council has prevented Councillors or others from properly considering the SHMA by refusing to make public the basis on which it was drawn up.
- The housing figure, when properly recalculated, should be subject to constraints to reflect Guildford's circumstances, including in particular the Green Belt and road infrastructure. National policy permits such constraints to be applied and it is inappropriate not to consider the need to do this.
- We do not believe the draft plan accords with the NPPF policies on protecting the Green Belt.
- Exceptional circumstances need to be shown to justify removing areas from the Green Belt and this has not been do The housing need number is not itself a very special circumstance justifying an indiscriminate removal of sites from the Green Belt. Having properly calculated a housing needs number, constraints should be applied to it to reflect the Green Belt and AONB. Each proposed Green Belt site then needs to be considered on its own merits. The benefits of the proposed development need to be identified together with the harm to the Green Belt. Only if there are exceptional circumstances and following a proper balancing exercise demonstrating that these exceptional circumstances outweigh the harm to the Green Belt can the proposal proceed. The draft plan does not demonstrate that this has been done. Even once a housing number has been calculated it cannot be used to justify taking land out of the Green Belt on a wholesale basis.
- Stronger assurances should be included in the plan that development can only commence when required infrastructure improvements have been secured.
- The A247 through Clandon is overburdened by traffic already and is unsuitable as an A road in any event. In parts it is too narrow for two lorries to pass and lorries routinely mount the pavement at speed in a dangerous fashion. We believe the plan should include proposals to provide other routes for traffic to take traffic away from the A247.
- We object to the Gosden Hill proposal. We do not believe very exceptional circumstances have been shown to justify taking this site out of the Green Belt. Even if the Gosden Hill development were to remain in the plan we believe the boundary should be explicitly drawn so as to prevent it being visible from West Clandon. In addition development should be conditional on the A3 improvements and new railway station.
- We object to the Garlick's Arch proposal. This site was removed from consideration before the previous draft of the plan was issued. We do not understand how this site has been brought back into the plan. We do not believe exceptional circumstances have been shown to justify taking this site out of the Green Belt. The site was not discussed in the Green Belt and Countryside study and there seems to have been no consideration of the justification for removing it from the Green Belt.

General Comment on Policies

The status of the text which accompanies each policy box is not clear. If the accompanying text does not have the force of policy a number of the policies (i.e. the text in blue) are so vague and general that they commit the Council to very little.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY S2 – Borough Wide Strategy

We object to Policy S2 on a number of grounds.

1. The housing number of 13,860 new homes is excessive. The number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.

1. The number is in any event based on an arbitrary and inappropriate Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. Rushmoor is excluded in spite of it being easily reached from Guildford town centre. An HMA should be an area within which a majority of people live, work, shop or study. On any commonsense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton, Haslemere, Reigate and Redhill and Basingstoke but all lie well outside “West Surrey”. Guildford is in the London commuter belt and part of a far wider and more complex housing market.

1. These concerns have been raised repeatedly since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinize it. The absence of a ready alternative, however, does not make “West Surrey” as a Housing market Area reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guildford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

1. The assumptions and calculations in the SHMA are widely regarded as flawed and even before Brexit, produced an inflated housing needs number. The figure of 13,860 new homes is completely unsubstantiated. It has not been scrutinized by Councillors despite repeated requests for debate. The assumptions and calculations underlying the model are hidden, protected by a claim to intellectual property by a commercial sub-contractor used in preparing the SHMA. We have serious doubts about the objectivity of the SHMA because it has been produced by consultants whose website openly proclaims their pro-development agenda leading to reasonable suspicion that the figures are inflated. Guildford’s OAN is not transparent but has been taken on trust by the authors of the plan. Given that almost every element of the plan is predicated on this OAN, the plan as a whole cannot be considered “sound”.

1. The status of the 13,860 figure is ambiguous. The Council has said that the housing number and the OAN are identical because the OAN is “deliverable” and is by definition objective and cannot be contradicted. The OAN is only deliverable because of the Council’s cavalier approach to the Green Belt in contravention of the NPPF, ministerial statements and local and national Conservative Party manifesto commitments. The plan also states that infrastructure or other constraints may in due course affect deliverability. It is also unlikely that the number of houses can be built at the rate proposed. In recent years, housing starts have on average been less than half the proposed rate. This is not because developers do not have the land or cannot get planning permission. Constraints in the supply chain and maintaining profit levels have been more important.

1. The plan cannot be considered “deliverable”. In addition, the number of homes proposed, plus existing planning permissions, plus expected “windfall” sites, exceeds the total of 13,8 So how many homes (taking account of these adjustments) do the Council want built? The plan does not say. Without this figure it is hard to see how anything else can be planned. This undermines the validity of the whole consultation. It is unreasonable to ask the public to approve a “plan” that fails to propose a target number that takes all the standard constraints and
adjustments realistically into account, leaving the Council to set one without further consultation. Even if the OAN were not flawed, it is at best only a baseline figure and should not be passed off as a policy proposal.

1. It is unreasonable to embark on a radical transformation of the borough on the basis of an unclear housing target. Most of Guildford borough is highly protected from development (89% Green Belt, 44% AONB and about 75% protected by SPA). Whether or not increasing the number of dwellings by up to a quarter is desirable, it would be a major and irreversible change, arguably turning a largely rural borough into a mainly urban or suburban one like Woking. The scale of the housing number increases the onus for it to be seen to be sound. A substantially lower number, on the other hand, would remove the need to build on Green Belt or open countryside, and instantly meet the single biggest public objection to the plan as a whole.

1. The Plan in general and this policy in particular does not address the point that Guildford exists as part of London's commuter belt. Any increase in supply of housing in Guildford, particularly if the increase is proportionately greater than elsewhere in the commuter belt, will simply result in a shift of population into the area. It will not reduce prices or increase availability except imperceptibly. The Plan also ignores the point that many of those working in the area live elsewhere. Accordingly in considering the housing number the Plan should take into account that in this part of London’s commuter belt, demand for housing is, in practical terms, unlimited.

1. This policy does not take proper account of the constraints to development which exist, principally posed by the Green Belt and by infrastructure limitations. We believe the Council is under a duty to properly consider applying these constraints. It is clear the Council has failed to do this. This approach differs from all the other boroughs in Surrey. The Plan appears to have deliberately been manipulated towards a growth agenda without disclosing why this is being done. The housing that is needed should be concentrated on urban brown field sites and through increasing the housing density of existing built up urban areas.

1. The development of 13,860 homes in the Plan period with 65% in the Green Belt does not constitute sustainable development. It will have a permanently detrimental impact on the Borough in general and on West Clandon and surrounding area in particular. The developments at Garlick’s Arch and Gosden Hill farm do not meet the needs of the local communities. The road infrastructure in and around West Clandon will be unable to cope with additional demand. The edge of urban Guildford will creep that much closer to West Clandon, thus negating the purposes of the Green Belt in the area which include safeguarding the countryside from encroachment, checking the unrestricted sprawl of large built up areas and preventing neighboring towns merging into one another.

1. The Plan is out of balance in proposing 36% of all new housing in the three wards of Lovelace, Send and Clandon and Horsley. These are currently rural areas whose identities will be greatly and detrimentally changed by these proposals.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

| Comment ID: | SQLP16/598 | Respondent: | 8609217 / West Clandon Parish Council (John Stone) | Agent: |
|-------------|------------|-------------|---------------------------------------------------|
| Document:   | Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination |

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (Yes)
West Clandon Parish Council wishes to express an interest in attending the examination. We wish to determine who will represent us nearer the event.

John Stone
Clerk
for West Clandon Parish Council

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** pslp172/2337  **Respondent:** 8609217 / West Clandon Parish Council (John Stone)  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy A25

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire): ( )**

1) Gosden Hill is located entirely within the Green Belt. No exceptional circumstances have been demonstrated for building on this site and therefore development here does not meet paragraphs 87-89 of the NPPF. Furthermore, Gosden Hill performs all five functions of green belt,

2) If this development proceeds, the narrow strip of Green Belt remaining between Guildford and Clandon at this point will again be proposed for development by the same developer who is promoting Gosden Hill.

3) The development will be highly visible from the A3 when approaching Guildford.

4) Together with the developments at Garlick’s Arch and Burnt Common there will be an almost uninterrupted ribbon of development along the A3 extending 5 miles from the centre of Guildford.

5) The development of this site will cause massive congestion in surrounding roads. It will generate many thousands of vehicle movements onto the A3 which is stationary every day during rush hours.

6) The linking of the A3100, B2215 and A247 would channel thousands of cars through the narrow, winding road through West Clandon.

7) The proposal for a link road to bring traffic from the Gosden Hill development to the proposed 4 way junction at Burnt Common has the potential to generate large volumes of traffic (including commercial vehicles) on the A247 through Send and West Clandon - a road which is already under traffic stress.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** pslp172/2332  **Respondent:** 8609217 / West Clandon Parish Council (John Stone)  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy A35
The Wisley development of a new village/town with at least 2000 houses, 4-entry form secondary school and employment land will generate large amounts of additional traffic onto the A3. If the slip roads at the A3/A247 junction to relieve the impact of this development on Ripley do get built, traffic on the A247 will increase dramatically.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/2334  Respondent: 8609217 / West Clandon Parish Council (John Stone)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A58

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1) This previous allocation for B1c, B2 and B8 development was removed from the 2014 draft due to all the objections made previously.

2) The Plan calls for a minimum of 7000sq. m (previously in the 2016 Plan a maximum figure) but will take 9.26 hectares out of the green belt. There is no proper justification given for taking the additional land.

3) The evidence base does not support this scale of additional industrial space and the justification for placing it in the green belt is not made out. If the quality of some existing industrial provision is not adequate this should cause redevelopment of it not a large encroachment into the green belt. The 2017 Employment Land Need Assessment shows a demand of 3.9 hectares for industrial land for the whole borough not a huge over allocation of 9.26 hectares at Burnt Common in the green belt.

4) The reference to waste management facilities mentioned at paragraph 4.4.23a lacks enough detail for proper consultation and should not be so casually included for this site.

5) The proposal for light industry, storage, distribution and waste management activities at Burnt Common will generate large amounts of traffic including heavy vehicles on the A247.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/785  Respondent: 8609217 / West Clandon Parish Council (John Stone)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy ID1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1) Our residents are being asked to accept very large amounts of development with little or no detail being provided on measures which would relieve existing congestion and limit future problems.

2) Much is made of the need for new infrastructure to support developments and for this to be in place as needed (listed in App. C to the Plan). Even if this happens the Plan admits …”we forecast that there will also be an absolute increase in overall traffic volumes”. This will be most acutely felt at junctions but these effects have apparently not been analysed so that we don’t know the location or impact.

3) We can be sure however that the cumulative effects of the developments in the North East of Guildford will have a devastating impact on the A247 through our village (and of course on Send). It is hard to see how any of the infrastructure proposals in the Plan (App. C) will do anything to mitigate this impact. GBC has little or no control over the plans of Surrey County Council as the local highways authority and it is well known that they have no money available.

4) The Plan now calls for nearly all infrastructure to be funded by developers (see APP. C). We question how realistic it is to expect developers not only to pay for all the infrastructure but also to have it in place in a timely fashion. The Plan says that planning permission will be refused if timely provision of infrastructure cannot be secured. Such refusals will almost certainly be settled in the courts. Developers’ business models are based on building and selling houses to create the cash required to provide infrastructure. People will be living on the sites well before infrastructure is complete.

5) If development were to be refused the land would still have been removed from the green belt and its future rendered uncertain.

6) All of these developments will draw very large amounts of additional traffic to the A247 through the village. It would be naïve to think that the employment sites and schools will serve only the developments themselves. Apart from the normal movements of residents to and from the new sites there will be considerable additional traffic on the A247 generated by:
   - children from elsewhere being delivered to Gosden Hill schools and collected
   - the employees of the offices and industrial sites getting to work and returning home
   - the vehicle movements generated by distribution and storage activities
   - traffic from Wisley wishing to travel South and returning
   - traffic from Gosden Hill wishing to travel South and returning
   - traffic from Slyfield wishing to travel South and returning
   - private and commercial traffic originating in the South and accessing Gosden Hill, Burnt Common or the A3 and returning (including traffic from Dunsfold)
   - SCC’s business plan for Newlands Corner

We point out that although the A247 is classified as an A road, it has none of the characteristics because it:
   - is less than 2 vehicle wide in places
   - does not have continuous footpaths
   - has several sharp bends
   - has a hump-backed bridge with poor sight lines
   - has a very difficult junction to access the station
   - has a dangerous junction with the Southbound A3 on-slip road
   - is largely unlit
   - has a primary school
   - is already very congested at times

In summary, the A247 is quite unsuited to coping with additional traffic and it is very clear that the developments proposed in the 2017 Local Plan will increase the amount of traffic on this road over and above that in the 2016 draft to which
residents strongly objected. There is nothing in the Infrastructure Schedule which addresses this issue. Indeed several of the infrastructure proposals will themselves lead to significant increases in traffic on the A247.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/786  Respondent: 8609217 / West Clandon Parish Council (John Stone)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The Plan states: “4.3.16 National planning policy requires that Green Belt boundaries are only amended in exceptional circumstances and that this must be undertaken as part of the Local Plan process. We consider that exceptional circumstances exist to justify the amendment of Green Belt boundaries in order to facilitate the development that is needed and promote sustainable patterns of development.”

1) In the introduction to the Policy statement, numerous sites are taken out of the green belt including Gosden Hill, Blackwell Farm, Garlick’s Arch, Burnt Common, the prison and a number of villages. The Plan fails to detail the exceptional circumstances that have been identified for each site that is to be taken from the green belt.

2) It appears therefore that the Plan is based on an assumption that because the housing number cannot be accommodated on brownfield or previously developed land in the green belt, it is legitimate to move the boundaries. A blanket change to green belt boundaries is being made to facilitate development. That is not in accord with the NPPF or ministerial statements.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp17q/104  Respondent: 8609217 / West Clandon Parish Council (John Stone)  Agent:


Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (No)

The Local Plan is not sound.

The NPPF states para 155: “Early and meaningful engagement and collaboration with neighbourhoods, local organisations and businesses is essential. A wide section of the community should be proactively engaged, so that Local Plans, as far as possible, reflect a collective vision and a set of agreed priorities for the sustainable development of the area, including those contained in any neighbourhood plans that have been made.”

1) The Plan does not consider the implications of Surrey County Council’s business plan for Newlands Corner to attract 100,000 more visitors a year. A significant proportion of these can be expected to use the A247.
2) The Plan does not consider the Waverly B. C. approval for the development of 1,800 homes at Dunsfold which has the potential to feed traffic trying to avoid Guildford, onto the A247 to access the A3.

3) The changes in this latest version of the Guildford Local Plan show little or no willingness on the part of Guildford Borough Council to reflect a collective vision. Despite the many thousands of responses to previous versions of the Plan which overwhelmingly rejected building on Green Belt land this latest version has as much, if not more, building on the Green Belt and will bring increasing traffic congestion, pressure on other infrastructure, noise and pollution and a reduction in the quality of life of our residents.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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<th>Comment ID:</th>
<th>PSLPS16/4243</th>
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**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ()**

The should be removed from the plan as a possible housing site and the land allocated for possible use in the A3 Tunnel until such time as the viability and route of the Tunnel has been decided.

No mention has been made of a northbound route onto the A3. This would mean all traffic would go through the already congested roads of Burpham.

Very little information has been provided about the Sustainable Movement Corridor [SMC 6]. The little information provided would suggest a Dual carriageway is proposed, wherever possible, through the heart of Burpham. This is dangerous and inappropriate and would prejudice the existing residents of Burpham for the possible benefit of residents of Gosden Hill.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

<table>
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<th>Comment ID:</th>
<th>PSLPP16/9095</th>
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**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ()**
To make new developments better places to live in all residents should be provided with appropriate levels of off street/on curtilage parking areas/garages.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9089  Respondent: 8609377 / Mr Andy White  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

This should be renamed Employment or “Sustainable Employment” defined.

As the majority of the large scale employment is office based and not dependant upon being in Guildford the biggest threat to continuing employment is poor transport provision. If the owners of businesses no longer enjoy being in Guildford they can simply move their operation to a location that has appropriate transport infrastructure and move their jobs with them. The Plan is unsound as it does not address the existing infrastructure problems or provide infrastructure to deal with economic growth.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9090  Respondent: 8609377 / Mr Andy White  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Supported.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9091  Respondent: 8609377 / Mr Andy White  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E4
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

This should be amended to only Class B1B to maintain the special status of the Research Park. An article 4 Directive should also be considered.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Supported

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E6</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

No location for a hotel has been identified to support this policy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

| Comment ID: PSLPP16/9094 | Respondent: 8609377 / Mr Andy White | Agent: |
### Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E7

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

The policy is unsound as it does not take into account the change of shopping habits to on-line. Less land should be allocated to retail and more to housing.

The Town Centre Masterplan should be included within the Plan.

The Strategic Highway and Assessment Report (SHAR) has been produced late, has not been consulted upon and is unfinished. Information about traffic congestion – how much will occur and where – has not been given in time to inform Plan proposals or responses. It states the proposal to build 1000+ homes on Slyfield would not generate any additional traffic; omissions like this undermine the Plan and render it and the Plan unsound.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

Student housing, before and after study, has not been dealt with appropriately. A target of 100% of students on campus should be the target. University of Surrey has existing planning permission to build more accommodation but has not implemented it.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

<table>
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<th>Comment ID: PSLPP16/9086</th>
<th>Respondent: 8609377 / Mr Andy White</th>
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<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy H2</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()
Should be amended to read: Developers MUST provide affordable homes.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9096  Respondent: 8609377 / Mr Andy White  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The wording should be amended to read “Infrastructure needed to support development MUST be provided ….”

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9097  Respondent: 8609377 / Mr Andy White  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Highways England have stated that improvements to part of the A3 in Guildford will not start until 2020. Developments should be timed accordingly.

The policy states 3 unnamed improvements will be delivered by 2033. Significant housing will have been in place for many many years before this if the plan succeeds. This is clearly unsound bearing in mind the existing acknowledged substantial infrastructure shortfall that already exists.

As the large sites are all in Green Belt they will require substantial infrastructure to make them deliverable. This means new infrastructure will not help to resolve existing problems.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9098  Respondent: 8609377 / Mr Andy White  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID4
Making the other part of Riverside Nature Reserve a SANG will not provide any new land to recreation for the 28,000+ new residents.

Guildford is in desperate need of a local plan but this is unsound and will not deliver:

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/9087  **Respondent:** 8609377 / Mr Andy White  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Land removed as Green Belt in 2003 has not yet been utilised and yet more land has been allocated. The “Traffic Light” methodology is floored and many inaccuracies remain despite comments in previous consultations.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/9088  **Respondent:** 8609377 / Mr Andy White  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P5

**Supported**

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
This is very selective in its interpretation of the definition provided with the NPPF and is unsound.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

The housing figure produced by the SMHA is unsound as no constraints have been introduced by GBC unlike Woking and Waverley. There is no rational why the duty to cooperate has not extended to the east and west of the Borough. There is no explanation as to how the numbers of houses will be delivered when for the last 15 years GBC has been unable to deliver half of this figure. A revised SMHA should be undertaken in the light if Brexit.

The SHMA produced by the GRA is more deliverable and deals with other factors more appropriately.

The Plan is unsound as the plan does no deliver the infrastructure needed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I am also extremely concerned about site Allocation 46 (Land to the south of Normandy and north of Flexford).

First of all, removing villages from the greenbelt is not a sustainable model for house building because the purpose of the greenbelt is to prevent this urban sprawl which you are proposing. You appear to be changing the rules to suit.

I am sure that you have compiled the local plan on projections for housing requirements based on past trends and data, however, something major has since happened in this country and we will shortly be leaving the EU and as such the uncontrolled movement of people from within the EU will no longer apply to our country. Therefore, any data or modelling you previously carried out cannot be used to project future trends so I think the validity of the local plan is in doubt.

On a practical point, the infrastructure in this area is just not sufficient to cope with such a development. I do not see how any of the roads in Flexford could be improved to cope with such a vast number of additional vehicles; life would just be a misery for current residents and the potential new residents.

I am not aware of any provision for a doctor’s surgery and it is already very difficult to get an appointment at the Fairlands or Glaziers Lane surgery and the last thing we need is extra pressure on an already stretched service.

Overall I am just extremely disappointed with this approach and I feel that no thought has been put into it.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/6854  Respondent: 8609473 / Darren Williams  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A46

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Site A46 Land to South of Normandy and North of Flexford: Mixed used Development 1100

I strongly object to the inclusion of this site within the plan for these reasons:

In my opinion the classification of the two roads that border site A46, Westward Lane and Glaziers Lane, are ill equipped to service a development of this size and the additional traffic. Westwood Lane reduces to a single lane carriageway underneath the railway bridge and Glaziers Lane, a lower classification road than the former is narrower with residential garden boundaries bordering the carriageway. It would seem that the plan hasn't considered a viable transport strategy to implement a development of this scale. As a resident who commutes daily to Walton-on-Thames, I am aware of the already significant traffic congestion within the village at peak times. These two roads are currently roads used to capacity as alternative routes to/from the A3 and as rat runs to/from the Hogs Back, especially when there is a travel incident in Guildford or on the A3 (which is frequent!).

If the development is considered based on the village being served by a railway station, then this service would be immediately be over-stretched. To double the size of the village would be to potentially double the amount of people using the transport links. Wanborough is a small station with a short platform. The railway station car park has only 8 spaces and there is no scope to provide more. It is surrounded by houses and a roofing business thus not making it conducive to
expansion without further investment of developing the field North of the line. The current car park floods terribly whenever it rains and you need wellington boots to access the platforms. This coupled with the lack of parking spaces already forces commuters to park in Culls Road and The Paddocks, so where would additional users of the station park?

Normandy already suffers with low water pressure, how will the usage of another 1100 homes help this?

There is already a significant burden on our Doctors Surgery in Glaziers Lane. You can't currently obtain a bookable appointment for much less than 4 weeks in advance, therefore you are often forced to request an emergency appointment as your healthcare needs become more urgent in this time-frame. I do not see how an increase to the size of the village can improve this situation. Has there been any provision for further healthcare needs of the proposed additional community?

Historically, the land is agricultural. The Greenbelt is for everyone's benefit. There are Grade 2 listed properties backing onto this site and surely this is part of our heritage that we should be working to preserve. Guildford Borough Council is keen to showcase its history, however, this should not be exclusively retained in a museum or in the town centre. We should be proud to see it in our villages and secure its place in our future.

The light pollution of the proposed development would affect the view from the Surrey Hills and have a lasting effect on the ecology of Normandy - less than 5kms from the Thames Heath Basin's Special Protection Area, with many wildlife species that use it, as listed above.

The current plan treats Normandy and Flexford as two separate settlements for the purposes of the greenbelt, however, they are one and the same and gives false suggestion; for which I can only presume is beneficial to planning. I cannot see a logical reason for including this development in the draft plan, only for it to serve the council. Dealing with one developer on a scale such as this would ultimately incur less resource than managing many smaller ones. Is Normandy now to suffer for Guildford Borough Council's shortcomings for not providing adequate housing previously?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/3820  Respondent: 8609473 / Darren Williams  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I am writing to object to the proposed development in Normandy (Site Allocation 46 and Site 47) which is part of the draft GBC Local Plan.

My immediate concern is site Allocation 47 (Land to east of The Paddocks, Flexford).

I have only recently purchased my property and the main reason for purchasing this property was the open fields to which my property looks out on to.

Currently I am not overlooked, I hear hardly any noise (except the railway) and I enjoy the wildlife which the fields bring to the village. If you subject me to look out on to housing (social or otherwise) then this will significantly lower my quality of life. I will not be able to use my garden in the way which I currently do. I have very little fencing or any means of privacy between my property and the adjacent fields.
I moved from an area which was overcrowded and I purposefully sought a location which was semi-rural knowing it was within the greenbelt.

In addition I do believe that this area is a flood risk with significant surface water present throughout the early part of 2013. There is a ditch which runs directly adjacent to my property which was also full of water during this period. I cannot see that building further houses will improve this situation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/6853  Respondent: 8609473 / Darren Williams  Agent:  

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A47

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Site A47 Land East of The Paddocks: Homes C3 Quantity 50

This site is on the direct boundary of my home and I strongly object to the inclusion of this site within the plan for these reason:

From first hand experience I see how easily this site floods. The fields are at saturation levels at all times, even during periods of dry weather. The ditches bordering the fields overflow during the winter and flood water creeps over fields creating large areas of still water; substantial enough for birds and wildlife to sustain new habitats in and the ponies that reside there in dryer months have to be moved to other paddocks. I believe the ground saturation levels would not be suitable for development. If built on where would the water drain to? Our garden floods in the wet weather already.

Amongst the various wildlife I’ve seen, is a pair of Egrets, which are rarely sighted away from Poole and Chichester Harbours. Bats roost nearby as every evening at dusk we see them fly from the direction of the field around our bungalow and back across the field. They continue this lap many times and my understanding is that they are protected by the Wildlife and Countryside Act (1981), which states it is an offence to intentionally disturb a roost. We also see Hedgehogs, Badgers, Common Toads, Barn Owls and Fieldfares. I am aware that both the Barn Owl and Fieldfare are protected by same legislation the Bat, however the Fieldfare is a migratory bird which arrives in its flocks to this site every Autumn is currently on the RSPB’s Red status list, as well. Any development to this site would not only disturb the fragile ecological status but would irrevocably destroy the fragile habitat of these species in our area.

There are also many mature Oak trees on site A47, one of which is a particular veteran and stands almost central to the site. Flexford borders the site of the Ancient Springs at Wanborough and the Area of Outstanding Natural Beauty on the Surrey Hills. It is less than 5kms away from the Thames Heath Basin’s Special Protection Area at Ash Ranges. The greenbelt is there to prevent the urban sprawl. Being located 3 miles out of Guildford it is vital to retain the boundary for social and ecological purposes. Previously this was ‘protected greenbelt’, so why has the status changed?

Furthermore, my husband and I chose to buy our home adjacent to this site over any other property we viewed purely because of its location and outlook from the kitchen and garden, not because of size or style or because it was up to a certain stand of living. We moved there 3 years ago and have sacrificed and purchase it. We have invested time and money to have a new boiler and central heating, new electrics and plumbing. The property isn’t large but it will take us many years to complete the renovations whilst there is general maintenance work to pay-out for. We are not seeking to
extend. We consider this to be our forever home and would be devastated if we were to be surrounded on all sides by dwellings and our outlook was to change. It would destroy our sanctuary.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp173/477  Respondent: 8609473 / Darren Williams  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Appendix H: Maps - Normandy and Flexford

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Owing to the inability of the infrastructure to cope with such large developments I wish to SUPPORT the removal of Site A46 and A47 from the GBC Local Plan. The roads, wastewater, sewerage flooding, electricity supply and healthcare could not have coped. These sites were also on greenbelt land.

I wish to OBJECT to the removal from the greenbelt the:

- Homes in Guildford Road,
- Land at the Northern end of Glaziers Lane,
- Land in Flexford
- Walden Cottages
- Palm House Nurseries Travelers Site

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/4833  Respondent: 8609473 / Darren Williams  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPA16/299  **Respondent:** 8620417 / Karen Lawson  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Normandy and Flexford

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )

I am writing to OBJECT against the planning for development in Normandy and in particular to site A46 which proposes a development of 1100 and a secondary school. I highlight my reasons below.

Firstly this area is recognised as highly sensitive Greenbelt. In the meeting held in Feb 2016 Mr Spooner, head of GBC even advised that Normandy would not be built on unless there was a case for exceptional circumstances. He did not mention any school until asked directly by a member of the public, at which stage he said that the building of a school would indeed TRUMP the Greenbelt. I believe that Mr Spooner was already fully aware of a developers proposal, Taylor Wimpey, which included the building of a 7 form entry secondary school.

As my horses live on a parcel of land I have been fully aware of the developers comings and goings so since 2014 and the offers made to landowners in the form of 'options'.

Originally the parcel of land A46 was highlighted to be put into the new local plan as 'safe guarded' but seeing as this plan has never been approved, this land cannot therefore be classified as safeguarded and has in fact gone straight into the latest plan, as a bit of a late entry. I think that the developers have seen this as an easy opportunity to grab a large portion of land and little or NO thought has been given to this properly by the council. The land is mostly owned by 4 parties, 2 of which do not live locally and the other 2 embroiled in a bitter divorce - of course all parties would be keen to sell. Taylor Wimpey and another developer Kitewood have been aggressive with the offers of options and all by about 7 acres have options on them.

We have been advised by Mr Spooner that following the executive meeting in early June 2016, if there is no school on parcel A46 then there will be no building.

I firmly OBJECT to the building of the school for the following reasons:-

1. There is no need for a secondary school. With local schools, namely Ash Manor, Kings college, Christ college all underscribed and also offering space for development on their own sites, should need arise, there is NO need for an additional school here. New schools is Hoebridge offer further capacity and a further institution at Guildford Technical college taking children of 14 upwards offers even more places.

The likelihood of starter homes and affordable housing producing such a volume of secondary school children is totally unrealistic and in a poll of 300 people held on 22/6/16 only 4 people had a child of secondary age.

I would also like to highlight that if a school should be built, would it include a sixth form? It is very difficult to get to any
sixth form from Normandy but at the same time, for sixth form students, the location of Normandy is unappealing as during their free periods mid day - and they get a lot of these, there is nowhere for them to socialise/shop etc. My 3 children have travelled further afield to attend sixth forms that offer a social side as well as academic. They have all coped well with this and broadened friendship circles.

Next the transport to and from site A46 between the C16 and the D60 road ... Both LANES. Westwood Lane and Glaziers Lane. Both dangerous roads, with one pavement on one side and both having dangerous bridges. In this year alone there have been 5 accidents involving bicycles, 2 serious and one fatality on the A323 involving a motorbike. Children as young as 16, year 11, can ride a moped and these roads are far too dangerous for these vehicles. There is no significant budget made for improving Westwood Lane or Glaziers Lane, the minimal £3m that Taylor Wimpey has projected for road infrastructure won't even adjust the railway bridge in Westwood lane which is tricky at the best of times. The bridge in Westwood Lane is single traffic only, with a blind spot leading out of Beech lane and cannot take a double decker bus .... Not that we really have a bus service anyway!

Next the railway .... A teeny weeny unmanned station with no way of purchasing a weekly child subsidised ticket. I know this for fact as I have this problem every week for my youngest daughter journey to Farnborough sixth form. The station mainly serves great western trains and SW trains. You cannot preorder students tickets at Ash either because you have to buy them after 12pm for next day and the ticket office closes at 12! If there is any increase in train services then there is no chance of ever getting through Ash as the level crossing barriers, which are currently down more often than they are up, will be permanently shut. This level crossing, although a bridge is proposed for 2024, this needs addressing before any building anywhere is undertaken.

If the children are expected to travel from the proposed developers at Blackwell farm you may also wish to address the Christmas pie trail, it frequently floods and is dark and woody, not safe for children to walk or cycle on their own. I would never let my children use this path as parts of it are very remote.

Next the environment. I KNOW Site A46 well, my horses live on the land. It's is arable farming land, used for cattle and hay. The soil is clay, meaning it is rock hard in the summer and a quagmire in the winter. My horses stand knee deep in mud from October to April. If it rains in the summer, the water cannot run off fast enough and it DOES experience flooding. I have offered Mr Spooner to spend a day on the roads and the farm to witness it himself, sadly he is too busy. It is crucial to keep the ditches within this area clear to prevent flooding further down in the village towards the Guildford road and it was due to flooding in summer 2007 that the foot and mouth spread, the prime site of foot and mouth was indeed behind Peakmead farm with the cattle based on the footpath that runs right through the middle.

My house has also been flooded in 2006 when a flash flood caused the water runs of course to burst and us and a number of houses on the A323 Guildford road lost the contents of the whole if the downstairs. This brings me on to parcel of land directly behind our house, it had been rejected as a cemetery due to the flooding issues but still showing as residential in the plan, I OBJECT to this being included too ..... Unless you wish to build the houses on stilts!

How can anyone dispute that there isn't wildfire in these beautiful fields. It is a haven for hedgehogs, badgers, rabbits, skylarks and swallows, buzzards, frogs and newts and the secretive dormice. Taylor Wimpey are running a dormice survey but unfortunately have set the traps at such an angle that the dormice would need climbing harnesses to get in and stay in the traps. It has a number of ancient oak trees and is truly beautiful. These picture were taken in a sunny day in May, however in the winter, other than the footpath, the whole area is a marsh. In an seriously concerned that the concreting over of this area will lead to massive flooding in Normandy as the water will have nowhere to soak away. Wanborough station already floods after even a few showers.

Sewage is another issue, Normandy already suffers from inadequate sewer removed facilities and it is know that Pirbright is already concerned at how they will cope should the new development go ahead as our sewerage travel and is processed by them. In 2014 a main sewer pipe collapsed in Glaziers lane causing the road to shut on and off for several weeks. On a wet day, we can smell drains in our house and in Glaziers lane sewerage frequently backs up and leaks. Internet has recently been addressed but we are still poor compared to other villages and it is a lottery as to how close you are to a magic green broadband box as to how got your service will be. Normandy is also a black spot for mobile service. We have very limited reception in our house.

So here are a number of reasons for my strong OBJECTION, not to mention that we live in a democratic society and this is our village, and as the residents we should be listened to. In. The recent meeting on 22 June 2016, not a single person out of the 300 attendees wanted your plan in Normandy. Do we not deserve to be listened to?
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents: Picture attachment for Karen Lawson.docx (2.8 MB)

Comment ID: pslp173/533  Respondent: 8620417 / Karen Lawson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Appendix H: Maps - Normandy and Flexford

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Removal of sites Policies 46/47

I am greatly relieved that common sense has prevailed – not to double the size of Normandy and Flexford by building 1,100 houses and a school in our precious Green Belt: it’s the wrong place, fed by country lanes, with dangerous railway bridges, is a floodplain and also… Green Belt!

So I support this changes to the plan.

Change to the Green Belt coverage of Normandy and Flexford

I am not clear why GBC have ignored the policy of the Green Belt and seem keen to try to find ‘exceptional circumstances’ where it can to build its unsubstantiated housing target.

I object to the change in the plan to remove the Green Belt coverage in settlements in Normandy, Flexford and Walden Cottages marked on the maps in Appendix H. There is no evidence to prove why these random areas have been selected as all contribute, as do the settlement areas not selected, to the openness of the Green Belt and no ‘exceptional circumstances’ have been proved. This openness has in fact been stated by the planning inspectorate in previous planning appeals. The area around these selected settlements do also contribute to the rural economy. They also are close enough to the Surrey Hills ANOB given the geography of the land allowing views that fulfil the Green Belt obligations. The area has already been identified as one of ‘high sensitivity’ yet that doesn’t seem to count when this insetting has been proposed. If this was allowed to happen then there will be pressure in the future to join up the resultant ‘urban islands’ into a wider urban area.

The Green Belt was created to prevent urban sprawl and should be permanently protected.

I also object to the statement under Green Belt Policy P2 (4.3.13) that claims Normandy and Flexford (and many other villages) are now inset from the Green Belt. Its in the Plan to do that very thing - so cannot be right. I also object to any of these villages being changed to be inset from the Green Belt.

Infrastructure improvements

With all the current development and proposed around the area – especially in the sacrificial lamb Ash – the pressure on roads, Doctors etc will only get worse.
It is vital that the infrastructure is agreed and implemented before any large scale development takes place.

The most key are LRN17 Puttenham Hill/A31, LRN24 A323/324 Junction and LNR21 Ash Railway Station flyover and I support the plans - although the ‘likely cost and funding source’ don’t appear to be very robust.

**Traveller Sites in Normandy and Flexford**

Like the settlement areas in Normandy, Flexford and Walden Cottages, the sites at Palm House Nurseries (Policy 49) and Whittles Drive (Policy A50) are proposed to be inset.

I object to this as it will remove the development restrictions in an area sensitive to residents in the village of Normandy and Flexford and no evidence has been provided for ‘exceptional circumstances’. I can forsee that it will result in even less respect for the planning law.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** SQLP16/527  **Respondent:** 8626721 / Peter Malovany  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 7: Any other comments?

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** (Yes)

**Paragraph 4.3.13 and Inset Plan for West Horsley (south)**

The Insetting of the villages as set out in Paragraph 4.3.13 and as identified on the Inset Plan for West Horsley is fully supported for the following reasons:

1. Guidance in the NPPF (paragraph 86) makes it clear that villages should only be included within the Green Belt in circumstances where the open character of the village makes a contribution to the openness of the Green Belt. Since there are many villages within the Borough where this does not apply, it is right and proper that as part of the evidence base for the Local Plan, each of the villages should be appraised for the contribution that they make to maintaining the objectives of Green Belt. Accordingly, the Green Belt and Countryside Study relating to the insetting of villages is supported in general terms.

2. More specifically, the assessment and conclusions of the Green Belt and Countryside Study in respect of West Horsley (South) are supported. This concluded that the village should be inset with the Green Belt. As noted in the study, the majority of the village is considered to exhibit an enclosed character due to tree cover and topography surrounding the village; areas of open land within the wider Green Belt are not frequently visible within or beyond the perceived village area and it is generally contained by a number of recognisable and defensible boundaries that would permit the provision of new Green Belt boundaries, as shown on the Stage 2 Map. This analysis is correct and, as such, the conclusion that the village should inset into the Green Belt is supported.

3. Guidance in the NPPF (paragraph 85) deals with defining boundaries and advises local planning authorities that they should be clear, using physical features that are readily recognisable and likely to be permanent. The preparation of the Local Plan provides an opportunity for the existing defined boundary of the settlement to be reviewed. It is considered that this is necessary due to existing inconsistencies in the way that the 2003 Settlement Boundary is drawn and the need for the new defined settlement boundary to accord with the proposed new status of the village as being Inset within the Green Belt.
4. For the above reasons, the identification of a defined boundary for specified villages in which appropriate development or redevelopment will be allowed is fully supported. In particular, the inclusion of West Horsley (South) as one of these settlements is supported. For the same reasons, the Horsley Plan showing the proposed Settlement Boundary is also supported.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
<table>
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<tr>
<th>Comment ID: PSLPP16/12579</th>
<th>Respondent: 8627009 / East Clandon Parish Council (Sibylla Tindale)</th>
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<tr>
<td>I object to the fact that infrastructure has not been properly assessed and is inadequate to deal with current housing levels – roads, doctors, schools will not be able to cope.</td>
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<td><strong>Answer (if comment is on questions 1-7 of the questionnaire): ()</strong></td>
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<td>I object that housing being proposed on the Green Belt will increase traffic bringing increased danger and pollution and slower journey times on our already overcrowded village roads.</td>
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<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy P2</td>
<td><strong>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</strong></td>
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<td><strong>Answer (if comment is on questions 1-7 of the questionnaire): ()</strong></td>
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<td>I object to the Settlement Boundary which has been imposed on East Clandon without any consultation. This imposition provides no protection to further development outside of the settlement boundary (Policy P2 para 4.3.25) and is deemed by me as being unnecessary in an already tightly developed ancient and rural conservation village with high archaeological merit. I demand that this proposal be removed as it will endanger the openness of the Green Belt, the views in and out of the AONB (protection of the AONB Policy P1) and the character of our village.</td>
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Policy P2 – Green Belt: I object to this significant erosion of the Green Belt with the proposals for large towns being developed on Green Belt land thereby removing the openness of the Green Belt. I note in particular the huge developments proposed for the North East quadrant of the borough which will adversely affect our amenity, but also unfairly targets our tranquil rural villages because we can provide ‘dormitory’ facilities for commuters to London. The developments directly affecting our villages are the proposals for Wisley Airfield, Gosden Hill Farm, various farms and tracts in the Horsleys and Garlicks Arch at Send.

Further, on the erosion of Green Belt and I object that Policy P2 is not met where it states that Green Belt should be protected. I object to the disproportionate use of Green Belt land for housing – some 65% of the housing proposed is on Green Belt and with little consideration being given to redevelopment of brown field sites.

I object to building on the Green Belt because the essential characteristic of Green Belt is its openness and permanence (National Planning Policy Framework paragraph 79).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12580  Respondent: 8627009 / East Clandon Parish Council (Sibylla Tindale)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object that GBC are contravening the NPPF framework stipulation in paragraph 87 with the proposed developments at Gosden Hill Farm, Ripley, East and West Horsley and Garlicks Arch, Send. Paragraph 87 states “As with previous Green Belt policy, inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances.” and GBC have not proven any special circumstance for developing on these Green Belt areas.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12576  Respondent: 8627009 / East Clandon Parish Council (Sibylla Tindale)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to Policy S1 not offering sustainable development as regards roads and rail infrastructure which currently does not cope with demand, congestion on the A3 in particular, but also other A roads in the area such as the A247, the A246 and then there is the already overcrowded and slow train system for those currently living in the borough and needing to commute to London. No pre-emptive planning has been made to alleviate these real problems which will be much exacerbated by any large increases in housing.

I specifically want you to note the winding, narrow and dangerous route via the A247 through West Clandon which then drives people to use a short-cut the even narrower rural road, the Ripley Road, through East Clandon to and from the A3. This will be much exacerbated with the large increase in housing twinned with large increase in cars and travel.

Continuing with Policy S1 (Presumption in favour of Sustainable Development) I object that this is not being met and that GBC are contravening this when it is clear that no fixed plans are available to improve the provision of shops, medical facilities, schools in our immediate area (besides roads and rail already mentioned) to service us. If the GBC were serious about improving the infrastructure and sustainability of our communities, they would have secured plans and funding to ensure these facilities are available and not just at the behest and hoped-for goodwill from the developers. Further, how will developers be held accountable to their promises to build infrastructure? Stories are legion of developers reneging on commitments as the ‘money runs out’ even though vast profits will be made from turning agricultural and Green Belt land into highly valuable housing land.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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I have lived in East Clandon for 13 years. As such, I have a strong view about the proposed Local Plan.

I object to the 2016 Draft Local Plan as a whole and in particular I object to the specific issues (listed below). I believe that this deeply flawed Local Plan will have a direct and detrimental effect on the amenity currently enjoyed by my family and other residents of East Clandon and to the even greater detriment to our neighbouring villages of West Clandon, Ripley, West and East Horsley. It erodes the openness of the Green Belt and endangers the beauty and views in and out of the Surrey Hills AONB.

I object to Policy S2 for the proposed provision of the very high overall housing numbers of 13,800 new homes (690 new dwellings being built every year for 20 years) and I object on two grounds; these housing numbers have been imposed on the borough with no real consultation being undertaken with the residents of East Clandon and the borough as a whole. Secondly, the housing numbers are based on a high-growth economic development plan which in itself has had no consultation with us and this combined with estimated demand from London residents will turn Guildford into a dormitory town for London.

Further, I object to the fact that no real economic or housing demand factors have been provided by the borough planners to substantiate the very high housing target of 13,800 new dwellings over the next 20 years. This is in direct contravention of the NPPF’s requirement for the planning authority to provide meaningful consultation.
I object to all other strategic sites in the Local Plan, Blackwell Farm, 3 Farms Meadows, Garlick’s Arch, West Horsley and Hog’s Back. All are out of proportion to the surrounding area and none qualify for the exceptional circumstances required to take them out of the Green Belt.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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### Comment ID: SQLP16/1494  **Respondent:** 8627009 / East Clandon Parish Council (Sibylla Tindale)  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 2: Legal compliance

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

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I object to the fact that GBC have not met the requirements of the NPPF Paragraph 155 which imposes an explicit obligation to have early and meaningful consultation. This has not been met in a number of areas by GBC. We have not had a meaningful consultation on imposing a settlement boundary on East Clandon, on the absence of meaningful economic and population growth figures for Guildford showing various scenarios with high, medium and low growth scenarios being offered.

I note that there were over 20,000 responses objecting to the 2014 draft Plan and therefore I object that the Consultation Process has not been properly followed for this Plan which is not materially different from that plan.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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### Comment ID: PSLPA16/4532  **Respondent:** 8627201 / Shalford Parish Council (Nuala Livesey)  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Shalford (south)

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

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<See attached document>

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:** [SPC_Local_Plan_Comments_July_2016 (2).doc](74 KB)

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### Comment ID: PSLPP16/18631  **Respondent:** 8627201 / Shalford Parish Council (Nuala Livesey)  **Agent:**

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
Answer (if comment is on questions 1-7 of the questionnaire): ()

Section 1: Introduction and Assumptions

1.1 As identified in para 1.8 of the Submission Local Plan (“the Plan”) it is “also based on a collection of research and information documents called the Evidence Base”. Our principal concern with the plan is that the Evidence Base, principally the Land Availability Assessment (“LAA”), the West Surrey Strategic Housing Market Assessment (“SHMA”) and the Green Belt and Countryside Study (“GBCS”) must now be challenged as no longer being appropriate since the Referendum result of 23rd June 2016 which will lead to the United Kingdom leaving the European Union. We have already seen a major fall in the value of the £ sterling, informed reports of 80,000 City of London jobs going to other European financial centres, and the fundamental question that we face is the free movement of labour within the UK and Europe, putting the economic future of the United Kingdom into a period of substantial uncertainty. Against this background the population growth figures in the SHMA, being 21,179 from 2013 to 2033 in para 4.12, resulting in a requirement for 693 new households per annum can only be described as highly questionable.

1.2 In particular in looking at para 4.16 of the SHMA, it states that 51% of the West Surrey population growth in the period is forecast to be natural (births v deaths), and 49% will arise from net migration. In looking further at GBC in para 4.24, Table 17 shows internal net migration as negative at a rate of 812 per annum, whilst international net migration is positive at a rate of 1229 per annum for the period. Thus net international migration exceeds the total forecast population growth in GBC for the period 2013-2033, being 24,580 (1229 x 20 years) compared with forecast overall growth of 21,179. Given the result of the referendum we feel that the GL Hearn SHMA must be re-addressed as it no longer has any credibility and thus the Submission Local Plan is flawed and should be revisited.

1.3 Whilst preparing this response to the Plan we have received two substantive and excellent reports on the SHMA from GBC Cllr Reeve and Mr Niels Laub together with a report (the NMSS report) from Neil McDonald commissioned by Guildford Residents Association. The credentials of Mr McDonald and his experience at DCLG are unquestioned and the NMSS report together with those of Cllr Reeve and Mr Laub clearly demonstrate that the SHMA must be revisited and the Plan be substantially amended before it is submitted to the Inspectorate. The NMSS report concludes that the “Objectively Assessed Need for housing should be taken as 510 homes a year over the period 2013-33, not the 693 homes a year suggested by the SHMA” . It would appear that the authors of the SHMA were unable to interpret the historic data on international migration and student movements, and in particular could not find a definitive answer to the extraordinarily large negative Unattributable Population Change (“UPC”) of 717 pa throughout the period 2001-2011 (see SHMA para 4.32). As GL Hearn state in para 4.32. of the SHMA “it is unknown why this difference has occurred” and that this large UPC would “suggest an overestimation of population growth in the components of change date”.

1.4 Whilst we understand that the task of analysis of the historic data is complex and difficult, we are very concerned that the Plan has been based on what can only be described as guesstimates rather than estimates of population growth. The analyses of Messrs Reeve, Laub and McDonald challenge the conclusions of the SHMA and this excludes the need to re-visit the economic growth and migration aspects resulting from the Brexit vote. We have chosen to emphasise the above point as a preface to our other comments, which seek to address the Plan as it stands and looks at certain details which are relevant to Shalford parish. However we hope that the Borough and the Inspectorate will reflect on the new reality post the Referendum and, frustratingly for all concerned, re-cast the Plan with appropriate new assumptions as the basis of the Evidence Base.

1.5 It is the belief of the Parish Council expressed in the earlier consultation that the method used to identify the quantity of land needed to meet the housing requirement of the borough is questionable, and goes against the guidance of the NPPF. This states that
“Local plans should meet objectively assessed needs with sufficient flexibility to adapt to rapid change unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole; or

specific policies in this Framework indicate development should be restricted.”

The footnote to the NPPF lists specific policies including designated Green Belt, AONB, SSSI and sites liable to flooding or protected by the Birds and Habitats Directive. Guildford BC is proud to promote the fact that 89% of the borough is designated as Green Belt yet on this occasion chooses to disregard this very significant point. The NPPF states that only one of the above criteria needs to be met in order to justify a lower level of housing provision than the assessed need. However we consider that both criteria could be applied to the Local Plan because of the impact on the existing infrastructure and the local environment. The Borough Council is currently proposing over 13,860 dwellings, resulting in a need for 693 dpa over the 20 year period 2013-2033 (or well over 800 dpa if calculated over the 15 year period in which the new plan will be in operation). This figure needs to be reviewed with regard to balancing the housing need against the impact on the Green Belt, the AONB, AGLV and other local protections as well as the ability of the existing infrastructure to cope with such development. The infrastructure proposals which have been published with regard to supporting this level of development across the borough, show that most of the proposed infrastructure work is in the latter stages of the plan period and the funding and execution of these works must be questioned. In our view the improved infrastructure must precede the development rather than follow it.

1.6 The Borough Council is keen to promote the theme of sustainability across its work yet seems to ignore this worthy principle in developing a Local Plan and focuses purely on Market Housing for which there is significant demand, not just from within the borough. Again the government guidance is that market housing numbers should be assessed to ensure that it does not conflict with policies within the NPPF. Looking forward it is clearly an argument that by ignoring the need for sustainability, the future of the very attractive borough that exists today and the quality of life offered to the current population will be lost for generations still to come. The Green Belt is such an attractive place for people to live that the Borough Council could not possibly hope to meet the demand for houses here in any sustainable way. One must also ask whether the Council should attempt to do this, so making homes more inaccessible for people who have lived in the borough for their whole lives. Like many other parts of the borough Shalford Parish Council recognises the problems facing local people looking for a home and would accept that perhaps this would be a justifiable use of Green Belt land. Likewise it acknowledges the suggestion that levels of Affordable Housing should be higher than the national requirement in new development and hopes that this could ease the pressure on Green Belt sites.

1.7 There have been recent examples of neighbouring authorities experiencing problems with their Local Plan submissions to the Inspectorate. As a result GBC’s focus seems to be purely on ensuring that the housing need number is robust enough to satisfy the scrutiny of the Inspector and there is little acknowledgement of the special circumstances of the borough mentioned above that allow for the reduction of this figure. As a result, it is possible that the Inspectorate could view the plan as showing inadequate regard to the Green Belt, AONB, AGLV and other protections of which the borough is rightly proud.

Assessing need

1.8 The proposed growth in population in the Plan as stated in para 2.3 from 137,183 in 2011 to 162,188 in 2033 is 18.2% over 22 years (approx 0.8%p.a.) as compared to growth from 124,900 in 1980 to 137,183 in 2011 which was 9.8% over 31 years (approx 0.32%p.a.). If this rate of growth were to be extrapolated forward it is clear to see that it is unsustainable in the context of the NPPF taking account of the constraints of Green Belt protection, and physical infrastructure limitations of the Borough. Such unrestrained development will affect the quality of life of future generations.

1.9 We fail to understand why 13860 new homes are required in the plan period to meet a population increase of 21,179. The population growth number is from para 4.2 of the SHMA (162,188 less 141,009). At the 2011 census 137,183 people were housed in 56,400 homes at a density of 2.43 per home. At the same population density of 2.43 it would appear that 8716 new homes would be required to house the anticipated growth of 21,179 and this would suggest only 436 new homes per annum. We understand that there is hidden homelessness at the moment but such an increase in housing stock cannot be explained by this factor alone. It appears that there is an over-reliance on the various consultants’ reports and that no-one has used basic arithmetic to check that the conclusion is sound.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Policy A34 Broadford Business Park – 100 homes**

We are concerned about the development of this site for the following reasons;

3.1.1 As compared to the existing traffic volumes from the Business Park users it would seem that 100 homes would create a major increase in traffic movements from Broadford Park with a consequent knock-on effect to the T-junction of that road where it meets the A281 (already noted above for its severe congestion problems – see 2.1 above). It should also be noted that the exit/entrance to the site is very close to a blind bend on the Broadford Road.

3.1.2 As a residential site there is inadequate pedestrian access from the site to the school, railway station, bus stop and shops. There is no safe walking route from Broadford Road along the A281, because there is no pavement on the west side of that road and it is not permitted to construct one on Common land. There are paths over the Common but not of an all-weather nature, although the main path across the Common via Juniper Terrace has been newly relaid. If some of these issues could be resolved we would suggest that the site could possibly support a smaller development of mixed flats and small houses, or even sheltered housing to cater for the elderly and so help to release larger properties for younger families.

3.1.3 The risk of flooding is a concern as parts of the site are identified as Zone 2 and 3 flood zones. We wish to emphasise our concern that any affordable housing provided here should be at no greater risk of flooding than any market property located on the site.

3.1.4 The River Wey is a significant part of the Parish’s “blue infrastructure” and as such would need sensitive development of the site with appropriate screening and due regard for National Trust guidelines. This stretch of water is popular with users of narrow boats and is therefore a valuable tourist attraction for the whole borough. In consequence, it is particularly important that any development of this site does not have an adverse impact on the peace and tranquillity of the water meadows on the opposite bank.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy A56 Valley Park Equestrian centre – 5 homes

Although we know that local residents opposed the application for three temporary pitches (approved in 2012), we have received no representations from them about the current proposal for five permanents pitches on this site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/18632  Respondent: 8627201 / Shalford Parish Council (Nuala Livesey)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We note and support the following policies in the Plan

7.2 Policy H1, Homes for all states that

“New residential development is required to deliver a wide choice of homes to meet a range of accommodation needs…..and…..provide a mix of housing tenures, types and sizes appropriate to the site, size, characteristics and location”

We welcome this statement and hope that this aspect of the policy will reduce the number of new developments for large “executive “ homes which do not meet local need.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/18633  Respondent: 8627201 / Shalford Parish Council (Nuala Livesey)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
We note and support the following policies in the Plan:

7.3 Policy H2 on Affordable Homes and H3 Rural Exception Homes

7.3.1 We strongly support the proposed lower threshold for affordable housing on sites providing 5 or more homes of which at least 40% must be affordable.

7.3.2 As a village parish we are acutely aware of the problem of local families being unable to stay living within the area in which they have grown up. The attractiveness of the whole borough means that the pressure on property availability and price is immense. The Settlement Hierarchy document indicates that Chilworth has a shortage of three-bedroom accommodation, the impact of which is to break-up the local community. Similarly the nature of property in Shalford is such that young people who have grown up in the village are unlikely to be able to afford property in the area when they leave home. We would urge GBC to acknowledge the needs of local people as an integral part of any long-term plan for the borough.

7.3.3 Following our Shalford Housing Needs Survey (September 2012), we have worked with the Affordable Housing Team to identify potential rural exception sites in order to provide affordable housing specifically for those with genuine local connections. This simply emphasised the difficulty in finding areas acceptable for development, but the Parish Council is committed to following this project through to fruition and there may be some parcels of land (possibly owned by GBC), which we will wish to review with the Council.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Council is committed to following this project through to fruition and there may be some parcels of land (possibly owned by GBC), which we will wish to review with the Council.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/18630  Respondent: 8627201 / Shalford Parish Council (Nuala Livesey)  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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Section 2: Infrastructure

2.1 The most frequently expressed concern of residents within the parish is that the current traffic congestion is a major concern which will clearly only be increased by any further development. The A281 is regularly congested from Bramley to Guildford and the roundabout in Shalford where it is joined by the A248 is often congested back into Chilworth and Wonersh from the east and into Peasmarsh along the Broadford Road to the west. The fundamental issues here are:

- the inability of the gyratory system in Guildford to handle the volume of traffic entering and passing through this “gap” town; and
- the potential for bottlenecks created by junctions on major roads to the south of Guildford, such as the roundabouts at Shalford and Bramley and the junction at Rice’s Corner in Chilworth.

Recent and proposed major development in Waverley will only add to the problem with Guildford being a major employer for all these areas as well as a hub for entertainment and communication. We note that the traffic flows on A roads in Surrey already have 64% higher volumes than the UK averages and some roads are already operating beyond their design capacity.

2.2 We note that the Settlement Hierarchy (2014) document assessment of whether both Chilworth and Shalford are “well connected’ grades both villages as ‘poor or neutral’, and this certainly accords with views expressed by residents about the existing rail and local bus services.

2.3 We welcome the Infrastructure Policies within the Plan and in particular under Policy I1 the fact that “where the timely provision of necessary supporting infrastructure is not secured, development may be phased to reflect infrastructure delivery, or will be refused”. We remain concerned that funding from Highways England and SCC may be delayed or reduced and would re-iterate that the Transport Infrastructure is currently not adequate for the borough. We note with concern that there are no proposals to improve the A281 which is the main congested artery through the parish.

2.4 The other most frequently stated concern of residents is that any future development will increase the existing pressure which they already experience on schools, medical services and the utility providers. Whilst there may be availability at certain schools within Guildford Borough or its neighbours, this would result in an increased need to travel, with resulting further traffic congestion during school terms.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
We note and support the following policies in the Plan:

**Policy I4 Green and Blue infrastructure**

7.5.1 We welcome GBC’s recognition of the importance of preserving and enhancing green spaces and stretches of open water, and looks forward to the Green and Blue Infrastructure Supplementary Planning Document (“SPD”).

In that context we would encourage GBC to incorporate within the Local Plan the proposal by parish residents, working with Surrey Wildlife, to develop the Stonebridge site as a Wildlife Refuge.

7.5.2 We welcome the aspect of the Policy with regard to Open Space and note the inclusion of Shalford as having a “shortfall of park and rec (public combined), children’s play space and youth provision” (page 81) in the Guildford Open Space, Sports and Recreation Assessment 2016-2033 prepared by Ethos Environmental Planning in June 2016.

7.5.3 We further note in the Assessment of Sites of Amenity Value produced by Ethos Environmental Planning in May 2016 that, on page 118, the land to the south of the Village Hall was identified as a site of High Amenity Value GIS ETH_088 and that “the site is in an elevated position and offers aesthetic value”. It should be noted that the site could be accessible to the public with a public footpath on the western boundary and the public village hall to the north.

7.5.4 The Policies Map for Shalford (south) on page 364 of the Plan now clearly identifies the site as Open Space which under NPPF paragraph 74 means that it “should not be built on except in specified circumstances”. We welcome this protection if it is determined ultimately that the land falls within the proposed revised settlement boundary for Shalford.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
maintaining the AGLV and Green Belt status of the sites behind Shalford Village Hall and Christmas Hill (see Sections 5 and 6), and by reviewing its proposals to inset the Tillingbourne Valley villages of Chilworth and Shalford (see Section 4).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/18628</th>
<th>Respondent: 8627201 / Shalford Parish Council (Nuala Livesey)</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2</td>
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</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

**Section 5: Settlement Boundaries**

**Shalford Settlement Boundary**

5.1 Fields behind the Village Hall and at Christmas Hill: The insetting proposals include a re-drawn settlement boundary which encloses a piece of land to the south of the Shalford Village Hall, and a further triangular strip to the east behind the houses on Kings Road in Christmas Hill, both of which would in consequence lose their current Green Belt protection. We oppose this proposal for the following reasons:

5.1.1 Both tracts of land are in a relatively elevated position within the village and as such form a very visible part of the open character of the village and its connections to the Green Belt. Any development of this land will significantly diminish the open aspect as viewed from Kings Road, the Common and surrounding areas.

5.1.2 Any development on the land to the south of the Village Hall would be particularly harmful to the Village Hall and its surroundings, which lie directly below the site. The land rises steeply behind the hall, and building on such an elevated site directly adjoining the village tennis courts and bowling green would have a marked impact on this important communal area, in both visual and practical terms. We know that our Tennis Club and Bowls Club, as well as their individual members, have responded to the proposed Plan detailing the practical effects which development of this site would have on their facilities.

5.1.3 The triangle of land behind and to the south of Christmas Hill is also in an elevated position and forms a very visible part of the open character of the village and its connection to the Green Belt. It appears that the re-drawn boundary as proposed has more to do with a neat line on a map rather than any proper evaluation of the land. We see no justification for this particular amendment to the settlement boundary which should not be so amended and this land should remain as Green Belt.

5.1.4 The land in question is all classified as AGLV. The proposed Policy P18 on Surrey Hills AONB, which we very much welcome, states that

"the AGLV will be retained until such time as there has been a review of the AONB boundary. Proposals within the AGLV will be required to demonstrate that they would not result in harm to the AONB or the distinctive character of the AGLV itself"

Given this policy it is clear that the redrawn settlement boundary affecting the land behind the Village Hall and Christmas Hill should not have included any of this open grassland, and that it should have been retained as Green Belt.
5.1.5 It appears that Shalford is the only village in the Borough in which a proposed change of a settlement boundary brings areas of AGLV into an inset village and deprives them of their Green Belt protection.

5.1.6 The existing settlement boundary is defensible with already existing established hedges which have been there for over 50 years. These hedges and fences clearly mark the edge of the current boundary between settlement and open AGLV land. However, it is understood and accepted that the settlement boundary should be amended to embrace the Upper Village Hall, tennis courts and bowling green.

5.1.7 We understand that the Plan has now designated the land to the south of the Village Hall as Open Space as shown on the policies map for Shalford south on page 364 of the Plan. Whilst this is a welcome proposal and appears to give strong protection to the retention of the land as Open Space we are aware that the land is under option to a developer who is contracted to pursue development of this land and is likely to make representation to the Inspectorate regarding the Plan. At this stage we feel that if the current settlement boundary were to be retained, the land in question would still be part of the Green Belt and as such would enjoy greater protection from any risk of long term development. As we, as a Council, are not planning experts we would ask that the Inspectorate give consideration to the strongest form of protection for this land which is of great concern to the parish residents. It is more than worthy of note that the land on which the Village Hall and clubs are now sited was originally given by Mr Edgar Wigan in 1962 “for the use of the inhabitants of Shalford and the neighbourhood…..in particular for the use of meetings, classes and other forms of recreation and leisure time occupation, with the object of improving the conditions of life for the said inhabitants” Further we understand that there is reason to believe that the donor, who also owned the fields behind the village hall, intended them to remain open and undeveloped.

5.2 Common Land in Shalford

5.2 The re-drawn settlement boundary as proposed has incorrectly included Common land within Shalford. In particular the Common land abutting the Horsham Road together with a triangle of land opposite Snooty’s Groceries, and a triangle of land in Chinthurst Lane have been included within the new settlement boundary. The Common land in Chinthurst Lane extends to the south-east towards Wonersh for a considerable distance on both sides of the lane. None of the land should be shown as being within the settlement boundary as to do so implies that it does not enjoy the protection of the Green Belt even though it is still Common land. For the avoidance of doubt for future generations of planners and citizens this error should be corrected.

5.3 Chilworth Settlement Boundary

5.3 There are two proposed changes to the settlement boundary in Chilworth within the parish and we do not support them.

5.3.1 Firstly, there appears to be no justification to include the land adjacent to Old Manor Farm, other than it being perceived as “tidying up” the boundary and has poor access, as it falls to the river Tillingbourne. It is our understanding that this land remains as part of the AGLV.

5.3.2 The other proposed boundary change extends the settlement to include Tillingbourne Junior School and playing fields. We have been advised school playing fields have specific statutory protection under Schedule 14 to the Education Act, but that does not allay our concern. We are aware that many councils have sold playing fields for development over recent decades and, despite statutory protection, are continuing to do so. We consider that it is important that the Tillingbourne School playing fields remain outside the Chilworth settlement boundary and retain their Green Belt protection.

Peasmarsh Settlement Boundary

5.4 We have received no representations from residents on the proposed settlement boundary.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/18629  Respondent: 8627201 / Shalford Parish Council (Nuala Livesey)  Agent:
Section 4: Insetting of Villages- Policy D4

4.1 In response to the Issues and Options document (2013) we raised concern at the process by which the review of current Green Belt boundaries was undertaken. The process described in the Report (Green Belt and Countryside Survey Vol IV Insetting of villages and defining new Green Belt boundaries) involved a number of assessments: ‘assessing the degree of openness’, ‘assessing the location of Green Belt boundaries within the surroundings of each village’ and ‘assessing the suitability of each village for insetting’. We have never found any details of the criteria on which such assessments were based and, despite having been advised by a senior officer within GBC Planning Office that this process is objective, it continues to appear to us to be highly subjective and considerably flawed.

4.2 We note that the objective/subjective assessment process has resulted in 15 of the 24 villages within the borough being recommended for insetting. In consequence of this, certain villages in the Tillingbourne valley, with the exception of Albury, Gomshall and Shere stand to lose their Green Belt protection.

4.3 A key element in determining whether a village should be inset appears to be the perception of whether it is ‘open’ or ‘closed’. We believe that the vast majority of residents and visitors to the villages of the Tillingbourne valley would regard their character as open, as there are extensive visual connections throughout all these villages to the open countryside of the Green Belt.

4.4 In our view it would be highly undesirable to inset any of the Tillingbourne villages. They all lie between the North Downs and the greensand area to the south, and are visually connected to and from the Surrey Hills AONB. They form part of a unique industrial and landscape heritage (detailed in the 2013 application to the Heritage Lottery Fund, led by the Surrey Hills Board). We believe that all the villages in the valley should be regarded as being open and the insetting process needs to be re-evaluated. In our view this is essential if these villages are to preserve their long-term attractiveness and serve to develop the tourism business which GBC wishes to promote.

4.5 Specific issues about insetting villages of Chilworth and Shalford

4.5.1 We note that page 82 of the Report on the Insetting of Villages (Green Belt and Countryside Study Vol IV) states that ‘the settlement of Shalford contains two distinctive areas: one north and one south of the Kings Road and open Common land’. Furthermore ‘it is close to the urban area of Guildford yet has a Common, rivers and streams converging that make it seem like the countryside’. In addition the Report states: ‘Shalford is situated in the Shalford Gravel Terrace landscape’, ‘the villages of Shalford and Chilworth cover much of the area’ and ‘the landscape strategy for Shalford gravel terrace is to conserve the Commons and the pastoral farmland, the historic village centres and the characteristic relationship of the buildings edging the Common’. We note that the proposed insetting of the villages of Shalford and Chilworth is in conflict with this landscape strategy.

4.5.2 With respect to the village of Shalford we note that the part of the village to the north of Christmas Hill up to the railway line and going east to Bradstone Brook which is clearly “low density” has been omitted from the perceived Village Area identified within the Green Belt – this omission increases the percentage of built development to open land with a clear impact on the proposal that Shalford should be determined as a “closed” village. It also seems illogical to totally exclude the Common land which is in the centre of the village between two settlements from the assessment of “the degree of openness” as any observer would have a very clear impression of the village as having a substantial degree of openness.

4.5.3 As detailed above, we feel that the proposed insetting of the village of Shalford is inappropriate because the settlement shows open characteristics and in particular the southern portion of the village has relatively low density. We also question the ‘perceived Village Area within the Green Belt’, which produces a higher density of developed land than would be calculated if this ‘perceived Village Area’ were redrawn to reflect the village correctly and in particular included
the Common land. This matter should be re-addressed by the consultants in conjunction with the local residents who know their village, and we urge GBC to undertake this review as a matter of urgency.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/18636  Respondent: 8627201 / Shalford Parish Council (Nuala Livesey)  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We note and support the following policies in the Plan:

Policy P1 Surrey Hills AONB and Policy P2 Green Belt  We are delighted to see that GBC understands the importance of protecting the Surrey Hills AONB and appreciates “the high quality of AGLV in its own right” together with the presumption against development within the Green Belt. We strongly urge GBC to respect the principles of this policy by maintaining the AGLV and Green Belt status of the sites behind Shalford Village Hall and Christmas Hill (see Sections 5 and 6), and by reviewing its proposals to inset the Tillingbourne Valley villages of Chilworth and Shalford (see Section 4).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/2122  Respondent: 8627201 / Shalford Parish Council (Nuala Livesey)  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Section 6: Land Availability Assessment (“LAA”) 2016

We have reviewed the LAA being one of the major elements of the Evidence Base and we have the following observations relating to Shalford Parish.

6.1 Sites within Villages: We note that 8 sites have been identified within the LAA which would fall within the existing settlement boundaries of the villages of Chilworth and Shalford and could provide 59 new homes. If the inset proposal goes ahead as planned by GBC these sites will no longer be within the Green Belt and any such planning application will be addressed as and when they arise and we will have to rely on the provisos in Policy D4 to resist any applications which we feel to be unacceptable.
6.2 Land proposed to be inset: There is only one such site within the LAA which arises from the proposed re-drawing of settlement boundaries being Site 2286 Land at Old Manor Farm, Chilworth. We have commented on this is para 5.3.1

6.3 We note that site reference 1264 being land to the rear of Greenhill/Burnside has been discounted due to Suitability Concerns and its designation as protected Open Space in the Plan. This is very much welcomed, but in addition we would equally welcome a decision that this land should retain its Green Belt status outside the settlement boundary.

6.4 We note that site reference 2295 Chinthurst Farm, Chinthurst Lane has been discounted as “not sufficient evidence base to demonstrate that it is Previously Developed Land”. This is very much welcomed.

6.5 We also note and welcome the substantial number of “discounted sites” listed on page 544 of the LAA

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: SQLP16/477  Respondent: 8627201 / Shalford Parish Council (Nuala Livesey)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 7: Any other comments?

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Comments attached below

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents: SPC Local Plan Comments July 2016.doc (76 KB)

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Comment ID: pslp173/432  Respondent: 8627201 / Shalford Parish Council (Nuala Livesey)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Appendix C: Infrastructure Schedule

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Appendix C

Infrastructure Schedule. We note the proposed road works, LRN25, being A281 Horsham Road/A248 Kings Road/A248 Broadford Road junction improvement schemes to be delivered between 2021 and 2023 by SCC at a likely cost of £2.5 - £5 million funded by the developer of Dunsfold Park. We have opposed the Dunsfold Park application due to the increased traffic volumes which will result throughout this parish and we would likely be opposed to these improvements if planning permission were to be granted after the Public Inquiry. We are opposed to any loss of Common land and believe that local residents will also be strongly opposed to the losses which would result from these proposed road improvements.
1. We support the views of Artington Parish Council that the B3000 to the east of Compton already operates well above its capacity and is subject to grid lock. This is exacerbated by the narrow humpbacked railway bridge which has barely room for the passing of the heavy goods vehicles which constantly use the B3000 between the A3 and Godalming or Guildford. It is disappointing that the opportunity has not been taken to improve this part of the road when the bridge is replaced in 2018 instead of simply replacing it with ‘like for like’ at the same width. Beyond the railway bridge the B3000 joins the A3100 at an extremely busy roundabout (Guildford Crematorium roundabout) which has frequent tail-backs.

2. The Shalford north map has a redrawn boundary of the Local Shopping Centre and this new boundary excludes 5 existing retail outlets along Kings Road to the east of the reduced new boundary. We believe that this primary shopping area should continue to extend along the Kings Road to the east as far as the Guildford Wine Shop. The reduction in the area will put the sustainability of the village at risk by limiting the Local Shopping Centre.

3. In looking at any new developments we do not see, in Policy D4, that there is any policy on light pollution. This is a general national concern and Guildford Borough Council could take a lead by introducing some constraints on light pollution for all new developments throughout the borough and perhaps look further to a policy on light pollution on existing properties. We have no further comments other than those previously submitted on the earlier version of the Local Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/2044  Respondent: 8627201 / Shalford Parish Council (Nuala Livesey)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Key facts

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Para 2.13. This states that "facilities to assist pedestrians in crossing roads are commonplace". Whilst it is difficult to argue with this statement we feel that they are insufficient and further crossings are certainly required in this parish on the A 248 and the A 281 for the use of both young and elderly residents. We also believe that changes in speed limits through the villages make it difficult for all road users to travel safely.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/1642  Respondent: 8627201 / Shalford Parish Council (Nuala Livesey)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy E1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Policy E1. We note and support the inclusion of Broadford Business Park as a Locally Significant Employment Site and note its removal as a site for housing development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/2043  Respondent: 8627201 / Shalford Parish Council (Nuala Livesey)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

In our response to the July 2016 Submission Local Plan we expressed concern in Section 1 of our response that the OAN, following the Brexit vote, needed to be re-assessed and GBC duly did so. We note the resultant decrease in the OAN but we continue to question whether the revised number is appropriate as the Brexit negotiations for the UK's exit from the EU are still at a very early stage and the impact on UK economic growth and net international immigration is totally uncertain.

We note the phased implementation of the housing units but believe that the OAN should be re-evaluated after the Brexit negotiations are complete and our economic future is a little more predictable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp17q/249  Respondent: 8627201 / Shalford Parish Council (Nuala Livesey)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Question 6: Any other comments?

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. In our response to the July 2016 Submission Local Plan we expressed concern in Section 1 of our response that the OAN, following the Brexit vote, needed to be re-assessed and GBC duly did so. We note the resultant decrease in the OAN but we continue to question whether the revised number is appropriate as the Brexit negotiations for the UK's exit from the EU are still at a very early stage and the impact on UK economic growth and net international immigration is totally uncertain. We note the phased implementation of the housing units but believe that the OAN should be re-evaluated after the Brexit negotiations are complete and our economic future is a little more predictable.

2. Para 2.13. This states that "facilities to assist pedestrians in crossing roads are commonplace". Whilst it is difficult to argue with this statement we feel that they are insufficient and further crossings are certainly required in this parish on the A 248 and the A 281 for the use of both young and elderly residents. We also believe that changes in speed limits through the villages make it difficult for all road users to travel safely.
Wanborough Parish Council has reviewed the proposed revisions to the Local Plan. In general we are supportive of the revisions made, many of which appear to have taken into account the comments and suggestions submitted in respect of previous Local Plan consultations, by local organisations and residents.

In particular we welcome the additional focus on Guildford town centre residential development, the objective of greater containment of student accommodation on Surrey University Campus land (thus reducing pressure on lower cost residential property elsewhere) and a clearer acknowledgement in the Local Plan of the severe existing traffic congestion and road infrastructure and access problems associated with the A3 and A31. Unfortunately however, there appears to be no regional solution or funding in sight to resolve this infrastructure issue.

We believe the A3 / A31 road infrastructure problem is so severe, as evidenced by the daily rush hour traffic jams and local road gridlock in the event of the smallest of accidents on the A3 (or any of its slip roads), that we remain firmly against the proposed Blackwell Farm residential development (Policy A26). For this reason, Wanborough Parish Council is supporting the submission of Compton Parish Council against the development of this specific site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comments on Guildford Borough Transport Strategy

The description of the current transport networks in Guildford is a good one, though it excludes the poor bus network present in Guildford as well as the pedestrian environment.

Whilst the improvements are nice to have, some of them are not in the control of GBC, such as rail and strategic road improvements. There is a need to better explain some of the improvements, such as “local traffic management and environmental schemes” what are these and would these be sufficient to mitigate the expected increase in traffic numbers. These schemes should have been identified in the iterative use of the strategic transport model to identify, maybe not the detail, but the level of magnitude that these schemes would be.

Looking at the indicative programme and costs, some of the costs seem to be an underestimate of the likely cost of the scheme and there is no indication on who would foot the bill. It is not sufficient for the developer’s to foot the bill as these schemes would be added to the cost of development, together with affordable housing etc, and would affect the viability of any development. There is no guarantee that the developers would end up paying for any highway scheme.

In conclusion, this strategy is very aspirational, with no guarantee for delivery.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/2369  Respondent: 8627393 / Worplesdon Parish Council (Gaynor White)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Comments on Strategic Highway Assessment

This work was carried out by Surrey CC on behalf of GBC using their county wide traffic model. This model is widely used in Surrey and therefore I have no comments on the principles and objectives behind the model.

According to the report, Guildford is made up of 68 zones mainly concentrated in the town itself with larger zones representing the outlying areas. For a countryside model this would be sufficient. However, to assess the impacts of the proposed draft Local Plan it would have been expected that the outlying zones are subdivided to better represent the population in the area, eg: Worplesdon is represented by 1 zone however there are 3 large villages (Wood Street, Fairlands and Jacobs Well) each of these having traffic on the road network in the peak periods. This is similar in the other outlying areas.

This being said, the assessment has been along acceptable lines, it would have been expected that the Base 2009 flows be included in this assessment for comparison purposes only. With reference to the 2009 flows in the model, these are some 7 years old and would normally be out of date. It would have been expected that an assessment should have been carried out to ensure that these flows were still relevant. This appears not to have been done. Although, looking at the DfT counts for the A322 and A323, the Annual Average Daily Flow (AADF) appears to have little or no growth from 2000. Sample checks have been made of the DfT traffic survey sites in Guildford and a similar pattern can be found. This would appear to suggest that the level of traffic at AADF level supports the use of 2009.
Information on Waverley development sites and the growth rates from the surrounding Boroughs should have been included. In addition Woking and Mole Valley development should have been identified for inclusion rather than using the general DfT growth rate.

All growth rates sites and trip generation information should have been included in the report. This being said the total vehicles generated appear to be of the right order.

The vehicle trip distribution adopted for this assessment followed an acceptable methodology for this type of strategic assessment. As this is a strategic assessment of a local plan, and little detail is known, only the accesses to the strategic sites should have been included. This would enable a more accurate assessment of the traffic impacts of these sites and hence would better inform the infrastructure assessment. It is an iterative process. Little is known as to whether the proposed mitigations would be sufficient to cater for current, future or future with development flows.

The Level of Service assessment is an acceptable methodology in transport assessments and gives a comparative assessment between the 6 categories.

The conclusion indicates that there would not be a severe impact on the highway network in Guildford for the local plan quantum of development and the major highway improvements (Highways England). This may be true when looking at Guildford as a whole, however there are pockets of severe congestion problems now which would get far worse with development. As stated previously this should have been an iterative process which should have identified areas for further work and assessment.

On a final note, it appears that the draft Local Plan housing numbers need the Highways England improvements.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPA16/2370</th>
<th>Respondent: 8627393 / Worplesdon Parish Council (Gaynor White)</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base</td>
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</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Comments on Topic Paper: Transport

Whilst it is true that the government has committed to long term funding to support delivery of the Highways England Schemes, it is well known that as governments change, funding commitments can change, or there is a review of government spending. Therefore, it would be prudent not to base development plans just on these major schemes. Indeed the strategic transport assessment indicated that without these schemes the impact of the proposed development on the highway network would be far worse than the assessment concluded.

While more sustainable transport is always an acceptable ideal, the infrastructure for this transport has to be provided at an early stage of development and going to places people wish to go. Without this in place people will not be persuaded to get out of their cars and use sustainable transport. An example of this is that currently cyclists have to use the current road network, there is little space on these roads to provide cycle lanes. This implies that the whole picture has to be looked at.

The Reasoned Justification at paragraph 4.6.23 of the Proposed Submission Local Plan now states that:
“The Sustainable Movement Corridor will be implemented in sections during the plan period, largely on existing roads and with the urban extensions at Blackwell Farm, SARP and Gosden Hill Farm, and some sites in the town centre, required to make provision for the corridor.”

This is not acceptable as there is no guarantee that the route will ever be completed. The route should be built through Guildford first and then extended if and once development comes along.

Whilst rail and strategic road schemes are welcomed, these cannot be delivered by GBC and are in the control of other institutions who will have other pressures on the available capital and elsewhere on the network. Therefore while it is acceptable that they are included in the draft Local Plan, these should be caveated that these may or may not be delivered during the plan period and that these should not form the basis of development quantum.

Surrey County Council prepared the Options Growth Scenarios Transport Assessment Report (OGSTAR) (January 2014) for Guildford Borough Council in advance of the Regulation 18 public consultation in 2014. The report identified a number of highway “hotspots” relating to the various scenarios assessed. Whilst the baseline would be useful for the Reg19 consultation, the other scenarios should not be used for this. The Strategic Assessment report looked at the top 30 and this document only looks at the top 10.

The document sets out where the sustainable corridor will be. The extent of the corridor and its purpose is acceptable, though the seven wards should have been named. However, parts of the corridor depend on delivery by developers. This could lead to holes in the corridor as developments come along at different times. This corridor should be delivered as a whole to serve existing residents. With extensions as and when new developments come on stream.

There is nothing in this document about supporting existing bus networks. Having a good public transport network could encourage existing car users out of their cars into buses. A good sustainable network would be required to ensure any expansion to meet the needs of new developments has a good foundation to build on.

The same can be said of cycle and pedestrian networks. If a good base network is not present then it would be difficult to build a sustainable network to meet development needs.

Before any new park and ride site is proposed, an in depth analysis of existing sites will need to be carried out. This, together with the users of car parks in the town centre would lead to a better understanding of whether or not a new site would be viable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
The inset map for Wood Street Village is incorrect as it does not show the common land on Oak Hill.

<See attached map>

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:  Map - Wood Street Village (Inset) 2016.pdf (1.0 MB)

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Comment ID:  PSLPA16/2364  Respondent:  8627393 / Worplesdon Parish Council (Gaynor White)  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Worplesdon

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The following existing employment land within Worplesdon parish should be protected:

- The Pines Industrial Estate, Broad Street
- Oak Hill, Wood Street Village
- Hunts Farm and Frosbury Farm, Gravetts Lane
- 148 Oak Hill, Wood Street Village
- Cheesman Bros, Broad Street
- Sandiacre Nurseries, Frog Grove Lane
- Frog Grove Farm, Frog Grove Lane
- Clasford Farm, Aldershot Road
- Sylvester’s Garage, Aldershot Road
- The Guildford Flooring Co. Aldershot Road
- Russell Place Farm, Frog Grove Lane
- Riverside Business Park, Clay Lane
- Woodlands Farm Nursery & Reclamation, Wood Street Village
- Fairlands Farm

Russell Place Farm – The inclusion of Russell Place Farm as a SANG in the Local Plan on page 296, in our opinion amounts to pre-determination of planning application no: 13/P/01453, which has not yet been decided by the Borough Council despite the application being submitted almost three years ago. A site visit was undertaken on 16 June 2016 after the s19 public consultation period has commenced.

With respect to all Traveller pitches we would expect DCLG Planning Policy for Traveller Sites August 2015 to apply.

The inset map for Wood Street Village is incorrect as it does not show the common land on Oak Hill. See attached map.

Conclusion:  Worplesdon Parish Council believes that the Submission Local Plan: Strategy and Sites is unsound.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:  Map Wood Street Village Inset 2016 (4).pdf (1.0 MB)

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Comment ID:  PSLPS16/4524  Respondent:  8627393 / Worplesdon Parish Council (Gaynor White)  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy A19
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

A19

Land at Westway, off Aldershot Road – 38 homes Support.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/4525  Respondent: 8627393 / Worpsdon Parish Council (Gaynor White)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A21

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

A21  Land as Westborough allotments Support.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/4526  Respondent: 8627393 / Worpsdon Parish Council (Gaynor White)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A22

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
| A22 | Land north of Keens Lane – 140 homes and a care home with approximately 60 beds | OBJECT as there is a current lack of infrastructure, including waste water infrastructure, to support development on this site. The narrow road cannot be widened due to the house called “Timbers” (of local heritage interest). Impact on the Grade II listed building called “Pitch Place House”. Proximity to Whitmoor Common SPA/SSSI. Bats, owls, moths. Worplesdon Parish Council objects to the proposed relocation of the urban boundary at this point. |
| A23 | Land north of Salt Box Road – Allocated as a burial ground | Support subject to full infrastructure improvements being provided to allow safe access for all users. Concern about access both vehicular and pedestrian. Proximity to Britten’s Pond, which forms part of the ordinary watercourse leading to the River Wey from which drinking water is abstracted. The suitability of the site is for the Env. Agency to decide. Worplesdon Parish Council objects to the proposed relocation of the urban boundary at this point as it is not necessary to facilitate a cemetery in accordance with para 89 of the NPPF. |

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** PSLPS16/4527  **Respondent:** 8627393 / Worplesdon Parish Council (Gaynor White)  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A23

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

**Comment ID:** PSLPS16/4529  **Respondent:** 8627393 / Worplesdon Parish Council (Gaynor White)  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A24

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
### A24 SARP – Slyfield Area Regeneration Plan – Mixed use development

Support subject to full infrastructure improvements being provided prior to development to mitigate the impact on users. The Strategic Highway Assessment Report carried out by Surrey County Council, on behalf of GBC concludes that the Woking Road (A320) and Moorfield Road would experience increased traffic congestion and have levels of service indicators which would be at least unstable or where traffic demand exceeds capacity.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPS16/4530</th>
<th>Respondent: 8627393 / Worpsdon Parish Council (Gaynor White)</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A25</td>
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</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

### A25 Gosden Hill Farm, Merrow

Support subject to the appropriate infrastructure prior to development commencing to mitigate the impact on this part of Guildford. Land for the railway station to be secured and brought in at the earliest opportunity for the benefit of the wider community.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPS16/4531</th>
<th>Respondent: 8627393 / Worpsdon Parish Council (Gaynor White)</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
<table>
<thead>
<tr>
<th>A26 Blackwell Farm, Hogs Back – Mixed use 1,800 homes, 6 Traveller pitches, employment, Local Centre, school etc.</th>
<th><strong>OBJECT</strong> the majority of this land should be designated AONB</th>
</tr>
</thead>
<tbody>
<tr>
<td>• Most of Blackwell Farm and the land in its vicinity is of a landscape and scenic quality, character and condition that should merit inclusion within a revised AONB boundary.</td>
<td></td>
</tr>
<tr>
<td>• The landscape is critical to the setting of the Hog’s Back ridge and in the conservation of rural views to the north of equal, if not greater importance, than land to the west of Down Place, which has been included in the boundary proposed by the Surrey Hills AONB Board.</td>
<td></td>
</tr>
<tr>
<td>• Two fields at the very eastern edge of the Blackwell Farm/Manor Farm site did not meet the AONB criteria. However, these were acknowledged to be important in providing the setting to Guildford and an important transitional landscape.</td>
<td></td>
</tr>
<tr>
<td>• The boundary put forward by Surrey Hills AONB Board between Misley Copse and Down Place and between Down Place and the current AONB boundary does not follow any defined landscape features (such as a ridge line, woodland edges, or prominent field boundary) or reflect a decline in landscape and scenic quality or changes in landscape character that might justify exclusion.</td>
<td></td>
</tr>
<tr>
<td>• The proposed AONB boundary should be reviewed at this location and realigned according to the recommendations made by Land Management Services Ltd – As per their report entitled “Hogs Back Natural Beauty Evaluation” dated May 2016, as attached.</td>
<td></td>
</tr>
<tr>
<td>• Failure to realign the boundary according to Land Management Services Ltd.’s recommendations could enable opportunities for development which would result in significant harm to the setting of the existing AONB and the loss of landscape which is of a character and quality which merits inclusion within a revised AONB boundary.</td>
<td></td>
</tr>
</tbody>
</table>

Lack of infrastructure and increased surface water run-off would affect Wood Street Village (particularly Pound Lane/Baird Drive) and Fairlands. The proposed accesses from the A31 and Gill Avenue would be inadequate to support such a development. Indeed access onto the A31 would be in the AONB. In addition there would be an adverse impact on the following Ancient Woodland, Strawberry Grove, Dean Bottom, Manor Copse and a strip of Ancient woodland at Wildfield Copse. The Infrastructure Study para 3.10 states there is insufficient waste water infrastructure for this site.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

**Comment ID:** PSLPS16/4616  **Respondent:** 8627393 / Worpleston Parish Council (Gaynor White)  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ( )**
1. Introduction

Land Management Services Ltd was commissioned by Compton and Worplesdon Parish Councils to undertake a Natural Beauty Evaluation of land to the east of Flexford, in the vicinity of Blackwell Farm, Down Place and Homestead Farm to the north of the Hog’s Back. This evaluation is linked to the ongoing Surrey Hills Area of Outstanding Natural Beauty (AONB) and Surrey County Area of Great Landscape Value (AGLV) boundary review. A report prepared by HDA titled Surrey County Council LCA Phase 2, Surrey Hills AONB Areas of Search, Natural Beauty Evaluation (October 2013) included a natural beauty evaluation of land to the north of the Hog’s Back, as part of the County wide AONB/AGLV boundary review. This review describes Areas of Search extending to the full AGLV boundary with recommended areas for inclusion within a revised AONB boundary based on the findings of the evaluation. The evaluation was undertaken in accordance with ‘Guidance for assessing landscapes for designation as National Park or area of Outstanding Natural Beauty in England (Natural England 2 March 2011).

The HDA report recommends extension of the AONB boundary to the north of the Hog’s Back to include an area described as ‘Area of Wooded Rolling Claylands extending down from the chalk ridge’ (Area 12-1). A copy of the relevant extract from the HDA report including the Natural Beauty Evaluation for Area 12-1 against the Natural England criteria and mapping showing the original Area of Search and recommended area for inclusion within the AONB as part of the boundary review, are included in Appendix 1 to this report.

The 2013 HDA report recommends inclusion of land to the north of the Hog’s Back chalk ridge with a northern boundary broadly defined by West Flexford Lane between the village of Flexford and land on the western edge of Guildford. The conclusions to the evaluation for Area 12-1 state:

‘There is a gently sloping transition northwards from the top of the dip slope, but vegetated roadides, hedged/treed field boundaries and woodland blocks form a relatively robust east-west northern boundary, beyond which urban influence increase(s) in places’

This evaluation prepared by Land Management Services Ltd has been prepared on behalf of Compton and Worplesdon Parish Councils (with additional support from Wanborough) in order to:

• Provide a more detailed Natural Beauty Evaluation of the areas excluded from Area 12-1 in the HDA October 2013 Report
• Assess the degree to which the excluded areas contribute to the natural beauty and setting of the Hog’s Back
• Provide a comparative assessment of the areas within the original Area of Search included and excluded in Area 12-1

This evaluation has been carried out in accordance with the ‘Guidance for assessing landscapes for designation as National Park or Area of Outstanding Natural Beauty in England’ (Natural England, 2 March 2011). Appendix 1 of the Guidance provides an Evaluation Framework for

Natural Beauty Criterion. This describes six criterion or factors with associated sub-factors and example indicators to inform a Natural Beauty Evaluation. The six ‘Factors’ or criteria are:

• Landscape Quality
• Scenic Beauty
• Relative wildness
• Relative tranquillity
• Natural heritage features
• Cultural heritage

The October 2013 HDA evaluation was carried out in accordance with the Natural England methodology and also includes a brief concluding section titled ‘Specific Issues addressed when identifying extent of Area 12-1’.

For ease of comparison the study area evaluation covered by this report is set out to an identical layout to the Study Area sheets within the HDA report (see Appendix 1).

Preparation of this report has involved the following:
• Desk top review of the HDA report, and other earlier landscape assessment reports which have contributed to the boundary review, principally:
  ◦ Review of Landscape Assessments within the AONB (Alison Farmer Associates, March 2012)
  ◦ Surrey Hills AGLV Review (Chris Burnett Associates, 2007)
• Desk top review of County and Borough Landscape Character Assessments:
  ◦ Guildford Landscape Character Assessment and Guidance (Land Use Consultants January 2007)
  ◦ Surrey Landscape Character Assessment – Guildford Borough (HDA April 2015)
• Desk top review of other relevant documentation, principally:
  ◦ Surrey Hills AONB Management Plan 2014-2019
  ◦ Guildford Borough Core Strategy and Local Plan documentation
• Site visit on 28th April 2016

We have also reviewed the Surrey History Centre Historical Maps for the evaluation area, principally the Ordnance Survey 1897 and 1934 editions.

This report is set out as follows:

1. Baseline Landscape Character Assessments
2. Landscape Policy Context
3. The Surrey Hills AONB
4. Evaluation against Natural Beauty Criterion
5. Conclusions and Recommendations

2. Baseline Landscape Character Assessments

Full descriptions and key characteristics for each of the character areas are given in the respective 2007 Guildford and 2015 Surrey LCAs. The Guildford Assessment also includes an Evaluation and overall Landscape Strategy together with Landscape and Built Development Guidance. The recently published Surrey LCA largely adopts the same two principal landscape character areas as described in the Guildford LCA for the land covered by this evaluation. These are:

• Wanborough Wooded Rolling Clayland(s)
• Hog’s Back Chalk Ridge

The Guildford LCA also includes a Rural-Urban Fringe Assessment which describes two sub character areas on the western edge of Guildford:

• Wanborough Wooded Clay Lowlands: Rydeshill-Fairlands Rural-Urban Fringe
• Hog’s Back Rural-Urban Fringe

2.1 Wanborough Wooded Rolling Clayland(s)

The majority of the land covered by this evaluation is located within the Wanborough Wooded Rolling Claylands Character Area. The description of the character area in the Guildford LCA includes this reference to the land in the vicinity of Down Place:

‘There are many mature hedgerow trees and occasional field trees, often oaks, the remnants of former hedgerows and woodlands or of 18th century parkland for instance at ... Down Place to the far south east of the area’

The Guildford LCA also references the twelfth century deer park including the remnant features of ‘Strawberry Grove and hedgerow boundaries representing the former extent of the park’, on the western edge of Guildford. The Surrey LCA references ‘historic landscape patterns’ as a key characteristic.

The Guildford LCA also highlights the importance of ‘Views to the unsettled chalk ridge of the Hog’s Back form a rural backdrop to the area’.

This attribute is also identified in the Surrey LCA
These aspects combined with a ‘peaceful rural character’ are identified as some of the key attributes of the Wanborough Wooded Rolling Claylands Character Area.

The Rydeshill-Fairlands Rural-Urban Fringe assessment (described in the Guildford LCA) identifies the importance of the land on the western edges of Guildford in ‘containing residential sprawl and creating the sense of a quick transition from the town to rural landscape.

The southern-most section of the area covered by this evaluation falls just within the Hog’s Back Chalk Ridge.

2.2 Hog’s Back Chalk Ridge

Both the Guildford and Surrey LCAs identify the drama of the chalk ridge and the panoramic views, north and south as defining characteristics of the Hog’s Back. Both the Surrey and Guildford LCAs identify the significance of views to and from the ridge. The more regular field pattern associated with the chalk downland is identified in both assessments. The Guildford LCA also references the importance of the historic parkland, with remnant parkland trees associated with Down Place, Flexford House and Poyle Park. Both assessments identify the noise and visual impacts associated with the A31 as detracting features.

The Guildford LCA Hog’s Back Rural Urban Fringe assessment references the importance of the land in providing ‘the setting to and views from Guildford’ and the desire to maintain the ‘essentially undeveloped rural character’ of the land. The assessment notes that:

The setting of Guildford and the AONB are both highly sensitive to any small scale incremental change.

3. Landscape Policy Context

Paragraph 115 of the National Planning Policy Framework (NPPF) states:

Great weight should be given to conserving landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty, which have the highest status of protection in relation to landscape and scenic beauty.

This principle is taken forward in planning policy at a local level in the Guildford Local Development Framework and Local Plan. The Guildford Planning documents also reference the relative importance and weight to be attached to land within the AGLV, subject to the AONB boundary review.

4. Surrey Hills AONB

The Surrey Hills AONB is described in the AONB Management Plan as ‘an intriguingly diverse landscape characterised by hills and valleys, traditional mixed farming, a patchwork of chalk grassland and heathland, sunken lanes, picturesque villages and market towns’. The AONB encompasses both the North Downs and Greensand Hills with intervening lowlands and valleys. It is a landscape with a diverse underlying geology and as, a consequence, enormous diversity in the features which define and characterise the AONB. The definition of Natural Beauty as referenced in the AONB Management Plan also recognises the influence of human intervention and management on the beauty of the AONB:

‘Natural Beauty is not just the look of the landscape but includes landform and geology, plants and animals, landscape features and the rich history of human settlement over the centuries’

Areas of Outstanding Natural Beauty: A Guide for AONB Partnership Members, Countryside Agency, 2001 (CA 24) These are important considerations in this Natural Beauty Evaluation, since in assessing whether land within the AGLV merits inclusion within the AONB, this should be evaluated against all landscape typologies or characteristics associated with the whole of the AONB, not just the landscape feature immediately adjoining the land, in this case the chalk ridge of the Hog’s Back.

5. Evaluation against Natural Beauty Criterion

The HDA recommended area for inclusion within the AONB (Area 12-1), as described in the HDA October 2013 report, is shown on the extract from the supporting plan to the report below (Figure 1). The full Area of Search and proposed area for
inclusion within the revised AONB boundary are shown on the drawing included with Appendix 1. Figure 2 (overleaf) shows the current AONB Boundary, Area 12-1 and the five sub character areas identified as part of this evaluation. The remainder of this section includes a Natural Beauty Evaluation of a series sub character areas identified as part of this evaluation, against the Natural England Criteria, together with photographs illustrating the character and condition of the landscape. These are presented in the form of a table consistent with the HDA evaluation. The final section of each table includes an assessment of the key qualities of each sub character area and an assessment of the relationship between the sub character area with the adjoining areas within Area 12-1. This section also assesses the natural and scenic beauty of the landscape in the context of key characteristics associated with the whole of the Surrey Hills AONB and concludes whether each sub character area should have been included as part of Area 12-1. Representative viewpoint locations included in the evaluation are shown on Figure 4 (Appendix 2).

Figure 1: Extracts from HDA Plans showing the Area of Search (left plan) and proposed Area 12-1 for inclusion within the revised AONB (right plan)

Figure 2 LMS Sub Character Areas

<table>
<thead>
<tr>
<th>Location/Sub Character Area</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>Area 1 Land to the east of Flexford</td>
<td>Stronger urban influence on fringes of Flexford. Planted woodlands and field boundaries in variable but mainly good condition. Landscape pattern typical of smaller field pattern around Flexford and Wanborough. Few large woodland blocks. No ancient woodland.</td>
</tr>
</tbody>
</table>

| Scenic Quality                          | Less distinct character than land south of West Flexford Lane which has strong visual and physical relationship with chalk ridge of the Hog’s Back. Lane provides physical and visual separation. Properties influence rural character on the edge of the settlement and along the lane. |

| Relative Wildness                      | Settlement edge and traffic noise. Managed arable landscape. |

| Relative Tranquillity                 | Traffic noise from A31 evident but not intrusive. Other influences associated with settlement edge. |

| Natural Heritage Features            | Relatively indistinct natural landscape pattern or irregular fields bordered by hedges with few strong or defining landscape features. No larger woodland blocks of ancient woodland. |
### Cultural Heritage

No known major cultural heritage associations.

### Relationship with Area 12-1 and Conclusions

This sub character area is visually and physically distinct from Area 12-1. The landscape lacks a strong or defining character and bears little relationship with Area 12-1 and is not significant in views to and from the Hog’s Back.

Agree with the boundary to Area 12-1 as shown. Area does not merit inclusion within the AONB.

---

#### Viewpoint 1:
View east from the village of Flexford showing land within Area 12-1 and land excluded to the north of West Flexford Lane

#### Location/Sub Character Area

Area 2 Land to the east of Pond Hill

#### Landscape Quality

Declining influence of settlement on landscape character. A few isolated properties on west Flexford Lane. Landscape of larger fields with broad views to both the north and south. Landscape character and pattern and land use very similar north and south of the lane. No ancient woodland.

#### Scenic Quality

Large field pattern, but with wide expansive views to the, mainly to the south. Few significant landscape features or defining characteristics.

#### Relative Wildness

Managed arable landscape, but declining influence of settlement edge. Broad views with few visual detractors such as pylons or incongruous built development.

#### Relative Tranquillity

Traffic noise from A31 evident but not intrusive.

#### Natural Heritage Features

Large fields with indistinct field pattern. Woodland fringes to east associated with Wildfield Copse.
<table>
<thead>
<tr>
<th>Cultural Heritage</th>
</tr>
</thead>
<tbody>
<tr>
<td>No known major cultural heritage associations.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Relationship with Area 12-1 and Conclusions</th>
</tr>
</thead>
<tbody>
<tr>
<td>The character, condition and quality of the landscape are very similar south of the lane (within Area 12-1) and north (outside Area 12-1). The landscape north and south of the lane is, however, assessed of being of relatively indistinct landscape character and of relatively low landscape and scenic quality. Land south of the lane is, however, of significantly greater importance in forming the lower areas of the dip slope to the Hog’s Back and is highly visible from the crest of the ridge, and therefore merits inclusion within the AONB, as currently proposed.</td>
</tr>
</tbody>
</table>

| Agree with the boundary to Area 12-1 as shown. Area does not merit inclusion within the AONB. |

| Viewpoint 2: View north of West Flexford Lane (outside Area 12-1) |
| Viewpoint 3: View south of West Flexford Lane towards the Hog’s back showing land within Area 12-1 |

<table>
<thead>
<tr>
<th>Location/Sub Character Area</th>
</tr>
</thead>
<tbody>
<tr>
<td>Area 3 Land to the east of Wildfield Copse and north of Down Place</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Landscape Quality</th>
</tr>
</thead>
<tbody>
<tr>
<td>Distinctive rural parkland character with strong landscape pattern defined by managed hedges with mature oak hedgerow trees together with a number of woodland blocks and copses including areas of ancient woodland (see Viewpoints 4 and 5). In many respects this landscape has a more distinct character and enhanced quality when compared with much of the land to the west included within Area 12-1.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Scenic Quality</th>
</tr>
</thead>
<tbody>
<tr>
<td>Strong sense of place with distinct landscape pattern with many defining elements, in particular the mature parkland trees, woodland blocks and managed hedgerows. Glimpsed views of Down Place and Blackwell Farm add to distinctive local character.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Relative Wildness</th>
</tr>
</thead>
<tbody>
<tr>
<td>Managed arable landscape, but with little or no urbanising influences. Impact of A31 is reduced as road is not visible and noise impacts seem reduced.</td>
</tr>
</tbody>
</table>

| Relative Tranquillity |
Greater sense of tranquillity relative to land to the east and south east due to the declining influence of the A31.

Natural Heritage Features

Strong landscape pattern with origins dating back largely to 18th century parkland associated with Down Place. A number of substantial woodland blocks including smaller areas of Ancient Woodland associated with Wildfield Copse.

Cultural Heritage

Former parkland associated with Down Place.

Relationship with Area 12-1 and Conclusions

The landscape has a distinct parkland character with high landscape and scenic qualities. In many respects the relative wildness and tranquillity are assessed as being greater than adjacent land within Area 12-1. The landscape shares many defining characteristics and attributes associated with lowland estates elsewhere within the Surrey Hills AONB. The boundary to Area 12-1 cuts across this landscape and does not seem to follow any clear landscape features or reflect a defining change in landscape character, quality and scenic quality.

Area does merit inclusion within the AONB on the basis of distinctive landscape character and scenic qualities. It is recommended that the boundary to Area 12-1 be reviewed to follow the southern edge of Wildfield Copse.

Viewpoint 4: View south east from public footpath to the south of Wildfield Copse. The parkland landscape shown in this view currently lies outside Area 12-1.

Viewpoint 5: View north from the southern edge of sub character Area 3. The proposed boundary to area 12-1 runs through the centre of the field.

Location/Sub Character Area

Area 4: Land to the east of Down Place and in the vicinity of Blackwell Farm

Landscape Quality

There is a strong visual and physical relationship between this sub character area and the chalk ridge of the Hog’s Back, which extends to the woodland bordering the railway line. Viewpoint 6 shows the southernmost section of this character which forms the lower sections of the dip slope to the Hog’s Back and the boundary with the AONB. This is a classic downland landscape of comparable landscape quality to the areas to the west which have been included in Area 12-1. The land further north maintains this distinctive character (see Viewpoint 7) and as illustrated in Viewpoint 11 is critical to the landscape setting of the Hog’s Back chalk ridge. This character area also includes one of the largest blocks of Ancient Woodland associated with the Hog’s Back in the form of Strawberry Copse and Manor Copse.
### Scenic Quality

A distinctive downland landscape of comparable landscape and scenic quality to land within the existing AONB boundary. The northern areas are critical to the landscape setting of the chalk ridge and are therefore considered integral to the character and scenic quality of the AONB.

### Relative Wildness

Characteristic managed arable landscape. The impact of the A31 is more significant in the southerly sections on the fringes of the existing AONB boundary. The relative wildness of this area increase further north as the influence of the A31 declines. There are limited visual, noise and landscape character impacts associated with the western edge of Guildford, despite the relatively close proximity of development and the size of the settlement (see also Sub Character Area 5).

### Relative Tranquillity

Greater sense of tranquillity to the north as a consequence of the declining influence of the A31.

### Natural Heritage Features

The southern sections provide a typical downland landscape. To the north the landscape patterns reflects origins dating back to 18th century parkland associated with Down Place. This sub character area also includes significant areas of Ancient Woodland.

### Cultural Heritage

In addition to the former parkland associated with Down Place, the land lies on the western fringes of the former medieval deer park.

### Relationship with Area 12-1 and Conclusions

The landscape has a strong physical and visual relationship with the existing AONB and is considered critical in maintaining the rural character and quality of views from the Hog’s Back (see Viewpoint 11). Much of the landscape is typical of downland on the dip slope to the Hog’s Back of comparable landscape and scenic quality to much of the land included within Area 12-1 further west (see Viewpoint 10). The landscape shares many defining characteristics and attributes associated with chalk downland within the Surrey Hills AONB.

This area merits inclusion within the AONB on the basis of distinctive landscape character and scenic qualities and the strong visual relationship with land within the existing AONB. It is recommended that the boundary to Area 12-1 be reviewed to follow the western edge of Wildfield Copse and the narrow woodland screen bordering the railway line to the north.

*image 9*

Viewpoint 6: View west from the area of publicly accessible land north of Manor Copse showing the southernmost section of sub character area 4, on the dip slope to the Hog’s Back. The existing AONB boundary is located just below the wooded ridge line (the dashed line shows the approximate line of the existing AONB boundary). The lower slopes are not proposed for inclusion within Area 12-1.
Viewpoint 7: View south from the southern edge of sub character area 4 towards the Hog’s Back

Location/Sub Character Area

Area 5: Guildford Settlement Edge

Landscape Quality

The landscape, in particular to the north (see Viewpoint 8), retains a strong rural character despite the proximity of urban development on the western edge of Guildford. Urban development and influence of the A31 are more significant to the south (see Viewpoint 9), although this area is assessed as being of particular importance to the setting of the AONB with dramatic views to and from the chalk ridge (see Viewpoints 6 and 11). The distinctive character and rural qualities diminish in the eastern sections of this sub character area, but this forms an important buffer and transitional area on the western edge of Guildford.

Scenic Quality

The principal scenic qualities associated with this sub character area lie in the outward views towards the Hog’s Back and rural land to the east. The northern sections retain something of a rural downland character, but this is not considered a landscape of high scenic quality.

Relative Wildness

Despite the proximity of the settlement edge, the northern sections retain a degree of wildness which is comparable with the more rural areas further west.

Relative Tranquillity

Similar to the assessment of relative wildness, there is a greater sense of tranquillity to the north as a consequence of the declining influence of the A31. There are surprisingly limited effects on tranquillity as a result of the proximity to Guildford, with much of the built development largely screened and limited associated noise impacts. There is some evidence of fly tipping and other activities which detract from rural character and sense of place.

Natural Heritage Features

The principal natural heritage features of interest are associated with the ancient woodland at Strawberry and manor copses.

Cultural Heritage

The land lies within the area covered by the former deer park and features such as deer leaps can be observed.

Relationship with Area 12-1 and Conclusions
The landscape forms an important buffer and transitional area on the western edge of Guildford. Although the overall landscape and scenic quality would not necessarily merit inclusion within a revised AONB boundary, the landform and woodland cover significantly reduce the potential impact of Guildford on the land further west, including views from the eastern end of the Hog’s Back.

This area does not merit inclusion within the AONB, but provides an important buffer and transitional landscape on the western edge of Guildford. It is recommended that the boundary to Area 12-1 follows the western edge of this sub character area but includes Strawberry and Manor Copses. The semi-rural transitional character of this landscape should be retained in order to conserve the currently limited impact of Guildford on the AONB and other rural land to the west.

Viewpoint 8: View south east towards Guildford from the northern edge of sub character area 5.

Viewpoint 9: View west towards Guildford from land in the southern part of sub character area 5

1. Conclusions and Recommendations

This Natural Beauty Evaluation has been carried out in accordance with the guidance produced by Natural England. Five landscape sub character areas have been identified as part of this study, based on an assessment of existing landscape character. These five sub character areas have been evaluated against the Natural England criteria and compared against the qualities and character of the adjoining land, in particular those areas proposed for inclusion within the revised AONB boundary as Area 12-1. The section below provides an overview of the Natural Beauty Evaluation for the study area and includes recommendations for revisions to the current proposed AONB boundary in the eastern part of the study area, in the vicinity of Down Place and Blackwell Farm. The current AONB boundary, proposed Area 12-1 and the recommended AONB boundary extension as part of this evaluation are shown on Figure 3 (above).

This report agrees with the conclusions of the HDA evaluation with regard to the proposed revised AONB boundary to the east of Flexford (sub character areas 1 and 2), although it is noted that land within sub character area 2 is broadly similar in terms of quality, character, condition and appearance to land south of West Flexford Lane (included within Area 12-1). This evaluation concludes that the landscape quality of the land north of the lane does not, however, merit AONB designation and is not of particular significance to the setting of the Hog’s Back, in terms of both landscape character and views to and from the chalk ridge.

This evaluation does, however, conclude that land to the south and east of Wildfield Copse, in the vicinity of Down Place and Blackwell Farm (sub character areas 3 and 4), is of a landscape and scenic quality, character and condition which should merit inclusion within a revised AONB boundary. The landscape represents many of the defining characteristics of landscapes within the Surrey Hills AONB. These two sub character areas include land on the upper slopes of the Hog’s Back ridge which is representative of classic chalk downland and areas on the lower slopes typical of former parkland estates, with field patterns and mature trees and large blocks of ancient woodland providing strong evidence of the landscape and cultural heritage of the local area. This landscape is therefore considered integral to the AONB and critical to the conservation of rural views to the north of equal if not greater importance to land to the west of Down Place included in Area 12-1 (see comparative Viewpoints 10 and 11).

The proposed boundary to Area 12-1 between Misley Copse and Down Place and between Down Place and the current AONB boundary and does not follow any defined landscape features (such as a ridge line, woodland edges, or prominent field boundary) or reflect a decline in landscape and scenic quality or changes in landscape character (for instance increased urban influences) which might justify exclusion. This evaluation recommends that the proposed AONB boundary should be reviewed in this location and re-aligned as recommended in this report (see Figure 3). Failure to do so could enable
opportunities for development which would result in significant harm to the setting of the existing AONB and the loss of landscape which is of a character and quality which merits inclusion within a revised AONB boundary.

Although not recommended for inclusion in the revised AONB boundary this evaluation notes the importance of the eastern most sections (sub character area 5) in providing the setting to Guildford and an important transitional landscape.

**image 14**

Viewpoint 10: View north west from Footpath 480 from just below the crest of the Hog’s Back ridge. The existing AONB boundary runs east to west approximately through the centre of this field at the base of the steeper areas of the dip slope. The area proposed for inclusion within the AONB as part of the HDA evaluation (Area 12-1) extends beyond the lower field boundary to include substantial areas further north (shown approximately by the dashed lines).

**image 15**

Viewpoint 11: View north east from Footpath 480 from just below the crest of the Hog’s Back Ridge. The existing AONB boundary runs east to west approximately through the centre of this field at the base of the steeper areas of the dip slope (the small clump of pines lies within the existing AONB). The area proposed for inclusion within the AONB as part of the HDA evaluation (Area 12-1) extends this to include the land around Down Place. The proposed areas for inclusion within the AONB as part of this report would include the fields beyond Down Place, enclosed by woodland and land further east (see Viewpoint 6). The dashed lines indicate the approximate boundaries of the existing AONB, Area 12-1 and the LMS recommended AONB extension.

Appendix 1: Extracts from Surrey County Council LCA Phase 2 Surrey Hills AONB Areas of Search Natural Beauty Evaluation (HDA October 2013)

**6.1.11 Chalk Ridge and Wooded Rolling Claylands RECOMMENDED ADDITIONAL AREA 12-1**

Area of Wooded Rolling Claylands extending down from the Chalk Ridge.

**LANDSCAPE TYPE: E – Wooded Rolling Claylands**

**CHARACTER AREA: E1 – Wanborough Wooded Rolling Claylands**

**NATURAL BEAUTY CRITERIA**

**Landscape Quality**

Includes large blocks of ancient woodland, such as Wanborough Wood. Field sizes are relatively large and continuous, following gentle slopes down from the Hog’s Back. Occasional glimpses of traffic on the A31 along the Hog’s Back, but no significant incongruous elements present in the vicinity.

**Scenic Quality**

Patchwork of fields and woodland rising gently up the dip slope towards the ridge, form an appealing pattern which can be appreciated as one travels through the landscape, either from the Hog’s Back, or from footpaths, tracks and roads to the north.

**Relative Wildness**

There are few roads, very limited settlement and large areas where access is limited to tracks. This lack of activity, combined with a number of woodland blocks results in a sense of remoteness in most parts. Filtered urban influence from Flexford and Ash Green reduce remoteness slightly to the north.
Relative Tranquillity

Contributors to tranquillity such as birdsong, peace and quiet, and natural-looking woodland dominate minor detractors such as glimpses of vehicles on the A31, to result in a substantially tranquil area.

Natural Heritage Features

Woodland on the gently rising dip slop contributes to the scenic quality of the area.

Cultural Heritage

Historic vernacular buildings at Wanborough Manor.

SPECIFIC ISSUES ADDRESSED WHEN IDENTIFYING EXTENT OF AREA 12-1

Largely unsettled (with the exception of Wanborough Manor area), sloping dip slope of the chalk ridge to the south. There is a gently sloping transition northwards from the top of the dip slope, but vegetated roadsides, hedged/treed field boundaries, and woodland blocks form a relatively robust east-west northern boundary, beyond which urban influence increase in places.

image 16
image 17
image 18

See attachment for images.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents: Hogs Back Natural Beauty Evaluation V2 24.05.16.pdf (6.1 MB)

Comment ID: PSLPS16/4532  Respondent: 8627393 / Worplesdon Parish Council (Gaynor White)  Agent:  

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy A29

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
A29 Land to the south and east of Ash and Tongham

OBJECT to the level of development in Ash due to the increased impact of traffic on the highway network through Worplesdon. The Strategic Highway Assessment Report carried out by Surrey County Council, on behalf of GBC concludes that the Aldershot Road (A323) would experience increased traffic congestion and have a level of service indicator which would be at least unstable or where there would be no spare capacity.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/4533  Respondent: 8627393 / Worplesdon Parish Council (Gaynor White)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A30

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

A30 Ash Road bridge

Comment: Whilst we welcome the improvement to the rail crossing for safety reasons. We are concerned about the flow rate onto the Aldershot Road into Guildford through Worplesdon. The Strategic Highway Assessment Report carried out by Surrey County Council, on behalf of GBC concludes that the Aldershot Road (A323) would experience increased traffic congestion and have a level of service indicator which would be at least unstable or where there would be no spare capacity. Therefore, some means of controlling the traffic would need to be introduced to mitigate the increased impact of traffic on the highway network through Worplesdon and the impact on accesses onto Aldershot Road (A323).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/4534  Respondent: 8627393 / Worplesdon Parish Council (Gaynor White)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A46

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
A46 Land to the south of Normandy and north of Flexford

**OBJECT** to the inappropriate size of the development in Normandy. Westwood Lane and Glaziers Lane, which are unclassified rural roads, as well as the two railway bridges, are unsuitable to an increase in traffic from such a development. The draft Local Plan indicates that local highway environmental improvements (these are not specified) would mitigate the transport impact from this development.

However, the Strategic Highway Assessment Report carried out by Surrey County Council, on behalf of GBC concludes that the Aldershot Road (A323) would experience increased traffic congestion and have a level of service indicator which would be at least unstable or where there would be no spare capacity. This implies that far more traffic mitigation would be required. The sewerage system is already running at capacity and could not cope with the proposed development. The parish is not convinced that there is a demand for a secondary school in this part of Guildford.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/9854</th>
<th>Respondent: 8627393 / Worplesdon Parish Council (Gaynor White)</th>
<th>Agent:</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D1</td>
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*Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )*  

*Answer (if comment is on questions 1-7 of the questionnaire): (*)*  

<table>
<thead>
<tr>
<th>D1 Making Better Places</th>
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*Support subject to a reduction in the threshold to 10 residential dwellings.*

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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<td>D2 Sustainable Design, construction and energy</td>
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<td>8627393 / Worplesdon Parish Council (Gaynor White)</td>
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<td>D3 Historic Environment</td>
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<td>8627393 / Worplesdon Parish Council (Gaynor White)</td>
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<td>D4 Development in Urban Areas and inset villages</td>
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</tbody>
</table>
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

E1 Sustainable Employment (Research Park and Slyfield) Support.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9845  Respondent: 8627393 / Worplesdon Parish Council (Gaynor White)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

E2 Location of New employment space Support.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

<table>
<thead>
<tr>
<th>E3</th>
<th>Maintaining Employment Capacity and improving floor space</th>
<th>Support.</th>
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</table>

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9848  Respondent: 8627393 / Worplesdon Parish Council (Gaynor White)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

<table>
<thead>
<tr>
<th>E4</th>
<th>Surrey Research Park</th>
<th>Support.</th>
</tr>
</thead>
</table>

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9849  Respondent: 8627393 / Worplesdon Parish Council (Gaynor White)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
<table>
<thead>
<tr>
<th>E5</th>
<th>Rural Economy</th>
<th>Support.</th>
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<tbody>
<tr>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
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| Comment ID: PSLPP16/9850  Respondent: 8627393 / Worplesdon Parish Council (Gaynor White)  Agent: |
| Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E6 |
| Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( ) |
| Answer (if comment is on questions 1-7 of the questionnaire): () |

<table>
<thead>
<tr>
<th>E6</th>
<th>Leisure and Visitor Experience</th>
<th>Support.</th>
</tr>
</thead>
<tbody>
<tr>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
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<td>Attached documents:</td>
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| Comment ID: PSLPP16/9851  Respondent: 8627393 / Worplesdon Parish Council (Gaynor White)  Agent: |
| Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E7 |
| Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( ) |
| Answer (if comment is on questions 1-7 of the questionnaire): () |

<table>
<thead>
<tr>
<th>E7</th>
<th>Guildford Town Centre</th>
<th>Support in principle – There should be a higher density and increased provision of sustainable residential development including a high proportion of affordable housing being no less than 40%. Plus there should be a reduced increase of retail provision.</th>
</tr>
</thead>
<tbody>
<tr>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Attached documents:</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

| Comment ID: PSLPP16/9852  Respondent: 8627393 / Worplesdon Parish Council (Gaynor White)  Agent: |
**Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E8**

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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<tr>
<th>E8</th>
<th>District Centres</th>
<th>Support.</th>
</tr>
</thead>
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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** PSLPP16/9853  **Respondent:** 8627393 / Worplesdon Parish Council (Gaynor White)  **Agent:**

**Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E9**

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

<table>
<thead>
<tr>
<th>E9</th>
<th>Local Centres</th>
<th>In principle support - Jacobs Well is an existing local centre and will need to be added to the six local centres already listed.</th>
</tr>
</thead>
</table>

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** PSLPP16/9834  **Respondent:** 8627393 / Worplesdon Parish Council (Gaynor White)  **Agent:**

**Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1**

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
H1 Homes for All
Support – There should be a higher housing density in the town centre.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9835  Respondent: 8627393 / Worplesdon Parish Council (Gaynor White)  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

H2 Affordable Homes
Support.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9836  Respondent: 8627393 / Worplesdon Parish Council (Gaynor White)  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

H3 Rural Exception Homes
Support.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9827  Respondent: 8627393 / Worplesdon Parish Council (Gaynor White)  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Page 1373 of 3335
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

**General comments:**

Infrastructure must come first and the correct delivery sequence must be complied with. Worplesdon Parish Council supports development of the town centre (including Walnut Tree Close) which is a more sustainable location. There should be less retail and more residential development in the town centre providing the correct infrastructure is in place.

Following the precedent set by a nearby local planning authority, the parish council believes that all major developments must install all necessary infrastructure for the complete development at commencement.

Improved sewage works, enhanced transport infrastructure and improved air quality are a prerequisite to any future development.

Paragraph 3.6 of the Infrastructure Study is incorrect. The Hockford Sewage works have been omitted in error.

Locally the following infrastructure improvements would be required:

- Pedestrian facilities to meet proposed development, including a pedestrian crossing on the A323 near Hunts Farm.
- Improved cycling facilities throughout the parish and improved junctions to have the capacity to cater for existing and future traffic levels.
- Worplesdon Parish Council supports the upgrade of the pedestrian bridge between the railway station and the town to fully integrate the station with the town.
- Healthcare

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

---

**Comment ID:** PSLPP16/9858  **Respondent:** 8627393 / Worplesdon Parish Council (Gaynor White)  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

<table>
<thead>
<tr>
<th></th>
<th>Infrastructure and Delivery</th>
<th>OBJECT unless the following amendments are made:</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td></td>
<td>1st paragraph Delete – “and available when 1st needed to serve the occupants and users of the development” and replace with “prior to the development being first occupied.”</td>
</tr>
<tr>
<td></td>
<td></td>
<td>3rd paragraph – 2nd line – delete the word “most”.</td>
</tr>
</tbody>
</table>
Comment – The Infrastructure schedule is not adequate to deliver the appropriate level of mitigation and infrastructure improvement needed to support the level of proposed development contained within the Local Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/9859</th>
<th>Respondent: 8627393 / Worplesdon Parish Council (Gaynor White)</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID2</td>
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<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
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<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>I2 Supporting DfT’s Road Investment Strategy</th>
</tr>
</thead>
<tbody>
<tr>
<td>Support. Would encourage GBC and HE (Highways England) to implement improvements to the A3 as early as possible to alleviate traffic congestion in Guildford.</td>
</tr>
</tbody>
</table>

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/9860</th>
<th>Respondent: 8627393 / Worplesdon Parish Council (Gaynor White)</th>
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<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>I3 Sustainable Transport for new developments</th>
</tr>
</thead>
<tbody>
<tr>
<td>Suggest deletion of the final bullet point as this should be included in the CIL 123 Infrastructure list.</td>
</tr>
<tr>
<td>Bullet point 7 should read Travel Plan (in the singular) – see page 149.</td>
</tr>
</tbody>
</table>

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
<table>
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<tr>
<th>Comment ID: PSLPP16/9861</th>
<th>Respondent: 8627393 / Worplesdon Parish Council (Gaynor White)</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID4</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )

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<thead>
<tr>
<th>I4</th>
<th>Green and Blue Infrastructure</th>
<th>Support.</th>
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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<tr>
<th>Comment ID: PSLPP16/9837</th>
<th>Respondent: 8627393 / Worplesdon Parish Council (Gaynor White)</th>
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</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P1</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )

<table>
<thead>
<tr>
<th>P1</th>
<th>Surrey Hills</th>
</tr>
</thead>
</table>

In principle – support subject to the recommendations made by Land Management Services Ltd in their report entitled “Hog’s Back Natural Beauty Evaluation” dated May 2016 being implemented.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/9838</th>
<th>Respondent: 8627393 / Worplesdon Parish Council (Gaynor White)</th>
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<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2</td>
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</table>
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

<table>
<thead>
<tr>
<th>P2 Green Belt and Limited Infilling</th>
</tr>
</thead>
<tbody>
<tr>
<td>The coalescence between the urban area of Guildford and the surrounding villages and also Guildford with the surrounding boroughs should be strenuously resisted. This policy should be expanded as per paragraph 80 of the NPPF. The Borough Council’s duty to cooperate should extend to Rushmoor Borough Council, Surrey Heath Borough Council, Woking Borough Council and Waverley Borough Council.</td>
</tr>
</tbody>
</table>

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9840  Respondent: 8627393 / Worplesdon Parish Council (Gaynor White)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

<table>
<thead>
<tr>
<th>P4 Flood Risk and Water source protection</th>
</tr>
</thead>
<tbody>
<tr>
<td>Whilst requested by the Worplesdon Flood Forum, Wood Street Village has not been included within the Guildford Surface Water Management Plan. Development at Blackwell Farm is likely to increase the risk of surface water flooding at Wood Street Village and Fairlands.</td>
</tr>
</tbody>
</table>

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9841  Respondent: 8627393 / Worplesdon Parish Council (Gaynor White)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
P5 Thames Basin Heath SPA

Agree in principle BUT the Waddenzee judgement must be applied. As per paragraph 21 of Planning Circular 06/2005.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9832  Respondent: 8627393 / Worplesdon Parish Council (Gaynor White)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

| S1 | Presumption in Favour of Sustainable Development | Whilst in support of policy S1 this should, by virtue of a footnote, contain reference to paragraph 119 of the NPPF which states “The presumption in favour of sustainable development (para 14) does not apply where development requiring appropriate assessment under the Birds of Habitats Directives is being considered, planned or determined.” |

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9833  Respondent: 8627393 / Worplesdon Parish Council (Gaynor White)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

| S2 | Planning for the Borough – Our Spatial Development Strategy | OBJECT to the proposed SHMA figures – which have been challenged in “A Review of the West Surrey SHMA as it relates to the Objectively Assessed Housing Needs of Guildford” by Neil McDonald dated June 2016. In accordance with para 166 of the NPPF the appropriate constraints MUST be applied by the Borough Council. In the dwelling stock estimates by local authority district: 2001 – 2015 (DCLG) the amount of new houses in Guildford has increased on average 250 per year far shorter than objectively assessed housing need figure contained in the draft local plan. |
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** pslp172/4194  **Respondent:** 8627393 / Worplesdon Parish Council (Gaynor White)  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy A21

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Support

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** pslp172/4196  **Respondent:** 8627393 / Worplesdon Parish Council (Gaynor White)  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy A22

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

OBJECT as there is a current lack of infrastructure, including waste water infrastructure, to support development on this site. The narrow road cannot be widened due to the house called “Timbers” (of local heritage interest). Impact on the Grade II listed building called “Pitch Place House”. Proximity to Whitmoor Common SPA/SSSI. In part this site is within 400m of the SPA/SSSI.

Increased traffic will correspondingly increase vehicular particulates and nitrous oxide emissions, which will have a detrimental impact on Whitmoor Common SPA/SSSI contrary to the Habitats Directive, the Birds Directive and the Habitats Regulations - See Judicial Review Case No: CO/3796/2013 (21.2.2014) Ashdown Forest Economic Development LLP Claimant - and - (1) Secretary of State for Communities and Local Government (2) Wealden District Council (3) South Downs National Park Authority

This site provides an important wildlife corridor between Whitmoor Common SPA/SSSI/LNR and Chitty’s Common, Rydes Hill Common, Littlefield Common (SNCI) and Broad Street and Backside Commons (SNCI).

When assessing the suitability of this site constraints should be applied as per paragraph 119 of the NPPF.

Worplesdon Parish Council objects to the proposed relocation of the urban boundary at this point.
<table>
<thead>
<tr>
<th>Comment ID: pslp172/4199</th>
<th>Respondent: 8627393 / Worplesdon Parish Council (Gaynor White)</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A24</td>
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</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Support subject to full infrastructure improvements being provided prior to development to mitigate the impact on users. The Strategic Highway Assessment Report carried out by Surrey County Council, on behalf of GBC concludes that the Woking Road (A320) and Moorfield Road would experience increased traffic congestion and have levels of service indicators which would be at least unstable or where traffic demand exceeds capacity.

Support the additional opportunities proposed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: pslp172/4201</th>
<th>Respondent: 8627393 / Worplesdon Parish Council (Gaynor White)</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A25</td>
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<td></td>
</tr>
<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Support subject to the appropriate infrastructure prior to development commencing to mitigate the impact on this part of Guildford. Land for the railway station to be secured and brought in at the earliest opportunity for the benefit of the wider community.

Support the additional opportunities proposed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
OBJECT the majority of this land should be designated AONB

- Most of Blackwell Farm and the land in its vicinity is of a landscape and scenic quality, character and condition that should merit inclusion within a revised AONB boundary.

- The landscape is critical to the setting of the Hog’s Back ridge and in the conservation of rural views to the north of equal, if not greater importance, than land to the west of Down Place, which has been included in the boundary proposed by the Surrey Hills AONB Board.

- Two fields at the very eastern edge of the Blackwell Farm/Manor Farm site did not meet the AONB criteria. However, these were acknowledged to be important in providing the setting to Guildford and an important transitional landscape.

- The boundary put forward by Surrey Hills AONB Board between Misley Copse and Down Place and between Down Place and the current AONB boundary does not follow any defined landscape features (such as a ridge line, woodland edges, or prominent field boundary) or reflect a decline in landscape and scenic quality or changes in landscape character that might justify exclusion.

- The proposed AONB boundary should be reviewed at this location and realigned according to the recommendations made by Land Management Services Ltd – As per their report entitled “Hogs Back Natural Beauty Evaluation” dated May 2016, as attached.

- Failure to realign the boundary according to Land Management Services Ltd.’s recommendations could enable opportunities for development which would result in significant harm to the setting of the existing AONB and the loss of landscape which is of a character and quality which merits inclusion within a revised AONB boundary.

Lack of infrastructure and increased surface water run-off would affect Wood Street Village (particularly Pound Lane/Baird Drive) and Fairlands. The proposed accesses from the A31 and Gill Avenue would be inadequate to support such a development. Indeed access onto the A31 would be in the AONB. In addition there would be an adverse impact on the following Ancient Woodland, Strawberry Grove, Dean Bottom, Manor Copse and a strip of Ancient woodland at Wildfield Copse. The Infrastructure Study para 3.10 states there is insufficient waste water infrastructure for this site.

The Expansion of the Research Park and the proposed development at Blackwell Farm should be separate projects.

Paragraph 112 of the NPPF states Local Authorities should take into account the economic and other benefits of the best and most versatile agricultural land. Whilst the proposal to reduce the number of dwellings to 1,800 is noted, the proposed development area includes land assessed to be Grade 2, Grade 3a and Grade 3b as previously acknowledged by Guildford Borough Council.

The Parish Council wishes to express concern about how the link road will be controlled and how access and egress will be managed and refer to RGP’s Technical Note Ref: SHBL/16/3174/TN02 dated June 2017, which was jointly commissioned by Compton Parish Council and Worplesdon Parish Council, as attached. Additional accesses are required despite the number of dwellings being reduced.

For any Research Park development the surface water drainage needs to be fully attenuated within the proposed development to protect existing communities. In addition any changes that will affect the hydrology of Whitmoor Common SPA/SSSI need to be carefully assessed.
Also submitted is a Surface Water Flood Risk Assessment from JBA Consulting dated July 2017 which concludes that risk from surface water run-off as a result of the proposed change from agricultural to urban use WILL increase in Wood Street Village, Fairlands, The Research Park and Park Barn area of Guildford in the event this site is taken forward within the Draft Local Plan. Policies P4 and P5 refer.

Worplesdon Parish Council fully supports the s19 submission made by Green Balance on behalf of Compton Parish Council, as attached.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:  
- Response to GBC Reg19 by SHB & ComptonPC Jul17 Final.pdf (631 KB)
- 2017s5991-worplesdon-parish-council-sw-fra-v4-july-2017.pdf (15.5 MB)
- RGP Technical Note - 2017-06-28 TN02 (3).pdf (246 KB)

Comment ID: pslp172/4209  
Respondent: 8627393 / Worplesdon Parish Council (Gaynor White)  
Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Scheme removed by GBC.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/2481  
Respondent: 8627393 / Worplesdon Parish Council (Gaynor White)  
Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Support.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/2486  
Respondent: 8627393 / Worplesdon Parish Council (Gaynor White)  
Agent:
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<tr>
<th>Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy E7</th>
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<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<tr>
<td>Support in principle – There should be a higher density and increased provision of sustainable residential development including a high proportion of affordable housing being no less than 40%. Plus there should be a reduced increase of retail provision.</td>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy E9</td>
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<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<tr>
<td>Support - and welcome the inclusion of Jacobs Well in the list of Local Centres.</td>
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<tr>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
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<td>Attached documents:</td>
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<th>Comment ID: pslp171/2473  Respondent: 8627393 / Worplesdon Parish Council (Gaynor White)  Agent:</th>
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<td>Support – There should be a higher housing density in the town centre.</td>
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<td>OBJECT unless the following amendments are made:</td>
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<tr>
<td>1st paragraph Delete – “and available when 1st needed to serve the occupants and users of the development” and replace with “prior to the development being first occupied.”</td>
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<tr>
<td>Comment – The Infrastructure schedule is not adequate to deliver the appropriate level of mitigation and infrastructure improvement needed to support the level of proposed development contained within the Local Plan.</td>
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<td>1st paragraph Delete – “and available when 1st needed to serve the occupants and users of the development” and replace with “prior to the development being first occupied.”</td>
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<tr>
<td>[Comments on 2016 Plan:] Suggest deletion of the final bullet point as this should be included in the CIL 123 Infrastructure list.</td>
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<tr>
<td>Bullet point 7 should read Travel Plan (in the singular) – see page 149.</td>
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<tr>
<td>[Comments on 2017 Plan:] This policy still refers to the P&amp;R site at Gosden Hill. This shows inconsistency between policies.</td>
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Page 1384 of 3335
Support.

In principle this policy is supported however we would suggest the following additions:

Point 4 In terms of vehicular parking for new developments: (a) in Controlled Parking Zones, or component areas thereof, in which the demand for on-street parking by residents of existing dwellings and, where allowed, ‘pay and display’ visitor parking exceeds the supply of designated on-street parking spaces, planning permission for new residential development resulting in a net increase in dwellings will be subject to a planning obligation to require that future occupants will not be eligible for on-street residents parking permits, with the exception of disabled people who will be eligible (to be secured through the s106 agreement), and (b) for residential new development in all other areas, and for all nonresidential new development in the borough, off-street vehicle parking should be provided such that the level of any resulting parking on the public highway does not adversely impact road safety or the movement of other road users.

Point 8 Planning applications for new development will have regard to the Infrastructure Schedule at Appendix C which sets out the key infrastructure requirements on which the delivery of the Plan depends, or any updates in the latest Guildford borough Infrastructure Delivery Plan and wherever possible, there is early delivery of such infrastructure to provide early benefit to the Borough.

Point 9 Provision of suitable access and transport infrastructure and services will be achieved through direct improvements and/or schemes funded through Section 278 agreements, Section 106 contributions and/or the Community Infrastructure Levy (CIL), to which will address impacts in the wider area including across the borough boundary.

4.6.24 The Sustainable Movement Corridor will provide a priority pathway through the urban area of Guildford for buses, pedestrians and cyclists, serving the new communities at Blackwell Farm, SARP and Gosden Hill Farm including the new Park and Ride site, the new Guildford West (Park Barn) and Guildford East (Merrow) rail stations, the Onslow Park and Ride, both of the University of Surrey’s campuses, the town centre and Guildford rail station. The aim is for journeys to be rapid and reliable by bus and safe and direct on foot and by bike whilst not having an adverse impact on the existing highway network.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
In principle – support subject to the recommendations made by Land Management Services Ltd in their report entitled “Hog’s Back Natural Beauty Evaluation” dated May 2016 being implemented.

[see attached document]

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:  📖 [Hogs Back Natural Beauty Evaluation V2 24.05.16.pdf](#) (6.0 MB)

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**Comment ID:** pslp171/2478  **Respondent:** 8627393 / Worplesdon Parish Council (Gaynor White)  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Whilst requested by the Worplesdon Flood Forum, Wood Street Village has not been included within the Guildford Surface Water Management Plan 2014. Development at Blackwell Farm will increase the risk of surface water flooding at Wood Street Village, Fairlands, the Science Park and the Park Barn neighbourhood of Guildford as per the Surface Water Flood Risk Assessment produced by JBA Consulting on behalf of Worplesdon Parish Council July 2017, as attached.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:  📖 [2017s5991-worplesdon-parish-council-sw-fra-v4-july-2017.pdf](#) (15.5 MB)

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**Comment ID:** pslp171/2469  **Respondent:** 8627393 / Worplesdon Parish Council (Gaynor White)  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Whilst in support of policy S1 this should, by virtue of a footnote, contain reference to paragraph 119 of the NPPF which states “The presumption in favour of sustainable development (para 14) does not apply where development requiring appropriate assessment under the Birds of Habitats Directives is being considered, planned or determined.”

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** pslp171/2472  **Respondent:** 8627393 / Worplesdon Parish Council (Gaynor White)  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy S2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

OBJECT to the proposed SHMA figures – which have been challenged in “A Review of the West Surrey SHMA as it relates to the Objectively Assessed Housing Needs of Guildford” by Neil McDonald dated June 2016. Updated June 2017, as attached. In accordance with para 166 of the NPPF the appropriate constraints MUST be applied by the Borough Council. In the dwelling stock estimates by local authority district: 2001 – 2015 (DCLG) the amount of new houses in Guildford has increased on average 250 per year far shorter than objectively assessed housing need figure contained in the draft local plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents: Review of GL Hearn's Guildford Addendum to the West Surrey SHMA Final SV.pdf (1.2 MB)

Comment ID: PSLPS16/4792  Respondent: 8640353 / Julian Cranwell  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A25

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to policy A25 Gosden HillThere is no need for housing on this site because the local plan housing target is incorrect and inflated and ignores constraints.Gosden Hill is located entirely within the green belt. No exceptional circumstances have been demonstrated for building on this site and therefore development here does not meet paragraphs 87-89 of the NPPF. Furthermore, Gosden Hill performs all five functions of green belt,The site has no provision for foul or surface water sewerage and adjoining sewerage is at capacityThe Green Belt at this point serves the important function of separating West Clandon from the edge of urban Guildford. Development here will cause the two to coalesce defeating one of the objectives of the Green Belt. If this development proceeds WEbelieve the narrow strip of Green. Belt remaining between Guildford and Clandon at this point will be too narrow and will come under further pressure. It will represent an undesirable ribbon development along the A3. It will be highly visible from the A3 when approaching Guildford and will, in conjunction with A43a at Garlick's Arch give the appearance of almost continuous development from Send through to Guildford. The development of this site cannot be sustainable and will cause massive congestion onto surrounding roads. The development will generate in the region of 6,000 vehicles which will pour on to the A3 which is stationary every day during rush hours. The linking of the A3100, B2215 and A247 would channel thousands of cars through the narrow, winding road through West Clandon, a road where large lorries mount the pavement virtually every day and through Send and Ripley which are also severely constrained. WEobject to the proposal for a link road to bring traffic from the Gosden Hill development to the proposed 4 way junction at Burnt Common. This has the potential to generate large volumes of traffic (including commercial vehicles) on the A247 through Send and West Clandon - a road which is already under traffic stress (see below). The volume of traffic will greatly increase air pollution which is particularly critical given the proposal to build two schools. A new on-slip at Burpham would only be 1.8km from the on-slip at Burnt Common which is against Highway England’s requirement of 2km.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
There is no need for housing on this site because the local plan housing target is incorrect and inflated and ignores constraints. Blackwell Farm is located entirely within the green belt. No exceptional circumstances have been demonstrated for building on this site and therefore development here does not meet paragraphs 87-89 of the NPPF. Furthermore, Blackwell Farm performs all five functions of green belt, and fulfils purposes 1, 3 and 5 very strongly.  

1.1.1 Purpose 1 - “checking the unrestricted sprawl of large built-up areas”. There is huge pressure to develop on the western edge of Guildford; the University of Surrey has stated publicly that its key objective is to develop the whole of its landholdings, stretching west to Flexford Farm. This, combined with the indefensible boundary being proposed (a hedgerow rather than the existing belt of ancient woodland), will put more of the green belt and the Surrey Hills Area of Outstanding Natural Beauty (AONB) at risk of future development.  

1.1.2 Purpose 3 “assists in safeguarding the countryside from encroachment” - the proposed movement of the green belt boundary on the west of Guildford to allow for development of the University in 2004 resulted in the encroachment on countryside and the loss of working farmland (including some Grade 2) at Manor Farm. The proposed future change in the boundary would result in further encroachment and the loss of farmland including further Grade 2. The proposed road development with access road from the A31 would also effectively cut off farm access to the south of the development area leading to further urban influence on this countryside. The University’s stated key objective is to develop land which includes Chalkpit and Wildfield farms leading to the risk of further boundary change and further encroachment in future years.  

1.1.3 Purpose 5 - “assists in urban regeneration by encouraging the recycling of derelict and other urban land” Whilst all green belt assists towards this purpose, the ownership of this land by the University of Surrey with its extensive landholdings within the urban boundary (including land it leases to the Hospital and Holiday Inn, the Surrey Research Park, Hazel Farm as well as two large campuses) means that the location of Blackwell Farm within the green belt plays an even greater and direct role in encouraging the more efficient usage of urban land. Stopping development on Blackwell Farm would result in the University of Surrey investing in and regenerating, land in its ownership and delivering its commitments following the 2003 boundary review (including 270 homes for key workers, 3,125 student residences and releasing further accommodation at Hazel Farm). The University has 17 hectares of surface car parking that could be built over with offices and flats. This is a more sustainable option than building over open farmland (largely grade 2 and 3a) within the green belt. The Blackwell Farm development would result in harm to the Surrey Hills Area of Outstanding Natural Beauty (AONB), harm to an Area of Great Landscape Value (AGLV), and harm to the setting to the AONB. (Blackwell Farm forms the views into and out of the Hogs Back ridge). The NPPF is clear that AONBs should be afforded the highest level of protection in relation to landscape and scenic beauty. All development proposals within and adjacent to the AONB must conserve or enhance its special qualities. The NPPF also makes it clear that applications for major development in the AONB will be refused unless exceptional circumstances are demonstrated and the development is proven to be in the public’s interest. Guildford Borough Council has not shown that the proposed housing development or the extension of the Research Park, or the proposed link road from the A31 to Gill Avenue, is in the wider public interest. Indeed, the increased traffic through the already congested Egerton Road/Gill Avenue junction, which would result from the development, would impede emergency vehicles travelling to the Hospital and this would be very much against public interest. GBC’s Policy P1 states that, “The Surrey Hills Area of Outstanding Natural Beauty (AONB) will be conserved and enhanced to maximise its special landscape qualities and protect it from
inappropriate development. All proposals will be considered against whether they conserve and/or enhance the setting and views of the AONB”. We question how the proposal to carve a new two-lane carriageway through the AONB fits this policy, or meets para 115 of the NPPF? Finally, nearly the whole site has been identified as a “candidate area” for AONB status in the Landscape Evaluation Study commissioned by Compton, Worpleston and Wanborough parish councils. Therefore, the entire site should be treated as though it is within the AONB during this local planning process. The access to the proposed Blackwell Farm site will put additional peak hour pressure on two of Guildford’s worst congestion “hot spots”: the A31 (Hog’s Back) and the Tesco Roundabout on Gill Avenue. GBC’s proposal to create a new major route into Guildford from the west at, or close to, the Down Place private driveway, and to make this the main access to the planned Blackwell Farm development, does not appear to have been thought through. There are queues stretching back from the Farnham Road Bridge as far as the Down Place driveway entrance most weekday mornings and any traffic generated by the new development would not be able to clear the junction. In order to accommodate the volume of traffic using the new junction (generated by residents of the new housing estate, employees at the Surrey Research Park, Hospital and University, and visitors to the new school/supermarket), there would almost certainly need to be a roundabout (rather than the proposed traffic-light controlled junction) and GBC has ruled out a roundabout on grounds of landscape impact and traffic. The secondary access to the site at Gill Avenue also presents problems, and as GBC states in its Transport Assessment (14.9.5), changes planned for the Tesco roundabout will not mitigate against the increased level of traffic through the junction as a result of the Blackwell Farm development, and this in turn will impact on the Egerton Road/Gill Avenue junction, which services the Royal Surrey County Hospital. We question whether it is responsible to allow a development that would impede emergency access to an A&E department and a major incident unit. The traffic impact resulting from the development of Blackwell Farm on the strategic road network would not appear to be properly assessed but it would be alleviated in part (but not completely) by widening the A3. However, timing and funding for this work is unclear so there would be many years of traffic chaos before any widening took place (if indeed it does). More significantly, the widening of the A3 would create noise and environmental impact on the neighbouring residential areas of Onslow Village and Beechcroft Drive and a six-lane highway would cause greater severance between Guildford and Blackwell Farm and areas to the west. The NPPF states in Section 6 para 47 that local authorities should “identify a supply of specific, developable sites or broad locations for growth, for years 6-10 and, where possible, for years 11-15”. In a footnote to this, it further adds, “To be considered developable, sites should be in a suitable location for housing development and there should be a reasonable prospect that the site is available and could be viably developed at the point envisaged.” We consider that the proposed access arrangements to Blackwell Farm are wholly inadequate for a development of this scale and thus the site cannot be “viably developed”.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/4794  Respondent: 8640353 / Julian Cranwell  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Policy A35 Wisley

We object to the re-inclusion in the plan of Policy A35 (land at Three Farms Meadow, alias the former Wisley airfield, Ockham). Following a huge public outcry, Guildford Planning Committee have unanimously rejected a recent planning application for precisely this development on 14 separate grounds. This deceived many residents into thinking that it has been defeated. Scandalously, the site had been reinserted into the new draft local plan published just 24 hours before the
planning decision – a clear signal to the developers to try again. There is in any case no need for housing on this site because the local plan housing target is incorrect and inflated and ignores constraints.

This is not an NPPF “presumption in favour of sustainable development” but a predetermined bias in favour of specific applicants, who had already been given many additional months to refine their application before it was rejected. Residents are disturbed by apparent political links between the ruling Conservative group on the Council and individuals connected to the developers, a shadowy Cayman Islands company. Policy A35 should be deleted from the plan for all the reasons the development was rejected by the Planning Committee, including:

1. Green Belt location and absence of “exceptional circumstances”.
2. Misrepresentation of the site as brownfield land: 17ha (less than 15%) is brownfield, it is adjacent to the SPA and therefore within the 400m exclusion zone for housing. The remains of the runway (14ha) are a habitat for rare flora and fauna and has never had any buildings on it.
4. Absence of adequate traffic data.
5. Further harm to air quality both onsite and nearby (e.g. the Cobham AQMA) and disregard for the health of children at the proposed secondary school.
6. Loss of high-quality agricultural land (55% of the site), in breach of national policy.
7. Disproportion of locating of over 2,000 dwellings within the ancient village of Ockham with just 159 households.
9. Cost of infrastructure required to the detriment of alternative more favourable sites.
10. Lack of local transport possibilities owing to country lanes with no footpaths or cycle ways and the distance to railway stations which have no spare parking capacity.
11. Impact on listed buildings.
12. Difficulty of SANG siting and inability to divert residents and their pets away from the SPA.
13. Extreme housing density with tiny garden spaces.
14. Damage to neighbouring communities of creating a settlement of 5,000 residents, equivalent to East and West Horsley combined, with worse light pollution, noise and traffic, and competition for local amenities and infrastructure.
15. Insufficient information about the impact on the local water table and run-off (see comments on flooding in Horsley above), and the possible aggravation of downstream flooding towards the Thames (e.g. Thames Ditton, which was under water during the winter of 2013/14). 19
16. Failure to evaluate the cumulative impact of this and nearby development sites on the area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to policy A42 Clockbarn Nursery There is no need for housing on this site because the local plan housing target is incorrect and inflated and ignores constraints. The site is part of the permanent Green Belt at Send and should remain undeveloped in order to preserve the amenity of the surrounding area. The site has very restricted access along Tannery Lane which is narrow and for most its length only capable of providing access for cars in one direction. Development of the site is not therefore sustainable or practical. Tannery Lane already provides access to a Business Park which generates a considerable amount of traffic at all times of the day including lorries. This narrow country lane cannot cope with any more traffic. Planning consent has already been granted, rather unwisely given the access problems, for 84 flats and a marina. Anymore development at this location would not be sustainable. The junction with Send Road has poor visibility and is dangerous for traffic entering and leaving Tannery Lane.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/4796  Respondent: 8640353 / Julian Cranwell  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to policy A43 Garlick’s Arch There is no need for putting houses on this site because the local plan housing target is incorrect and inflated and ignores constraints. The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy. Garlick’s Arch (A43) is in an unsustainable location. It does not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. The site is unsuitable due to lack of access to sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick’s Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided. The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result. We object to the proposal to remove Garlick’s Arch from the Green Belt. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for this land to be taken from the Green Belt. Once taken the green belt is lost forever. There is a real danger that the loss of this Green Belt will result in urban sprawl and the neighbouring villages merging into one another. The significant development in Send, Ripley and Clandon will result in the character of these villages being lost and the countryside encroached. We object to the development at Garlick’s Arch because of flood risk. The site at Garlick’s Arch is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. Knowing the area well we are aware that this site often floods during the winter months and the flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-
infrastructure planning has been undertaken. The Infrastructure Schedule makes no provision for any infrastructure removal of this land from the Green Belt (Policy P2). It is clear that with this site being added at the 11th hours no general industrial (B2) and storage and distribution (B8). There are no exceptional circumstances which allow for the will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (B1c), and their health. We object to the inclusion of the land at Garlick’s Arch, Send Marsh/Burnt Common and Ripley (A43). The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads. Furthermore, many of the country lanes around the villages of Ripley, Send and Clandon are narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition. We object to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces. Many of the affected villages, such as Send and Ripley, already suffer from parking problems. Further development around these villages will only result in more traffic and more parking problems. With some 5000 houses being proposed close to the village of Send and Ripley, the roads serving the village will become even more congested. Cycling has become an ever popular past time, particularly at weekends hundreds of cyclists past through the village on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road accidents involving cyclists as a result of the development proposed under the local plan. The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the road becoming ever more dangerous for pedestrians. We object to the lack of proper infrastructure planning for sites (Policy I1). Policy I1 requires the delivery of improvements to infrastructure in conjunction with development. We have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all. Despite the Garlick’s Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents’ in the locality will see their quality of life significantly deteriorate in many ways. Many of the utilities in the Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers. No plans to improve these services should mean no development of the Garlick’s Arch site. Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are already at capacity and suffering from funding cuts or freezes. Any further development without funding will place further stress upon existing health services. Police services are seeing funding reduced. The development of the proposed 13,860 homes during the plan period will stretch the police services further and is unsustainable. We object due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2). There is no certainty that either the A3 or M25 in the borough will be improved to increase capacity and reduce congestion during the Plan period. Highways England has no plans to even examine improving the A3 before 2020. We have considerable concerns that development of the large residential sites identified at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), will take place before any improvements are made to the trunk road network. The A3 & M25 are already at capacity during peak hours and any development prior to improvement of these roads will only make the situations worse. We object to poor air quality concerns (Policy I3). Paragraph 4.6.27 of the Plan states that “Development must also mitigate its traffic impacts, including its environmental impacts and impacts on amenity and health.” The significant level of development being proposed, particularly in the north east of the borough will lead to considerable further congestion, despite any attempts to mitigate this through travel plans. This will be particularly acute in built up residential areas and will only lead to greater levels of air pollution, which will have a detrimental effect on local residents and their health. We object to the inclusion of the land at Garlick’s Arch, Send Marsh/Burnt Common and Ripley (A43). Garlick’s Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8). There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2). It is clear that with this site being added at the 11th hours no infrastructure planning has been undertaken. The Infrastructure Schedule makes no provision for any infrastructure improvements for this site. How will the local services such as schools and doctors cope, many of which are already at capacity? (Policy I1)
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/4797  Respondent: 8640353 / Julian Cranwell  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to the inclusion of the land for new on/off ramps at Burnt Common (A43a). The addition north facing ramps to the A3 at Burnt Common would be a disaster for local communities. There is no requirement for local traffic to access the A3 to the north, but the addition will draw in a huge amount of ‘through’ traffic. The route from London/M25 to Woking would now be through Burnt Common and Send. Equally traffic from the east of Guildford (Merrow etc) and the A25 will now go through Clandon and Burnt Common. This will cause immense damage to those areas on small roads which cannot be improved. We object to the proposed Infrastructure Schedule (Appendix C). The Infrastructure Schedule sets out the key infrastructure requirements on which the delivery of the plan depends. For each of the Key Allocated Sites in the borough it identifies infrastructure projects that are required, except for Garlick’s Arch (A43) which is not mentioned. It is clear that the Plan takes no account of the infrastructure required for this site and is therefore not fit for purpose.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/4798  Respondent: 8640353 / Julian Cranwell  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A44

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to policy A44 Send Hill. There is no need for housing on this site because the local plan housing target is incorrect and inflated and ignores constraints. The proposed development is not sustainable because of poor infrastructure. Send Hill is a single track country road and too narrow to provide sufficient access to the site for travellers or accommodate the potential new levels of traffic the proposed development would bring. The site is a high quality green belt amenity area within beautiful surrounding countryside and would be spoilt by the development. A Wasteland Solutions environmental report on Send Hill dated March 2004 gave evidence of past ponding of water in the excavated area. Further development would disturb the water table and increase risk of flooding to surrounding properties. The site was used as a GBC registered landfill site and shown on the 1963-8 Ordnance Survey maps as “refuse and slag heap”. It is therefore unsuitable for such a development on health reasons. On the 1971 Ordnance Survey the site is shown as a “refuse tip” prior to when proper
licensing/registration was required. The date of the landfill works predates the 1999 EU Landfill Directive regulations. We therefore believe that there is a danger that any disturbance would be health hazard due to the unknown materials. GBC has installed gas monitoring wells on site since July 2000. One well recording methane gas discharge. A Southern County Searches (Sitescope Ltd) report E.2978.SN_HCP dated 5th January 2005 - Identifies the proposed site as GBC recorded landfill site Ref GU/11/LLC with type of waste not identified. The date of the landfill works predates the 1999 EU Landfill Directive regulations. We therefore believe that there is a danger that any disturbance would be health hazard due to the unknown materials. A Southern County Searches (Sitescope Ltd) report E.2978.SN_HCP dated 5th January 2005 - Identifies proposed site GBC recorded landfill site Ref GU/12 with type of waste identified as "unrestricted". This causes concern as to what it does contain and the dangers if disturbed. An Envirosearch Report RS1100201_1_1 dated 17th February 2004 and historical map data and information from GBC has identified the site as landfill and has "areas of potentially contaminative industrial activities” and “potential risk from landfill gas migrations”. Development of this site would be a health hazard.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/4799  Respondent: 8640353 / Julian Cranwell  Agent: 8640353 / Julian Cranwell

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A46

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to policy A46 land to the south of Normandy There is no need for housing on this site because the local plan housing target is incorrect and inflated and ignores constraints. There is unproven demand for secondary school places in the west wards that is being proposed as "exceptional circumstances" to redraw the Green Belt boundary. There is strong research evidence from SCC Education which proves existing under-utilisation in long term of secondary places in the west of the borough. There is an incorrect calculation of bespoke SANG since only 10 ha are proposed within site but the new population requires 21 ha. This will impact viability if contained in site (65 ha approx) - there is not an additional 10 ha in currently proposed SANG pre-allocated schedule in infrastructure report (Russell Place Farm) There is an incorrect evaluation of contribution of land within and between settlements to Green Belt "openness" - the previous PINS decisions in three appeals asserts "openness". GBC state there is no "openness" yet all land parcels in the site are "red" sensitivity in GBCS Vol 2 Addendum 1 & 2 and all contribute to the 3 key purposes of the Green Belt. There is a failure to engage with Rushmoor under the duty to co-operate rules in regards of traffic impact from Aldershot Urban Extension (3,800 homes) The increased commuting to Guildford plus new local vehicles (1,375 estimated) will take the A323 to over design capacity and produce perpetual congestion. The one railway bridge in Glaziers Lane + 1 railway tunnel in Westwood Lane on North Downs line are restricted (tunnel single lane) with poor geometry and have poor safety records with one fatality in last 15 years and there is no plan in the infrastructure report to widen bridge or replace tunnel (Network Rail). This will lock traffic from new development within site to the north of Flexford. C and D class roads are not designed for volumes indicated in Scenario 5. The flood risk will be significantly increased when land is developed. The site lies on the Hogs Back spring line and the land is natural SuDS. There is a stream running through the site with flood risk 3a. Civil engineering mitigation is unlikely to be effective. The site will introduce 300+ dogs and 250+ cats within 1km of TBHSPA and SANG will not stop increased disturbance and predation on the SPA.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/10091  Respondent: 8640353 / Julian Cranwell  Agent: 8640353 / Julian Cranwell
We object to Policy D1 Making better places

We object to the absence of any reference to vernacular or historic design guidelines, even in Conservation Areas. Most of the borough, especially the rural areas, has vernacular design guidelines that are available to give suggestions as to appropriate design. These should have mandatory planning force. The monitoring of this policy is inappropriate. Why should this policy result in a reduction of the number of appeals for poor design? Should it not result in better-designed buildings?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

We object to Policy D2 Sustainable design, construction and energy

Sustainability should be an overarching ambition, conditioning the whole local plan and running through it, as claimed in the NPPF, “like a golden thread”. It should be set out clearly in Policy S1, not buried away as a minor detail in Policy D2. This policy amounts to “greenwashing”, expounding aspirational environmental targets while ignoring the plan to build dormitory towns across the Green Belt that are environmentally and socially unsustainable. These settlements will bring vastly increased car use and will lead to unacceptable traffic congestion, overstretched social infrastructure, and more greenhouse gas emissions, noise and light pollution. This policy should not be just about saving energy but about preserving the borough’s stock of natural capital, especially the countryside, from futile attempts to rig the housing market. This policy’s emphasis on Combined Cooling Heating and Power and communal heating networks is meaningless, since no such networks are available locally.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
We object to policy D3 Historic Environment. This policy clashes with the strongly pro-development agenda of the rest of the plan and fails to address the contradiction. History is unamenable to improvement, so the policy should commit the Council firmly to protecting and preserving our heritage assets from development. Instead, the specific policy pledge to “support development” that might “enhance” heritage assets leaves wide scope for abuse in the form of destructive commercialisation and financial leveraging of relevant sites. This policy is based on the false premise that Guildford’s heritage is inherently in decay. This is a developer’s charter – a short step away from the idea that the historic environment needs to pay its way to be preserved. The Council’s aggressive reviews of Guildford Museum and the Electric Theatre support this interpretation. Whatever the “reasoned justification”, the actual policy wording in the blue box leaves too many loopholes. Development close to historical assets is harmful and should be expressly prohibited. This policy fails to meet the requirements of NPPF paragraphs 126 and 131-133.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Urban development

There is a fundamental flaw in the draft Local Plan, in that there are not enough dwellings planned in urban areas, in particular, Guildford town centre. This is where the demand for affordable homes is most acute, a fact which is recognised in much of the draft Local Plan. Yet the plan then envisages that most dwellings will be built outside the urban area, so there is no continuity in the plan – if the demand for affordable homes is most acute within the town, then is where these dwellings should be built. There are sites available, for example, various sites in Woodbridge Meadows, Walnut Tree Close (including the area around the station) and North Street. Yet the focus in these areas is to provide a very limited number of dwellings, with the emphasis on additional retail space and more commercial premises. Given the profound changes in traditional retail, this is not a sustainable policy. There have been many examples of bankruptcies amongst traditional retailers, the most recent examples being BHS and Austin Reed, and previously Woolworths, Comet, etc. The British Retail Consortium forecast that by 2020 up to one third of those now employed in traditional retail could lose their jobs, due to a combination of the move to the internet and higher costs, from business rates and increases in the minimum wage. Recent figures show that online sales are still growing quickly, with more than 13% of total retail sales now made over the internet. Nor does an expansion in traditional retail chime with the objective of attracting highly paid jobs to the area – the majority of jobs in retail are low paid, with zero hours contracts and usually a pay rate based on the minimum wage. So any expansion in traditional bricks and mortar retail would create a greater demand for affordable and social housing – exactly the reverse of what is needed.

Even the major grocery retail chains have been affected by changes in retail habits – Tesco, Sainsburys, Morrisons, etc are closing some stores, with no major large stores planned. Banks and other financial institutions are still closing some branches, so changes in town centres still have some way to go – but none of these changes are recognised in the draft Local Plan, which envisages no limit to traditional retail.

There is another reason why the retail sector is unlikely to exhibit long term growth, and this is consumer debt, which has reached a level that the Bank of England have said could contribute to economic stability. This is likely to have a greater destabilising effect in the event of an economic downturn – and there will certainly be at least two of these during the life of the Local Plan. Retail spending simply cannot be maintained indefinitely at its current rate, and to plan for a large increase in consumer spending is irresponsible.

So there has to be a reappraisal of the urban development plans, with more homes provided in urban areas, in particular in the centre of Guildford, before there is any consideration of building outside the urban area. These are not separate policies to be considered separately, but hang together as part of a holistic plan. As the council own many sites in the centre, these could be made available for development within the first 5 years of the plan, with mixed housing on these sites, including new social housing, which is sorely needed. Affordable housing is simply not affordable to anyone on the minimum wage, there is a need for a considerable expansion of social housing, a need that is not adequately recognised in the draft Local Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/10094   Respondent: 8640353 / Julian Cranwell   Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
We object to policy D4 Development in urban areas and inset villages

Summary

There are effectively two separate parts to this policy, both are flawed, and in the case on insetting, fatally flawed. In the case of urban development there are numerous flaws, including:

- The plan envisages a large expansion of the traditional “bricks and mortar” retail sector, but this is a sector in long term decline.
- The plan envisages that 40% of homes built will be affordable, but this does not provide any accommodation for low paid workers, for example, those on the minimum wage, who cannot afford to buy “affordable” homes, not can they pay the so-called “affordable” rent. There is a great need for an expansion in social housing, especially in urban areas, where there is a greater concentration of low paid workers such as those employed in the retail, warehousing and distribution sectors.
- The number of homes planned in the urban area is too low – there is a need for regeneration in some areas, but this is ignored and instead the plan concentrates on building homes on green field sites, which does not meet the needs for housing within the town, especially with the centre. This is not a sustainable policy as building outside the town has a disproportionate effect on road traffic.

In the case of insetting, the policy is fatally flawed, for two separate reasons.

- Firstly, it is based on an erroneous assumption. GBC justify the policy (in para 4.5.50) by suggesting, without any supporting data, that development in villages washed over by the green belt is at a lower rate than within Guildford town. This is not the case, and statistics from the ONS censuses of 2001 and 2011 show that this is assumption is incorrect. These statistics show that the growth rate in housing was higher in, for example, Effingham, a village washed over by the green belt than Merrow, a suburb of Guildford which is not washed over by the green belt. In fact, the rate of increase in housing stock in Effingham was faster than the average for the borough.
- Insetting has been based on the assumptions set out in the Green Belt and Countryside Study, but this is not referred to as part of the Evidence base. The analysis in this document was flawed to the extent that it is valueless. It has serious flaws in its methodology, includes subjective judgements, and thus its conclusions are flawed. These flaws are so serious that it should be removed from the evidence base that supports the Local Plan. However, removing the reference but retaining the decision process means that the decisions are based on flawed assumptions.

Urban development

There is a fundamental flaw in the draft Local Plan, in that there are not enough dwellings planned in urban areas, in particular, Guildford town centre. This is where the demand for affordable homes is most acute, a fact which is recognised in much of the draft Local Plan. Yet the plan then envisages that most dwellings will be built outside the urban area, so there is no continuity in the plan – if the demand for affordable homes is most acute within the town, then is where these dwellings should be built. There are sites available, for example, various sites in Woodbridge Meadows, Walnut Tree Close (including the area around the station) and North Street. Yet the focus in these areas is to provide a very limited number of dwellings, with the emphasis on additional retail space and more commercial premises. Given the profound changes in traditional retail, this is not a sustainable policy. There have been many examples of bankruptcies amongst traditional retailers, the most recent examples being BHS and Austin Reed, and previously Woolworths, Comet, etc. The British Retail Consortium forecast that by 2020 up to one third of those now employed in traditional retail could lose their jobs, due to a combination of the move to the internet and higher costs, from business rates and increases in the minimum wage. Recent figures show that online sales are still growing quickly, with more than 13% of total retail sales now made over the internet. Nor does an expansion in traditional retail chime with the objective of attracting highly paid jobs to the area – the majority of jobs in retail are low paid, with zero hours contracts and usually a pay rate based on the minimum wage. So any expansion in traditional bricks and mortar retail would create a greater demand for affordable and social housing – exactly the reverse of what is needed.

Even the major grocery retail chains have been affected by changes in retail habits – Tesco, Sainsburys, Morrisons, etc are closing some stores, with no major large stores planned. Banks and other financial institutions are still closing some
branches, so changes in town centres still have some way to go – but none of these changes are recognised in the draft Local Plan, which envisages no limit to traditional retail.

There is another reason why the retail sector is unlikely to exhibit long term growth, and this is consumer debt, which has reached a level that the Bank of England have said could contribute to economic stability. This is likely to have a greater destabilising effect in the event of an economic downturn – and there will certainly be at least two of these during the life of the Local Plan. Retail spending simply cannot be maintained indefinitely at its current rate, and to plan for a large increase in consumer spending is irresponsible.

So there has to be a reappraisal of the urban development plans, with more homes provided in urban areas, in particular in the centre of Guildford, before there is any consideration of building outside the urban area. These are not separate policies to be considered separately, but hang together as part of a holistic plan. As the council own many sites in the centre, these could be made available for development within the first 5 years of the plan, with mixed housing on these sites, including new social housing, which is sorely needed. Affordable housing is simply not affordable to anyone on the minimum wage, there is a need for a considerable expansion of social housing, a need that is not adequately recognised in the draft Local Plan.

In the detail of Policy D4, it suggests that in urban areas and inset villages planning permission will be granted provided that a proposed development:

• “Ensures that the layout, scale, form, massing, height of buildings and structures, and materials relate to the site context and its surroundings;” ....

There are several other criteria listed and the Policy then goes on to elaborate criteria specific to inset villages, as follows:

“In addition to the above, proposals for new development within inset village areas will have particular regard to:

• The distinctive settlement pattern of the village and the important relationship between the built development and the surrounding landscape;
• Important views of the village from the surrounding landscape;
• Views within the village of local landmarks.”

There are numerous development sites proposed that mean that the first criterion cannot be met, as the developments proposed do not relate to the scale, form or massing of the site surroundings. For example, in West Horsley and East Horsley, there are number of sites where this does not apply. It is proposed that a total of 3.6 km² should be removed from the green belt, with a total of 533 houses proposed on sites in East and West Horsley on a total of 29.1 ha, an average density of 18 dwellings/ha. These proposed developments are not in scale or proportion to the existing villages, and the housing density is considerably higher than existing housing density. Effectively, if these developments were to proceed, East and West Horsley would merge and become a large urban area in the green belt, totally different in character to the existing settlements, with the existing settlement pattern completely lost. Similar considerations apply to other proposed development sites, such as Flexford and Normandy. In this case, 1.3 km² would be removed from the green belt and a total of 1100 dwellings proposed on 67 ha, with an average density of 16.4 dwellings/ha. Again, the scale and form would overwhelm existing hamlets and villages, merging these to form another urban area in the heart of the green belt, with no consideration of the views of the settlements from the surrounding countryside, much of which has been given AONB status.

Thus the words of the policy statement D4 do not match the proposals contained in the draft local plan.

The “Reasoned Justification” for the policy consists of five paragraphs, 4.5.48 to 4.5.52. Of these, 4.5.48 and 4.5.49, 4.5.51 and 4.5.52 are not justifications for the policy, they are simply statements or further information. Paragraph 4.5.50 is the only attempted justification for this policy, but in fact this applies only to insetting. Paragraph 4.5.50 is factually wrong and so the justification for this policy does nor bear close examination. Parts of this paragraph are taken in turn below, to show the inaccuracies this paragraph contains.

“Historically, development has been focused in the urban areas of Guildford, and Ash and Tongham only. Development in the villages has been very limited due to the Green Belt designation which previously washed over all but one of the villages.”
This depends on how development is measured. In terms of raw numbers, this may be true, but this would ignore the fact that urban area of Guildford town contains much of the housing in the borough. Taking the increase in housing stock between the censuses of 2001 and 2011 in a specific wards reveals a much more complex picture. The village and ward of Effingham, for example, had a higher rate of adding dwellings than the average for the borough and for at least some of the Guildford urban wards. Using census data collected by the ONS, between 2001 and 2011, the number of dwellings in Effingham increased by 6.6%, whereas for the borough as a whole it increased by 5.0%. Over the same period in Merrow, a ward within the urban area of Guildford, the number of dwellings increased by only 1.2%, whilst in Normandy ward the increase was 2.6%. This analysis has not been exhaustive, but it is sufficient to show that the opening statement in paragraph 4.5.47 is incorrect, and that in some cases, proportionally, considerably more development has occurred in green belt villages. It must be incumbent on GBC to assess the facts before making false statements such as this. Opinions are not facts. ONS statistics are open to all.

In the first three months of 2016, planning applications for 11 additional dwellings in Effingham have been made, in a village of approximately 525 dwellings. One of these applications has been reduced from 6 to 4 dwellings, whilst the other 5 have been approved. This shows clearly that development within villages washed over by the green belt can occur, and that organic growth is possible. There is no necessity for insetting.

“Fifteen villages are now inset from the Green Belt meaning that development is no longer, by definition, considered inappropriate”.

Guildford’s Green Belt boundaries were established in the Guildford Borough Local Plan 1987, so are well established. There has not been any justification for the extensive green belt review that accompanies the insetting of villages, or for the removal of these villages from the green belt. According to the NPPF, paragraph 83, green belt boundary changes should be made only in exceptional circumstances, as follows

“Local planning authorities with Green Belts in their area should establish Green Belt boundaries in their Local Plans which set the framework for Green Belt and settlement policy. Once established, Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan. At that time, authorities should consider the Green Belt boundaries having regard to their intended permanence in the long term, so that they should be capable of enduring beyond the plan period.”

No exceptional circumstances have been demonstrated, with none given as justification in Policy D4 for the policy of insetting. Proposed green belt boundary changes are on a very large scale, as it is proposed to remove more than 6% of the existing area designated as green belt, and to create new green belt boundaries extending to more than 105 km. This is not a simple revision to the green belt, and a demonstration of exceptional circumstances is required for each change. This has not been done, not for a single proposed change.

Although Guildford Borough Council are in the process of producing a new Local Plan, this in itself is not enough to change Green Belt boundaries; the requirement to demonstrate exceptional circumstances still applies. According to a High Court judgement, Gallagher vs Solihull, issued March 30th, 2014, Case No. CO/17668/2013, there is still a requirement to prove exceptional circumstances – quotations below are from paragraph 125 of this judgement:

“However, it is not arguable that the mere process of preparing a new local plan could itself be regarded as an exceptional circumstance justifying an alteration to a Green Belt boundary. National guidance has always dealt with revisions of the Green Belt in the context of reviews of local plans…… and has always required “exceptional circumstances” to justify a revision. The NPPF makes no change to this.”

“Exceptional circumstances are required for any revision of the boundary, whether the proposal is to extend or diminish the Green Belt.”

Whilst each case is fact-sensitive and the question of whether circumstances are exceptional for these purposes requires an exercise of planning judgment, what is capable of amounting to exceptional circumstances is a matter of law, and a planner may err in law if he fails to adopt a lawful approach to exceptional circumstances. Once a Green Belt has been established and approved, it requires more than general planning concepts to justify an alteration.

Each and every proposed change to the green belt boundary requires that exceptional circumstances be demonstrated, otherwise the changes are not lawful. This has not been done by GBC, not for any proposed change.
From paragraph 130 of this judgement

"In other words, something must have occurred subsequent to the definition of the Green Belt boundary that justifies a change. The fact that, after the definition of the Green Belt boundary, the local authority or an inspector may form a different view on where the boundary should lie, however cogent that view on planning grounds, that cannot of itself constitute an exceptional circumstance which necessitates and therefore justifies a change."

"…..That, in his judgment, may now be so: but that falls very far short of the stringent test for exceptional circumstances that any revision of the Green Belt boundary must satisfy. There is nothing in this case that suggests that any of the assumptions upon which the Green Belt boundary was set has proved unfounded, nor has anything occurred since the Green Belt boundary was set that might justify the redefinition of the boundary.”

No changes that would warrant an alteration to green belt boundaries have been demonstrated by GBC, their so called “sensitivity analysis” is shallow and subjective, and changes that may have occurred since the boundary was established was discussed. The changes proposed do not meet the standards set in this judgement. Instead, GBC maintain that it is housing need that creates blanket exceptional circumstances for changes proposed to the green belt. However, this is not the case. Following a meeting with local councillors and MPs in early 2014, Nick Boles wrote to Anne Milton MP to clarify the issue of exceptional circumstances and in this letter said:

“The written Ministerial Statement of 1 July 2013 set out the Government’s concern that some recent planning decisions have not accorded the Green Belt the level of protection that was the explicit policy intent of Ministers. It made clear that the single issue of unmet need – whether for conventional housing or for travellers sites – is unlikely to outweigh the harm to the Green Belt and other harm to constitute the “very special circumstances” justifying inappropriate development in the Green Belt.”

These quotations show that the insetting process has considerable hurdles to overcome, including as it does the revision to Green Belt boundaries that accompanies insetting. Thus the most important questions are – did the flawed Pegasus “Guildford Borough Green belt and Countryside Study” show unequivocally that villages to be inset are not open villages, making no or a minimal contribution to the openness of the Green Belt; and that there were exceptional circumstances (other than unmet housing need) that justify a change to the Green Belt, creating a new boundary around all these villages – more than 105 km of new boundary? The Pegasus study did not do this, and this was just one of its many flaws (cf Annexe XX)

As shown above, development has occurred within villages, and the NPPF made it easier for additional development to take place within the green belt, via the provisions of paragraph 89, which specifically makes it easier for limited infill to occur and on a larger scale, for affordable housing to be built within villages washed over by the green belt. These provisions came into effect in 2012, when the NPPF was adopted and so the rate of increase in housing within villages is very likely to increase beyond that observed in the period between the 2001 and 2011 censuses.

It is clear from the most recent figures for planning applications to GBC in 2016 in Effingham that the pace of development within villages is changing, even with continued green belt protection. There is no requirement for insetting villages within the green belt, and the desire to increase development within the villages is not an adequate basis for insetting.

The final part of paragraph 4.5.47 is

“In accordance with national policy, the important character of these inset villages should instead be protected using other development management policies”.

This is not national policy, national planning policy is provided by the NPPF, and paragraph 86 of the NPPF is the relevant paragraph, which reads

“If it is necessary to prevent development in a village primarily because of the important contribution which the open character of the village makes to the openness of the Green Belt, the village should be included in the Green Belt. If, however, the character of the village needs to be protected for other reasons, other means should be used, such as conservation area or normal development management policies, and the village should be excluded from the Green Belt.”
There is thus no national policy that requires insetting. Instead, a judgement should be made for each village based on its contribution to the openness of the green belt. In fact, many of the villages proposed for insetting exhibit an open pattern of development, and so make an important contribution to the openness of the green belt, for example, Effingham. This has not been considered, other than in the flawed Pegasus report, and the examination of their approach reveals how this analysis was flawed. No further consideration has been given by GBC, and so GBC’s policy of wholesale insetting does not accord with national policy, as claimed.

In itself, there are many issues with insetting, and these include:

- According to the previous draft of the Local Plan, subject to the Regulation 18 consultation during summer 2014, insetting is based largely on the findings of the Pegasus study, “Guildford Borough Green Belt and Countryside Study. This report was very poor and various parts of the study criticised by many, including some borough councillors. It is perverse to continue with any recommendations of this study. In particular, a detailed review of this report for Effingham village showed that it was inaccurate and subjective.
- The settlement hierarchy was also subject to a detailed review and again this showed that scoring methods used were inaccurate and subjective.
- Boundary changes are arbitrary, without an adequate detailed survey. There are no checks and balances to this, even though the positioning of the line can change the price of an acre of land from about £15,000 to over £1 million. There is no process to it, simply someone using a computer and a mouse – literally a mouse click can turn some land owners into millionaires. In some cases, the proposed boundary divides semi-detached houses, so that one is still inside the green belt and the other outside. In other cases, the boundary divides gardens, so that part of a garden is in, part out of the green belt. Due care and attention has not been given to producing proposed boundaries.
- In many cases, boundaries proposed do not comply with the requirements of the NPPF, which is given in the NPPF, paragraph 85, final bullet point, which states “define boundaries clearly, using physical features that are readily recognisable and likely to be permanent”.

Given this NPPF definition, treelines, hedgerows, woodlands, etc should not be considered as potential Green Belt boundaries. In fact, in some cases proposed boundaries cross open fields, with no discernible features whatsoever. These are entirely inappropriate as a green belt boundary.

It should also be noted that GBC implicitly recognise that insetting is likely to lead to more development within villages on sites that are not identified in the draft Local Plan. But there is no recognition of this in the housing target. As is noted, insetting would mean that the rate of windfall development would increase, but GBC have not provided a proper analysis of windfall development (such as that provided by Mole Valley District Council) and they have failed to recognise a higher rate of windfall development in showing how the housing target will be met – even though, via Policy D4, they are planning for it. Windfalls should be deducted from the housing target, and the need for additional sites would thus be substantially reduced. Windfall development should be properly assessed and identified within the housing target, with an appropriate increase in the rate of windfalls in any villages that are inset.1 THE BROWNFIELD OPPORTUNITY

Yes, we need a new Local Plan for our borough in order to provide a development strategy within which we can accommodate our local housing, economic and environmental needs. We do not consider that the target of 1,172 homes in the town centre takes account of the need and demand for housing or the opportunities that brownfield sites present for increasing the residential development in the core of the town which will in itself help to sustain the retail core...
by increased economic impact. The Town Centre policy needs to maximise the potential for residential development on brownfield and include as an absolute minimum the 2,551 units proposed in by Allies and Morrison for the town centre included in the masterplan 2015 which has recently been adopted by GBC. The reality is that the Town Centre has the capacity for at least 5,000 homes. The additional target capacity of 5,000 could easily be provided within the following urban sites which have the capacity for 7,500 homes:

- 2,500 homes detailed in Masterplan 2015 including Woodbridge Meadows which can itself be increased substantially
- 500 homes at North Street
- 1000 homes on current GBC car parks (25 acres) and at the station
- 1000 homes saved in the urban area if 100% of students are accommodated on Surrey University campus (17 ha of car parks)
- 1000 homes at Slyfield on the 40 ha regeneration site
- 1000 windfall infill (50 per annum)
- 500 homes on brownfield sites in villages on sites of max 1ha which do not impact Green Belt

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/457  Respondent: 8640353 / Julian Cranwell  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy E1: Sustainable employment

Response

Summary

I OBJECT because:

- the evidence base is unreliable
- there is unclear differentiation between B class uses
- only high added-value business uses are desirable, not low grade, low employment warehousing which is land hungry
- industrial and commercial businesses must be concentrated in the urban area, or existing business parks (eg Slyfield) not in the rural environment which the infrastructure is unable to support
the rural environment must support micro or high tech businesses, agricultural industries, and tourism, and these sectors must not be damaged by general industrial development which is inappropriate

**Detailed response:**

I OBJECT to this policy.

I need to distinguish between wanting to increase the added value of the economy and physical expansion, especially given the scarcity of land in Guildford. Guildford is not the place for large space hungry businesses. I believe Guildford should target high added-value small and medium sized enterprises or the headquarters of larger corporations, but not provide low added value warehousing and industrial space.

GBC appear to fail to appreciate the fundamental rationale of the Use Classes Order as a planning tool in terms of useful property market research or forward planning.

No proper analysis has been made of data held by GBC in respect of different B classes in terms of planning applications granted or evidence gathered by the economic development function at GBC without any attempt at real market demand apart from vague references to freely available market research undertaken by commercial estate agents. (See definitions of B classes at end of this policy response).

What I are left with is a fairly clumsy and poorly informed plan which clusters B classes without any appreciation of widely different employment impact and economic sustainability. E.g. B1 (mostly local office use/R&D) generates at least 5 times as much employment as B8 (distribution and warehousing).

This draft Local Plan is partly based on new findings by Aecom in the latest ELNA 2015 [Employment Land Needs Assessment 2015]. This includes the recasting of the ELNA by Aecom in 2015 which updated the ELNA 2013 prepared by GBC. I have had regard to the evidence base provided by Aecom in the 2015 ELNA and find it a more reliable evidence base for overall projected employment in the borough over the plan period in overall numbers than done previously by GBC in 2013. However, I have concern that the survey work by Lambert Smith Hampton is in the form of high level free property research that is used for the purposes of marketing their services over a wide area not specifically commissioned for the borough of Guildford and undertaken for ELNA purposes.

However, I am concerned that the research undertaken by Aecom is generally superficial and lacks sufficient detail and analysis between B1a, B1b, B1c, B2 and B8 use classes and that no reliable individual analysis has been undertaken of the widely different supply and demand dynamics of office, research and development, light industrial, general industrial and warehousing and distribution floor space.

The lack of appreciation by GBC as to the opportunity for widely different uses being generated within B class clusters defeats the whole point of proper planning of employment uses and can significantly endanger previously good planning put forward in the previous 2003 plan. I support the concept of seeking increased investment in our local knowledge-based, high technology economy. This will provide well paid, creative jobs and generate the wealth necessary to fund the infrastructure and environment this sort of industry requires.

I need to promote the idea of new knowledge transfer in incubator units and small premises for new start up enterprises. We need to be on the wave of innovative new technology as opposed to older established businesses. High value-added industry is desirable; low tech, land-hungry older businesses which will increase congestion are not desirable.

I have concern as to the ill-informed clustering of all B classes. This is unclear in terms of market evidence required to inform effective planning. There is a failure to provide a clear understanding of business needs within the relevant area as required under Section 160 of the NPPF.

Little regard has been given in the plan to the economic reality of falling demand for B2 industrial space which is clustered with other B classes almost randomly throughout the plan.
Little regard is had to the opportunity of B1 b space as an opportunity for research and development which needs to be nurtured and preserved without the detrimental and confused clustering with other B classes both in terms of planning and promotion of a research hub.

I do not support the policy of creating Strategic Employment sites outside the urban centres.

Some of the strategic industrial sites would be better classified as brownfield land suitable for use as a residential area, eg Woodbridge Park, Woodbridge Road and Merrow Lane.

This study varies very significantly from the previous Guildford Borough Council ELNA 2013, which after two years has been completely re-written. This leads us to question the reliability of the evidence base here which has been used to justify the assumptions and plans; it is unclear that the current evidence base is any more reliable than that used previously. This calls into question the general reliability of the process of collection and interpretation of data in the overall forward planning process by GBC.

**DEFINITIONS:**

B1 Business

B1 building use is use for all or any of the following purposes:

(a) as an office other than a use within class A2 (financial and professional services),

(b) for research and development of products or processes, or

(c) for any industrial process, being a use which can be carried out in any residential area without detriment to the amenity of that area by reason of noise, vibration, smell, fumes, smoke, soot, ash, dust or grit.

General Industrial

B2 building use is for the carrying on of an industrial process other than one falling within class B1 above or within classes B3 to B7 below. (Note: B3-B7 relates to very heavy industry such as oil refining, smelting etc).

Distribution or Storage

B8 building use is for storage or as a distribution centre.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPP16/10078  **Respondent:** 8640353 / Julian Cranwell  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
We OBJECT because

- the evidence base is unreliable
- there is unclear differentiation between B class uses
- only high added-value business uses are desirable, not low grade, low employment warehousing which is land hungry
- industrial and commercial businesses must be concentrated in the urban area, or existing business parks (eg Slyfield) not in the rural environment which the infrastructure is unable to support
- the rural environment must support micro or high tech businesses, agricultural industries, and tourism, and these sectors must not be damaged by general industrial development which is inappropriate

Full response

We OBJECT to this policy.

We need to distinguish between wanting to increase the added value of the economy and physical expansion, especially given the scarcity of land in Guildford. Guildford is not the place for large space hungry businesses. We believe Guildford should target high added-value small and medium sized enterprises or the headquarters of larger corporations, but not provide low added value warehousing and industrial space.

GBC appear to fail to appreciate the fundamental rationale of the Use Classes Order as a planning tool in terms of useful property market research or forward planning.

No proper analysis has been made of data held by GBC in respect of different B classes in terms of planning applications granted or evidence gathered by the economic development function at GBC without any attempt at real market demand apart from vague references to freely available market research undertaken by commercial estate agents. (See definitions of B classes at end of this policy response).

What we are left with is a fairly clumsy and poorly informed plan which clusters B classes without any appreciation of widely different employment impact and economic sustainability. E.g. B1 (mostly local office use/R&D) generates at least 5 times as much employment as B8 (distribution and warehousing).

This draft Local Plan is partly based on new findings by Aecom in the latest ELNA 2015 [Employment Land Needs Assessment 2015]. This includes the recasting of the ELNA by Aecom in 2015 which updated the ELNA 2013 prepared by GBC. We have had regard to the evidence base provided by Aecom in the 2015 ELNA and find it a more reliable evidence base for overall projected employment in the borough over the plan period in overall numbers than done previously by GBC in 2013. However, we have concern that the survey work by Lambert Smith Hampton is in the form of high level free property research that is used for the purposes of marketing their services over a wide area not specifically commissioned for the borough of Guildford and undertaken for ELNA purposes.

However, we are concerned that the research undertaken by Aecom is generally superficial and lacks sufficient detail and analysis between B1a, B1b, B1c, B2 and B8 use classes and that no reliable individual analysis has been undertaken of the widely different supply and demand dynamics of office, research and development, light industrial, general industrial and warehousing and distribution floor space.

The lack of appreciation by GBC as to the opportunity for widely different uses being generated within B class clusters defeats the whole point of proper planning of employment uses and can significantly endanger previously good planning put forward in the previous 2003 plan. We support the concept of seeking increased investment in our local knowledge-based, high technology economy. This will provide well paid, creative jobs and generate the wealth necessary to fund the infrastructure and environment this sort of industry requires.
We need to promote the idea of new knowledge transfer in incubator units and small premises for new start up enterprises. We need to be on the wave of innovative new technology as opposed to older established businesses. High value-added industry is desirable; low tech, land-hungry older businesses which will increase congestion are not desirable.

We have concern as to the ill-informed clustering of all B classes. This is unclear in terms of market evidence required to inform effective planning. There is a failure to provide a clear understanding of business needs within the relevant area as required under Section 160 of the NPPF.

Little regard has been given in the plan to the economic reality of falling demand for B2 industrial space which is clustered with other B classes almost randomly throughout the plan.

Little regard is had to the opportunity of B1 b space as an opportunity for research and development which needs to be nurtured and preserved without the detrimental and confused clustering with other B classes both in terms of planning and promotion of a research hub.

We do not support the policy of creating Strategic Employment sites outside the urban centres.

Some of the strategic industrial sites would be better classified as brownfield land suitable for use as a residential area, eg Woodbridge Park, Woodbridge Road and Merrow Lane.

This study varies very significantly from the previous Guildford Borough Council ELNA 2013, which after two years has been completely re-written. This leads us to question the reliability of the evidence base here which has been used to justify the assumptions and plans; it is unclear that the current evidence base is any more reliable than that used previously. This calls into question the general reliability of the process of collection and interpretation of data in the overall forward planning process by GBC.

**DEFINITIONS:**

**B1**

**Business**

B1 building use is use for all or any of the following purposes:

(a) as an **office** other than a use within class A2 (financial and professional services),

(b) for **research** and **development** of products or processes, or

(c) for any industrial process, being a use which can be carried out in any residential area without detriment to the amenity of that area by reason of noise, vibration, smell, fumes, smoke, soot, ash, dust or grit.

**General Industrial**

B2 building use is for the carrying on of an industrial process other than one falling within class B1 above or within classes B3 to B7 below. (Note: B3-B7 relates to very heavy industry such as oil refining, smelting etc).

**Distribution or Storage**

B8 building use is for storage or as a distribution centre.

We note that there is a significant reduction of between 71% and 79% in the previous job target and resultant 79% reduction in employment space in response to the many objections lodged in 2014 against an unsubstantiated agenda for economic expansion in the last draft and based on new findings by Aecom in the latest ELNA 2015. We have concern as to the ill-informed clustering of all B classes in terms of the clarity of market evidence required to inform effective planning and a failure to provide a clear understanding of business needs required under Section 160 of the NPPF. We also note the
dramatic reduction in assessed demand by two Employment Land Needs Assessment Reports carried out under the same terms of reference within a period of 2 years which calls into question the general reliability of the process of collection and interpretation of data in the overall forward planning process by GBC. We do not support the policy of creating a Strategic Employment site at Garlick’s Arch (A43) in the Green Belt which is completely unnecessary due to the overall decrease in demand for industrial space which could be easily accommodated at Slyfield. We are concerned however that the research undertaken by Aecom is generally superficial and lacks sufficient detail and analysis between B1a, B1b, B1c, B2 and B8 use classes and that no reliable individual analysis has been undertaken of the widely different supply and demand dynamics of office, research and development, light industrial, general industrial and warehousing and distribution floor space. No proper analysis has been made of data held by GBC in respect of different B classes in terms of planning applications granted or evidence gathered by the economic development function at GBC and no robust assessment of local market demand apart from fairly brief references to freely available market research undertaken by commercial estate agents such as Lambert Smith Hampton covering a much wider area. GBC appear to fail to appreciate the fundamental rationale of the Use Classes Order as a planning tool in terms of useful property market research or forward planning. What we are left with is a fairly clumsy and poorly informed plan which clusters B classes without any appreciation of widely different employment impact and economic sustainability. E.g. B1 generates at least 5 times as much employment as B8. The lack of appreciation by GBC as to the opportunity for widely different uses being generated within B class clusters defeats the whole point of proper planning of employment uses and can significantly endanger previously good planning put forward in the previous 2003 plan. E.g. the creation of a research and development park linked to the University but now has the threat of being downgraded into a general business park (see below). Little regard has been given in the plan to the economic reality of falling demand for B2 industrial space which is clustered with other B classes almost randomly throughout the plan. Little regard is had to the opportunity of B1b space as an opportunity for research and development which needs to be nurtured and preserved without the detrimental and confused clustering with other B classes both in terms of planning and promotion of a research hub. We note that the past trend of expansion of Office/R &D is 0.43% pa over the period from 2004 to 2012 derived from VoA analysis and that the calculated annual floor space demand is 0.7% over the plan period up to 2033. We support the concept of seeking increased investment in our local knowledge-based, high technology economy. This will provide well paid, creative jobs and generate the funding necessary to pay for the infrastructure and environment this sort of industry requires. We need to distinguish between wanting to increase the added value of the economy and physical expansion, especially given the scarcity of land in Guildford. Guildford is not the place for large space hungry businesses. So we should target high added value small and medium sized enterprises rather than the headquarters of larger corporations. We need to promote the idea of new knowledge transfer in incubator units and small premises for new start up enterprises. They need to be on the wave of innovative new technology as opposed to older established businesses. We object to the policy of creating a Strategic Employment at Garlick’s Arch (A43) in the Green Belt. The stated requirement of 7,000 sq m (B1c, B2 and B8) could easily be accommodated at the Slyfield Regeneration site of 40 ha.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/458  Respondent: 8640353 / Julian Cranwell  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Policy E2: Location for new employment floorspace

Response

Summary

I OBJECT to this policy as it stands. I am of the opinion that all new office and research and development (use Class B1a and B1b) floor space should be within Guildford town centre. I do not support the policy of expanding the Research Park onto Blackwell Farm and I do not believe there are exceptional circumstances to justify incursion into this permanent and high quality area of Green Belt

Detailed response:

- The Surrey Research Park currently extends to 65,000 sq m
- There is already granted consent to expand to a further 9,000 sq m (14%)
- The past trend of expansion of Office/R &D is 0.43% pa over the period from 2004 to 2012 based on ELNA 2015 derived from VoA analysis
- The ELNA 2015 calculated annual floor space demand is 0.7%
- The data point for our analysis is today in 2016 so we have 17 years to go to the end of the plan period.
- The necessary growth in floor space over the plan period is therefore 17 years x 0.7% = 11.9%
- There is currently 14% expansion space already available
- The proposal by GBC to expand the 65,000 sq m by 9,000 sq m (existing allocation) with an additional 35,000 sq m amounts to an increase of 67% of the Research Park which is not required
- The Research Park is currently developed at a density of 25% plot ratio. The majority of existing buildings are 2 storeys giving a developed floor space plot ratio of 12.5%.
- The existing Research Park has the opportunity to markedly increase its density without infringing any Green Belt land nearby. Any density increase would be cost effective for the use of all existing infrastructure and would also have the potential to match the existing densities of existing academic buildings on the university campus which are three to four times higher.
- Together with the existing expansion of 14% through existing consents and the opportunity to increase its density the Research Park has ample capacity to expand to embrace new demand for B1b uses linked to the university.
- A preferred location for increased B1a and B1b space should be on other existing sites close to housing and a convenient transport hub

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
We OBJECT to this policy as it stands. We are of the opinion that all new office and research and development (use Class B1a and B1b) floor space should be within Guildford town centre. We do not support the policy of expanding the Research Park onto Blackwell Farm and we do not believe there are exceptional circumstances to justify incursion into this permanent and high quality area of Green Belt

- The Surrey Research Park currently extends to 65,000 sq m
- There is already granted consent to expand to a further 9,000 sq m (14%)
- The past trend of expansion of Office/R &D is 0.43% pa over the period from 2004 to 2012 based on ELNA 2015 derived from VoA analysis
- The ELNA 2015 calculated annual floor space demand is 0.7%
- The data point for our analysis is today in 2016 so we have 17 years to go to the end of the plan period.
- The necessary growth in floor space over the plan period is therefore 17 years x 0.7% = 11.9%
- There is currently 14% expansion space already available
- The proposal by GBC to expand the 65,000 sq m by 9,000 sq m (existing allocation) with an additional 35,000 sq m amounts to an increase of 67% of the Research Park which is not required
- The Research Park is currently developed at a density of 25% plot ratio. The majority of existing buildings are 2 storeys giving a developed floor space plot ratio of 12.5%.
- The existing Research Park has the opportunity to markedly increase its density without infringing any Green Belt land nearby. Any density increase would be cost effective for the use of all existing infrastructure and would also have the potential to match the existing densities of existing academic buildings on the university campus which are three to four times higher.
- Together with the existing expansion of 14% through existing consents and the opportunity to increase its density the Research Park has ample capacity to expand to embrace new demand for B1b uses linked to the university.
- A preferred location for increased B1a and B1b space should be on other existing sites close to housing and a convenient transport hub

We are of the opinion that all new office and research and development (use Class B1a and B1b) floor space should be within Guildford town centre. We object to the policy of expanding the Research Park onto Blackwell Farm and we do not believe there are exceptional circumstances to justify incursion into this permanent and high quality area of Green Belt. The Surrey Research Park currently extends to 65,000 sq m. There is already granted consent to expand to a further 9,000 sq m (14%). The past trend of expansion of Office/R &D is 0.43% pa over the period from 2004 to 2012 based on ELNA 2015 derived from VoA analysis. The ELNA 2015 calculated annual floor space demand is 0.7%. The data point for our analysis is today in 2016 so we have 17 years to go to the end of the plan period. The necessary growth in floor space over the plan period is therefore 17 years x 0.7% = 11.9%. There is currently 14% expansion space already available. The proposal by GBC to expand the 65,000 sq m by 9,000 sq m (existing allocation) with an additional 35,000 sq m amounts to an increase of 67% of the Research Park which is not required. The Research Park is currently developed at a density of 25% plot ratio. The majority of existing buildings are 2 storeys giving a developed floor space plot ratio of 12.5%. The existing Research Park has the opportunity to markedly increase its density without infringing any Green Belt land nearby. Any density increase would be cost effective for the use of all existing infrastructure and would also have the potential to match the existing densities of existing academic buildings on the university campus which are three to four times higher. Together with the existing expansion of 14% through existing consents and the opportunity to increase its density the Research Park has ample capacity to expand to embrace new demand for B1b uses linked to the university. We do not accept that the valuable and workable concept of the Research Park should have its integrity and purpose diluted by being converted into...
yet another Business Park for office users rather than research organisations
A preferred location for increased B1a and B1b space should be in the Town Centre close to housing and a convenient transport hub

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/459  Respondent: 8640353 / Julian Cranwell  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy E3: Maintaining employment capacity and improving employment floorspace

Response

Summary

I OBJECT. I do not support the policy of resisting change of use from B1a to residential because it flies in the face of positive property market solutions for the regeneration of brownfield land and is contrary to current government policy which has recently been reaffirmed and permits a change of use from B1a (offices) to C3 (residential).

Detailed response:

- I believe that the existing government policy which has recently been made permanent of allowing change of use from B1a to C3 is sound
- Many office buildings reaching an age of more than 30/50 years become redundant in terms of energy compliance making them illegal to occupy for employment purposes and the cost of refurbishment makes them redundant and uneconomic
- The reality of market demand is that the gross development value of refurbished residential space is in excess of the gross development value of refurbished old office space in many locations (this gross development value assessment is supported by the analysis by property consultants GVA in the supporting evidence within the Allies and Morrison Masterplan for Guildford dated 2015)
- Office space is available and the turnover of office space in Guildford is slow, which would seem to indicate that there is excess office capacity relative to demand
- To resist change from B1a to C3 is contrary to the concept of brownfield first for residential development schemes
- To resist change from B1a to C3 in Strategic or Significant Employment Sites is contrary to the concept of integrated mixed use communities whereby the journey to work is minimised
· London has led the way with significant residential schemes being created from redundant office stock. A good example is the South Bank in London adjacent to Waterloo Station where in 2005 the Shell Centre has been converted into flats. Another early example is the 2000 scheme at Metro Central Heights at Elephant and Castle where the old Alexander Fleming House was converted to 435 flats by St George. GBC needs to adopt more modern trends and policies.

· Guildford is in dire need of increasing town centre residential development

· The feared loss of employment will be marginal and impractical to resist. Empty office blocks are not the answer.

· I regard the evidence base (Employment Land Needs Assessment 2015 and the Guildford Borough Economic Strategy 2013-31) as flawed and inconsistent and therefore unreliable evidence

· In relation to the targets and monitoring indicators, I do not consider that the targets are desirable or sound, and therefore do not consider that the monitoring indicators are valid. Why should Guildford target 3200 additional B class jobs when it has almost full employment? Why should no employment floorspace be lost, when some of it is inappropriate and not fit for purpose? Why is it desirable to increase B1/B2/B8 floorspace?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/10080  Respondent: 8640353 / Julian Cranwell  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Policy E3 maintaining employment capacity

We support the concept and aim but object on the grounds that the practicalities of sustainable transport have not been properly considered,

It is not sustainable to build dormitory towns and call them sustainable.

Not everyone can cycle all the time.

How can large developments outside the town centre maximise sustainable travel? This is a matter for the planning process- the further from the town centre, the less sustainable the development will be.

Reliance on cycling discriminates against vulnerable members of the community. How can the disabled, those with small children, or the very old, or the infirm, or those who are ill, cycle outside the town in order to commute, or even inside the town? Only some people cycle –and Guildford has some steep hills, especially going out of town. Park and rides are slow – how can those with a 3 hour commute add 1 hour to their journey from using park and rides?
The only sustainable mechanism for new developments is to have them in the town centre close to the railway and the main shopping links where a hoppa bus can provide satisfactory links for those who cannot walk or cycle.

While we welcome the intention to encourage rail travel by adding two new stations there could unintended consequences. Once again we see the word “expect” used which means the policy has no teeth. The word “expect” must be replaced with the word “require” so that this policy is enforceable.

There are a number of problems with this policy.

Congestion is a widely recognised factor in the local area of Guildford, and this is a major factor in the public response to the proposed housing numbers, which represents more than a 25% increase in housing numbers in a borough that is already profoundly congested. [Source: SHMA p61: itself sourced from ONS for 2013.] Residents recognise that to increase the population by this level within the existing transport provision is not feasible, and this informs much of the public response to the proposed level of housing accommodation.

It is not clear that this recognition, which is widespread through the borough, is shared by those who have drafted the Local Plan.

Guildford is a commuter town, which (compared to London) offers better quality of life and lower house prices, so it will continue to be a commuter town for the foreseeable future. As a result, access to the stations for commuting is of significance. It is not realistic to assume that traffic to stations for commuters can be replaced either by bus services (slow, intermittent, expensive, and in many cases absent completely) or by cycle. There is a capacity issue of car parking at the station, which effectively creates an absolute constraint on the feasibility of commuting from Guildford.

Cycling is attractive, and, for the urban young, especially students, it is both practical and cheap, and can be quick. However, as noted, those en route to work cannot be assumed to be able to cycle in working clothes. Elderly members of the community, those transporting small children, and the disabled cannot participate in cycling except to a limited extent. Effectively the "average" person deemed to be capable of cycling to substitute for car trips is an able-bodied adult not travelling to somewhere where smart clothing is required, not needing to arrive clean (or with showering facilities on arrival, not provided by all employers); this is not sufficiently widespread in terms of the local demographic for travellers that it should be allowed to determine policy – and of course, not needing to transport, for example, supermarket shopping after the trip. What about the disabled? the elderly? those looking after more than one child? Are they to be housebound? This is not a reasonable strategy. Before transport and buildings are determined on the basis of such a policy, it is also imperative that safe cycle routes are implemented through the borough. Cycling in winter on rural roads is inherently more dangerous. Upgrading these roads would not be feasible in terms of cost nor desirable in terms of local character.

Cycle lanes which disappear into normal traffic lanes, which travel over potholes and which allow cyclists to be threatened by HGVs are not conducive to wider cycle usage, nor should wider cycle usage be encouraged until it can be demonstrated that it is safe, which currently, locally, it is not. The A25 cycle corridor scheme (Part of LRN1) will exchange the risk between cyclists and vehicles sharing space for the risk between cyclists and pedestrians sharing space. Much of the A25 has no pedestrian area anyway outside the urban space. Many cyclists travel at high speed and they will be put into conflict with pedestrians including mothers with very young children and schoolchildren many of whom need to cross the road and hence cross the cycleway. This is likely to lead to accidents and pedestrians are being disadvantaged.

Road capacity reduces as average speeds come down due to congestion. Where proper cycle lanes or off-road lanes are not provided then it is inevitable that safe driving will lead to reduced average motor vehicle speeds and gap development in the traffic stream. Both these effects act to reduce the capacity of our local road network. This loss of capacity has not been recognised in the Transport Strategy.

The concept of the park and ride with access into the town limited for those who live outside the town, is similarly flawed. Park and Ride is expensive, cumbersome and slow. It should be noted that in Oxford it has had a disastrous impact on small local retailers which is a retail segment that it is important to retain and support.

Use of park and rides increases the use of the strategic road network by local users, which is not what it is designed to do.
This proposal is combined with aggressive exclusion from the town of those who are living in peripheral communities, which will increasingly resemble housing estates. This is a strategy for sink estates through Surrey instead of the Green Belt - this is not a strategy for growth. Head offices will choose to go elsewhere, because highly skilled staff and management in the cutting edge industries that GBC wants to encourage, will not choose to live in a dense housing estate.

The existing extent of traffic congestion has not been fully recognised. As a consequence the impact of the various development scenarios has been understated and the infrastructure costs are an understatement.

The transport studies are incomplete and unpublished and this should have led to deferral of consideration of the Local Plan consultation process until it was possible to revise the plan post publication of the studies. This matter was raised by a number of councillors at the Full Council meeting on 24 May 2016 when the consultation was approved, but a motion to defer was overturned by the majority party.

Cross-subsidy in terms of infrastructure is envisaged. The infrastructure deficit needs to be resolved before there are large numbers of new residents exacerbating the current congestion. The funding of the new developments through CIL and S 106 is expected to contribute to the transport impacts across the borough, and there is negligible concern for the transport problems created within those new developments or in areas adjacent to them. This is not acceptable to existing residents and is likely to cause some problems with the future residents too, who may arguably feel aggrieved that the road funding associated with their developments is being subverted to other areas. While this may be permissible under the revised CIL regulations it is questionable whether it is morally acceptable to grant planning permission to build on the Green Belt in order to cross subsidise the building of roads or other infrastructure in the town centre or elsewhere across the borough or outside it.

Insetting of villages and the proposed relaxation of planning restrictions anywhere outside settlements (Green Belt or not), implied in P2, will lead to substantial infilling that will not require traffic assessment but will contribute a highly significant amount of additional car journeys overall - by a more insidious process than the large developments proposed.

Costs for rail or bus travel could be substantially reduced and would incentivise their use; but these are outside the remit of GBC and so cannot be encouraged by them.

It remains to be seen whether the proposed new stations will be delivered as they are not entirely within the council’s control. While we welcome the intention to encourage rail travel by adding two new stations there could be unintended consequences as the roads local to both sites are heavily congested. If parking facilities are inadequate this could lead to a need for onerous parking restrictions on roads nearby – possibly affecting small businesses adversely.

If parking facilities are adequate this will encourage more traffic onto local roads and commuters tend to be hurrying to catch a train or anxious to return home after a day at work. That does not bode well for the safety of pedestrians needing to cross those roads. House prices near to stations tend to attract higher prices and this will increase the profit motive to developers wanting to build on greenfield sites nearby. It will also mean that so-called affordable housing will be even less affordable at these sites. It may also lead, over time, to an undesirable loss of social-rented housing in the vicinity. A minor issue is that stopping at the additional stations will increase the train journey times to and from Guildford town centre on the lines affected.

Detail in Policy wording – flawed drafting:

The policy begins and ends with the weak and totally ineffective word, in planning terms, “expect”.

Contributing through CIL will not necessarily address needs local to the development concerned, and created by it, but may involve solving existing problems elsewhere in the Borough.

Bullets 4 & 5 – improvements to park and ride facilities imply increased car usage from outside the town and the parking provision acknowledges that most journeys will be by car.
Bullet 6 - Has the Vehicle parking Supplementary Planning Document been published? It is not listed as key evidence but the policy refers. How can a policy have been determined with reference to a non-existent part of the evidence base?

Bullets 7, 8, 9 & 10 are weak & aspirational with let-out words such as “facilitate the use of”, “wherever possible”, “contribute” and “where appropriate” (and poorly bulleted!). How will the use of ultra low emission vehicles be facilitated? This is such a vague aspiration as to be meaningless.

The policy only “expects” new developments to contribute, demonstrate adequate provision, etc – it should enforce them. A transport statement AND assessment ought to be a fixed requirement – not a matter for negotiation – while the policy implies that this might be waived even for sites that generate significant amounts of movement.

The construction traffic, noise and pollution generated by meeting the proposed housing number will be excessive. It will have a highly significant impact on the amenity and health of those residents living close to the development sites and those who live on the routes that will be taken by the construction traffic.

The last paragraph says nothing new in planning terms but does mean that the Local Plan has not fully and properly considered the traffic impacts of the proposed sites. We have experience of how misleading the TAs produced by developers can be – using averaging techniques and understated baseline figures, days when schools are not operating and many other devices to pull the wool over the eyes of planning authorities. This aspect is a denial of responsibility by GBC. The result is that Green Belt and countryside will be released for development when fuller consideration of traffic impacts at the Local Plan stage should have prevented that. If the planning authority is taken in by developers’ TAs then wholly unsuitable developments will be permitted.

Introduction:

The spatial development strategy (paragraph 4.6.20 and Policy S2) does not address the development needs of the borough ensuring distances are practical; this is certainly not the case with all the development sites. For example, the Wisley airfield site will generate a massive increase in vehicle journeys; developments in West Horsley will lead to greater car use, as will the proposed developments at Garlick’s Arch and in Send. The obvious site choice for sustainable development would be on brownfield sites in the town but the Local Plan proposes allocating those sites to the declining retail industry instead.

Paragraph 4.6.21 suggests that sustainable transport is promoted. Far from providing sustainable transport this Plan will generate a massive increase in motor vehicle journeys. The Plan cannot force residents to ride bicycles or walk everywhere.

Justification:

Paragraph 4.6.22 seeks to set out a reasoned justification and alleges that development should offer real travel choice by sustainable transport modes. There is little sign that this is being taken seriously enough now.

Paragraph 4.6.23 proposed to bring forward a Vehicle Parking Supplementary Planning Document. It is not clear what to make of this. Failure to provide off-street vehicle parking will not prevent residents owning cars and finding somewhere else to park but it may make life difficult for key workers to commute to their place of work. How can a consultation take place relying on non-existent background documents which are key parts of the Evidence Base? How can anyone comment on non-existent documents, and even if brought forward part-way through the consultation, any comments will be prejudiced by the absence of this informing the start of the consultation.

Paragraph 4.6.24 refers to the Sustainable Movement Corridor. Bus services are aspirational but economic reality may mean that they fail to persist. There is not enough detail published on how the SMC will be delivered – suggesting that it is aspirational rather than fully thought through.

Paragraph 4.6.26 refers to reviewing existing transport facilities and likely transport generation as part of assessing the amount of incremental travel demand. That consideration should have taken place in a robust and detailed manner on a site-by-site basis before the sites were allocated in the Local Plan. It is not sufficient to leave that until the planning application stage as intended by GBC and SCC, given that all sites will be subject to “permission in principle” under the Housing and Planning Act 2016 and so will not be capable of subsequent rejection on these grounds.
Paragraph 4.6.27 notes that Development must mitigate its transport impacts. The measures described rely entirely on people taking them up and not dumping their travel information packs in the nearest bin. It is clear that GBC, in response to concerns about elderly and disabled people failing to be coerced into riding bicycles are now suggesting tricycles to overcome this obstacle to their aspirations. They should be aware that while tricycles may help with balance issues they are heavier and harder to ride uphill. While the policy (unusually) notes that mitigation must be provided, in fact this is then diluted to suggest that facilities for electric car charging points and encouragement to car-share can be sufficient; all are optional and therefore meaningless.

However well designed a development is it will make matters worse during construction and if on a greenfield site, it is hard to see how it will achieve environmental benefits. On the other hand, replacing inefficient buildings on a brownfield site could lead to benefits in the long term.

Paragraph 4.6.28 notes “Developers should have regard” to the “Infrastructure Schedule at Appendix C”. The only thing that developers have regard for is forcing their application through and maximising their profit – that is the business they are in. Appendix C is lacking in detail. It notes, for example that there will be new town centre bus facilities at a cost of £5-10million – such vagueness make it clear that no real costing or analysis of proposals has been prepared, and that the Infrastructure improvements proposed have not been properly considered. Having regard to fluid and uncertain proposals is effectively meaningless as a constraint or a requirement.

Paragraph 4.6.29 requires that applications need to address the transport implications of the proposed development. Experience with recent planning applications suggests that developers will do everything in their power to understate transport impacts and we have no faith in GBC and SCC taking a sufficiently robust line on this.

Key Evidence is missing or inadequate.

The Strategic Transport Assessment (SCC 2016) is listed as “forthcoming”, but this plan has been produced in the absence of any strategic transport review.

There are further inadequacies in the Evidence Base, highlighted in the following annexes, which include examples of deficiencies, ambiguities and inadequacies in the transport and infrastructure evidence. This is not a comprehensive list of deficiencies, but serves as an illustration of the poor evidence on which decisions have been based.

Annexe 1

Comments on Guildford Borough Transport Study 2016

Page 2 – “address the historic infrastructure deficit” - developers are not required to do this?

Page 2 – It is wrong to claim that the cycle infrastructure along the A25 is good – and many cyclists are not careful, so putting them in contention with pedestrians is not a good idea.

Page 5 – The decision on Heathrow or Gatwick has yet to be taken but airport expansion in the south-east cannot be regarded as sustainable development and, although GBC has no control over such external decisions, its own growth agenda will drive a need for that expansion.

Page 6 An additional weakness is alternative “road closure diversion” routes for the SRN on the LRN

Page 6 Are the “Committed Improvements” actually committed and guaranteed to be delivered?

Page 7 The rail strategy does not provide for Wisley (residents would drive to stations)

Page 7 How long will it take to deliver Crossrail 2? “We hope that Crossrail 2 could be operational by 2030, but we are in the very early stages of planning and no decision to build it has been made.”

Page 7 Guildford platform capacity still many years away if ever.
Page 7 The rail strategy anticipates many improvements that have not been secured and may have unintended consequences if they proceed (see above)

Page 7 The Southern Rail Access to Heathrow ##[see the feasibility study dated December 2015 – although other proposals may be put forward (e.g. by Hounslow)]## is still in its early stages and would have significant impacts on open space beyond our Borough. For example, all options in the feasibility study would use Staines Moor SSSI and Option 4 would use Bedfont Lakes Country Park (a Local Nature Reserve and SNCI).

The various options would use existing commercial, residential and highways land in varying degrees. It seems unlikely that a solution will be delivered within the Plan period and removal of highly valued open space with high biodiversity (wherever it is in South-east England) cannot be regarded as sustainable.

Page 10 and 13 There is a stark contrast between the plans for the town centre which involve encouraging a reduction in traffic by reducing roadspace and the plans for the SRN and parts of the LRN which involve increasing capacity. While increasing capacity may reduce some areas of congestion in the short term, history suggests that traffic will rapidly grow until the improved roads are congested once again. This can hardly be regarded as sustainable. A sustainable option would be to apply a very substantial traffic infrastructure constraint on the housing number.

Page 10 While the A3 Guildford Tunnel aspiration has some environmental advantages over widening (in particular for residents living close to the A3), the environmental burden of the construction phase will be far higher and aspects such as location of ventilation stacks and their local effect (in all weather conditions) do not appear to have been considered.

Page 14 Under Weaknesses the point about A roads in Guildford Town also applies to surrounding areas in the Borough and beyond. The anticipated improvements ignore existing congestion to the south and east of Guildford – presumably because SCC’s transport assessment methodology only identifies the tip of the iceberg. The current Plan will see increased congestion and a resultant reduction in air quality in many areas beyond the town centre.

Page 16 “Largely commercial bus services” is seen as a strength whereas it should be seen as a weakness with a trend to reduced subsidies and the provision of bus services, especially in rural areas, being increasingly dependent on commercial gain. It is difficult to see this changing under the current Government cuts philosophy. The point “Subject to business case including funding” under Aspirations demonstrates this point.

Page 18 We welcome the aspiration to “Expand the public realm through significantly extended pedestrian-priority areas”

Page 19 Guildford is well behind other areas in monitoring air quality let alone attempting to reduce it.

The introduction talks about reductions in some pollutants. This may be the case for pollutants such as Sulphur Dioxide, which contributed to the visible London smogs, but it is not true of diesel vehicle emissions which have increased as a result of Government policy including its aggressive growth agenda and population increase through immigration. 30 accessible electric vehicle charging points are only an aspiration and will be nowhere near enough if there is a real shift to electric vehicles.

It is clear from the “Strategy outcomes” that GBC would prefer not to follow other areas in pro-actively tackling air quality.

Page 22/23/24 The timescales indicate that the main rail improvements (Including the two new stations) are unlikely to be delivered until the end of the Plan period or even later. The sites that are supposedly justified by their inclusion will generate a major increase in road traffic in the interim and it may be more difficult to achieve this aspect of modal shift in the longer term. The same can be said about the other traffic infrastructure proposals. Residential development is being scheduled before the infrastructure that it will need.

Page 24 Monitoring – “Increase” needs to be in proportion to population growth as otherwise failure will taken as success. “An Increase in average vehicle speeds” is inconsistent with the desire to reduce the number of persons killed or seriously injured. For example, some A roads pass through residential areas where pedestrians, including schoolchildren, are trying to cross the road at peak times. It is noted that increase in vehicle speeds is only desired in the morning. Going home from work does not seem to matter!
Annexe 2

GTAMS

NPPF and NPPG The Plan ignores the points concerning Green Belt and protecting the environment. GBC have tried to get round this by spinning their messages and using misleading statistics including a major understatement of the area of Green Belt to be removed.

Planning Update (March 2015) – The point in this update concerning Green Belt has been ignored

Monitoring Indicators:

Ten years is far too long to wait for information on whether the approach is working or not. The target requires only an increase. This would permit an increase less than that in line with any population growth to be regarded as success. The bar has been set well within the failure range.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/460  Respondent: 8640353 / Julian Cranwell  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy E4: Surrey Research Park

Response

Summary

I support the maintenance of research, development and design activities, in any science, including social science, that is complementary to the activities of the University of Surrey at the Surrey Research Park. I do not believe that there is a need to expand the Research Park into a larger Business Park. I believe that the planning policy going forward for the Surrey Research Park should be to maintain and enhance the integrity of its research base allowing for the economic value add to the local economy of knowledge and technology transfer from the University. I believe that B1b (should be the primary use class for the Research Park and that applications for B1a should be resisted due to the danger of dilution of the core purpose and reputation of the park. I do not believe the inclusion of B1c uses is appropriate or necessary.

Detailed response:
- Research parks based on the early UK technology transfer exemplars of the Cambridge and Oxford need careful monitoring, nurturing and protection to ensure the integrity and quality of the park is maintained and the park continues to be a destination for innovation and enterprise.

- There is a danger for research parks to be overwhelmed by short sighted development opportunities being taken by park managers provided by standard office activities and administrative functions which in time turn them into standard business parks which can be found anywhere in the country. Their relative low density and attractiveness make them targets for "any other" office user.

- Research parks that lose their way stop being the location of choice for new innovative enterprises.

- The Surrey Research Park in Guildford needs to be focussed on a broad spectrum of scientific research including computer science, bio-chemistry, design, space-science, eco-science, health science, software development, laser technology, media-science, artificial intelligence, robotics and super-manufacturing.

- Monitoring indicators should include new start-ups and new patents created.

- Facilities should be provided whereby new small businesses can secure premises under subsidised licence fee arrangements with no onerous rent or lease commitments.

- I support the idea of a variety of sizes of unit including some small units (between 15 – 80 sq m) bearing in mind one workstation is 10 sq m.

- Consideration should be given to the concept of shared “enterprise hubs” where individuals can take pay as you go workstations in shared spaces similar to touch down business centres similar to the “enterprise village” concept.

- I do not support the policy of a new extension of the research park more than the existing 14% already provided for within the park.

- The Surrey Research Park currently extends to 65,000 sq m.

- There is already granted consent to expand to a further 9,000 sq m (14%) This space has been available for 10 years and is still to find a taker.

- The past trend of expansion of Office/R &D is 0.43% pa over the period from 2004 to 2012 based on ELNA 2015 derived from VoA analysis.

- The ELNA 2015 calculated annual floor space demand is 0.7%.

- The data point for our analysis is today in 2016 so we have 17 years to go to the end of the plan period.

- The necessary growth in floor space over the plan period is therefore 17 years x 0.7 = 12% which is less than the current expansion space of 14%.

Nature Conservation value of the site is protected or improved.

In relation to the Target there is no evidence of a justified need for additional B1a and c use. I consider that the existing land, used efficiently, will accommodate realistic expansion of B1b uses for high tech added value purposes. Existing planning permissions must be built before any additional green belt land is earmarked for development. The target of 35,000 sq metres of additional employment land are not justified by the evidence base.

I regard the evidence base (Employment Land Needs Assessment 2015) as flawed and inconsistent and therefore unreliable evidence.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/10081  Respondent: 8640353 / Julian Cranwell  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to policy E4 Surrey research Park.

We support the maintenance of research, development and design activities, in any science, including social science, that is complementary to the activities of the University of Surrey at the Surrey Research Park. However, we do not believe that there is a need to expand the Research Park into a larger Business Park. We believe that the planning policy going forward for the Surrey Research Park should be to maintain and enhance the integrity of its research base allowing for the economic value add to the local economy of knowledge and technology transfer from the University. We believe that B1b (should be the primary use class for the Research Park and that applications for B1a should be resisted due to the danger of dilution of the core purpose and reputation of the park. We do not believe the inclusion of B1c uses is appropriate or necessary.

- Research parks based on the early UK technology transfer exemplars of the Cambridge and Oxford need careful monitoring, nurturing and protection to ensure the integrity and quality of the park is maintained and the park continues to be a destination for innovation and enterprise.
- There is a danger for research parks to be overwhelmed by short sighted development opportunities being taken by park managers provided by standard office activities and administrative functions which in time turn them into standard business parks which can be found anywhere in the country. Their relative low density and attractiveness make them targets for “any other” office user.
- Research parks that lose their way stop being the location of choice for new innovative enterprises.
- The Surrey Research Park in Guildford needs to be focussed on a broad spectrum of scientific research including computer science, bio-chemistry, design, space-science, eco-science, health science, software development, laser technology, media-science, artificial intelligence, robotics and super-manufacturing.
- Monitoring indicators should include new start-ups and new patents created.
- Facilities should be provided whereby new small businesses can secure premises under subsidised licence fee arrangements with no onerous rent or lease commitments.
- We support the idea of a variety of sizes of unit including some small units (between 15 – 80 sq m) bearing in mind one workstation is 10 sq m.
- Consideration should be given to the concept of shared “enterprise hubs” where individuals can take pay as you go workstations in shared spaces similar to touch down business centres similar to the “enterprise village” concept.
- We do not support the policy of a new extension of the research park more than the existing 14% already provided for within the park.
- The Surrey Research Park currently extends to 65,000 sq m.
- There is already granted consent to expand to a further 9,000 sq m (14%) This space has been available for 10 years and is still to find a taker.
The past trend of expansion of Office/R &D is 0.43% pa over the period from 2004 to 2012 based on ELNA 2015 derived from VoA analysis.

The ELNA 2015 calculated annual floor space demand is 0.7%.

The data point for our analysis is today in 2016 so we have 17 years to go to the end of the plan period.

The necessary growth in floor space over the plan period is therefore 17 years x 0.7 = 12% which is less than the current expansion space of 14%.

Nature Conservation value of the site is protected or improved.

In relation to the Target there is no evidence of a justified need for additional B1a and c use. We consider that the existing land, used efficiently, will accommodate realistic expansion of B1b uses for high tech added value purposes. Existing planning permissions must be built before any additional green belt land is earmarked for development. The target of 35 000 sq metres of additional employment land are not justified by the evidence base.

We regard the evidence base (Employment Land Needs Assessment 2015) as flawed and inconsistent and therefore unreliable evidence.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/461  Respondent: 8640353 / Julian Cranwell  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy E5: Rural Economy

Response

Summary

This policy should only apply to small-scale development in rural areas which means development of less than 100 sq m (gross) which is in keeping with and the permanence and amenity of the green belt.

Use of rural areas for town centre uses without applying the sequential approach is against the principles of localism which mean that local people should be consulted – and heeded (not ignored!). Villages need protecting both in terms of design and in terms of scale.

Previous commitments to improved high-speed broadband and mobile phone coverage have now been diluted, despite general support. This is disregarding the responses from the previous consultation.
Detailed response:

It should be noted that the NPPF “provides a framework within which local people and their accountable councils can produce their own distinctive local and neighbourhood plans which reflect the needs and priorities of their communities.” (NPPF 1).

Guildford becoming a Growth Hub was NOT in the election manifesto. This policy was mentioned only tangentially in the corporate plan. Given Guildford’s poor transport links, noted congestion and the problems that this is perceived to cause for existing businesses, this does not seem an appropriate decision.

This radical, unsupported policy change is apparently in order to generate "growth" - although the possibility is that too much building over the areas that make Guildford Borough attractive will actually generate damage and stagnation, and cause a net decline in local affluence and growth. This risk has been highlighted by some local business leaders in the press.

In addition to NPPF 1, the Core Planning Principles set out in NPPF 17 include, as the FIRST (and therefore most important) principle, that “planning should:

· Be genuinely plan-led, empowering local people to shape their surroundings, with succinct local and neighbourhood plans setting out a positive vision for the future of the area”.

Furthermore, if this were not enough, in the section on Plan-making, NPPF 155 states:

“Early and meaningful engagement and collaboration with neighbourhoods, local organisations and businesses is essential. [It is not clear that early collaboration with prospective developers is either required or legal]. A wide section of the community should be proactively engaged so that Local Plans, as far as possible, reflect a collective vision and a set of agreed priorities for the sustainable development of the area, including those contained in any neighbourhood plans that have been made”.

Local People are supposed to be represented within the NPPF, and any plan which does not meet with the consent of local people is arguably unsound. The failure to amend a plan following consultation, and to take the points made into account, is arguably in breach of NPPF and is therefore at risk of consequential challenge. A policy that is unsupported by the local community should be considered to be unsound.

It is arguable that GBC is arguing aggressively for a pro-development strategy in relation to villages and the Green Belt and mis-stating national policy as a result.

Many of the proposed “main town centre” uses would not be appropriate either to the Green Belt or villages within it - indoor bowling, casinos, warehouses etc. would not be appropriate for most villages in Surrey.

The provision and take up of reliable and high speed broadband, and the increased impact of home working and smart working are welcomed. Access to high speed broadband as a priority is welcomed and this is one of few aspects of the LEP’s policy that is welcomed in relation to the rural environment.

In this context, it seems entirely inappropriate that a monitoring indicator is net additional employment floorspace completed by category. “Smart” and home-working do not involve incremental floorspace and to evaluate incremental economic growth by the size of floorspace allocated is an inappropriate measure in the Green Belt. By definition such work uses do not require space. It is important to recognize – as this Local Plan does not – that the main employment within the countryside is related to that countryside, whether due to agriculture, tourism (so that “unproductive” or open space land has a positive economic impact too), film, or ancillary activities related to the above, and that to reduce the countryside footprint by building sites is to reduce economic land. The only use of land that has no ongoing positive impact for the community is to use it as a building site, whereupon it is lost in terms of ongoing economic benefit to all except the future owners.

NPPF 17 requires that local authorities “always seek to secure high quality design and a good standard of amenity for all existing and future occupants of land and buildings”, and that they “take account of the different roles and character of
different areas, promoting the vitality of our main urban areas, protecting the Green Belts around them, recognizing the intrinsic character and beauty of the countryside and supporting thriving communities within it”. To appraise building within the Green Belt merely in terms of numbers of buildings or net additional floorspace does not meet the requirements of those principles.

The rural areas currently have a vibrant and strong economy, and building should not be regarded as a major objective. Existing agriculture, food production, tourism and film industries rely on our existing countryside, and to substitute these by building warehouses, commercial space or even processing space for ancillary agricultural processing will be to damage the environment for no economic gain. The loss of agricultural land is to be avoided; food security is an increasingly important factor in a congested island with an increasingly population based in the temperate zone so that it can supply food without climate stress; as noted by Cambridge University we will need more food producing land, not less, over the next few decades (see study attached to previous submission, disregarded).

Villages should be protected; new building in villages should be within the existing settlement boundaries, and new settlement boundaries should only reflect the historic changes of the settlement areas; building should not extend into the open countryside of the Green Belt; and new building should focus on brownfield sites within the urban areas.

I support the proposal for high speed broadband but are disappointed that the previous reference to this specifically “Provision and take-up of reliable and high speed broadband has been a major issue reported by rural businesses. Access to key services vital for economic growth is often poor in rural areas. Slow broadband and inadequate and slow mobile phone coverage are constraints to economic development” has now been modified to refer only to “provision of internet services where needed in rural areas and enhance digital inclusion in such areas”. This must be modified to read “provision of high speed internet services and reliable mobile phone coverage to all rural areas etc”. In the prior consultation, a matter that was warmly welcomed by most respondents has now been significantly weakened.

I agree that high speed broadband is a desirable attribute for the wider economy, and that this is particular lacking in the rural areas of Guildford. However, its introduction should lead to an increase in smart home-working, rather than the building of additional employment space. The policy needs to include a commitment to get super fast broadband accessible by all residents in the borough as this will provide much greater support to rural industry than anything else.

In this context, a monitoring indicator of “Number of sq m of B Class floorspace permitted and completed in rural wards” is fundamentally wrong; the indicator used for monitoring should be independent of land use, or this creates a perverse incentive to build on land. It should be related to real economic growth – for example, incremental corporation and personal tax income generated by businesses and individuals based within the borough.

Furthermore, as ever, the urban-guided planning philosophy also entirely fails to recognize the real phenomenon of rural employment. Some of this is genuine “smart” growth of the kind that the council ought to be promoting, and states that they are keen to encourage. Faster broadband, where it exists, is a genuinely useful tool which allows remote working for the highly educated populace. The University of Surrey generates a significant proportion of this highly skilled group. It also boasts about the highly skilled external population and the high calibre of local residents in its publicity material. The Surrey Hills AONB is proud to be classified by government as an “Elite Employment Enclave” where a high proportion of around 40% of households include a company director; such groups can often work flexibly. However, too much industrialization, commercialization and physical building in a rural environment will result in a change in the environment that attracts these flexible and affluent members of the community, and would result in these same groups moving to a more desirable and pleasant location. This would have a negative impact on the local economy. This consideration, while noted in public meetings in relation to the Surrey Hills by the Surrey Hills AONB board, has a general application to the borough as a whole.

In addition to smart-working among an educated group, and its economic upside, there is the fact that the rural area is founded on an agricultural framework that has persisted for two thousand years and is a viable, successful and profitable series of businesses. The land on which GBC proposes to build is viable and profitable agricultural land which supports existing businesses. Some of these are simple farms, producing food which our country needs. This should not be underestimated. The University of Cambridge has noted a significant decline in the UK’s food security or ability to feed itself – a significant factor in an era of increased climate change and global insecurity. This report, produced in
conjunction with a number of other groups including CLA (Country Landowners’ Association), NFU (National Farmers’ Union), Sainsbury’s, Asda and Nestlé noted that the UK would require up to 7 million hectares more agricultural land to meet the country’s needs for food by 2030, roughly the period covered by the plan. To replace valuable and necessary agricultural land with storage depots or warehouses which will make the environment unpleasant for residents, destroy viable agricultural businesses, and that are likely to remain empty and unprofitable unless they undercut existing viable depots elsewhere, seems to benefit only those who build the depots.

While there is ostensible recognition of the importance of agriculture, this is subverted by suggesting that the provision of new and larger buildings is essential to agriculture and forestry. I would dispute this contention.

In addition to the essential business of food production, an increasing number of our farmers are engaged in high added value food processing and delivery, which is also an extremely profitable business and of growing local interest. This does not, however, necessitate large scale building. The Surrey Hills label is helpful in this regard, as is noted in the context of the policy. Silent Pool gin and sparkling wine, The Tillingbourne Trout Farm, the Kingfisher Watercress beds, the raising of beef, lamb, pork, and poultry in the Surrey Hills at Drydown Farm or Manor Farm; the Hog’s Back brewery, fruit grown throughout the borough and many other businesses are of enormous significance to the borough and should be encouraged. It will be harder to cultivate a label advertising premium quality organic food from the North Downs if Guildford becomes known principally as a storage or warehousing area.

Economic growth is indeed needed by the country. Some of that growth is perhaps needed in Surrey, although we already produce a disproportionate share of the national wealth and are the most densely populated rural county. Many would argue that this is not an appropriate destination for economic pump-priming and that areas which have more need of employment, (for example in the Black Country, the North West, the North East or Wales) would be better recipients of public finance to encourage economic growth. We don’t particularly want it; we don’t particularly need it; and we are trying to cope with the organic growth we have, we certainly don’t need to stimulate it further. The unelected and undemocratic M3 LEP has a stated agenda, evidenced by its minutes (subsequently expurgated), of actively influencing government policy in relation to housebuilding; and this is perhaps because house builders sit on the Land and Property Group of the M3 LEP. This constitutes an unacceptable conflict of interest.

The ability to generate wealth is not related to the size or number of warehouses built. This is unintelligent and old thinking – wealth is not related to the size of storage space. The monitoring of sq m of B class floorspace completed in rural wards is entirely inappropriate.

The Key Evidence summary notes that the evidence base includes the Guildford Borough Rural Economic Strategy which is yet to be published and therefore (by definition) cannot have informed this policy or the decisions which have been taken in order to arrive at it. To determine a policy on the basis of a non-existent evidence base, which is only provided (or indeed drafted) post hoc, must be legally indefensible.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
We **object** to policy E5 Rural Economy

This policy should only apply to small-scale development in rural areas which means development of less than 100 sq m (gross) which is in keeping with and the permanence and amenity of the green belt.

Use of rural areas for town centre uses without applying the sequential approach is against the principles of localism which mean that local people should be consulted – and heeded (not ignored!). Villages need protecting both in terms of design and in terms of scale.

Previous commitments to improved high-speed broadband and mobile phone coverage have now been diluted, despite general support. This is disregarding the responses from the previous consultation.

It should be noted that the NPPF “provides a framework within which local people and their accountable councils can produce their own distinctive local and neighbourhood plans which reflect the needs and priorities of their communities.” (NPPF 1).

Guildford becoming a Growth Hub was NOT in the election manifesto. This policy was mentioned only tangentially in the corporate plan. Given Guildford’s poor transport links, noted congestion and the problems that this is perceived to cause for existing businesses, this does not seem an appropriate decision.

This radical, unsupported policy change is apparently in order to generate "growth" - although the possibility is that too much building over the areas that make Guildford Borough attractive will actually generate damage and stagnation, and cause a net decline in local affluence and growth. This risk has been highlighted by some local business leaders in the press.

In addition to NPPF 1, the Core Planning Principles set out in NPPF 17 include, as the FIRST (and therefore most important) principle, that “planning should:

- Be genuinely plan-led, **empowering local people to shape their surroundings**, with succinct local and neighbourhood plans setting out a positive vision for the future of the area”.

Furthermore, if this were not enough, in the section on Plan-making, NPPF 155 states:

“Early and meaningful engagement and collaboration with neighbourhoods, local organisations and businesses is essential. [It is not clear that early collaboration with prospective developers is either required or legal]. A **wide section of the community should be proactively engaged so that Local Plans, as far as possible, reflect a collective vision and a set of agreed priorities for the sustainable development of the area, including those contained in any neighbourhood plans that have been made**.”

Local People are supposed to be represented within the NPPF, and any plan which does not meet with the consent of local people is arguably unsound. The failure to amend a plan following consultation, and to take the points made into account, is arguably in breach of NPPF and is therefore at risk of consequential challenge. A policy that is unsupported by the local community should be considered to be unsound.

It is arguable that GBC is arguing aggressively for a pro-development strategy in relation to villages and the Green Belt and mis-stating national policy as a result.

Many of the proposed “main town centre” uses would not be appropriate either to the Green Belt or villages within it - indoor bowling, casinos, warehouses etc. would not be appropriate for most villages in Surrey.

The provision and take up of reliable and high speed broadband, and the increased impact of home working and smart working are welcomed. Access to high speed broadband as a priority is welcomed and this is one of few aspects of the LEP’s policy that is welcomed in relation to the rural environment.
In this context, it seems entirely inappropriate that a monitoring indicator is net additional employment floorspace completed by category. “Smart” and home-working do not involve incremental floorspace and to evaluate incremental economic growth by the size of floorspace allocated is an inappropriate measure in the Green Belt. By definition such work uses do not require space. It is important to recognize – as this Local Plan does not – that the main employment within the countryside is related to that countryside, whether due to agriculture, tourism (so that “unproductive” or open space land has a positive economic impact too), film, or ancillary activities related to the above, and that to reduce the countryside footprint by building sites is to reduce economic land. The only use of land that has no ongoing positive impact for the community is to use it as a building site, whereupon it is lost in terms of ongoing economic benefit to all except the future owners.

NPPF 17 requires that local authorities “always seek to secure high quality design and a good standard of amenity for all existing and future occupants of land and buildings”, and that they “take account of the different roles and character of different areas, promoting the vitality of our main urban areas, protecting the Green Belts around them, recognizing the intrinsic character and beauty of the countryside and supporting thriving communities within it”. To appraise building within the Green Belt merely in terms of numbers of buildings or net additional floorspace does not meet the requirements of those principles.

The rural areas currently have a vibrant and strong economy, and building should not be regarded as a major objective. Existing agriculture, food production, tourism and film industries rely on our existing countryside, and to substitute these by building warehouses, commercial space or even processing space for ancillary agricultural processing will be to damage the environment for no economic gain. The loss of agricultural land is to be avoided; food security is an increasingly important factor in a congested island with an increasingly population based in the temperate zone so that it can supply food without climate stress; as noted by Cambridge University we will need more food producing land, not less, over the next few decades (see study attached to previous submission, disregarded).

Villages should be protected; new building in villages should be within the existing settlement boundaries, and new settlement boundaries should only reflect the historic changes of the settlement areas; building should not extend into the open countryside of the Green Belt; and new building should focus on brownfield sites within the urban areas.

We support the proposal for high speed broadband but are disappointed that the previous reference to this specifically “Provision and take-up of reliable and high speed broadband has been a major issue reported by rural businesses. Access to key services vital for economic growth is often poor in rural areas. Slow broadband and inadequate and slow mobile phone coverage are constraints to economic development” has now been modified to refer only to “provision of internet services where needed in rural areas and enhance digital inclusion in such areas”. This must be modified to read “provision of high speed internet services and reliable mobile phone coverage to all rural areas etc”. In the prior consultation, a matter that was warmly welcomed by most respondents has now been significantly weakened.

We agree that high speed broadband is a desirable attribute for the wider economy, and that this is particular lacking in the rural areas of Guildford. However, its introduction should lead to an increase in smart home-working, rather than the building of additional employment space. The policy needs to include a commitment to get superfast broadband accessible by all residents in the borough as this will provide much greater support to rural industry than anything else.

In this context, a monitoring indicator of “Number of sq m of B Class floorspace permitted and completed in rural wards” is fundamentally wrong; the indicator used for monitoring should be independent of land use, or this creates a perverse incentive to build on land. It should be related to real economic growth – for example, incremental corporation and personal tax income generated by businesses and individuals based within the borough.

Furthermore, as ever, the urban-guided planning philosophy also entirely fails to recognize the real phenomenon of rural employment. Some of this is genuine “smart” growth of the kind that the council ought to be promoting, and states that they are keen to encourage. Faster broadband, where it exists, is a genuinely useful tool which allows remote working for the highly educated populace. The University of Surrey generates a significant proportion of this highly skilled group. It also boasts about the highly skilled external population and the high calibre of local residents in its publicity material. The
Surrey Hills AONB is proud to be classified by government as an “Elite Employment Enclave” where a high proportion of around 40% of households include a company director; such groups can often work flexibly. However, too much industrialization, commercialization and physical building in a rural environment will result in a change in the environment that attracts these flexible and affluent members of the community, and would result in these same groups moving to a more desirable and pleasant location. This would have a negative impact on the local economy. This consideration, while noted in public meetings in relation to the Surrey Hills by the Surrey Hills AONB board, has a general application to the borough as a whole.

In addition to smart-working among an educated group, and its economic upside, there is the fact that the rural area is founded on an agricultural framework that has persisted for two thousand years and is a viable, successful and profitable series of businesses. The land on which GBC proposes to build is viable and profitable agricultural land which supports existing businesses. Some of these are simple farms, producing food which our country needs. This should not be underestimated.

The University of Cambridge has noted a significant decline in the UK’s food security or ability to feed itself – a significant factor in an era of increased climate change and global insecurity. This report, produced in conjunction with a number of other groups including CLA (Country Landowners’ Association), NFU (National Farmers’ Union), Sainsbury’s, Asda and Nestlé noted that the UK would require up to 7million hectares more agricultural land to meet the country’s needs for food by 2030, roughly the period covered by the plan. To replace valuable and necessary agricultural land with storage depots or warehouses which will make the environment unpleasant for residents, destroy viable agricultural businesses, and that are likely to remain empty and unprofitable unless they undercut existing viable depots elsewhere, seems to benefit only those who build the depots.

While there is ostensible recognition of the importance of agriculture, this is subverted by suggesting that the provision of new and larger buildings is essential to agriculture and forestry. We would dispute this contention.

In addition to the essential business of food production, an increasing number of our farmers are engaged in high added value food processing and delivery, which is also an extremely profitable business and of growing local interest. This does not, however, necessitate large scale building. The Surrey Hills label is helpful in this regard, as is noted in the context of the policy. Silent Pool gin and sparkling wine, The Tillingbourne Trout Farm, the Kingfisher Watercress beds, the raising of beef, lamb, pork, and poultry in the Surrey Hills at Drydown Farm or Manor Farm; the Hog’s Back brewery, fruit grown throughout the borough and many other businesses are of enormous significance to the borough and should be encouraged.

Economic growth is indeed needed by the country. Some of that growth is perhaps needed in Surrey, although we already produce a disproportionate share of the national wealth and are the most densely populated rural county. Many would argue that this is not an appropriate destination for economic pump-priming and that areas which have more need of employment, (for example in the Black Country, the North West, the North East or Wales) would be better recipients of public finance to encourage economic growth. We don’t particularly want it; we don’t particularly need it; and we are trying to cope with the organic growth we have, we certainly don’t need to stimulate it further. The unelected and undemocratic M3LEP has a stated agenda, evidenced by its minutes (subsequently expurgated), of actively influencing government policy in relation to housebuilding; and this is perhaps because housebuilders sit on the Land and Property Group of the M3 LEP. This constitutes an unacceptable conflict of interest.

The ability to generate wealth is not related to the size or number of warehouses built. This is unintelligent and old thinking – wealth is not related to the size of storage space. The monitoring of sq m of B class floorspace completed in rural wards is entirely inappropriate.

The Key Evidence summary notes that the evidence base includes the Guildford Borough Rural Economic Strategy which is yet to be published and therefore (by definition) cannot have informed this policy or the decisions which have been taken in order to arrive at it. To determine a policy on the basis of a non-existent evidence base, which is only provided (or indeed drafted) post hoc, must be legally indefensible.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Policy E6: The leisure and visitor experience

Summary

I OBJECT. Tourism and visitors do not depend on new visitor attractions and facilities – and these may undermine the area. Overdevelopment is a risk especially in the countryside.

- I believe that the importance of a visitor attraction hub could be much better articulated. Guildford has great potential to become a “must see” destination for tourists and visitors. Surrounded by the natural beauty of the Surrey Hills, it is already distinguished as an historic town. The historic part of the town should be exploited to the full creating a real sense of vibrancy and atmosphere. This should be linked to the attractions of the Museum, the Castle, the Wey and the historic High Street including its views of the Hogs Back. Guildford would be wise to model itself on other historic towns like Bath, Chester and York. The economic impact would create big advantages for both the local niche speciality retail sectors in the town. Given the local and wider catchment of the town Guildford should strive for high quality definition making it a great centre for people to live in and visit. It would be a great mistake if Guildford were to opt for large impersonal department stores and dull high street chain stores at the expense of exploiting its uniqueness and character which would afford greater benefits.

- Guildford the historic “Gateway to the Surrey Hills” has far more potential than Guildford just any other stereotypical centre found anywhere around London. What GBC needs to do is create a theme such as a new “Pilgrims Trail” similar to the Patriots trail in Boston USA with marked yellow footsteps leading from the station to the River and up through the historic heart of the town.

Detailed response:

The importance of tourism and leisure within the borough is acknowledged by GBC, and thus far this policy is welcomed. Thus far, the principles underlying this policy are given measured and qualified support. However, the emphasis however on development in order to facilitate tourism seems fundamentally misguided, and, as in other areas of the plan, seems to regard both the planning function and local government as a whole as the marketing and sourcing department of the building and civil engineering industries. This is inappropriate and therefore this element merits objection on an overall basis.

It should be noted that Tourism is one of the major industries in the country. Visit Britain notes: “Since 2010 tourism has been the fastest growing sector in the UK in employment terms, responsible for one-third of the net increase in UK jobs between 2010 and 2012.

The report forecasts that the tourism economy will be worth around £127 billion this year (2013), equivalent to 9% of the UK’s GDP supports over 3.1 million jobs, that’s 9.6% of all jobs and 173,000 more than in 2010. The sector is predicted to grow at an annual rate through to 2025 - significantly faster than the overall UK economy (with a predicted annual rate of 3% per annum) and much faster than sectors such as manufacturing, construction and retail.”

In the context of the importance of the tourism sector, it is deeply shocking that there is so little care attached to this section of the local plan. The part of the local economy is likely to grow more quickly than any other sector of the economy, and the damage to the UK economy...
could result from unrestricted promotion of housing estates and warehouses should be calculated before growth is seen as a motivating force for development.

This area of England is important, and it is visited by tourists and visitors, not primarily because of tourist centres nor even because of other sites of significance such as Hatchlands Park, important though that National Trust sites may be.

The importance to the borough of the countryside qua countryside, embodying rural tourism, rural agriculture and its related impact on the local economy cannot be overstated. The contribution of the outstanding countryside in the borough (which is highly valued by walkers, cyclists and many others) has been disregarded.

In this part of England agriculture is prosperous and prospering; and the importance of the countryside to the country as a whole is enormous. Set out below are extracts from the submission to the Issues and Options consultation by the Burrows Cross Area Residents’ Association which indicates, just for the villages within the ward of Shere, some of the tourist sites which are of historic, cultural and tourist interest. These are illustrative only, and many other areas within the borough have equivalent points of local and regional interest. This is indicative of the level of information that should be considered for all areas throughout the borough, and that greenfield and Green Belt sites should be avoided wherever possible on these grounds, quite apart from any other environmental factors. It indicates some of the tourist significance of this area. It should be noted that tourism relies heavily on the agricultural and rural qualities of the landscape in the area, not just to visit particular sites but for walking and cycling on a routine basis.

It should also be noted that activities such as Duke of Edinburgh walks rely heavily on the North Downs for schools in most of the South West quadrant of London. These schools would not send parties of teenagers through the countryside every weekend of spring and early summer if the sites were overdeveloped. Walks along the nationally important North Downs Way or Pilgrims’ Way are of enormous popular importance to all sections of the community. These do not need “facilities” except the informal facilities of cafes, pubs and restaurants that exist within the villages.

Furthermore, it should be noted that the cycle trips that are of increasing national importance rely heavily on the Surrey countryside. The Olympic cycle route routed through the Surrey villages, through or past Ripley, Ockham, Clandon, Shere and Gomshall; subsequently followed by Ride Prudential, is regarded as the archetypal illustration of the English countryside at its best for an international audience. Lack of development is in itself a key element of the attraction to tourists, and this should not be disregarded as a key element of the planning process, which should constrain inappropriate development as much as it should promote development which is socially and environmentally desirable (e.g. in the renovation of brownfield sites).

Appendix:

Extracts from BCARA submission to issues and options consultation as an illustration of the level of tourist activity and areas of interest in rural areas:

NPPF 132 notes an obligation to restrict development in the vicinity of heritage assets. It has already been noted that heritage assets are significant in the villages of Shere (Norman church (1190), mediaeval village buildings (The Old Forge, The Old Prison, Weaver’s House, Wheelwright Cottage), many other listed buildings including the restaurant of Kinghams in a mediaeval building or The White Horse pub, filmed in The Holiday (tourism, local business)) and Gomshall (17th Mill, Tudor houses including the King John House, NT property and land at Netley House). The area also has bronze age hill forts, a Roman temple, High House Shere (1630, Grade 2 listed). This brief history of Shere (incorporated in full by reference) gives an indication of its historical importance: http://www.sheredelight.com/history.html

This website also gives an indication of the importance of the undamaged nature of the villages and the surroundings to an important industry, which is filming. See http://www.sheredelight.com/films.html. It should be noted that NPPF enjoins local authorities to consider the impact of development on any existing business, and that if this is adverse, then they should not give permission. The impact on the film industry of any development in this area should not be underrated. This would have a significantly negative impact on the local economy of the borough as a whole.

notes that the Manor of Gumesele was a Saxon feudal landholding; that Gomshall appears in Domesday Book of 1086 as Gomeselle. It was held by William.

In 1154, Henry II of England divided the Manor of Gumesele into three: West Gomshall (granted to an abbey in Netley so known as Netley after 1240), East Gomshall (granted to an Abbey in Tower Hill in 1376 so now known as Tower Hill) and Somersbury (now Gomshall). This demonstrates that the current boundaries of the village are recognizable from the Domesday book, and that this is in itself of cultural importance. To develop on land adjacent to these boundaries would be wholly inappropriate since that would be to alter the village boundaries that have lasted on a very long term basis as permanent and established features of the landscape, as required by NPPF.

Local industries developed based on the plentiful and constant water supply of the River Tillingbourne. Leather tanning is a historic industry, now gone. Gomshall Mill was the corn mill. Some other businesses based on the Tillingbourne survive, and would be damaged by over-development. These include watercress growing (at the Kingfisher Watercress Beds in Abinger) and trout farming (between Abinger and Gomshall, in the area bounded by this study – for both of which clean water is a particular essential ingredient. Damage the water supply and you will kill the business). In addition to these food suppliers, many of the local fields are farmed organically and contribute to the Surrey organic food brands (beef, lamb, pork). The importance of the agricultural industry should not be ignored; it is not reasonable to perceive that building a house is “growth” or “development” while destroying a farm or an agricultural business (which of course economically is negative growth). Those farms have a hugely positive tourist impact too.

The AA has prepared a walking guide of historical sites associated with Romans and Celts in this parish, http://www.theaa.com/walks/the-romans-and-celts-at-farley-421068

The area of Abinger Roughs and Netley Park is listed on the NT website; this link is incorporated into this section by reference: http://www.nationaltrust.org.uk/abinger-roughs-and-netley-park/how-to-get-here/?findPlace=Abinger%20Roughs%20and%20Netley%20Park&type=&view=map. The guide to the locality from the NT (see web link incorporated by reference) is relevant in the context of local wildlife, which are abundant throughout this parish not just in the area identified by the NT. http://www.nationaltrust.org.uk/cs/Satellite?blobcol=urldata&blobheader=application%2Fpdf&blobkey=id&blobtable=MungoBlobs&blobwhere=1349108282364&ssbinary=true

NPPF 126 notes that local authorities have a duty to recognise that heritage assets (and their setting) are an irreplaceable resource and that they have a duty to conserve them.

NPPF 123 notes that planning decisions should protect areas of tranquillity which have remained relatively undisturbed by noise and for their recreational and amenity value for this reason. In this locality the most prevalent noise is that of birdsong. It is not appropriate to consider this as a possible area for development.

NPPF 118 notes that planning permission should be refused for development resulting in the loss or deterioration of irreplaceable habitats.

The NT guide to Netley Park and the Abinger Roughs notes in the context of local wildlife: “Lots of birds can be seen and heard on the Roughs. Near the rhododendrons is a good spot - look out for: goldcrests, woodpeckers, wrens, treecreepers, song thrushes, chaffinch, dunnocks.” Some of these species, and also the other species noted by the NT such as noctule bats, are of conservation importance and should not be disturbed. (Source: http://www.nationaltrust.org.uk/abinger-roughs-and-netley-park/wildlife/).

NPPF 115 notes that “Great weight should be given to conserving landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty”. It is not acceptable to destroy any part of this area, protected over the last two millennia and substantively unchanged, in order to make a short term developmental profit even for a tourism related project. It further comments that the conservation of wildlife and cultural heritage are important considerations in all these areas. NPPF 116 notes that planning permission should be refused in these areas except in exceptional circumstances. This should be incorporated into the local plan.

Overriding force should be given to the Green Belt provisions of NPPF 88 and 89 which generally notes that substantial weight should not be given to any harm to the Green Belt and that the construction of new buildings is generally inappropriate.

GBC should be reminded that the AONB has status equivalent to that of a National Park.
Interestingly in National Parks, the National Park authority has overall responsibility for planning policy. For the South Downs National Park, the guidance is of relevance [http://www.southdowns.gov.uk/__data/assets/pdf_file/0013/123232/Agenda_Item_8_Appendix_1_20101203.pdf](http://www.southdowns.gov.uk/__data/assets/pdf_file/0013/123232/Agenda_Item_8_Appendix_1_20101203.pdf).

This states:

“National Parks have two statutory purposes which must be taken into account when considering planning proposals that could have an impact upon a National Park.

To conserve and enhance their natural beauty, wildlife and cultural heritage

To promote opportunities for the public understanding and enjoyment of these special qualities.

If there is a conflict between these two policies then the first must take precedence.”

Other guidance is worth noting. The National Parks and Access to the Countryside Act 1949 legislated for the designation of AONBs and National Parks. Their purpose was to be similar – to conserve and enhance natural beauty. The Countryside Commission defined the purpose of AONB designation in a statement of 1991.

**Purpose of AONB Designation**

- "...Is primarily to conserve and enhance natural beauty.

- In pursuing the primary purpose of designation, account should be taken of the needs of agriculture, forestry, and other rural industries and of the economic and social needs of local communities. Particular regard should be paid to promoting sustainable forms of social and economic development that in themselves conserve and enhance the environment.

- Recreation is not an objective of designation but the demand for recreation should be met so far as this is consistent with the conservation of natural beauty and the needs of agriculture, forestry and other uses."

**Areas of Outstanding Natural Beauty: A policy statement (Countryside Commission, CCP 356, 1991), p5**

AONBs and National Parks are recognised in England to be on a par legally because of their nationally important landscapes. The National Planning Policy Framework confirms that AONBs are equivalent to National Parks in terms of their landscape quality, scenic beauty and planning status.

The statutory duty enjoined upon GBC is not to seek to develop but to protect this area – “to conserve and enhance natural beauty”. It appears to have objective seeking growth which is in conflict with the requirements to protect. This is already covered by NPPF in relation to Green Belt status, which is in itself glossed by ministerial guidance, as previously noted (Eric Pickles, Brandon Lewis and others).

Development within the AONB of any form is likely to be damaging. In addition to the overriding restriction on such development under NPPF, the following statement referred to by Natural England is of significance:

“The United Nations Environment Programme (UNEP) has recently drawn attention to studies finding that although developed land covers only a small proportion of North America’s land base, it has a large impact on ecosystem services. For example, roads occupy just 1% of US land area, but they alter the ecological structures and functions of about 22% or more of the land. In US regions with rapid exurban growth, species richness and endemism diminish as urban cover increases, threatening biodiversity. The fragmentation of natural habitat threatens more than 500 endangered US wildlife species with extinction. It also provides new entry points for invasive species already introduced through other pathways”. 13. Source: United Nations Environment Programme, Global Environment Outlook GEO-4, Environment for development, 2007, p.259 at Box 6.30, itself quoted by Natural England.

In other words, seeking growth of any kind within the AONB is inherently undesirable and in conflict with the overriding principles of biodiversity, and therefore sustainability.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**
We object to Policy A6 as it stands. Tourism and visitors do not depend on new visitor attractions and facilities – and these may undermine the area. Overdevelopment is a risk especially in the countryside.

- We believe that the importance of a visitor attraction hub could be much better articulated. Guildford has great potential to become a “must see” destination for tourists and visitors. Surrounded by the natural beauty of the Surrey Hills, it is distinguished as an historic county town. The historic part of the town should be exploited to the full creating a real sense of vibrancy and atmosphere. This should be linked to the attractions of the Museum, the Castle, the Wey and the historic High Street including its views of the Hogs Back. Guildford would be wise to model itself on other historic towns like Bath and York. The economic impact would create big advantages for both the leisure and the niche speciality retail sectors in the town. Given the local and wider catchment of the town Guildford should strive for high quality definition making it a centre for people to live in and visit. It would be a great mistake if Guildford were to opt for large impersonal department stores and dull high street chain stores at the expense of exploiting its uniqueness and character which would afford greater benefits.

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It should be noted that Tourism is one of the major industries in the country. Visit Britain notes: “Since 2010 tourism has been the fastest growing sector in the UK in employment terms, responsible for one-third of the net increase in UK jobs between 2010 and 2012. The report forecasts that the tourism economy will be worth around £127 billion this year (2013), equivalent to 9% of the UK’s GDP, supports over 3.1 million jobs, that’s 9.6% of all jobs and 173,000 more than in 2010. The sector is predicted to grow at an annual rate of 3.8% through to 2025 - significantly faster than the overall UK economy (with a predicted annual rate of 3% per annum) and much faster sectors such as manufacturing, construction and retail.”
In the context of the importance of the tourism sector, it is deeply shocking that there is so little care attached to this section of the local plan. The part of the local economy is likely to grow more quickly than any other sector of the economy, and the damage to the UK economy that could result from unrestricted promotion of housing estates and warehouses should be calculated before growth is seen as a motivating force for development.

This area of England is important, and it is visited by tourists and visitors, not primarily because of tourist centres nor even because of sites of significance such as Hatchlands Park, important though that National Trust sites may be.

The importance to the borough of the countryside qua countryside, embodying rural tourism, rural agriculture and its related impact on the local economy cannot be overstated. The contribution of the outstanding countryside in the borough (which is highly valued by walkers, cyclists and many others) has been disregarded.

In this part of England agriculture is prosperous and prospering; and the importance of the countryside to the country as a whole is enormous.

Set out below are extracts from the submission to the Issues and Options consultation by the Burrows Cross Area Residents’ Association which indicates, just for the villages within the ward of Shere, some of the tourist sites which are of historic, cultural and tourist interest. These are illustrative only, and many other areas within the borough have equivalent points of local and regional interest. This is indicative of the level of information that should be considered for all areas throughout the borough, and that greenfield and Green Belt sites should be avoided wherever possible on these grounds, quite apart from any other environmental factors. It indicates some of the tourist significance of the area. It should be noted that tourism relies heavily on the agricultural and rural qualities of the landscape in the area, not just to visit particular sites but for walking and cycling on a routine basis.

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industry of any development in this area should not be underrated. This would have a significantly negative impact on the local economy of the borough as a whole.

Gomshall’s history is summarised usefully on the Wikipedia site: (incorporated by reference): http://en.wikipedia.org/wiki/Gomshall, notes that the Manor of Gumesele was a Saxon feudal landholding; that Gomshall appears in Domesday Book of 1086 as Gomeselle, held by William.

In 1154, Henry II of England divided the Manor of Gumesele into three: West Gomshall (granted to an abbey in Netley so known as Netley after 1240), East Gomshall (granted to an Abbey in Tower Hill in 1376 so now known as Tower Hill) and Somersbury (now Gomshall). This demonstrates that the current boundaries of the village are recognizable from the Domesday book, and that this is in itself of cultural importance. To develop on land adjacent to these boundaries would be wholly inappropriate since that would be to alter the village boundaries that have lasted on a very long term basis as permanent and established features of the landscape, as required by NPPF.

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NPPF 126 notes that local authorities have a duty to recognise that heritage assets (and their setting) are an irreplaceable resource and they have a duty to conserve them.

NPPF 123 notes that planning decisions should protect areas of tranquillity which have remained relatively undisturbed by noise and are prized for their recreational and amenity value for this reason. In this locality the most prevalent noise is that of birdsong. It is not appropriate to consider this as a possible area for development.

NPPF 118 notes that planning permission should be refused for development resulting in the loss or deterioration of irreplaceable habitats. The NT guide to Netley Park and the Abinger Roughs notes in the context of local wildlife: “Lots of birds can be seen and heard on the Roughs. Near the rhododendrons is a good spot - look out for: goldcrests, woodpeckers, wrens, treecreepers, song thrushes, chaffinches, dunnocks.” Some of these species, and also the other species noted by the NT such as noctule bats, are of conservation importance and should not be disturbed. (Source: http://www.nationaltrust.org.uk/abinger-roughs-and-netley-park/wildlife/).

NPPF 115 notes that “Great weight should be given to conserving landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty”. It is not acceptable to destroy any part of this area, protected over the last two millennia and substantive unchanged, in order to make a short term developmental profit even for a tourism related project. It further comments that the conservation of wildlife and cultural heritage are important considerations in all these areas. NPPF 116 notes that planning permission should be refused in these areas except in exceptional circumstances. This should be incorporated into the local plan.

Overriding force should be given to the Green Belt provisions of NPPF 88 and 89 which generally notes that substantial weight should be given to any harm to the Green Belt and that the construction of new buildings is generally inappropriate.

GBC should be reminded that the AONB has status equivalent to that of a National Park.
Interestingly in National Parks, the National Park authority has overall responsibility for planning policy. For the South Downs National Park, the guidance is of relevance http://www.southdowns.gov.uk/__data/assets/pdf_file/0013/123232/Agenda_Item_8_Appendix_1_20101203.pdf. This states:

“National Parks have two statutory purposes which must be taken into account when considering planning proposals that could have an impact upon a National Park.

To conserve and enhance their natural beauty, wildlife and cultural heritage

To promote opportunities for the public understanding and enjoyment of these special qualities.

If there is a conflict between these two policies then the first must take precedence.”

Other guidance is worth noting. The National Parks and Access to the Countryside Act 1949 legislated for the designation of AONBs and National Parks. Their purpose was to be similar – to conserve and enhance natural beauty. The Countryside Commission defined the purpose of AONB designation in a statement of 1991.

Purpose of AONB Designation

- “...Is primarily to conserve and enhance natural beauty.
- In pursuing the primary purpose of designation, account should be taken of the needs of agriculture, forestry, and other rural industries and of the economic and social needs of local communities. Particular regard should be paid to promoting sustainable forms of social and economic development that in themselves conserve and enhance the environment.
- Recreation is not an objective of designation but the demand for recreation should be met so far as this is consistent with the conservation of natural beauty and the needs of agriculture, forestry and other uses.”


AONBs and National Parks are recognised in England to be on a par legally because of their nationally important landscapes. The National Planning Policy Framework confirms that AONBs are equivalent to National Parks in terms of their landscape quality, scenic beauty and planning status.

The statutory duty enjoined upon GBC is not to seek to develop but to protect this area – “to conserve and enhance natural beauty”. It appears to have objective seeking growth which is in conflict with the requirements to protect. This is already covered by NPPF in relation to Green Belt status, which is in itself glossed by ministerial guidance, as previously noted (Eric Pickles, Brandon Lewis and others).

Development within the AONB of any form is likely to be damaging. In addition to the overriding restriction on such development under NPPF, the following statement referred to by Natural England is of significance:

“The United Nations Environment Programme (UNEP) has recently drawn attention to studies finding that although developed land covers only a small proportion of North America’s land base, it has a large impact on ecosystem services. For example, roads occupy just 1% of US land area, but they alter the ecological structures and functions of about 22% or more of the land. In US regions with rapid ‘exurban’ (or extensive residential) growth, species richness and endemism diminish as urban cover increases, threatening biodiversity. The fragmentation of natural habitat threatens more than 500 endangered US wildlife species with extinction. It also provides new entry points for invasive species already introduced through other pathways”. 13.Source: United Nations Environment Programme, Global Environment Outlook GE04 – environment for development, 2007, p.259 at Box 6.30, itself quoted by Natural England.

In other words, seeking growth of any kind within the AONB is inherently undesirable and in conflict with the overriding principles of biodiversity, and therefore sustainability.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Policy E7: Guildford Town Centre

Response

Summary

I OBJECT to this policy

There should be much more residential use of the town centre. There is limited need for further retail, which will disadvantage existing retailers as well as using valuable land inefficiently. There is an urgent need for a brownfield register and to focus on brownfield redevelopment before considering development outside the existing urban area. CIL strategy must promote brownfield redevelopment.

Detailed response:

The government committed to legislating for a ‘brownfield register’ of ‘land suitable for housing in the Queen’s Speech 2015 and the 73 councils piloting the brownfield register were announced in March, 2016. Section 151 of the Act permits regulations requiring LPAs to keep a register of particular kinds of land, of which the brownfield register will be one. There is no reference to a brownfield policy within the policy for Guildford Town Centre, which is a major flaw.

Retail

Policy E7 is ill-informed. The evidence base fails to assess the capacity of the existing town centre to accommodate appropriate new development objectively. Paragraph 161 of the NPPF requires the LPA to assess the real quantitative and qualitative needs for economic activity including retail and leisure development, and I consider that this requirement has not been met.

Policy E7 is unlikely to benefit the health of the town centre in the future. There is no reliable evidence provided that the retail core of the Town Centre can support expansion of 45,000 sq m of additional retail space at North Street. There is a lack of demand for retail units in the Town Centre particularly large units.

There is falling demand for retail space in Guildford and town centres throughout the country (as evidenced by independent research and the reality of empty shops in many high streets (including Guildford) and the accelerating competition from internet shopping – see CEBR studies).

The North Street scheme has repeatedly failed in various redevelopment proposals over the last ten years. This is evidence of a lack of demand, such that the original planning permission for a large retail scheme became time expired. A number of major developers have studied the proposals in detail and then withdrawn from negotiations because the proposals are not economically viable.
The reality is that the town centre has enough retail floor space. If more is introduced it will result in the closure of existing shops particularly in locations which are less than 50% of peak Zone A or 100% positions.

What Guildford needs is a new focus on speciality high quality comparison shopping supported by a revival of Guildford’s attractive heritage core and the historic visitor attractions supported by restaurants.

The existing site in North Street should be replaced with a well-designed ground floor high quality speciality retail mall and frontage of no more than 40 shops extending to 7,000 sq m with the rear and upper floors providing an additional 500 to 600 homes. The proportion of the above proposed smaller scheme at North Street will be complementary to and not antagonistic to the Upper High Street, Tuns gate, the Debenhams site and the 100% Zone A positions of the Lower High Street. If the existing policy under E7 is adopted the North Street site will remain empty for another 10 years.

The findings of the Guildford Retail and Leisure Study 25 September 2015 are very pessimistic about retail trends. Carter Jonas’s recent study reports a bad time for retail. GBC’s own evidence base demonstrates that there is limited demand for additional retails space. The bullet points below are direct quotes from the report:

- Para 3.3 Retail Trends “Town centres, once the principle focus for retail and leisure are now increasingly under threat”
- Para 3.4 Retail Expenditure “disposable income and retailers’ margins are being squeezed further”
- Para 3.5 “there has been limited growth in retail (convenience and comparison goods) expenditure per head since 2008”
- Para 3.6 “the retail sector remains fragile and analysts forecast that some operators and centres will continue to struggle over the short to medium term”
- Para 3.8 “completed new shopping centre floor space in the UK is currently at its lowest level since the 1990s”
- Para 3.11 Internet Shopping “New forms of retailing have also emerged in recent years and are becoming established as significant alternatives to more traditional ‘bricks and mortar’ shopping facilities. Over the last 5 years, online sales have increased by 222%”

Appendix 6 of the Retail Study indicates inaccurate demand data

- Para 5.29 “The latest CoStar Report recorded 64 requirements for Guildford from January 2013 to August 2014; representing a total maximum floor space requirement of 62,208m2 gross (see Appendix 6).”
- This looks in the main unpersuasive with brands such as Joules Clothing; Fossil; Comptoir des Cotonniers; Moshulu; Rituals; Princesse tam.tam; Cycle Surgery; Majestic Wine; Game Stores Group Ltd; Iceland. But if we look closely at Appendix 6 it is an amalgam of old unchecked national high street requirements some of which do not even include Guildford as a destination and most is hardly high quality comparison retail. There are also no “big” requirements in terms of space. Where are the big stores?
- GH Pressley & Sons – Watches and Silver - Requirement “They are seeking a flagship diamond store in central London. Target locations include Mayfair, St James, Kensington and Knightsbridge. Brands will include Hans D Krieger and Marco Bicego.” This does not sound like Guildford
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- Game Stores Group Ltd have apparently a requirement for a store in Guildford dated 2012 but the company entered administration on 26 March 2012, and 277 of Game's 609 UK stores were closed immediately, resulting in 2,104 job losses. Are they really looking?
The data relating to retail demand does not appear reliable. The 62,800 sq m does not translate to real demand for an expansion of 500,000 sq ft. If proper due diligence was applied perhaps 10% of this Carter Jonas requirement would survive.

Brownfield redevelopment

We must make full use of our urban brownfield before we consider building in the Green Belt or countryside. Paragraph 17 of the NPPF states that to “encourage the effective use of land by reusing land that has been previously developed (brownfield land)” is a core planning principle. Paragraph 80 of the NPPF clearly states that Green Belt serves a key purpose, “to assist in urban regeneration, by encouraging the recycling of derelict land and other urban land”. In order to comply with central planning policy we need a brownfield strategy.

In response to the detailed objections received in the Regulation 18 process of the 2014 Local Plan and also in accordance with government policy a Guildford brownfield land register should be urgently compiled showing address, ownership, occupier, current use and detailed planning brief.

- GBC needs to accelerate residential redevelopment at Woodbridge Meadows, Walnut Tree Close and the Station within the next 1 to 5 years
- GBC needs to examine the residential development opportunity of the 25.7 acres of car parks in GBC ownership
- A brownfield-first policy should underline all planning decisions and the default for non-brownfield land should be rejection
- Failure to promote brownfield-first is unsustainable and is contrary both to the policies of the Metropolitan Green Belt (still in force) and NPPF paragraph 80 and 84.

Our recommendation is for a new Brownfield Policy for the town centre:

“We are committed to a brownfield-first initiative. All applications on previously developed land within the urban settlement area will be given fast-track priority. Development of urban brownfield land will be prioritised for residential and employment purposes to satisfy the needs of local people.

In parallel a zero-CIL incentive should be given for all residential development on urban brownfield land in order to meet the NPPF requirement for urban regeneration. Brownfield sites in the urban area should be identified as soon as possible. The register should be public, with full details of ownership. All brownfield sites owned by Guildford Borough Council, Surrey County Council or other government entities should be considered as available development land within the first 5 years of the plan.”

Residential

I do not believe that the target of 1,172 homes in the town centre takes account of the need and demand for urban housing or the opportunities that brownfield sites present for increasing the residential development in the core of the town. This will help to sustain the retail core. The Town Centre policy needs to maximise the potential for residential development on brownfield. It must include as an absolute minimum the 2,551 units proposed in by Allies and Morrison for the town centre included in the masterplan 2015 which has recently been adopted by GBC. I consider that the Town Centre has the capacity for the higher of at least 50% of the total or at least 5,000 homes. At present, the plan is to impose 70% of new residential development on greenfield and Green Belt land.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: PSLPP16/10084  Respondent: 8640353 / Julian Cranwell  Agent:  

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E7  

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )  

Answer (if comment is on questions 1-7 of the questionnaire): ()  

We object to this policy. There should be much more residential use of the town centre. There is limited need for further retail, which will disadvantage existing retailers as well as using valuable land inefficiently. There is an urgent need for a brownfield register and to focus on brownfield redevelopment before considering development outside the existing urban area. CIL strategy must promote brownfield redevelopment.  

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/10087  Respondent: 8640353 / Julian Cranwell  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E8

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to policy E8 District centres We object to the proposal that sites “on the edge” of District Centres should be considered for retail developments. This is another Trojan horse policy, allowing retail hubs to be vastly expanded in order to smooth the way for vast new housing estates outside in the countryside (e.g. to meet the “everyday shopping and service needs” of the roughly 1,500 people living in the 600 new homes planned for the Horsleys). This is a case of back-to-front priorities. Expanded local retail hubs are being proposed in order to justify more housebuilding in the villages, and in a forlorn attempt to mitigate the serious traffic and infrastructure problems this will bring. The Council have no business preparing the way for new supermarkets in the Green Belt. Rural retail capacity should be left to local demand. The policy proposes not a single measure to support existing rural shops and services that are the lifeblood of village communities, e.g. using business rates and other levers at the Council’s disposal.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/10089  Respondent: 8640353 / Julian Cranwell  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E9

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Policy E9 Local centres

We object (for the reasons given under Policy E8 above) to the proposal for retail development adjacent to the 6 rural centres, and sites on the edge of designated centres. This is creeping urbanisation, damaging to the Green Belt and to Guildford town revival as a thriving urban hub. It will contribute to local urban decay and depopulation, just as expansion of the suburbs did to mid-20th century London.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/10068  Respondent: 8640353 / Julian Cranwell  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to policy H1 Homes for all.

Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan period. It fails to set any rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions. The housing mix is based on out-of-date, pre-Brexit projections and on assumptions set out in a flawed SHMA that has not been scrutinised or evaluated. We support higher density development in the urban area close to transport hubs to facilitate modal shift e.g. 20 minutes’ walk of Guildford railway station. Much of Guildford town could usefully be regenerated with 5-6 storey blocks (there are currently blocks of this size already in the town) at 50 homes per ha with landscaping and underground parking, as often seen on the Continent and, recently, in London. Student accommodation should provide for 100% of new students and more than 60% of existing students, which would free up ideal family accommodation in the urban area. Other university cities (e.g. Oxford) insist on higher percentages than those proposed in the plan. In my view, the Council’s timidity is a case of “regulatory capture” by Surrey University, which has failed to use its existing planning permissions (dating from 2004) to accommodate 3,000 students or to improve the efficient development of its campus (e.g. by building on its extensive and underused surface car parks). If all students were accommodated in this way, 2,000 homes would be freed up in town and there would be no need to build on the Hog’s Back. Surrey University has 17 ha of car parks that could provide all the student accommodation
required on stilts with parking beneath. Guildford borough already has a higher proportion of traveller sites than most comparable boroughs. Overprovision is inappropriate given other constraints.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/10070  Respondent: 8640353 / Julian Cranwell  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to policy H2 Affordable homes.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents: J Cranwell Objection to GBC Local Plan 15 July 2016.doc (700 KB)

Comment ID: PSLPP16/464  Respondent: 8640353 / Julian Cranwell  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy H3: Rural exception homes

Response

Summary

I OBJECT

This policy allows potential development OUTSIDE settlements even in Green Belt and includes wording to propose extension of this policy for Market housing. This is a Trojan horse to allow development where it would not otherwise be permitted. Ensure it is made clear, as part of the policy (blue box), that this is an exceptional scheme only and that the overriding requirements of the NPPF, especially NPPF 87, 88 and 89, will apply in the administration of this policy so
that it will only apply in exceptional circumstances. Far from being exceptional, this policy seeks to introduce a scheme where housing could be built anywhere, with no restriction, other than the general link to some form of connection with the Guildford housing list.

**Detailed response:**

Re rural exception sites, the NPPF deals with this in NPPF 54 which states:?

“In rural areas, local planning authorities should be responsive to local circumstances and plan housing development to reflect local needs, particularly for affordable housing, including through rural exception sites where appropriate”. This clause makes it clear that housing in rural locations should reflect local needs particularly for affordable housing. In this context local should imply with a direct connection to the local community only, not the wider community within the borough.

The following extract from the National Planning Policy Guidance is relevant:

**Paragraph: 034 Reference ID: 3-034-20140306**

Can unmet need for housing outweigh Green Belt Protection?

Unmet housing need (including for traveller sites) is unlikely to outweigh the harm to the Green Belt and other harm to constitute the “very special circumstances” justifying inappropriate development on a site within the Green Belt.

Revision date: 06 03 2014

In fact it is clear that Guildford Borough Council sees rural exception housing not as an exception but as a normal mechanism for supply while disregarding the constraints of the Green Belt.

It uses existing and projected affordable housing within the villages not in order to meet local needs but as a response to the general housing list. This, per the NPPF, is inappropriate. It is symptomatic of the manner in which Guildford Borough treats the rural area – although containing 50% of the population of the borough- as merely ancillary to the needs and desires of the town.

This is arguably in contravention of the requirements of NPPF where housing development in rural areas should reflect local (not borough-wide) need. Such lack of earmarking has two potential problems. One is that there is increased pressure to consider too many rural exception sites which properly would not and should not be required. The preferred response to this would therefore be to earmark affordable housing within villages for demonstrable local need.?

The other, which should not be overlooked, is that it has the capacity to create a rural poverty trap. In Gomshall, for example, (the site of a significant number of new affordable homes currently being built by GBC) the cost of a single bus fare to Guildford is currently £3.50 and the cost of a single train fare to Guildford is £3.80. This is likely to prove a significant obstacle in seeking employment or the facilities needed by most members of a community (cheaper food from supermarkets; hospitals; dentists; secondary schools; junior schools (none of these are present in Gomshall)). Such a rural poverty trap is likely to be of less impact for those with family in the immediate area or those who work in the area; but for those on the general housing list it is inappropriate housing. So if the affordable housing within villages is allocated to those with local connections, the need for the rural exception scheme falls away. It should be noted that the NPPF requires the policies under which limited affordable housing for local need to be set out in the Local Plan; this should not set out the circumstances either of where these policies should apply, nor to whom they should apply – both would seem to be required.

One particularly shocking – developer led –initiative is the proposal which suggests that the rural exceptions scheme should be utilised to grant planning permission in the Green Belt OUTSIDE settlement boundaries for market housing. This is completely in contravention of NPPF.

The detail of this provision indicates that this will override all guidelines as to appropriate zones for development within the plan. It is wholly unacceptable.
NPPF 89 notes that “a local planning authority should regard the construction of new buildings as inappropriate in Green Belt. Exceptions to this are... limited affordable housing for local community needs under policies set out in the Local Plan”. New market housing does not meet this criterion and should not be permissible. This is in clear breach of the requirements of NPPF and of planning law (St Albans, Gallagher homes) and should be deleted. There are no circumstances where it could or should be permissible to build market housing under the rural exceptions scheme?

Concerns have been expressed previously that the ordinary rural exceptions scheme could become a “Trojan Horse” policy allowing development that should not otherwise be permissible. This expression of that policy emphatically seems to embrace this concept.

This policy is much wider than the NPPF requirement that rural exception sites should be restricted to the local (i.e. parish level) need. The wording of this policy- “contribute to meeting... local needs” means that GBC plans to use these to meet its normal housing list - the “local” is defined by GBC as meaning “current or former residents of the borough or have a family or employment connection”. So these would not really be local housing at all.

This policy requires radical revision in order to?articulate the requirements under which the rural exception scheme might be permissible, making it clear that

- it will not be permitted except where there is demonstrable unfilled local need which cannot be met elsewhere?
- make it clear what the requirements are to qualify for the scheme?
- ensure it is made clear, as part of the policy (blue box), that this is an exceptional scheme only and that the overriding requirements of the NPPF, especially NPPF 87, 88 and 89, will apply in the administration of this policy so that the provision of rural exception sites will only apply in exceptional circumstances.

Under no circumstances should the rural exceptions scheme be used to accept market housing.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>PSLPP16/10071</th>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to this policy which allows potential development OUTSIDE settlements even in Green Belt and includes wording to propose extension of this policy for Market housing. This is a Trojan horse to allow development where it would not otherwise be permitted. Ensure it is made clear, as part of the policy (blue box), that this is an exceptional scheme only and that the overriding requirements of the NPPF, especially NPPF 87, 88 and 89, will apply in the administration of this policy so that it will only apply in exceptional circumstances. Far from being exceptional, this policy seeks to introduce a scheme where housing could be built anywhere, with no restriction, other than the general link to some form of connection with the Guildford housing list.
Re rural exception sites, the NPPF deals with this in NPPF 54 which states: "In rural areas, local planning authorities should be responsive to local circumstances and plan housing development to reflect local needs, particularly for affordable housing, including through rural exception sites where appropriate." This clause makes it clear that housing in rural locations should reflect local needs particularly for affordable housing. In this context local should imply with a direct connection to the local community only, not the wider community within the borough.

The following extract from the National Planning Policy Guidance is relevant:

*Paragraph: 034 Reference ID: 3-034-20140306*

**Can unmet need for housing outweigh Green Belt Protection?**

*Unmet housing need (including for traveller sites) is unlikely to outweigh the harm to the Green Belt and other harm to constitute the “very special circumstances” justifying inappropriate development on a site within the Green Belt.*

**Revision date: 06 03 2014**

In fact it is clear that Guildford Borough Council sees rural exception housing not as an exception but as a normal mechanism for supply while disregarding the constraints of the Green Belt.

It uses existing and projected affordable housing within the villages not in order to meet local needs but as a response to the general housing list. This, per the NPPF, is inappropriate. It is symptomatic of the manner in which Guildford Borough treats the rural area – although containing 50% of the population of the borough- as merely ancillary to the needs and desires of the town.

This is arguably in contravention of the requirements of NPPF where housing development in rural areas should reflect local (not borough-wide) need. Such lack of earmarking has two potential problems. One is that there is increased pressure to consider too many rural exception sites which properly would not and should not be required. The preferred response to this would therefore be to earmark affordable housing within villages for demonstrable local need.?

The other, which should not be overlooked, is that it has the capacity to create a rural poverty trap. In Gomshall, for example, (the site of a significant number of new affordable homes currently being built by GBC) the cost of a single bus fare to Guildford is currently £3.50 and the cost of a single train fare to Guildford is £3.80. This is likely to prove a significant obstacle in seeking employment or the facilities needed by most members of a community (cheaper food from supermarkets; hospitals; dentists; secondary schools; junior schools (none of these are present in Gomshall)). Such a rural poverty trap is likely to be of less impact for those with family in the immediate area or those who work in the area; but for those on the general housing list it is inappropriate housing. So if the affordable housing within villages is allocated to those with local connections, the need for the rural exception scheme falls away. It should be noted that the NPPF requires the policies under which limited affordable housing for local need to be set out in the Local Plan; this should not set out the circumstances either of where these policies should apply, nor to whom they should apply – both would seem to be required.

One particularly shocking – developer led – initiative is the proposal which suggests that the rural exceptions scheme should be utilised to grant planning permission in the Green Belt OUTSIDE settlement boundaries for market housing. This is completely in contravention of NPPF.

The detail of this provision indicates that this will override all guidelines as to appropriate zones for development within the plan. It is wholly unacceptable.

NPPF 89 notes that “a local planning authority should regard the construction of new buildings as inappropriate in Green Belt. Exceptions to this are... limited affordable housing for local community needs under policies set out in the Local Plan”. New market housing does not meet this criterion and should not be permissible. This is in clear breach of the requirements of NPPF and of planning law (St Albans, Gallagher homes) and should be deleted. There are no circumstances where it could or should be permissible to build market housing under the rural exceptions scheme.
Concerns have been expressed previously that the ordinary rural exceptions scheme could become a “Trojan Horse” policy allowing development that should not otherwise be permissible. This expression of that policy emphatically seems to embrace this concept.

This policy is much wider than the NPPF requirement that rural exception sites should be restricted to the local (i.e. parish level) need. The wording of this policy- “contribute to meeting.. local needs” means that GBC plans to use these to meet its normal housing list - the “local” is defined by GBC as meaning “current or former residents of the borough or have a family or employment connection”. So these would not really be local housing at all.

This policy requires radical revision in order to articulate the requirements under which the rural exception scheme might be permissible, making it clear that

- it will not be permitted except where there is demonstrable unfilled local need which cannot be met elsewhere?
- make it clear what the requirements are to qualify for the scheme?
- ensure it is made clear, as part of the policy (blue box), that this is an exceptional scheme only and that the overriding requirements of the NPPF, especially NPPF 87, 88 and 89, will apply in the administration of this policy so that the provision of rural exception sites will only apply in exceptional circumstances.

Under no circumstances should the rural exceptions scheme be used to accept market housing.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/465  Respondent: 8640353 / Julian Cranwell  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy II: Infrastructure and delivery

Response

Summary

I OBJECT to this policy as it stands. Various aspects of Infrastructure are acknowledged as congested, inadequate for the existing population and not able to accommodate much growth. However, greenfield sites – requiring heavy infrastructure investment – are targeted in order to generate CIL income for the council. This is not sensible. The current draft CIL scale also encourages development on greenfield sites rather than brownfield.

The methodology commissioned by the Council to assess traffic and the corresponding roads infrastructure needs is inadequate for the purpose of the Local Plan and identifies only the tip of the iceberg in terms of existing congestion. Looking at local traffic situations around the Borough it becomes clear that the schemes proposed will not solve congestion and the local road network has not been given sufficient consideration. Under the growth proposed some
locations would require highway schemes that involve demolition of property and road-widening in residential areas to solve the resultant congestion. Even the A3 improvements are not guaranteed to take place but they are being used to justify removing large areas from the Green Belt before detailed traffic assessments have taken place. These detailed investigations are being deferred until the planning application stage and will be left to developers to prepare. If a site then proves to be unsustainable its Green Belt protection will have been lost for no reason and unsuitable development will take place by a more insidious process.

With regard to SANG provision, GBC has demonstrated that it has no genuine interest in conserving and enhancing biodiversity and clearly regards the Thames Basin Heaths SPA as an obstacle to be overcome rather than a valued asset. This is underlined at the end of the Policy wording which indicates that the council is more interested in meeting its legal responsibilities than actually protecting wildlife. GBC is failing to take account of existing biodiversity at sites selected for SANG provision.

**Detailed response:**

Some infrastructure, as identified in Figure 1 of the draft IDP- is within the control and remit of Guildford Borough Council – they have some influence in relation to planning – but much is under the control, and is the fiscal responsibility of, Surrey County Council or Highways England.

It is not realistic to assume that car use can effectively be replaced for all or even many users. Those who are disabled or infirm cannot easily substitute car journeys with bike travel: the elderly; the disabled; those caring for young children (particularly uncertain bike users and those with multiple children to care for); those wishing to use cars for supermarket or other bulky shopping; those who wish to commute to work and have no facilities for showering or changing on arrival; those who have lengthy and tiring commutes at present, for which the car is the final (short) element of a long journey (for those commuting into London from outside Guildford, a daily 3 hour commute is typical; this cannot realistically be extended by extensive cycling). All these factors mean that the replacement of the car with cycle use is likely to be overstated by many studies, particularly given narrow roads which do not allow effective or safe bike lanes.

Funding is not the only - nor the main - obstacle to improving infrastructure within the borough, and this seems not to be recognized. Guildford is a gap town, set in a bowl within the Surrey Hills Area of Outstanding Natural Beauty to the south of the borough, and with large sections of the borough affected by the Thames Basin Heaths Special Protection Area to the north. There is a ribbon through the middle of the borough which contains rail and road links to London, but is already heavily congested, is Green Belt, AONB, SPA or more than one of the above. Very little of the borough is available for extensive development of infrastructure or any building. Do we really want solutions that involve driving new roads through our remaining countryside – including the AONB – at huge cost in financial and environmental terms. Such solutions may be the only ones left when the inadequacies of this proposed Local Plan are realised after the event.

Policy indicates note an intention to pool Community Infrastructure Levy from most new build development and to use CIL receipts to assist in provision of infrastructure needed to support the delivery of the plan. As with other aspects of planning, there is a failure to recognize that out of town settlements in particular have particularly high requirements for additional new basic infrastructure in order to exist at all – roads, sewers, water provision, electricity, gas, telephone and broadband links will all need to be provided and in many cases the links to existing services will need to be upgraded before these can be implemented. The ability to divert funds from CIL to other uses will be inherently limited, not least that otherwise the proposed settlements will not be able to function. The Council strategy of taking CIL from new build in the Green Belt seems to be to pay for roads within the town centre, as indicated in the policy which notes that legislation prevents the use of planning obligations to fund existing infrastructure deficits.

In the reasoned justification, it is indicated that the council will be prepared to negotiate if an applicant claims that the infrastructure requirements for their development make it unviable. This means that some developments will go ahead anyway and worsen the infrastructure deficit. The Policy claims that infrastructure needed “should” be provided and available when first needed but I have no confidence in the council enforcing this.

The absolute constraint on developmental capacity within the borough represented by the infrastructure limitations cannot be swept aside, but the council has ignored this and failed to apply a constraint on the housing number.
I am not convinced that the extent of existing traffic congestion has been fully recognised by the SCC transport assessment because the methodology employed waters down the level of traffic observed. This has knock-on effects when modelling the various development scenarios. The result is that the requirements identified (expensive though they may seem) are the tip of the iceberg. One of the easiest issues to understand is the use of average peak hour flows for the baseline data. SCC acknowledge that this is “typically lower” (see Transport Assessment 4.13.4 but GBC prefer the averaging approach with some eloquent wording in their Headline network metrics (3.9). A much better solution would have been to collect reliable baseline data that allowed for the effects of queuing and modelled each hour (or a shorter time period). Such an approach would have cost more but GBC seem unwilling to go the extra mile for reliable evidence while being content to spend large sums of money on propaganda exercises such as their one-sided video. There are other more technical reasons why the transport assessment methodology fails to fully identify current and planned congestion.

 Planned developments for Guildford and Waverley Boroughs were modelled together but growth for the rest of the UK was allowed for only using the DoT forecasts. As a result it is not clear whether adequate allowance has been made for significant developments planned for Woking and other neighbouring Boroughs. This represents an inconsistency in approach with the West Surrey SHMA.

 Many of the results for the PM peak are missing (TA 4.1.11 states that “these can be set out in an addendum report at a later date”). I believe that those who need to travel on the roads in peak hours will be every bit as interested in their future journeys home as they are for going to work. Publication of the Transport Assessment was delayed until the start of the consultation period so perhaps the non-inclusion of many PM results was simply a result of running out of time.

 The Model Development Validation Report does include some interesting baseline data that may be of interest to residents in terms of local knowledge of traffic.

 I am not convinced that it would be practical or desirable to end up in a position where the only solution to traffic congestion is to build many more new roads as by-passes through the Surrey countryside, or turn existing roads into dual carriageways, or demolish buildings (some of which may be historic) in order to accommodate higher capacity junctions in built-up areas.

 It is noted that the infrastructure Development Plan was developed using hotspots identified in “OGSTAR” (the previous Transport Assessment used for the 2014 consultation) as a starting point. (See Transport Topic Paper (5.56)). However, the site list used for OGSTAR was not even compatible with the former draft Local Plan let alone the current one. Despite this, the Key Evidence mentions the June 2016 TA but not OGSTAR.

 Appendix C (Infrastructure Schedule) is lacking in detail concerning what work will actually be carried out for most of the Local Road Network projects and the cost estimates are clearly at the guesswork stage suggesting that these schemes have not been fully thought through or checked for viability. If more detail is available then why not provide it.

 It is not clear whether CIL will be received in time to put the required infrastructure in place for each development – or what penalties will be applied for late payment.

 The Monitoring Indicators rely entirely on annual CIL receipts and spending. Surely they should look at actual infrastructure delivery and any changes in its adequacy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to policy I1 Infrastructure and delivery

We OBJECT to this policy as it stands. Various aspects of Infrastructure are acknowledged as congested, inadequate for the existing population and not able to accommodate much growth. However, greenfield sites – requiring heavy infrastructure investment – are targeted in order to generate CIL income for the council. This is not sensible. The current draft CIL scale also encourages development on greenfield sites rather than brownfield.

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new basic infrastructure in order to exist at all – roads, sewers, water provision, electricity, gas, telephone and broadband links will all need to be provided and in many cases the links to existing services will need to be upgraded before these can be implemented. The ability to divert funds from CIL to other uses will be inherently limited, not least that otherwise the proposed settlements will not be able to function. The Council strategy of taking CIL from new build in the Green Belt seems to be to pay for roads within the town centre, as indicated in the policy which notes that legislation prevents the use of planning obligations to fund existing infrastructure deficits.

In the reasoned justification, it is indicated that the council will be prepared to negotiate if an applicant claims that the infrastructure requirements for their development make it unviable. This means that some developments will go ahead anyway and worsen the infrastructure deficit. The Policy claims that infrastructure needed “should” be provided and available when first needed but we have no confidence in the council enforcing this.

The absolute constraint on developmental capacity within the borough represented by the infrastructure limitations cannot be swept aside, but the council has ignored this and failed to apply a constraint on the housing number.

We are not convinced that the extent of existing traffic congestion has been fully recognised by the SCC transport assessment because the methodology employed waters down the level of traffic observed. This has knock-on effects when modelling the various development scenarios. The result is that the requirements identified (expensive though they may seem) are the tip of the iceberg. One of the easiest issues to understand is the use of average peak hour flows for the baseline data. SCC acknowledge that that this is “typically lower” (see Transport Assessment 4.13.4 but GBC prefer the averaging approach with some eloquent wording in their Headline network metrics (3.9). A much better solution would have been to collect reliable baseline data that allowed for the effects of queuing and modelled each hour (or a shorter time period). Such an approach would have cost more but GBC seem unwilling to go the extra mile for reliable evidence while being content to spend large sums of money on propaganda exercises such as their one-sided video. There are other more technical reasons why the transport assessment methodology fails to fully identify current and planned congestion.

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The Model Development Validation Report does include some interesting baseline data that may be of interest to residents in terms of local knowledge of traffic.

We are not convinced that it would be practical or desirable to end up in a position where the only solution to traffic congestion is to build many more new roads as by-passes through the Surrey countryside, or turn existing roads into dual carriageways, or demolish buildings (some of which may be historic) in order to accommodate higher capacity junctions in built-up areas.

It is noted that the infrastructure Development Plan was developed using hotspots identified in “OGSTAR” (the previous Transport Assessment used for the 2014 consultation) as a starting point. (See Transport Topic Paper (5.56)). However, the site list used for OGSTAR was not even compatible with the former draft Local Plan let alone the current one. Despite this, the Key Evidence mentions the June 2016 TA but not OGSTAR.

Appendix C (Infrastructure Schedule) is lacking in detail concerning what work will actually be carried out for most of the Local Road Network projects and the cost estimates are clearly at the guesswork stage suggesting that these schemes have not been fully thought through or checked for viability. If more detail is available then why not provide it.

It is not clear whether CIL will be received in time to put the required infrastructure in place for each development – or what penalties will be applied for late payment.
The Monitoring Indicators rely entirely on annual CIL receipts and spending. Surely they should look at actual infrastructure delivery and any changes in its adequacy.

The local plan does not state an objective for congestion. The two strategic objectives that are included for infrastructure refer to supporting sustainable development and delivering a balanced system. However, in para 2.15 there is an aspiration expressed about opportunities ‘to improve the performance of the road networks through transport infrastructure and service improvements’, which taken with the previous paragraph includes reducing congestion. The evidence so far shows that this will not happen. The mitigation proposed is not sufficient to overcome the problems that will be caused by the level of growth in the local plan. Congestion will worsen. The network will lack resilience and be vulnerable to disruption due to incidents. Minor roads will have to cope with a lot more traffic, for which they are unsuitable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/466  Respondent: 8640353 / Julian Cranwell  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy I2: Supporting the Department for Transport’s “Road Investment Strategy”

Response

Summary

I OBJECT to this policy as it stands. This policy is concerned only with the strategic road network – the A3 and M25 for which the responsibility and decision-making lies with Highways England. It is only reasonable that the council will work closely with Highways England to ensure that the Local Plan does not utilise land in a way that limit the scope for future improvements.

However, the proposals for the A3 are undecided and the council has suggested a very expensive tunnel proposal that, even if HE decided to go ahead with it, is unlikely to be delivered until the end of the plan period. Less expensive alternative A3 improvements would not be delivered before implementation of the current draft Local Plan and would deliver a massive growth in traffic. The road improvements are likely to lead to significant disruption to traffic during the construction phase on top of an already overloaded road network. It would be folly to make matters worse by committing to such a large housing number and the only logical conclusion is that a very significant traffic constraint should be applied to the OAN for this Local Plan.

Detailed response:

Funding for prospective road improvements has not been secured.
The wording of this policy is far too vague. Terms such as “working with” Highways England, to “facilitate” improvements, “to take account” of “emerging proposals” mean that this policy is, in effect, meaningless. Typographical errors – such as the misspelling of “licensed” – must also be corrected.

The Road Investment Strategy phase 2 (RIS2) for the period post 2020 is currently in the research stage. Until the research is completed it is impossible to prejudge what impact this will have on the Strategic Road network. However, the Strategic Transport Assessment does state “4.8.6 It should be noted that despite these improvements, Figure 4.7 shows the A3 is still operating overcapacity with resulting impacts on congestion.” and “4.5.10 Currently it is unclear why some minor roads in or just outside Guildford town centre are showing increases. These include roads such as Nightingale Road, Denmark Road and Tormead Road. However, it could be related to re-routing occurring as a result of the improvements to the A3 through Guildford attracting drivers to both join the A3 and remain on the A3 at Guildford and weaving through local streets.” Also, at 4.8.3 “At the same time, average vehicle speeds increase not just on the A3 but across the network within the borough as a whole. However, despite this it should be noted that although the average speed across the network in Scenario 5 is higher than in Scenario 1 (the Do-Minimum), there are differences within the network with average speeds on A roads and minor roads lower than in Scenario 1.” In other words, traffic congestion on the local road network is predicted to be worse under this draft Local Plan.

It is possible or indeed probable that no further funding will be available, or that any funding will not meet projected full costs. If this funding is unavailable in full, then this policy should clearly state that projects cannot be developed.

RECOMMENDATION:

I propose that unless guaranteed public funds are available to cover costs in full, there should be no development of any individual sites of more than 10 homes outside the urban areas.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/10096  Respondent: 8640353 / Julian Cranwell  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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However, the proposals for the A3 are undecided and the council has suggested a very expensive tunnel proposal that, even if HE decided to go ahead with it, is unlikely to be delivered until the end of the plan period. Less expensive alternative A3 improvements would not be delivered before implementation of the current draft Local Plan and would deliver a massive growth in traffic. The road improvements are likely to lead to significant disruption to traffic during the construction phase on top of an already overloaded road network. It would be folly to make matters worse by committing to such a large housing number and the only logical conclusion is that a very significant traffic constraint should be applied to the OAN for this Local Plan.
Funding for prospective road improvements has not been secured.

The wording of this policy is far too vague. Terms such as “working with” Highways England, to “facilitate” improvements, “to take account” of “emerging proposals” mean that this policy is, in effect, meaningless. Typographical errors – such as the misspelling of “licensed” – must also be corrected.

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RECOMMENDATION:

We propose that unless guaranteed public funds are available to cover costs in full, there should be no development of any individual sites of more than 10 homes outside the urban areas.

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Attached documents:

Comment ID: PSLPP16/467  Respondent: 8640353 / Julian Cranwell  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy I3: Sustainable transport for new developments

Response

Summary
I support the concept and aim but OBJECT on the grounds that the practicalities of sustainable transport have not been properly considered, it is not sustainable to build dormitory towns and call them sustainable. Not everyone can cycle all the time.

How can large developments outside the town centre maximise sustainable travel? This is a matter for the planning process - the further from the town centre, the less sustainable the development will be.

Reliance on cycling discriminates against vulnerable members of the community. How can the disabled, those with small children, or the very old, or the infirm, or those who are ill, cycle outside the town in order to commute, or even inside the town? Only some people cycle - and Guildford has some steep hills, especially going out of town. Park and rides are slow – how can those with a 3 hour commute add 1 hour to their journey from using park and rides?

The only sustainable mechanism for new developments is to have them in the town centre close to the railway and the main shopping links where a hoppa bus can provide satisfactory links for those who cannot walk or cycle.

While we welcome the intention to encourage rail travel by adding two new stations there could be unintended consequences.

**Detailed response:**

Once again we see the word “expect” used which means the policy has no teeth. The word “expect” must be replaced with the word “require” so that this policy is enforceable.

There are a number of problems with this policy.

Congestion is a widely recognised factor in the local area of Guildford, and this is a major factor in the public response to the proposed housing numbers, which represents more than a 25% increase in housing numbers in a borough that is already profoundly congested. [Source: SHMA p61: itself sourced from ONS for 2013.] Residents recognise that to increase the population by this level within the existing transport provision is not feasible, and this informs much of the public response to the proposed level of housing accommodation.

It is not clear that this recognition, which is widespread through the borough, is shared by those who have drafted the Local Plan.

Guildford is a commuter town, which (compared to London) offers better quality of life and lower house prices, so it will continue to be a commuter town for the foreseeable future. As a result, access to the stations for commuting is of significance. It is not realistic to assume that traffic to stations for commuters can be replaced either by bus services (slow, intermittent, expensive, and in many cases absent completely) or by cycle. There is a capacity issue of car parking at the station, which effectively creates an absolute constraint on the feasibility of commuting from Guildford.

Cycling is attractive, and, for the urban young, especially students, it is both practical and cheap, and can be quick. However, as noted, those en route to work cannot be assumed to be able to cycle in working clothes. Elderly members of the community, those transporting small children, and the disabled cannot participate in cycling except to a limited extent. Effectively the "average" person deemed to be capable of cycling to substitute for car trips is an able-bodied adult not travelling to somewhere where smart clothing is required, not needing to arrive clean (or with showering facilities on arrival, not provided by all employers); this is not sufficiently widespread in terms of the local demographic for travellers that it should be allowed to determine policy – and of course, not needing to transport, for example, supermarket shopping after the trip. What about the disabled? the elderly? those looking after more than one child? Are they to be housebound? This is not a reasonable strategy. Before transport and buildings are determined on the basis of such a policy, it is also imperative that safe cycle routes are implemented through the borough. Cycling in winter on rural roads is inherently more dangerous. Upgrading these roads would not be feasible in terms of cost nor desirable in terms of local character.

Cycle lanes which disappear into normal traffic lanes, which travel over potholes and which allow cyclists to be threatened by HGVs are not conducive to wider cycle usage, nor should wider cycle usage be encouraged until it can be
demonstrated that it is safe, which currently, locally, it is not. The A25 cycle corridor scheme (Part of LRN1) will exchange the risk between cyclists and vehicles sharing space for the risk between cyclists and pedestrians sharing space. Much of the A25 has no pedestrian area anyway outside the urban space. Many cyclists travel at high speed and they will be put into conflict with pedestrians including mothers with very young children and schoolchildren many of whom need to cross the road and hence cross the cycleway. This is likely to lead to accidents and pedestrians are being disadvantaged.

Road capacity reduces as average speeds come down due to congestion. Where proper cycle lanes or off-road lanes are not provided then it is inevitable that safe driving will lead to reduced average motor vehicle speeds and gap development in the traffic stream. Both these effects act to reduce the capacity of our local road network. This loss of capacity has not been recognised in the Transport Strategy.

The concept of the park and ride with access into the town limited for those who live outside the town, is similarly flawed. Park and Ride is expensive, cumbersome and slow. It should be noted that in Oxford it has had a disastrous impact on small local retailers which is a retail segment that it is important to retain and support.

Use of park and rides increases the use of the strategic road network by local users, which is not what it is designed to do. This proposal is combined with aggressive exclusion from the town of those who are living in peripheral communities, which will increasingly resemble housing estates. This is a strategy for sink estates through Surrey instead of the Green Belt - this is not a strategy for growth. Head offices will choose to go elsewhere, because highly skilled staff and management in the cutting edge industries that GBC wants to encourage, will not choose to live in a dense housing estate.

The existing extent of traffic congestion has not been fully recognised. As a consequence the impact of the various development scenarios has been understated and the infrastructure costs are an understatement.

The transport studies are incomplete and unpublished and this should have led to deferral of consideration of the Local Plan consultation process until it was possible to revise the plan post publication of the studies. This matter was raised by a number of councillors at the Full Council meeting on 24 May 2016 when the consultation was approved, but a motion to defer was overturned by the majority party.

Cross-subsidy in terms of infrastructure is envisaged. The infrastructure deficit needs to be resolved before there are large numbers of new residents exacerbating the current congestion. The funding of the new developments through CIL and S 106 is expected to contribute to the transport impacts across the borough, and there is negligible concern for the transport problems created within those new developments or in areas adjacent to them. This is not acceptable to existing residents and is likely to cause some problems with the future residents too, who may arguably feel aggrieved that the road funding associated with their developments is being subverted to other areas. While this may be permissible under the revised CIL regulations it is questionable whether it is morally acceptable to grant planning permission to build on the Green Belt in order to cross subsidise the building of roads or other infrastructure in the town centre or elsewhere across the borough or outside it.

Insetting of villages and the proposed relaxation of planning restrictions anywhere outside settlements (Green Belt or not), implied in P2, will lead to substantial infilling that will not require traffic assessment but will contribute a highly significant amount of additional car journeys overall - by a more insidious process than the large developments proposed.

Costs for rail or bus travel could be substantially reduced and would incentivise their use; but these are outside the remit of GBC and so cannot be encouraged by them.

It remains to be seen whether the proposed new stations will be delivered as they are not entirely within the council’s control. While we welcome the intention to encourage rail travel by adding two new stations there could be unintended consequences as the roads local to both sites are heavily congested. If parking facilities are inadequate this could lead to a need for onerous parking restrictions on roads nearby – possibly affecting small businesses adversely.

If parking facilities are adequate this will encourage more traffic onto local roads and commuters tend to be hurrying to catch a train or anxious to return home after a day at work. That does not bode well for the safety of pedestrians needing to cross those roads. House prices near to stations tend to attract higher prices and this will increase the profit motive to
developers wanting to build on greenfield sites nearby. It will also mean that so-called affordable housing will be even less affordable at these sites. It may also lead, over time, to an undesirable loss of social-rented housing in the vicinity. A minor issue is that stopping at the additional stations will increase the train journey times to and from Guildford town centre on the lines affected.

**Detail in Policy wording – flawed drafting:**

The policy begins and ends with the weak and totally ineffective word, in planning terms, “expect”.

Contributing through CIL will not necessarily address needs local to the development concerned, and created by it, but may involve solving existing problems elsewhere in the Borough.

Bullets 4 & 5 – improvements to park and ride facilities imply increased car usage from outside the town and the parking provision acknowledges that most journeys will be by car.

Bullet 6 - Has the Vehicle parking Supplementary Planning Document been published? It is not listed as key evidence but the policy refers. How can a policy have been determined with reference to a non-existent part of the evidence base?

Bullets 7, 8, 9 & 10 are weak & aspirational with let-out words such as “facilitate the use of”, “wherever possible”, “contribute” and “where appropriate” (and poorly bulleted!). How will the use of ultra low emission vehicles be facilitated? This is such a vague aspiration as to be meaningless.

The policy only “expects” new developments to contribute, demonstrate adequate provision, etc – it should enforce them. A transport statement AND assessment ought to be a fixed requirement – not a matter for negotiation – while the policy implies that this might be waived even for sites that generate significant amounts of movement.

The construction traffic, noise and pollution generated by meeting the proposed housing number will be excessive. It will have a highly significant impact on the amenity and health of those residents living close to the development sites and those who live on the routes that will be taken by the construction traffic.

The last paragraph says nothing new in planning terms but does mean that the Local Plan has not fully and properly considered the traffic impacts of the proposed sites. We have experience of how misleading the TAs produced by developers can be – using averaging techniques and understated baseline figures, days when schools are not operating and many other devices to pull the wool over the eyes of planning authorities. This aspect is a denial of responsibility by GBC. The result is that Green Belt and countryside will be released for development when fuller consideration of traffic impacts at the Local Plan stage should have prevented that. If the planning authority is taken in by developers’ TAs then wholly unsuitable developments will be permitted.

**Introduction:**

The spatial development strategy (paragraph 4.6.20 and Policy S2) does not address the development needs of the borough ensuring distances are practical; this is certainly not the case with all the development sites. For example, the Wisley airfield site will generate a massive increase in vehicle journeys; developments in West Horsley will lead to greater car use, as will the proposed developments at Garlick’s Arch and in Send. The obvious site choice for sustainable development would be on brownfield sites in the town but the Local Plan proposes allocating those sites to the declining retail industry instead.

Paragraph 4.6.21 suggests that sustainable transport is promoted. Far from providing sustainable transport this Plan will generate a massive increase in motor vehicle journeys. The Plan cannot force residents to ride bicycles or walk everywhere.

**Justification:**

Paragraph 4.6.22 seeks to set out a reasoned justification and alleges that development should offer real travel choice by sustainable transport modes. There is little sign that this is being taken seriously enough now.
Paragraph 4.6.23 proposed to bring forward a Vehicle Parking Supplementary Planning Document. It is not clear what to make of this. Failure to provide off-street vehicle parking will not prevent residents owning cars and finding somewhere else to park but it may make life difficult for key workers to commute to their place of work. How can a consultation take place relying on non-existent background documents which are key parts of the Evidence Base? How can anyone comment on non-existent documents, and even if brought forward part-way through the consultation, any comments will be prejudiced by the absence of this informing the start of the consultation.

Paragraph 4.6.24 refers to the Sustainable Movement Corridor. Bus services are aspirational but economic reality may mean that they fail to persist. There is not enough detail published on how the SMC will be delivered – suggesting that it is aspirational rather than fully thought through.

Paragraph 4.6.26 refers to reviewing existing transport facilities and likely transport generation as part of assessing the amount of incremental travel demand. That consideration should have taken place in a robust and detailed manner on a site-by-site basis before the sites were allocated in the Local Plan. It is not sufficient to leave that until the planning application stage as intended by GBC and SCC, given that all sites will be subject to “permission in principle” under the Housing and Planning Act 2016 and so will not be capable of subsequent rejection on these grounds.

Paragraph 4.6.27 notes that Development must mitigate its transport impacts. The measures described rely entirely on people taking them up and not dumping their travel information packs in the nearest bin. It is clear that GBC, in response to concerns about elderly and disabled people failing to be coerced into riding bicycles are now suggesting tricycles to overcome this obstacle to their aspirations. They should be aware that while tricycles may help with balance issues they are heavier and harder to ride uphill. While the policy (unusually) notes that mitigation must be provided, in fact this is then diluted to suggest that facilities for electric car charging points and encouragement to car-share can be sufficient; all are optional and therefore meaningless.

However well designed a development is it will make matters worse during construction and if on a greenfield site, it is hard to see how it will achieve environmental benefits. On the other hand, replacing inefficient buildings on a brownfield site could lead to benefits in the long term.

Paragraph 4.6.28 notes “Developers should have regard” to the “Infrastructure Schedule at Appendix C”. The only thing that developers have regard for is forcing their application through and maximising their profit – that is the business they are in. Appendix C is lacking in detail. It notes, for example that there will be new town centre bus facilities at a cost of £5-10 million – such vagueness make it clear that no real costing or analysis of proposals has been prepared, and that the Infrastructure improvements proposed have not been properly considered. Having regard to fluid and uncertain proposals is effectively meaningless as a constraint or a requirement.

Paragraph 4.6.29 requires that applications need to address the transport implications of the proposed development. Experience with recent planning applications suggests that developers will do everything in their power to understate transport impacts and we have no faith in GBC and SCC taking a sufficiently robust line on this.

Key Evidence is missing or inadequate.

The Strategic Transport Assessment (SCC 2016) is listed as “forthcoming”, but this plan has been produced in the absence of any strategic transport review.

There are further inadequacies in the Evidence Base, highlighted in the following annexes, which include examples of deficiencies, ambiguities and inadequacies in the transport and infrastructure evidence. This is not a comprehensive list of deficiencies, but serves as an illustration of the poor evidence on which decisions have been based.

Annexe 1

Comments on Guildford Borough Transport Study 2016

Page 2 – “address the historic infrastructure deficit” - developers are not required to do this?
Page 2 – It is wrong to claim that the cycle infrastructure along the A25 is good – and many cyclists are not careful, so putting them in contention with pedestrians is not a good idea.

Page 5 – The decision on Heathrow or Gatwick has yet to be taken but airport expansion in the south- east cannot be regarded as sustainable development and, although GBC has no control over such external decisions, its own growth agenda will drive a need for that expansion.

Page 6 An additional weakness is alternative “road closure diversion” routes for the SRN on the LRN

Page 6 Are the “Committed Improvements” actually committed and guaranteed to be delivered?

Page 7 The rail strategy does not provide for Wisley (residents would drive to stations)

Page 7 How long will it take to deliver Crossrail 2? “We hope that Crossrail 2 could be operational by 2030, but we are in the very early stages of planning and no decision to build it has been made.”

Page 7 Guildford platform capacity still many years away if ever.

Page 7 The rail strategy anticipates many improvements that have not been secured and may have unintended consequences if they proceed (see above)

Page 7 The Southern Rail Access to Heathrow [see the feasibility study dated December 2015 – although other proposals may be put forward (e.g. by Hounslow)] is still in its early stages and would have significant impacts on open space beyond our Borough. For example, all options in the feasibility study would use Staines Moor SSSI and Option 4 would use Bedfont Lakes Country Park (a Local Nature Reserve and SNCI).

The various options would use existing commercial, residential and highways land in varying degrees. It seems unlikely that a solution will be delivered within the Plan period and removal of highly valued open space with high biodiversity (wherever it is in South-east England) cannot be regarded as sustainable.

Page 10 and 13 There is a stark contrast between the plans for the town centre which involve encouraging a reduction in traffic by reducing roadspace and the plans for the SRN and parts of the LRN which involve increasing capacity. While increasing capacity may reduce some areas of congestion in the short term, history suggests that traffic will rapidly grow until the improved roads are congested once again. This can hardly be regarded as sustainable. A sustainable option would be to apply a very substantial traffic infrastructure constraint on the housing number.

Page 10 While the A3 Guildford Tunnel aspiration has some environmental advantages over widening (in particular for residents living close to the A3), the environmental burden of the construction phase will be far higher and aspects such as location of ventilation stacks and their local effect (in all weather conditions) do not appear to have been considered.

Page 14 Under Weaknesses the point about A roads in Guildford Town also applies to surrounding areas in the Borough and beyond. The anticipated improvements ignore existing congestion to the south and east of Guildford – presumably because SCC’s transport assessment methodology only identifies the tip of the iceberg. The current Plan will see increased congestion and a resultant reduction in air quality in many areas beyond the town centre.

Page 16 “Largely commercial bus services” is seen as a strength whereas it should be seen as a weakness with a trend to reduced subsidies and the provision of bus services, especially in rural areas, being increasingly dependent on commercial gain. It is difficult to see this changing under the current Government cuts philosophy. The point “Subject to business case including funding” under Aspirations demonstrates this point.

Page 18 We welcome the aspiration to “Expand the public realm through significantly extended pedestrian-priority areas”
The introduction talks about reductions in some pollutants. This may be the case for pollutants such as Sulphur Dioxide, which contributed to the visible London smogs, but it is not true of diesel vehicle emissions which have increased as a result of Government policy including its aggressive growth agenda and population increase through immigration.

30 accessible electric vehicle charging points are only an aspiration and will be nowhere near enough if there is a real shift to electric vehicles.

It is clear from the “Strategy outcomes” that GBC would prefer not to follow other areas in pro-actively tackling air quality.

Page 22/23/24 The timescales indicate that the main rail improvements (including the two new stations) are unlikely to be delivered until the end of the Plan period or even later. The sites that are supposedly justified by their inclusion will generate a major increase in road traffic in the interim and it may be more difficult to achieve this aspect of modal shift in the longer term. The same can be said about the other traffic infrastructure proposals. Residential development is being scheduled before the infrastructure that it will need.

Page 24 Monitoring – “Increase” needs to be in proportion to population growth as otherwise failure will be taken as success. “An Increase in average vehicle speeds” is inconsistent with the desire to reduce the number of persons killed or seriously injured. For example, some A roads pass through residential areas where pedestrians, including schoolchildren, are trying to cross the road at peak times. It is noted that increase in vehicle speeds is only desired in the morning. Going home from work does not seem to matter!

Annexe 2

GTAMS

NPPF and NPPG The Plan ignores the points concerning Green Belt and protecting the environment. GBC have tried to get round this by spinning their messages and using misleading statistics including a major understatement of the area of Green Belt to be removed.

Planning Update (March 2015) – The point in this update concerning Green Belt has been ignored

Monitoring Indicators:

Ten years is far too long to wait for information on whether the approach is working or not. The target requires only an increase. This would permit an increase less than that in line with any population growth to be regarded as success. The bar has been set well within the failure range.

Policy 14: Green and blue infrastructure

Response

Summary

Response type: OBJECT

The Policy shows concern for conserving and enhancing biodiversity, which is welcome. We also note and welcome the intention to extend the principle beyond Biodiversity Opportunity Areas. However the current plan to build on large areas of countryside and to inset villages will have the opposite effect. The Policy appears therefore to be a box-ticking exercise with no real teeth to it.
There is no mention of the value of wildlife gardening to biodiversity or the important role that larger gardens play in a village setting.

There is no mention of the impact of the plan on food production, or monitoring the loss of agricultural land.

“The natural world, its biodiversity and its constituent ecosystems are critically important to our wellbeing and economic prosperity, but are consistently undervalued in conventional economic analyses and decision-making” (Biodiversity 2020 page 11)

“As a public authority in England you have a duty to have regard to conserving biodiversity as part of your policy or decision making.” (Government Planning Guidance)

Part of the problem is that “Biodiversity benefits are unpriced” and so not valued by those who look only at the more obvious and simplistic economic benefits.

We have some concerns that “enhancing” the River Wey in the town centre will avoid using the available brownfield land around Walnut Tree Close and Slyfield for urban regeneration and sustainable housing that could otherwise be used.

Why should the Walnut Tree Close/Woodbridge Meadows industrial area not be regenerated from bus garages, urban car parks and empty factories to offer sustainable, well designed, urban homes which are medium height, and can meet almost all of Guildford’s real housing needs?

**Detailed response:**

The policy on Green and Blue infrastructure is broadly supported with an important and major caveat; and if disregarded this should count as an objection.

However, it is noted that the largest areas of industrial brownfield land within the borough are near to or adjacent to the River Wey, particularly in the Walnut Tree Close area and in the Slyfield industrial area.

These areas could support much more housing than the relatively small numbers indicated in the policy on the town centre, under a town centre regeneration scheme. This would have huge benefits for the community as a whole since relatively run down areas would be subject to regeneration, the river banks would be cleaner and more attractive.

It is vitally important for the town as a whole that the run-down Walnut Tree Close area is used for well-designed housing, as indicated by the Mastervision document first draft compiled by Allies and Morrison. John Rigg of Savills and Guildford Vision Group indicated to the Scrutiny Committee of GBC that initial commercial projections indicated that the Walnut Tree Close area alone could provide 4000 homes. This is significantly in excess of the current GBC proposals. Both Allies & Morrison and GVG initially indicated that they believed that this site could be available for regeneration within the critical 5 year window required for the local plan. It is therefore essential that nothing in this policy should jeopardise anything that could lead to the Walnut Tree Close area being a regeneration zone.

As has been noted elsewhere, for reasons that are not altogether clear but appear to be connected to central government direction and a desire to maximize the Community Infrastructure Levy, there is an aggressive desire to push development on to the Green Belt at all costs, ignoring or eliminating for other reasons sites which could be used in the town for residential purposes. This has informed recent planning decisions (both the Aldi site and the Waitrose site were originally zoned for residential purposes and were eminently suitable for this) and this bias seems to be informing the Local Plan.

As a result, it is important that the desire for Green and Blue infrastructure does not become an excuse for preventing regeneration of Walnut Tree Close. It is noted that the Council has stated that “The Council is keen to protect the watercourses from inappropriate development that would spoil their character”. The bus station adjacent to the River Wey, and the empty car parks associated with empty factory space, are hardly attractive development – well designed mid height (3-4 storey) apartment blocks would be a great improvement to the river corridor, offer major scope for sustainable regeneration, and would prevent the need for any incursion into the Green Belt to meet reasonable housing needs.
That regeneration zone would be highly sustainable, because it would be within 1 mile of the railway station, adjacent to
the A3, and would eliminate an area of huge congestion in the town because if the industrial sites were replaced by
housing then the residents would commute by train or walk to work rather than having to drive in to an industrial estate.

It certainly does not seem appropriate to create substantial new parkland on current hard standing. The protections to
which this policy refers largely describe existing open space, which is of great importance. But to determine not to
utilize brownfield land for residential use at an appropriate density in order to force building on to the Green Belt would
seem to be in contradiction of the principles of use of the Green Belt applied in the Gallaher Homes v Solihull court of
appeal case, where the hierarchy of use is clearly defined, with urban brownfield required to be used as a first option.

So there is some considerable support for the residential element of this policy, with the note that this should be explicitly
amended to permit construction of a regeneration zone on the brownfield areas surrounding the river in the middle of the
town, and that this should not be held up pending yet more transport studies (Guildford’s track record on brownfield
utilisation is poor), but should be implemented with immediate effect.

It is not clear what form the “parkland” along the River Wey will take but the images available in the Town Centre
MasterPlan suggest mown grass similar to the area around Millmead. This misses an opportunity to enhance biodiversity
and enable town centre residents to engage with wildlife. Engagement with wildlife should mean much more than
throwing bread at ducks and chasing pigeons. To achieve a wildlife corridor through Guildford, that can also benefit the
health and well-being of residents living close by, the green space retained beside the river should be managed with the
needs of wildlife in mind.

Responses to policy notes:

4.6.33 Villages are generally permeable to wildlife. The lower density of housing and presence of gardens (especially
larger gardens) provides a corridor for movement across the residential area. Insetting of villages and the relaxation of
planning restrictions in the Green Belt implied by Policy P2 will lead to infilling, “garden grabbing” and consequent loss
of biodiversity. It will replace connections and corridors between habitats with barriers and lead to further fragmentation
of our natural infrastructure.

4.6.34 In the past Guildford Borough Council recognised the role that wildlife gardening and management of parks and
open spaces for wildlife could play in enhancing biodiversity. There seems to have been a shift away from this. These
aspects should be recognised in the Plan as well as the importance of BOAs and although 4.6.35 goes part way towards
this we have yet to see the GISPD.

4.6.36 This is long overdue and should include the way that our lanes are managed. The current approach is
unsympathetic, sometimes damaging tree roots and scarce native plants. It seems to be oriented towards encouraging
faster traffic rather than recognising the traffic-calming effects of natural vegetation (See the original Quiet Lanes
Initiative) – management of open spaces and lanes

We await the Countryside Vision with interest.

4.6.37 It appears that Policy I5 (whatever it was) has been omitted. (We think this means P5 – more evidence of slapdash
work)

4.6.38 I agree with this statement but public access is frequently damaging to biodiversity – the more obvious examples
being dogs out of control in the vicinity of ground-nesting birds and trampling of grassland habitats. Public open space
must be protected for the reasons given but wildlife needs undisturbed (or at least less disturbed) space too if it is to
thrive.

Responses to definitions:

This section starts with a definition that is not a proper definition and is followed by statements that are not definitions at
all, apart from the last – suggesting that this part of the document has not been thought through or checked.

4.6.42 “Biodiversity creation and/or enhancement” is not a definition – it requires definition.
Do you mean that you will create new species or encourage them to evolve? Or do you mean that you will increase the number of species living in the Borough, or the population of each species, or both?

The points made are aspirational that have no enforcement to back them.

We support the use of green roofs and walls.

However, building on the countryside and increasing the population by such a large amount will not help vulnerable species. It will put added pressure on remaining habitats and increase light and air pollution, degrading the ability of the borough to support wildlife.

4.6.43 Arrangements with developers have no guarantee of success or longevity. They involve partial mitigation and overall loss of the original biodiversity interest of a site.

4.6.44 This appears to be saying that you will deliberately put playing fields, sports facilities and other leisure activities in BOAs – but these are land uses that reduce biodiversity!

4.6.45 Our understanding of SANG is that it is intended to reduce pressure on Special Protection Areas by providing an alternative area for people to walk their dogs – and hope that they do not prefer to use the SPA. In other words they are intended to attract the type of user that is damaging to vulnerable species such as ground-nesting birds. In the desperation to find SANG land Guildford Borough Council are making use of existing open space that will not attract people away from the SPA and you are ignoring the impact on existing wildlife. For example – GBC decided to include the towpath in the Parsonage Meadows SANG as a way of also facilitating a cycle route. Encouraging cyclists and dog-walkers to use the same narrow path will not encourage dog-walkers to use it rather than the SPA. At Effingham Common GBC plan to designate an important area for wildlife and ground-nesting Skylarks. GBC is riding roughshod over the opinions of the Commoners and local residents. GBC used to put up signage warning dog-walkers not to disturb the Skylarks during the nesting season – but it appears that these signs are no longer there. Protests to Cllr Richard Billington may result in returning signs but these are not yet in place.

In allocating sites as SANG, GBC has ignored the requirement to consider existing biodiversity and clearly have little or any knowledge or understanding of the issue. The issues relating to Russell Place Farm have been pointed out by a qualified Biologist (see article in The Guildford Dragon – Chris Venables), Many invertebrates are dependent on the dung of grazing animals and this aspect of our countryside is being steadily driven out of our Borough.

4.6.46 We welcome this acknowledgement of the damaging effects of the proposed building developments. This also has relevance to the manner in which the green spaces next to the River Wey are managed.

4.6.47 We welcome the proposals but are concerned that these may be no more than good intentions. How will GBC ensure that they are carried out fully – and paid for by the developer?

Reasoned Justification:

4.6.50 As the emerging strategy for Surrey and the GISPD are not yet available the plan should not be proposing sites that will jeopardise them. The implication is that this aspect of the plan is not being taken seriously and will carry no weight in site selection despite the guidance in the NPPF.

4.6.51 In fact some GBC contract mowing and lane management is not in line with a strategy that is meant to protect biodiversity. (Examples – damage to tree roots and unsympathetic treatment of roadside vegetation (that includes orchid species) in Chalk Lane – southern end of Kingston Meadow in East Horsley is now mown flat rather than left to grow as a meadow through the Spring and Summer as it used to be (so no more day-flying Burnet moths there for example.

KEY EVIDENCE

Guildford Borough Policy Statements are statements – not evidence.

Additional evidence should include:
Existing SNCI surveys, including those that took place in 2004-2007.

Biodiversity evidence emerging from Neighbourhood Plans.

Evidence obtained by requests to local naturalists and natural history societies including those with a specialist interest.

**MONITORING**

Simply maintaining open space will not be enough for a significantly enlarged population.

Providing more open space to meet existing shortfalls or the needs of a much larger population will reduce the area of land currently in food production or providing wildlife habitat.

**SANG delivery is harming existing biodiversity**

It is not clear how you will measure a change in biodiversity just by looking at planning applications. “Net gains in biodiversity provided by development” is a contradiction in terms. There may well be a few examples in England where low density housing has been combined with manufactured habitat at the expense of loss of agricultural land with no surrounding habitat damage - but we see no evidence of that in the Local Plan. Even when a housing development replaces agricultural land it increases pressure on the surrounding countryside. A simple example is where houses border woodland and residents dump their garden rubbish (and often worse) over the garden fence. Increased leisure use on nearby countryside also has an adverse effect on biodiversity.

There is no guarantee that mitigations listed in an application will be carried out and their effectiveness is not guaranteed either. GBC would need to carry out follow-up ecological surveys on all sites. Who would pay for these? Are there enough consultants to carry out the work in sufficient detail? What aspects of biodiversity will be measured?

How frequently are surveys by Natural England intended to take place? How will GBC ensure that NE carry them out? A baseline of existing surveys against which changes will be monitored should be included within the plan and it must be comprehensive for monitoring to be effective.

How frequently will SNCI surveys be carried out? At what expense? The last survey published in 2007 made recommendations for an increase in the size of the Wisley Airfield SNCI and stated that this should be taken into account for planning purposes. This was overridden in the recent planning inspector’s report and the Local Plan includes this particular SNCI as a building site. This is clearly a case of hypocrisy and suggests that the Council has no genuine intention to maintain biodiversity let alone enhance it.

We believe that a survey of SNCIs is currently taking place but that it is limited in scope to the previously known sites. This prevents other sites, where genuine biodiversity enhancement has taken place (often as a result of volunteer community effort), from being recognised in this way. While every stone is being turned over in the quest to find green space to build on, no genuine effort is being made to identify biodiversity hotspots that may have been overlooked in the past. In other words the approach being taken is one that intends to make no net gain, and possibly even reduce, sites of nature conservation interest – in contradiction to the stated aims.

If an existing SNCI (or one proposed on grounds of biodiversity but not formally accepted in a Local Plan) is found to be in poor condition the action taken should be to bring it back into good condition – not to remove its status and build on it.

**Policy P3: Countryside.**

**Response**
Summary

I OBJECT to this policy as it stands. There is huge emphasis on provision both of services and of additional Green Belt in Ash and Tongham. It is not clear why new Green Belt should be designated here, while the Green Belt is being rolled back in all other areas of the borough. The only notable fact is that the Leader of the Council and other Executive members are based in this area and the question of impartiality does need to be raised.

Detailed response

Note that in the recent judicial review in relation to Ashdown Forest, the SANG zone for the Ashdown Forest SPA was 7km, and this gave rise to a lower housing number than that proposed by this local authority.

The urban areas of Ash and Tongham are indeed of importance within the borough, creating a barrier between the countryside of Guildford and the urban towns of Aldershot and Farnborough.

However, as noted, it does not seem entirely appropriate to seek to reduce Green Belt designation everywhere else in the borough, on the grounds of overwhelming housing need (which is itself not an exceptional circumstance) – including land within the Green Belt and the Thames Basin Heath SPA, but then to propose designating additional Green Belt in this particular area.

If the planning policy is sufficiently aggressive as to disregard existing Green Belt, to propose significant development in that area, then it is inappropriate, and in contravention of existing planning law, (Gallagher Homes v Solihull as determined by the Court of Appeal) to consider proposing new areas for Green Belt. It is unclear why the strategic gap that separates the Ash and Tongham urban areas from neighbouring Aldershot is of greater significance to the borough as a whole, than other threatened Green Belt villages and fields.

The desire to protect the strategic gap between Ash and Tongham and Ash Green is welcomed, and provided that this does not arise because of a loss of Green Belt land elsewhere, the proposal to include some of this land within the Green Belt is welcomed too. However, Green Belt boundaries should not be traded off. One village community should not benefit to the detriment of another. The proposed extension of Green Belt designation to Ash and Tongham is unlikely to succeed, because it is not inherently better at serving the purposes of the Green Belt than other areas threatened by development, and a similar attempt in Solihull was wholly unsuccessful. The Court of Appeal decision will represent a precedent in this regard.

As noted in Gallagher Homes v Solihull, the NPPF is based on PPG2 which is quoted in a similar context to this proposal:

“If such an alteration is proposed the Secretary of State will wish to be satisfied that the authority has considered opportunities for development within the urban areas contained by and beyond the Green Belt.”

In other words, before altering Green Belt boundaries (to use for building), land beyond the Green Belt should be considered as building land first; and first of all, brownfield urban land should be used. Provided that the Green Belt is not subject to the wholesale assault then this extension might be acceptable to the wider community within the borough. It will not be acceptable as a trade-off for loss of the Green Belt elsewhere.

Policy P3 States that ‘development will only be permitted provided it:

“requires a countryside location or where a rural location can be justified, and is proportionate to the nature and scale of the site, its setting and countryside location, and does not lead to greater physical or visual coalescence between the Ash and Tongham urban area and Aldershot”.

We would like to know what the rural justification of proposed housing has for Ash and Tongham and how Guildford Borough Council proves that contributes to the rural economy? In the Local Plan, Guildford Borough Council refers to these Eastern Borough proposals as ‘extensions to urban boundaries’. Developments of 1241 and 91 homes cannot
possibly meet the necessary term ‘rural justification’ (The site allocation maps show different figures of 1200, 62, 58 homes)

As far as we can tell with the corresponding maps, the proposed developments in Ash and Tongham will create a greater coalescence between the separate villages to combine them into one urban area with a slither of green space between it and the A331/Aldershot.

Designation of Green Belt does not guarantee a barrier between Ash and Ash Green as Guildford has demonstrated the urge to move the Green Belt boundaries in communities elsewhere. We would suggest removing the allocation of further Green Belt designation as it does not follow NPPG Policy. There are no exceptional circumstances to allow changes in Green Belt Boundaries in Guildford.

It is also not clear what the impact will be of designating SANG in this area, and whether this will be used to permit building on Green Belt or land otherwise protected because of the Thames Basin Heath SPA designation elsewhere.

Ash and Tongham have countryside designated Ancient Woodland, AGLV and SNCI and a sensitive historic site which must be protected. This, together with a focus on using existing brownfield within the urban settlement area and a more realistic housing number, should succeed in protecting the valuable countryside around Ash and Tongham, while the attempt to adjust Green Belt boundaries seems doomed to failure and therefore will allow wholesale overdevelopment in this area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/10097  Respondent: 8640353 / Julian Cranwell  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to policy I3 Sustainable transport for new developments. This is another vaguely aspirational policy, based on wishful thinking and not grounded in the practical realities of daily life. It consists of a standard, box-ticking list of local government measures unrelated to the specifics of the plan. Like infrastructure, transport appears to be an afterthought; the policy fails in its essential job of guiding planning decisions, since it assumes development of any kind can be supported by sustainable transport.

We support the concept and aim but OBJECT on the grounds that the practicalities of sustainable transport have not been properly considered, it is not sustainable to build dormitory towns and call them sustainable. Not everyone can cycle all the time.

How can large developments outside the town centre maximise sustainable travel? This is a matter for the planning process - the further from the town centre, the less sustainable the development will be.

Reliance on cycling discriminates against vulnerable members of the community. How can the disabled, those with small children, or the very old, or the infirm, or those who are ill, cycle outside the town in order to commute, or even inside the town? Only some people cycle – and Guildford has some steep hills, especially going out of town. Park and rides are slow – how can those with a 3 hour commute add 1 hour to their journey from using park and rides?
The only sustainable mechanism for new developments is to have them in the town centre close to the railway and the main shopping links where a hoppa bus can provide satisfactory links for those who cannot walk or cycle. While we welcome the intention to encourage rail travel by adding two new stations there could be unintended consequences.

Once again we see the word “expect” used which means the policy has no teeth. The word “expect” must be replaced with the word “require” so that this policy is enforceable.

There are a number of problems with this policy.

Congestion is a widely recognised factor in the local area of Guildford, and this is a major factor in the public response to the proposed housing numbers, which represents more than a 25% increase in housing numbers in a borough that is already profoundly congested. [Source: SHMA p61: itself sourced from ONS for 2013.] Residents recognise that to increase the population by this level within the existing transport provision is not feasible, and this informs much of the public response to the proposed level of housing accommodation.

It is not clear that this recognition, which is widespread through the borough, is shared by those who have drafted the Local Plan.

Guildford is a commuter town, which (compared to London) offers better quality of life and lower house prices, so it will continue to be a commuter town for the foreseeable future. As a result, access to the stations for commuting is of significance. It is not realistic to assume that traffic to stations for commuters can be replaced either by bus services (slow, intermittent, expensive, and in many cases absent completely) or by cycle. There is a capacity issue of car parking at the station, which effectively creates an absolute constraint on the feasibility of commuting from Guildford.

Cycling is attractive, and, for the urban young, especially students, it is both practical and cheap, and can be quick. However, as noted, those en route to work cannot be assumed to be able to cycle in working clothes. Elderly members of the community, those transporting small children, and the disabled cannot participate in cycling except to a limited extent. Effectively the "average" person deemed to be capable of cycling to substitute for car trips is an able-bodied adult not travelling to somewhere where smart clothing is required, not needing to arrive clean (or with showering facilities on arrival, not provided by all employers); this is not sufficiently widespread in terms of the local demographic for travellers that it should be allowed to determine policy – and of course, not needing to transport, for example, supermarket shopping after the trip. What about the disabled? the elderly? those looking after more than one child? Are they to be housebound? This is not a reasonable strategy. Before transport and buildings are determined on the basis of such a policy, it is also imperative that safe cycle routes are implemented through the borough. Cycling in winter on rural roads is inherently more dangerous. Upgrading these roads would not be feasible in terms of cost nor desirable in terms of local character.

Cycle lanes which disappear into normal traffic lanes, which travel over potholes and which allow cyclists to be threatened by HGVs are not conducive to wider cycle usage, nor should wider cycle usage be encouraged until it can be demonstrated that it is safe, which currently, locally, it is not. The A25 cycle corridor scheme (Part of LRN1) will exchange the risk between cyclists and vehicles sharing space for the risk between cyclists and pedestrians sharing space. Much of the A25 has no pedestrian area anyway outside the urban space. Many cyclists travel at high speed and they will be put into conflict with pedestrians including mothers with very young children and schoolchildren many of whom need to cross the road and hence cross the cycleway. This is likely to lead to accidents and pedestrians are being disadvantaged.

Road capacity reduces as average speeds come down due to congestion. Where proper cycle lanes or off-road lanes are not provided then it is inevitable that safe driving will lead to reduced average motor vehicle speeds and gap development in the traffic stream. Both these effects act to reduce the capacity of our local road network. This loss of capacity has not been recognised in the Transport Strategy.

The concept of the park and ride with access into the town limited for those who live outside the town, is similarly flawed. Park and Ride is expensive, cumbersome and slow. It should be noted that in Oxford it has had a disastrous impact on small local retailers which is a retail segment that it is important to retain and support.

Use of park and rides increases the use of the strategic road network by local users, which is not what it is designed to do.

This proposal is combined with aggressive exclusion from the town of those who are living in peripheral communities, which will increasingly resemble housing estates. This is a strategy for sink estates through Surrey instead of the Green
Belt - this is not a strategy for growth. Head offices will choose to go elsewhere, because highly skilled staff and management in the cutting edge industries that GBC wants to encourage, will not choose to live in a dense housing estate.

The existing extent of traffic congestion has not been fully recognised. As a consequence the impact of the various development scenarios has been understated and the infrastructure costs are an understatement.

The transport studies are incomplete and unpublished and this should have led to deferral of consideration of the Local Plan consultation process until it was possible to revise the plan post publication of the studies. This matter was raised by a number of councillors at the Full Council meeting on 24 May 2016 when the consultation was approved, but a motion to defer was overturned by the majority party.

Cross-subsidy in terms of infrastructure is envisaged. The infrastructure deficit needs to be resolved before there are large numbers of new residents exacerbating the current congestion. The funding of the new developments through CIL and S 106 is expected to contribute to the transport impacts across the borough, and there is negligible concern for the transport problems created within those new developments or in areas adjacent to them. This is not acceptable to existing residents and is likely to cause some problems with the future residents too, who may arguably feel aggrieved that the road funding associated with their developments is being subverted to other areas. While this may be permissible under the revised CIL regulations it is questionable whether it is morally acceptable to grant planning permission to build on the Green Belt in order to cross subsidise the building of roads or other infrastructure in the town centre or elsewhere across the borough or outside it.

Insetting of villages and the proposed relaxation of planning restrictions anywhere outside settlements (Green Belt or not), implied in P2, will lead to substantial infilling that will not require traffic assessment but will contribute a highly significant amount of additional car journeys overall - by a more insidious process than the large developments proposed. Costs for rail or bus travel could be substantially reduced and would incentivise their use; but these are outside the remit of GBC and so cannot be encouraged by them.

It remains to be seen whether the proposed new stations will be delivered as they are not entirely within the council’s control. While we welcome the intention to encourage rail travel by adding two new stations there could be unintended consequences as the roads local to both sites are heavily congested. If parking facilities are inadequate this could lead to a need for onerous parking restrictions on roads nearby – possibly affecting small businesses adversely.

If parking facilities are adequate this will encourage more traffic onto local roads and commuters tend to be hurrying to catch a train or anxious to return home after a day at work. That does not bode well for the safety of pedestrians needing to cross those roads. House prices near to stations tend to attract higher prices and this will increase the profit motive to developers wanting to build on greenfield sites nearby. It will also mean that so-called affordable housing will be even less affordable at these sites. It may also lead, over time, to an undesirable loss of social-rented housing in the vicinity. A minor issue is that stopping at the additional stations will increase the train journey times to and from Guildford town centre on the lines affected.

**Detail in Policy wording – flawed drafting:**

The policy begins and ends with the weak and totally ineffective word, in planning terms, "expect".

Contributing through CIL will not necessarily address needs local to the development concerned, and created by it, but may involve solving existing problems elsewhere in the Borough.

Bullets 4 & 5 – improvements to park and ride facilities imply increased car usage from outside the town and the parking provision acknowledges that most journeys will be by car.

Bullet 6 - Has the Vehicle parking Supplementary Planning Document been published? It is not listed as key evidence but the policy refers. How can a policy have been determined with reference to a non-existent part of the evidence base?

Bullets 7,8, 9 & 10 are weak & aspirational with let-out words such as “facilitate the use of”, “wherever possible”, “contribute” and “where appropriate” (and poorly bulleted!). How will the use of ultra low emission vehicles be facilitated? This is such a vague aspiration as to be meaningless.
The policy only “expects” new developments to contribute, demonstrate adequate provision, etc – it should enforce them. A transport statement AND assessment ought to be a fixed requirement – not a matter for negotiation – while the policy implies that this might be waived even for sites that generate significant amounts of movement.

The construction traffic, noise and pollution generated by meeting the proposed housing number will be excessive. It will have a highly significant impact on the amenity and health of those residents living close to the development sites and those who live on the routes that will be taken by the construction traffic.

The last paragraph says nothing new in planning terms but does mean that the Local Plan has not fully and properly considered the traffic impacts of the proposed sites. We have experience of how misleading the TAs produced by developers can be – using averaging techniques and understated baseline figures, days when schools are not operating and many other devices to pull the wool over the eyes of planning authorities. This aspect is a denial of responsibility by GBC. The result is that Green Belt and countryside will be released for development when fuller consideration of traffic impacts at the Local Plan stage should have prevented that. If the planning authority is taken in by developers’ TAs then wholly unsuitable developments will be permitted.

Introduction:

The spatial development strategy (paragraph 4.6.20 and Policy S2) does not address the development needs of the borough ensuring distances are practical; this is certainly not the case with all the development sites. For example, the Wisley airfield site will generate a massive increase in vehicle journeys; developments in West Horsley will lead to greater car use, as will the proposed developments at Garlick’s Arch and in Send. The obvious site choice for sustainable development would be on brownfield sites in the town but the Local Plan proposes allocating those sites to the declining retail industry instead.

Paragraph 4.6.21 suggests that sustainable transport is promoted. Far from providing sustainable transport this Plan will generate a massive increase in motor vehicle journeys. The Plan cannot force residents to ride bicycles or walk everywhere.

Justification:

Paragraph 4.6.22 seeks to set out a reasoned justification and alleges that development should offer real travel choice by sustainable transport modes. There is little sign that this is being taken seriously enough now.

Paragraph 4.6.23 proposed to bring forward a Vehicle Parking Supplementary Planning Document. It is not clear what to make of this. Failure to provide off-street vehicle parking will not prevent residents owning cars and finding somewhere else to park but it may make life difficult for key workers to commute to their place of work. How can a consultation take place relying on non-existent background documents which are key parts of the Evidence Base? How can anyone comment on non-existent documents, and even if brought forward part-way through the consultation, any comments will be prejudiced by the absence of this informing the start of the consultation.

Paragraph 4.6.24 refers to the Sustainable Movement Corridor. Bus services are aspirational but economic reality may mean that they fail to persist. There is not enough detail published on how the SMC will be delivered – suggesting that it is aspirational rather than fully thought through.

Paragraph 4.6.26 refers to reviewing existing transport facilities and likely transport generation as part of assessing the amount of incremental travel demand. That consideration should have taken place in a robust and detailed manner on a site-by-site basis before the sites were allocated in the Local Plan. It is not sufficient to leave that until the planning application stage as intended by GBC and SCC, given that all sites will be subject to “permission in principle” under the Housing and Planning Act 2016 and so will not be capable of subsequent rejection on these grounds.

Paragraph 4.6.27 notes that Development must mitigate its transport impacts. The measures described rely entirely on people taking them up and not dumping their travel information packs in the nearest bin. It is clear that GBC, in response to concerns about elderly and disabled people failing to be coerced into riding bicycles are now suggesting tricycles to overcome this obstacle to their aspirations. They should be aware that while tricycles may help with balance issues they are heavier and harder to ride uphill. While the policy (unusually) notes that mitigation must be provided, in fact this is then diluted to suggest that facilities for electric car charging points and encouragement to car-share can be sufficient; all are optional and therefore meaningless.
However well designed a development is it will make matters worse during construction and if on a greenfield site, it is hard to see how it will achieve environmental benefits. On the other hand, replacing inefficient buildings on a brownfield site could lead to benefits in the long term.

Paragraph 4.6.28 notes “Developers should have regard” to the “Infrastructure Schedule at Appendix C”. The only thing that developers have regard for is forcing their application through and maximising their profit – that is the business they are in. Appendix C is lacking in detail. It notes, for example that there will be new town centre bus facilities at a cost of £5-10 million – such vagueness make it clear that no real costing or analysis of proposals has been prepared, and that the Infrastructure improvements proposed have not been properly considered. Having regard to fluid and uncertain proposals is effectively meaningless as a constraint or a requirement.

Paragraph 4.6.29 requires that applications need to address the transport implications of the proposed development. Experience with recent planning applications suggests that developers will do everything in their power to understate transport impacts and we have no faith in GBC and SCC taking a sufficiently robust line on this.

Key Evidence is missing or inadequate.

The Strategic Transport Assessment (SCC 2016) is listed as “forthcoming”, but this plan has been produced in the absence of any strategic transport review.

There are further inadequacies in the Evidence Base, highlighted in the following annexes, which include examples of deficiencies, ambiguities and inadequacies in the transport and infrastructure evidence. This is not a comprehensive list of deficiencies, but serves as an illustration of the poor evidence on which decisions have been based.

**Annexe 1**

Comments on Guildford Borough Transport Study 2016

Page 2 – “address the historic infrastructure deficit” - developers are not required to do this ?

Page 2 – It is wrong to claim that the cycle infrastructure along the A25 is good – and many cyclists are not careful, so putting them in contention with pedestrians is not a good idea.

Page 5 – The decision on Heathrow or Gatwick has yet to be taken but airport expansion in the south- east cannot be regarded as sustainable development and, although GBC has no control over such external decisions, its own growth agenda will drive a need for that expansion.

Page 6 An additional weakness is alternative “road closure diversion” routes for the SRN on the LRN

Page 6 Are the “Committed Improvements” actually committed and guaranteed to be delivered ?

Page 7 The rail strategy does not provide for Wisley (residents would drive to stations)

Page 7 How long will it take to deliver Crossrail 2 ? “We hope that Crossrail 2 could be operational by 2030, but we are in the very early stages of planning and no decision to build it has been made.”

Page 7 Guildford platform capacity still many years away if ever.

Page 7 The rail strategy anticipates many improvements that have not been secured and may have unintended consequences if they proceed (see above)

Page 7 The Southern Rail Access to Heathrow ##[see the feasibility study dated December 2015 – although other proposals may be put forward (e.g.by Hounslow)]## is still in its early stages and would have significant impacts on open space beyond our Borough. For example, all options in the feasibility study would use Staines Moor SSSI and Option 4 would use Bedfont Lakes Country Park (a Local Nature Reserve and SNCI).
The various options would use existing commercial, residential and highways land in varying degrees. It seems unlikely that a solution will be delivered within the Plan period and removal of highly valued open space with high biodiversity (wherever it is in South-east England) cannot be regarded as sustainable.

Page 10 and 13 There is a stark contrast between the plans for the town centre which involve encouraging a reduction in traffic by reducing roadspace and the plans for the SRN and parts of the LRN which involve increasing capacity. While increasing capacity may reduce some areas of congestion in the short term, history suggests that traffic will rapidly grow until the improved roads are congested once again. This can hardly be regarded as sustainable. A sustainable option would be to apply a very substantial traffic infrastructure constraint on the housing number.

Page 10 While the A3 Guildford Tunnel aspiration has some environmental advantages over widening (in particular for residents living close to the A3), the environmental burden of the construction phase will be far higher and aspects such as location of ventilation stacks and their local effect (in all weather conditions) do not appear to have been considered.

Page 14 Under Weaknesses the point about A roads in Guildford Town also applies to surrounding areas in the Borough and beyond. The anticipated improvements ignore existing congestion to the south and east of Guildford – presumably because SCC’s transport assessment methodology only identifies the tip of the iceberg. The current Plan will see increased congestion and a resultant reduction in air quality in many areas beyond the town centre.

Page 16 “Largely commercial bus services” is seen as a strength whereas it should be seen as a weakness with a trend to reduced subsidies and the provision of bus services, especially in rural areas, being increasingly dependent on commercial gain. It is difficult to see this changing under the current Government cuts philosophy. The point “Subject to business case including funding” under Aspirations demonstrates this point.

Page 18 We welcome the aspiration to “Expand the public realm through significantly extended pedestrian-priority areas”

Page 19 Guildford is well behind other areas in monitoring air quality let alone attempting to reduce it.

The introduction talks about reductions in some pollutants. This may be the case for pollutants such as Sulphur Dioxide, which contributed to the visible London smogs, but it is not true of diesel vehicle emissions which have increased as a result of Government policy including its aggressive growth agenda and population increase through immigration.

30 accessible electric vehicle charging points are only an aspiration and will be nowhere near enough if there is a real shift to electric vehicles.

It is clear from the “Strategy outcomes” that GBC would prefer not to follow other areas in pro-actively tackling air quality.

Page 22/23/24 The timescales indicate that the main rail improvements (including the two new stations) are unlikely to be delivered until the end of the Plan period or even later. The sites that are supposedly justified by their inclusion will generate a major increase in road traffic in the interim and it may be more difficult to achieve this aspect of modal shift in the longer term. The same can be said about the other traffic infrastructure proposals. Residential development is being scheduled before the infrastructure that it will need.

Page 24 Monitoring – “Increase” needs to be in proportion to population growth as otherwise failure will be taken as success. “An increase in average vehicle speeds” is inconsistent with the desire to reduce the number of persons killed or seriously injured. For example, some A roads pass through residential areas where pedestrians, including schoolchildren, are trying to cross the road at peak times. It is noted that increase in vehicle speeds is only desired in the morning. Going home from work does not seem to matter!

Annexe 2

GTAMS

NPPF and NPPG The Plan ignores the points concerning Green Belt and protecting the environment. GBC have tried to get round this by spinning their messages and using misleading statistics including a major understatement of the area of Green Belt to be removed.
Planning Update (March 2015) – The point in this update concerning Green Belt has been ignored

Monitoring Indicators:

· Ten years is far too long to wait for information on whether the approach is working or not. The target requires only an increase. This would permit an increase less than that in line with any population growth to be regarded as success. The bar has been set well within the failure range.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/10098  Respondent: 8640353 / Julian Cranwell  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Response type: OBJECT

The Policy shows concern for conserving and enhancing biodiversity, which is welcome. We also note and welcome the intention to extend the principle beyond Biodiversity Opportunity Areas. However the current plan to build on large areas of countryside and to inset villages will have the opposite effect. The Policy appears therefore to be a box-ticking exercise with no real teeth to it.

There is no mention of the value of wildlife gardening to biodiversity or the important role that larger gardens play in a village setting.

There is no mention of the impact of the plan on food production, or monitoring the loss of agricultural land.

“The natural world, its biodiversity and its constituent ecosystems are critically important to our wellbeing and economic prosperity, but are consistently undervalued in conventional economic analyses and decision-making” (Biodiversity 2020 page 11)

“As a public authority in England you have a duty to have regard to conserving biodiversity as part of your policy or decision making.” (Government Planning Guidance)

Part of the problem is that “Biodiversity benefits are unpriced” and so not valued by those who look only at the more obvious and simplistic economic benefits.

We have some concerns that “enhancing” the River Wey in the town centre will avoid using the available brownfield land around Walnut Tree Close and Slyfield for urban regeneration and sustainable housing that could otherwise be used.

The policy on Green and Blue infrastructure is broadly supported with an important and major caveat; and if disregarded this should count as an objection.

However, it is noted that the largest areas of industrial brownfield land within the borough are near to or adjacent to the River Wey, particularly in the Walnut Tree Close area and in the Slyfield industrial area.
These areas could support much more housing than the relatively small numbers indicated in the policy on the town centre, under a town centre regeneration scheme. This would have huge benefits for the community as a whole since relatively run down areas would be subject to regeneration, the river banks would be cleaner and more attractive.

It is vitally important for the town as a whole that the run-down Walnut Tree Close area is used for well-designed housing, as indicated by the Mastervision document first draft compiled by Allies and Morrison. John Rigg of Savills and Guildford Vision Group indicated to the Scrutiny Committee of GBC that initial commercial projections indicated that the Walnut Tree Close area alone could provide 4000 homes. This is significantly in excess of the current GBC proposals. Both Allies & Morrison and GVG initially indicated that they believed that this site could be available for regeneration within the critical 5 year window required for the local plan. It is therefore essential that nothing in this policy should jeopardise anything that could lead to the Walnut Tree Close area being a regeneration zone.

As has been noted elsewhere, for reasons that are not altogether clear but appear to be connected to central government direction and a desire to maximize the Community Infrastructure Levy, there is an aggressive desire to push development on to the Green Belt at all costs, ignoring or eliminating for other reasons sites which could be used in the town for residential purposes. This has informed recent planning decisions (both the Aldi site and the Waitrose site were originally zoned for residential purposes and were eminently suitable for this) and this bias seems to be informing the Local Plan.

As a result, it is important that the desire for Green and Blue infrastructure does not become an excuse for preventing regeneration of Walnut Tree Close. It is noted that the Council has stated that “The Council is keen to protect the watercourses from inappropriate development that would spoil their character”. The bus station adjacent to the River Wey, and the empty car parks associated with empty factory space, are hardly attractive development – well designed mid height (3-4 storey) apartment blocks would be a great improvement to the river corridor, offer major scope for sustainable regeneration, and would prevent the need for any incursion into the Green Belt to meet reasonable housing needs.

That regeneration zone would be highly sustainable, because it would be within 1 mile of the railway station, adjacent to the A3, and would eliminate an area of huge congestion in the town because if the industrial sites were replaced by housing then the residents would commute by train or walk to work rather than having to drive in to an industrial estate.

It certainly does not seem appropriate to create substantial new parkland on current hard standing. The protections to which this policy refers largely describe existing open space, which is of great importance. But to determine not to utilize brownfield land for residential use at an appropriate density in order to force building on to the Green Belt would seem to be in contradiction of the principles of use of the Green Belt applied in the Gallaher Homes v Solihull court of appeal case, where the hierarchy of use is clearly defined, with urban brownfield required to be used as a first option.

So there is some considerable support for the residential element of this policy, with the note that this should be explicitly amended to permit construction of a regeneration zone on the brownfield areas surrounding the river in the middle of the town, and that this should not be held up pending yet more transport studies (Guildford’s track record on brownfield utilisation is poor), but should be implemented with immediate effect.

It is not clear what form the “parkland” along the River Wey will take but the images available in the Town Centre MasterPlan suggest mown grass similar to the area around Millmead. This misses an opportunity to enhance biodiversity and enable town centre residents to engage with wildlife. Engagement with wildlife should mean much more than throwing bread at ducks and chasing pigeons. To achieve a wildlife corridor through Guildford, that can also benefit the health and well-being of residents living close by, the green space retained beside the river should be managed with the needs of wildlife in mind.

Responses to policy notes:

4.6.33 Villages are generally permeable to wildlife. The lower density of housing and presence of gardens (especially larger gardens) provides a corridor for movement across the residential area. Insetting of villages and the relaxation of planning restrictions in the Green Belt implied by Policy P2 will lead to infilling, “garden grabbing” and consequent loss of biodiversity. It will replace connections and corridors between habitats with barriers and lead to further fragmentation of our natural infrastructure.

4.6.34 In the past Guildford Borough Council recognised the role that wildlife gardening and management of parks and open spaces for wildlife could play in enhancing biodiversity. There seems to have been a shift away from this. These
aspects should be recognised in the Plan as well as the importance of BOAs and although 4.6.35 goes part way towards this
we have yet to see the GISPD.

4.6.36 This is long overdue and should include the way that our lanes are managed. The current approach is unsympathetic,
sometimes damaging tree roots and scarce native plants. It seems to be oriented towards encouraging faster traffic rather
than recognising the traffic-calming effects of natural vegetation (See the original Quiet Lanes Initiative) – management of
open spaces and lanes

We await the Countryside Vision with interest.

4.6.37 It appears that Policy I5 has been omitted. (We think this means P5 – more evidence of slapdash work)

4.6.38 We agree with this statement but public access is frequently damaging to biodiversity – the more obvious examples
being dogs out of control in the vicinity of ground-nesting birds and trampling of grassland habitats. Public open space
must be protected for the reasons given but wildlife needs undisturbed (or at least less disturbed) space too if it is to thrive.

Responses to definitions:

This section starts with a definition that is not a proper definition and is followed by statements that are not definitions at
all, apart from the last – suggesting that this part of the document has not been thought through or checked.

4.6.42 “Biodiversity creation and/or enhancement” is not a definition – it requires definition.

Do you mean that you will create new species or encourage them to evolve? Or do you mean that you will increase the
number of species living in the Borough, or the population of each species, or both?

The points made are aspirational that have no enforcement to back them.

We support the use of green roofs and walls.

However, building on the countryside and increasing the population by such a large amount will not help vulnerable
species. It will put added pressure on remaining habitats and increase light and air pollution, degrading the ability of the
borough to support wildlife.

4.6.43 Arrangements with developers have no guarantee of success or longevity. They involve partial mitigation and
overall loss of the original biodiversity interest of a site.

4.6.44 This appears to be saying that you will deliberately put playing fields, sports facilities and other leisure activities in
BOAs – but these are land uses that reduce biodiversity!

4.6.45 Our understanding of SANG is that it is intended to reduce pressure on Special Protection Areas by providing an
alternative area for people to walk their dogs – and hope that they do not prefer to use the SPA. In other words they are
intended to attract the type of user that is damaging to vulnerable species such as ground-nesting birds. In the desperation to
find SANG land Guildford Borough Council are making use of existing open space that will not attract people away from
the SPA and you are ignoring the impact on existing wildlife. For example – GBC decided to include the towpath in the
Parsonage Meadows SANG as a way of also facilitating a cycle route. Encouraging cyclists and dog-walkers to use the
same narrow path will not encourage dog-walkers to use it rather than the SPA. At Effingham Common GBC plan to
designate an important area for wildlife and ground-nesting Skylarks. GBC is riding roughshod over the opinions of the
Commoners and local residents. GBC used to put up signage warning dog-walkers not to disturb the Skylarks during the
nesting season – but these signs were not put up until well into the nesting season this year and only then after complaints
and harassment of Skylarks by out-of-control dogs.

In allocating sites as SANG, GBC has ignored the requirement to consider existing biodiversity and clearly have little or
any knowledge or understanding of the issue. The issues relating to Russell Place Farm have been pointed out by a
qualified Biologist (see article in The Guildford Dragon by Chris Venables, Many invertebrates are dependent on the dung
of grazing animals and this aspect of our countryside is being steadily driven out of our Borough).
4.6.46 We welcome this acknowledgement of the damaging effects of the proposed building developments. This also has relevance to the manner in which the green spaces next to the River Wey are managed.

4.6.47 We welcome the proposals but are concerned that these may be no more than good intentions. How will GBC ensure that they are carried out fully – and paid for by the developer?

Reasoned Justification:

4.6.50 As the emerging strategy for Surrey and the GISPD are not yet available the plan should not be proposing sites that will jeopardise them. The implication is that this aspect of the plan is not being taken seriously and will carry no weight in site selection despite the guidance in the NPPF.

4.6.51 In fact some GBC contract mowing and lane management is not in line with a strategy that is meant to protect biodiversity. Examples – damage to tree roots and unsympathetic treatment of roadside vegetation (that includes orchid species) in Chalk Lane – southern end of Kingston Meadow in East Horsley is now mown flat rather than left to grow as a meadow through the Spring and Summer as it used to be (so no more day-flying Burnet moths).

KEY EVIDENCE

Guildford Borough Policy Statements are statements – not evidence.

Additional evidence should include:

Existing SNCI surveys, including those that took place in 2004-2007.

Biodiversity evidence emerging from Neighbourhood Plans.

Evidence obtained by requests to local naturalists and natural history societies including those with a specialist interest.

MONITORING

Simply maintaining open space will not be enough for a significantly enlarged population.

Providing more open space to meet existing shortfalls or the needs of a much larger population will reduce the area of land currently in food production or providing wildlife habitat.

SANG delivery is harming existing biodiversity

It is not clear how you will measure a change in biodiversity just by looking at planning applications. “Net gains in biodiversity provided by development” is a contradiction in terms. There may well be a few examples in England where low density housing has been combined with manufactured habitat at the expense of loss of agricultural land with no surrounding habitat damage - but we see no evidence of that in the Local Plan. Even when a housing development replaces agricultural land it increases pressure on the surrounding countryside. A simple example is where houses border woodland and residents dump their garden rubbish (and often worse) over the garden fence. Increased leisure use on nearby countryside also has an adverse effect on biodiversity.

There is no guarantee that mitigations listed in an application will be carried out and their effectiveness is not guaranteed either. GBC would need to carry out follow-up ecological surveys on all sites. Who would pay for these? Are there enough consultants to carry out the work in sufficient detail? What aspects of biodiversity will be measured?

How frequently are surveys by Natural England intended to take place? How will GBC ensure that NE carry them out? A baseline of existing surveys against which changes will be monitored should be included within the plan and it must be comprehensive for monitoring to be effective.

How frequently will SNCI surveys be carried out? At what expense? The last survey published in 2007 made recommendations for an increase in the size of the Wisley Airfield SNCI and stated that this should be taken into account for planning purposes. This was overridden in the recent planning inspector’s report and the Local Plan includes this
particular SNCI as a building site. This is clearly a case of hypocrisy and suggests that the Council has no genuine intention to maintain biodiversity let alone enhance it.

We believe that a survey of SNCIs is currently taking place but that it is limited in scope to the previously known sites. This prevents other sites, where genuine biodiversity enhancement has taken place (often as a result of volunteer community effort), from being recognised in this way. While every stone is being turned over in the quest to find green space to build on, no genuine effort is being made to identify biodiversity hotspots that may have been overlooked in the past. In other words the approach being taken is one that intends to make no net gain, and possibly even reduce, sites of nature conservation interest – in contradiction to the stated aims.

If an existing SNCI (or one proposed on grounds of biodiversity but not formally accepted in a Local Plan) is found to be in poor condition the action taken should be to bring it back into good condition – not to remove its status and build on it.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/18684  Respondent: 8640353 / Julian Cranwell  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to the omission of a policy for the River Wey which was included in the previous local plan. The existing policy G11 from 2003 Local Plan should be included so that development within the River Wey corridor will only be permitted provided that:

1.1.1 It protects or improves the special character of the River Wey and the Guildford and Godalming Navigations, in particular their visual, setting, amenities, ecological value, architectural and historic interest;

1.1.2 The special character of the landscape and townscape in the corridor is protected or improved;

1.1.3 Views both within and from the corridor which contribute to this special character are protected or improved;

1.1.4 Where appropriate, public access is provided to and along the River and the Navigations.

1.1.5 The Nature Conservation value of the site is protected or improved

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/10072  Respondent: 8640353 / Julian Cranwell  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Policy P1 Surrey Hills Area of Outstanding National Beauty

Whilst the Guildford Greenbelt Group welcomes the inclusion of a policy to protect the AONB within its submission draft of the Local Plan, we strongly object to Policy P1 and its supporting text, which we consider has weakened the protection of the AONB and the AGLV from the previous draft Plan.

Much of our concern stems from the loose wording of the Policy, which in some places renders the policy ineffective, for example:

“All proposals will be considered against whether they...”

“All development proposals within and adjacent to the AONB will be expected to conserve or enhance its special qualities”

Terms such as “considered” and “expected” are not strong enough in prohibiting development proposals that do not conserve and enhance the AONB, and it is likely that developers will be able to use this loose wording to their advantage.

Of particular concern is the paragraph 3, which begins:

“Whilst the AONB designation does not preclude specific types of development in the Surrey Hills and proposals will be assessed on their individual merits...”

This whole opening clause is unnecessary and almost invites development proposals. We believe that it should be deleted, and the sentence should therefore begin: “There is a presumption against major development in the AONB in accordance with NPPF.”

In addition to the weakness of the language, we are also concerned that the AONB criteria listed in the policy are not the most important ones in determining whether a planning application should be approved. Aside from the one outlined in the first bullet point (which relates to the AONB setting) none of these criteria is concerned with the key characteristics of AONB, ie landscape character, scenic beauty, important views, tranquility etc. Whether or not a development supports the rural economy or provides public access are of far less national importance than preserving the quality of the landscape itself.

We believe that the AONB Policy in the Draft Plan 2014 provided greater protection to the AONB, and would like to see the following sentences reinserted:

• “The national significance the AONB will be afforded the highest level of protection and only proposals which can be sensitively amalgamated into the area and which complement and enhance the character of the AONB will be considered”
• “Proposals within the AGLV which would have a negative impact upon views into and out of the AONB and which do not respect the setting, will not be acceptable”
• In accordance with the most up to date Minerals and Waste Plan, safeguarding of applicable land within the AONB and/or AGLV may be necessary and deemed appropriate

Finally, we would like to see a clause which gives protection to the candidate areas for AONB status in the forthcoming Surrey Hills AONB Boundary Review. We consider that all land that has been assessed as meeting the latest Natural England criteria for AONBs should be subject to the same level of protection as an AONB, not just land that has been designated AGLV.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
We object to Policy P2 green belt. This policy states, “the general extent of the Green Belt has been retained.” We do not accept this statement. The policy wording is weak in support of the Metropolitan Green Belt even though the latter forms 89% of the borough and should be the cornerstone of all local planning policy. It is precious beyond the short-term demands of the present Government’s policy or a 15-year local plan. As noted under Policy S1 above, it is a solemn legacy to future generations – an asset and amenity that belongs as much to Londoners and the whole nation as to the people who live in it. It is an inalienable public good. Once gone it is gone forever. It is not the Council’s to give away. Policy P2 completely fails to appreciate the importance and permanence of the Metropolitan Green Belt and the fact that it has been around for a long time and it needs to be permanently protected. It was actually established in a local act of parliament in Guildford under the London Home Counties (Green Belt) Act 1938 and subsequently in the 1944 Greater London Plan to contain the outward sprawl of London. The boundaries of the Green Belt through Guildford Borough were later defined in the 1987 Local Plan, forming part of a 19-24km concentric belt around London. The Green Belt is intended to check the unrestricted sprawl of built up areas; to prevent neighbouring towns from merging into one another; to safeguard the countryside from encroachment; to preserve the setting and special character of historic towns; and to assist with urban regeneration by encouraging the recycling of derelict and other urban land. The principles of the Green Belt designation were outlined within Planning Policy Guidance 2: Green Belts (PPG2) and are found within the National Planning Policy Framework (NPPF). The Metropolitan Green Belt is an exemplar of good planning and the envy of planners throughout the world. Policy P2 omits any assessment of the Green Belt’s value. The Green Belt is not just empty space but is an inhabited, working environment that safeguards a certain stock of natural capital. Building on it involves high opportunity costs, including an irreversible loss of: 1. Agricultural production 2. Rural leisure and tourism amenities 3. Water catchment 4. Flood control 5. Biodiversity 6. Natural heritage 7. A carbon sink for air pollution 8. Room for public facilities such as parks and burial grounds 9. Profitable film locations (e.g. Shere) 10. Future economic potential such as mineral extraction (even fracking) 11. Natural beauty, landmarks, open space, rural views and sight lines 12. Benefits to public health and wellbeing, physical and psychological (as well expressed in the NPPF). As a matter of law and national and local policy, these assets should be protected in perpetuity, but Policy P2 seeks to justify excessive development in supposedly protected areas. This is in breach of party manifesto commitments and contrary to previous responses to public consultations. It is quite incorrect to argue, as the Council do, that the plan would involve the loss of “only” 1.6% of the borough’s Green Belt. In reality the figure is nearer 7% when insetting, infilling and settlement boundary extensions are included. More importantly, there is no “acceptable” percentage (in the NPPF or anywhere else) of Green Belt that may be sold. No-one argues that we should sell 1.6% of the Crown jewels in order to build houses. We object to the “insetting” of 14 villages from the Green Belt, and at “infilling” 12 of the borough’s Green Belt villages. We are deeply disturbed that settlement boundaries are to be hugely extended in many villages and that infilling is also proposed outside the settlement boundaries of 11 further villages. Many Guildford villages are “leggy” in outline, reflecting the effect of ribbon development (often along just one side of existing roads) permitted between the Wars. It is all too easy to square off boundaries by including countryside bounded on only one or two sides by existing development, claiming it contributes nothing to the “openness” of the Green Belt, a term which neither the plan nor the NPPF defines. The NPPF’s other 4 tests...
of Green Belt status, including the prevention of urban sprawl, are ignored. Effectively, this policy makes all villages within the Green Belt vulnerable to large blocks of new development and seems almost hell bent on self-defeat. We believe this policy is based on a flawed Green Belt and Countryside Study that, according to one Conservative Councillor, was irregularly commissioned by Council officers without the authority of Councillors. To “inset” two thirds of the borough’s rural villages on the grounds that they no longer contribute to the purposes of the Green Belt is extreme and inherently implausible, given the borough’s location on the edge of Metropolitan London. We cannot see how such extensive areas fail to contribute to the purposes of the Green Belt under the NPPF, although they would quickly destroy them if the proposed “insetting” and boundary extensions go ahead. This policy is wildly disproportionate in terms of any foreseeable development need (especially post-Brexit) and has caused tidal waves of opposition from residents. It flies in the face of NPPF paragraph 17’s aim of “empowering local people to shape their surroundings” and other NPPF provisions.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/10099  Respondent: 8640353 / Julian Cranwell  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to ALL Green Belt sites allocated for development in the local plan. We object to the identification and allocation of sites in this plan without regard to Green Belt, infrastructure or other constraints. The plan says that “allocating these sites does not grant planning permission for development, however, it does identify the principle of development and uses.” This ignores the tens of thousands of detailed comments the Council have received about individual sites ever since the Issues and Options consultation in 2013. This amounts to a war of attrition by the Council in conjunction with developers, since many busy residents are sick and tired of repeating the same comments to deaf ears. The plan has hardly changed since the Council received 20,000 objections to its first draft plan in 2014.13 There is no need for housing on this site because the local plan housing target is incorrect and inflated and ignores constraints. All Green Belt sites should be removed from the plan until “exceptional circumstances” for development are proven, as stipulated repeatedly in the NPPF. The Green Belt should trump short-term considerations such as perceived housing need, as case law has established.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/10074  Respondent: 8640353 / Julian Cranwell  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
We object to this policy, taken in the light of the other policies proposed within the local plan.

There is huge emphasis on provision both of services and of additional Green Belt in Ash and Tongham. We object to this policy. It is not clear why new Green Belt should be designated here, while the Green Belt is being rolled back in all other areas of the borough. The only notable fact is that the Leader of the Council and other Executive members are based in this area and the question of impartiality does need to be raised.

Note that in the recent judicial review in relation to Ashdown Forest, the SANG zone for the Ashdown Forest SPA was 7km, and this gave rise to a lower housing number than that proposed by this local authority.

The urban areas of Ash and Tongham are indeed of importance within the borough, creating a barrier between the countryside of Guildford and the urban towns of Aldershot and Farnborough.

However, as noted, it does not seem entirely appropriate to seek to reduce Green Belt designation everywhere else in the borough, on the grounds of overwhelming housing need (which is itself not an exceptional circumstance) – including land within the Green Belt and the Thames Basin Heath SPA, but then to propose designating additional Green Belt in this particular area.

If the planning policy is sufficiently aggressive as to disregard existing Green Belt, to propose significant development in that area, then it is inappropriate, and in contravention of existing planning law, (Gallagher Homes v Solihull as determined by the Court of Appeal) to consider proposing new areas for Green Belt. It is unclear why the strategic gap that separates the Ash and Tongham urban areas from neighbouring Aldershot is of greater significance to the borough as a whole, than other threatened Green Belt villages and fields.

The desire to protect the strategic gap between Ash and Tongham and Ash Green is welcomed, and provided that this does not arise because of a loss of Green Belt land elsewhere, the proposal to include some of this land within the Green Belt is welcomed too. However, Green Belt boundaries should not be traded off. One village community should not benefit to the detriment of another. The proposed extension of Green Belt designation to Ash and Tongham is unlikely to succeed, because it is not inherently better at serving the purposes of the Green Belt than other areas threatened by development, and a similar attempt in Solihull was wholly unsuccessful. The Court of Appeal decision will represent a precedent in this regard.

As noted in Gallagher Homes v Solihull, the NPPF is based on PPG2 which is quoted in a similar context to this proposal:

“If such an alteration is proposed the Secretary of State will wish to be satisfied that the authority has considered opportunities for development within the urban areas contained by and beyond the Green Belt.”

In other words, before altering Green Belt boundaries (to use for building), land beyond the Green Belt should be considered as building land first; and first of all, brownfield urban land should be used. Provided that the Green Belt is not subject to the wholesale assault then this extension might be acceptable to the wider community within the borough. It will not be acceptable as a trade-off for loss of the Green Belt elsewhere.

Policy P3 States that ‘development will only be permitted permitted provided it:

• “requires a countryside location or where a rural location can be justified, and
• is proportionate to the nature and scale of the site, its setting and countryside location, and
• does not lead to greater physical or visual coalescence between the Ash and Tongham urban area and Aldershot”.

We would like to know what the rural justification of proposed housing has for Ash and Tongham and how Guildford Borough Council proves that contributes to the rural economy? In the Local Plan, Guildford Borough Council refers to these Eastern Borough proposals as ‘extensions to urban boundaries’. Developments of 1241 and 91 homes cannot possibly meet the necessary term ‘rural justification’ (The site allocation maps show different figures of 1200, 62, 58 homes)

As far as we can tell with the corresponding maps, the proposed developments in Ash and Tongham will create a greater coalescence between the separate villages to combine them into one urban area with a slither of green space between it and the A331/Aldershot.
Designation of Green Belt does not guarantee a barrier between Ash and Ash Green as Guildford has demonstrated the urge to move the Green Belt boundaries in communities elsewhere. We would suggest removing the allocation of further Green Belt designation as it does not follow NPPG Policy. There are no exceptional circumstances to allow changes in Green Belt Boundaries in Guildford.

It is also not clear what the impact will be of designating SANG in this area, and whether this will be used to permit building on Green Belt or land otherwise protected because of the Thames Basin Heath SPA designation elsewhere.

Ash and Tongham have countryside designated Ancient Woodland, AGLV and SNCI and a sensitive historic site which must be protected. This, together with a focus on using existing brownfield within the urban settlement area and a more realistic housing number, should succeed in protecting the valuable countryside around Ash and Tongham, while the attempt to adjust Green Belt boundaries seems doomed to failure and therefore will allow wholesale overdevelopment in this area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/10075  
Respondent: 8640353 / Julian Cranwell  
Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to policy P4 Flood risk and water source protection zones Urban development on existing hardstanding would not create additional flood risk, especially where there is scope for improved flood resistance measures to be included in the design. Sites such as Woodbridge Meadows Industrial Estate and the Arriva bus depot, on the River Wey bank, are potential high-value brownfield sites that would not be available for housing if this policy is implemented. It is not the footprint of existing buildings that should limit future development, but the extent of existing hardstanding. Tarmac and concrete do not act as functional floodplain, and some land with hard standing close to the river, within the town centre and within easy walking distance of the railway station, provides an excellent opportunity for real urban regeneration that could protect the surrounding countryside. We strongly believe that this policy should not be used as a convenient excuse not to build on the extensive area of brownfield sites between the station and Ladymead. Any new development in this area could easily be built on stilts with flood resistant ground floor parking in areas that are identified as high flood risk. This area has been built over successfully over the last 50 years. We do not need to stop now.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/10077  
Respondent: 8640353 / Julian Cranwell  
Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
We OBJECT to this policy. This policy is weak. The mitigation (cash compensation) offered for development in the special protection area is so small and negligible as to be meaningless. SANG (Suitable Alternative Natural Greenspace) is not beneficial; the sites identified or targeted are already green space. To create SANG is just using agricultural or wooded land as recreation land in order to justify building on other green spaces. There is no actual increase in environmental protection; it is a policy designed to permit building on otherwise protected areas. SANG – in part used to prevent dogs and cats attacking nesting birds - must ensure that it is not using land which is adjacent to the special protection areas.

Thames Basin Heaths Special Protection Area (TBH SPA; see Map 1, Appendix 1), is a statutory designated site and designated for its rare and vulnerable birds, specifically nightjar, Dartford warbler and woodlark under the EC Birds Directive. This site also forms part of the Thursley, Ash, Pirbright and Chobham Special Area of Conservation (SAC), a statutory designated site and designated for its North Atlantic wet heaths, European dry heaths and peat bogs.

We believe that the Plan is unsound as the Habitats Regulations Assessment prepared for GBC does not take sufficient account of the impact seven proposed developments will have upon the Thames Basin Heaths Special Protection Area (TBH SPA) which is a European Site (as defined under the Habitats Directive and Conservation of Habitats and Species Regulations 2010 (as amended).

The seven proposed developments are less than five kilometres away from the TBH SPA and in some cases not much beyond the 400m exclusion zone, occupying an area between under 1km to just over 2km from the TBH SPA. It has been indicated that the cumulative effect of further residential development up to 5 km from protected heathlands will have a significant adverse effect on the heaths. The TBH SPA is an internationally important habitat for three rare species of bird - the Dartford warbler, woodlark and nightjar. The latter two are ground nesting and therefore particularly susceptible to disturbance from people and animals. In fact Natural England believes that recreational use of the heaths arising from housing developments up to five kilometres away from a SPA will create disturbance to rare bird populations.

A survey in 2008 showed that more than 83% of visitors to the SPA arrived by car and that 70% of those had come from within 5km of its access point. A very large proportion of the TBH SPA visitors are dog walkers, many of whom visit a particular site on a regular basis. A follow-up survey in 2012 found that there was a 10% increase in visitors to the SPA.

A survey of households carried out by a veterinary team at Bristol University in 2010 “Number and ownership profiles of cats and dogs in the UK” published in the Journal of The British Veterinary Association indicates 31% households own dogs and 26% households own cats. Dogs were more likely to be owned by rural households.

Applying this analysis for all new housing at the listed strategic housing sites in the draft Local Plan within the 400m-5km mitigation zone of TBHSPA (in total 7,000 new homes), the cumulative impact of dog ownership (up to an estimated 2,200 new dogs within 5 km of TBHSPA) with dog-walker incursions on the rare bird species habitat of the TBHSPA will be a devastating increase. No amount of SANG nor SAMM programmes will change human behaviour and the draft Local Plan evidence base contains no studies or data to prove otherwise, it contains only unproven assertions. Natural England can provide no survey evidence of the effectiveness of SANG or SAMM programmes in attracting dog-walkers and other visitors away from TBHSPA.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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<th>PSLPP16/10064</th>
<th>Respondent:</th>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to policy S1 as stated and the presumption in favour of sustainable development While this wording is based on the National Planning Policy Framework (NPPF) – which is binding - this policy fails to recognise that development in rural areas, with inadequate transport and other infrastructure, cannot cope with the proposed scale of development. It is unsustainable. This should represent an absolute constraint on development. The NPPF states that the presumption in favour of sustainable development “should be seen as a golden thread running through both plan-making and decision-taking.” Policy S1 ought to set a clear framework. No definition of “sustainable development” is given. The policy also fails to set out any principles for applying sustainable development in practice to local planning decisions, which often have serious long-term impacts. The promise “to secure development that secures the economic, social and environmental conditions in the area” omits to recognise that economic growth, social justice and environmental protection often conflict. It does not say how each element is to be weighted or conflicts resolved. Under this policy, any development will qualify as “sustainable”, thereby failing to apply the NPPF’s most important guideline. The most gaping hole in Policy S1 is the Green Belt. As an inter-generational covenant (enshrined in primary legislation) to protect green areas in perpetuity, the Green Belt is a living example of sustainable development in practice. It is the envy of the world. Policy S1 should commit to uphold Green Belt boundaries and protections, setting at least one clear boundary to planning decisions. The plan’s contempt for Green Belt constraints is amply demonstrated in later policies. The commitment to approve planning applications “wherever possible” and “without delay” reveals this draft plan’s pro-development bias. Countervailing references to sustainability are so vague that the NPPF presumption in favour of sustainable development becomes a presumption in favour of any development at all.

This policy suggests that “We will work proactively with applicants jointly to find solutions that mean that proposals can be approved wherever possible, and to secure development that improves the economic, social and environmental conditions in the area”. This does not appear to accord with the requirements of NPPF 10 which notes that “plans and decisions need to take local circumstances into account so that they respond to the different opportunities for achieving sustainable development in different areas”.

Furthermore NPPF 14 notes that specific policies within the framework may require development to be restricted, and in this context, decision taking should not imply that development proposals should be approved in all circumstances.

NPPF 17 notes further that there are 12 planning principles which should be applied to underpin both plan-making and decision-taking and so these should be taken into account in the framing and the administering of the Local Plan. These include

• "empowering local people to shape their surroundings"
• "take account of the different roles and character of different areas, promoting the vitality of our urban areas, protecting the Green Belts around them, recognising the intrinsic character and beauty of the countryside and supporting thriving communities within it" [note in this context that Guildford is in the Metropolitan Green Belt surrounding London and, therefore, that all users of the Green Belt within London are stake holders for the purposes of this assessment]
• "support the transition to a low carbon future" [hardly promoted by increasing commuter dwellings]
• "contribute to conserving and enhancing the natural environment and reducing pollution"
• "encourage the effective use of land by reusing land that has been previously developed (brownfield land) provided it is not of high environmental value"
• "conserve heritage assets in a manner appropriate to their significance"
• "actively manage patterns of growth to make the fullest possible use of public transport walking and cycling and focus significant development on locations which can be made sustainable"

Of the 12 core principles set out in NPPF 17, Policy S1 seems to be disregarding at least 7 of these. These core principles must be taken into account in order to meet the requirement to comply with NPPF 17.
There is grave concern about the statement in the policy that “Planning applications that accord with the policies in this Local Plan (and, where relevant, with policies in adopted neighbourhood plans) will be approved without delay, unless material considerations indicate otherwise.” This is too flexible and too permissive and open to subsequent abuse. Policies should be structured as part of local plan so that they will be enforceable for the duration of the plan. Furthermore, the presumption in favour of all applications, as stated in this policy, fails to recognise the requirement for constraints which should be agreed and implemented as part of the Local Plan process. The proximity of the SPA, for example, should preclude development (which is a major factor for a large proportion of the borough); most development in the AONB should be severely restricted (which is another major factor); and Green Belt should act as a substantial constraint on development. The Birds and Habitats Directive is a further major issue.

Astonishingly, there are no Monitoring Indicators to ensure the achievement of this core requirement set out in paragraph 14 of the NPPF.

In the context of assessing sustainability it is worth quoting from the response of David Roberts who is a retired civil servant who was, from 2005-08, in charge of the British Government's international policy on Sustainable Development (SD).

“The NPPF states that the presumption in favour of sustainable development “should be seen as a golden thread running through both plan-making and decision-taking[1].” Standing at the head of the draft plan, Policy S1 ought to set a clear framework. Instead, no definition of “sustainable development” is given[2]. The policy also fails to set out any principles for applying sustainable development in practice to local planning decisions, which often have serious long-term impacts.

The promise “to secure development that secures the economic, social and environmental conditions in the area” omits to recognise that economic growth, social justice and environmental protection often conflict. It does not say how each element is to be weighted or conflicts resolved. As a practical guide to the tough choices Councillors will face, it is useless. Under this policy, any development will qualify as “sustainable”, in breach of the NPPF’s most important guideline.

The most gaping hole in Policy S1 is the Green Belt. As an inter-generational covenant (enshrined in primary legislation) to protect green areas in perpetuity, the Green Belt is a living example of sustainable development in practice. It is the envy of the world. Policy S1 should commit to uphold Green Belt boundaries and protections, setting at least one clear boundary to planning decisions. The plan’s contempt for Green Belt constraints is amply demonstrated in later policies.

The commitment to approve planning applications “wherever possible” and “without delay” reveals this draft plan’s pro-development bias. Countervailing references to sustainability are so vague that the NPPF presumption in favour of sustainable development becomes a presumption in favour of any development at all.

This policy also ignores, as if they are inconvenient constraints, most of the 12 Core Planning Principles set out in NPPF paragraph 17[3].

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
We object to policy S2 the Borough Wide Strategy and the commitment to build 13,860 homes based on the Strategic Housing Market Assessment (SHMA) 2015 prepared by GL Hearn. The OAN “objectively assessed need” figure in the SHMA of 693 homes a year is far too high. We are very surprised and concerned that GBC have adopted the OAN of 13,860 homes as the housing target without any application of constraints as required under the National Planning Policy Framework and the National Planning Policy Guidance. The scale of the housing number proposed, inevitably increases the onus for it to be seen to be sound. A substantially lower number, on the other hand, would remove the need to build on Green Belt or open countryside, and instantly meet the single biggest public objection to the plan as a whole. Other local planning authorities appear to take a more balanced view in their approach to planning. The Woking Core Strategy 2012 applies a constraint of 50% from the 594 new homes identified in their own SHMA. “It should be noted that local evidence (Strategic Housing Market Assessment - SHMA) highlights a need for an additional 499 new affordable homes every year in the Borough and a total of 594 new homes every year when taking into account demand. Given the level of environmental constraints present in the Borough, it is considered that the provision of an average of 292 dwellings per annum represents a reasonable level of housing growth for Woking and is deliverable.” Historically GBC have correctly applied constraints on housing numbers to protect the Green Belt. The Surrey Structure Plan 1994 advocated a general slowing down in the rates of development “because of the environmental constraints which exist in the County, including Green Belt”. This slowing down was reflected in the requirement that Guildford Borough should accommodate a net increase of 3,800 dwellings between 1991 and 2006. This was a lower rate of development than in previous years. It is interesting to note that the Structure Plan at that time expected sufficient land to arise within the urban areas to accommodate this requirement. However it would appear that today GBC have effectively ignored the real potential of the urban area to provide for housing. At the same time GBC have adopted a radically different approach to the policy of the Council over the last 20/30 years and are now ignoring government policy in relation to the Green Belt. A detailed and comprehensive professional review of the SHMA dated June 2016 by NMSS an independent expert firm dealing with housing and demographics procured by Guildford Residents Association (GRA) has concluded that the OAN figure should be revised down from 693 homes per annum to 510 homes per annum. The 41 page report by NMSS which can be found on the GRA website entitled “A Review of the West Surrey SHMA as it relates to the Objectively Assessed Housing Needs of Guildford”. It was a real community effort. It was paid for by over separate 20 Guildford Residents Associations and Local Parish Councils none of whom were convinced that the SHMA report procured and presented by GBC was accurate or transparent or accessible in a meaningful way. So they clubbed together and collected contributions from many hundreds of Guildford residents to try to find out the truth of the housing need figure presented in the Local Plan. The NMSS report includes detailed analysis and financial modelling and was prepared by Neil McDonald who we were lucky to find. He is a niche consultant with the right skills and a national reputation. An independent adviser and commentator on housing demographics. He works with local authorities and others on the estimation of housing need and related issues. He was a civil servant and policy adviser to Ministers for over 30 years, the last 10 advising on housing and planning issues within the Department of Communities and Local Government. His 7 years as a Director at DCLG included a posting as Director, Planning Policy and a period as Chief Executive of the National Housing and Planning Advice Unit. NMSS found that the SHMA used in the Local Plan incorrectly adds extra homes to its basic demographic projection to allow for improving affordability of housing, increased student numbers and economic growth. The report found that none of these additions were justified based on the evidence presented within the SHMA. The report concluded amongst other matters that: The affordability of housing in Guildford is no worse than in other Surrey districts and boosting supply beyond the demographic OAN would not result in a noticeable improvement in affordability but simply in more people moving to the area. There are reasons for believing that the SHMA’s estimate of the number of homes needed for students may be too high and that an adequate provision for students is already included in the demographic OAN. The report advises that the Council should commission a separate student housing need figure for Guildford given the distorting effect of students on our overall OAN. It envisages that, once this exercise is undertaken, improved accuracy means the overall OAN would be likely to reduce still further. The SHMA seeks to estimate the number of homes needed to support employment growth using employment rate assumptions that are inconsistent with the employment forecasts. This produces misleading results. An analysis of the Cambridge Econometrics and Oxford Economics forecasts using employment or economic activity rate assumptions consistent with the forecasts suggests that in neither case is there a need to provide more housing than suggested by the demographic analysis. Indeed, in both cases a smaller population growth (and hence fewer homes) could support the jobs growth that is forecast. A further independent report was procured in 2016 by the Campaign for the Protection of Rural England CPRE from Richard Bate of Green Balance, an independent consultancy with expertise in demographic and housing matters to carry out a review of the GL Hearn SHMA. The report by Green Balance runs to 37 pages and its findings are that the OAN for homes in Guildford should be reduced from 693 per annum to 481 because: 1. the vacancy rate figures should be taken from local government annual records rather than from the 2011 Census. This would reduce vacancy rates to 2.9% in Guildford. 2. there should be no increase for affordability above basic demographic change. 3. there should be no increase for Student housing and it was considered
However, this is before constraints are applied to arrive at an acceptable housing target. A further study is attached which is included within this section by reference. It is unacceptable that demographic and economic model assumptions have been withheld by GBC and cannot be checked making the process unaccountable. The figure of 13,860 new homes is unsubstantiated. It has not been scrutinised by Councillors despite repeated requests for debate. The assumptions and calculations underlying the model are hidden, protected by a claim to intellectual property by commercial sub-contractor used in preparing the SHMA. Both the National Planning Policy Framework and National Planning Policy Guidance provide a clear policy direction that the overall housing target should be reduced by a variety of constraints to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors. We have corrected this omission below. Infrastructure policies should be planned at the same time as Local Plans but in this case they have effectively been left out and are not sufficiently developed. The Framework also makes clear that, once established, Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan. Unmet housing need (including for traveller sites) is unlikely to outweigh the harm to the Green Belt and other harm to constitute the “very special circumstances” justifying inappropriate development on a site within the Green Belt. Appendix: Report prepared by David Reeve in relation to the SHMA (attached as this is a separate document but included within this section by reference). The NEED TO APPLY CONSTRAINTS Ministerial guidance in relation to building on the Green Belt is clear.1. “the single issue of unmet need - is unlikely to outweigh the harm to the Green Belt and other harm to constitute the “very special circumstances” justifying inappropriate development in the Green Belt” - Nick Boles to Sir Paul Beresford MP 7th February 2014.2. “we were always very clear that we would maintain key protections for the countryside, and, in particular, for the Green Belt. The Framework makes it clear that a Green Belt boundary may be altered only in exceptional circumstances and reiterates the importance and permanence of the Green Belt” – Nick Boles to Sir Michael Pitt, Planning Inspectorate 3rd March 2014.3. “Planning Guidance, updated in March 2014, also states that unmet housing need is unlikely to outweigh the harm to the Green Belt to constitute the very special circumstances justifying inappropriate development within the Green Belt” – Nick Boles to Sir Paul Beresford MP 18th June 2014.70% of the sites put forward in the Local Plan are in the Green Belt which flies in the face of current government planning policy. The National Planning Policy Framework (NPPF), National Planning Policy Guidance and case law make it clear that Green Belt is an absolute constraint on housing supply. Exceptional circumstances need to be shown to adjust boundaries. Other constraints under the NPPF include assessments of sustainability, strategic flood risk assessment, physical constraints on land use and infrastructure constraints (this can include road congestion, schools, drains, power supply and medical requirements). Constraints should be applied to the Objectively Assessed Housing Need (OAN). However this itself is overstated and should be reduced from 693 per annum to 500. In view of the comments above it would appear logical to apply CONSTRAINTS in line with government policy to a corrected OAN. Of approximately 50% to account for the fact that 89% of the borough is in the permanent Green Belt and development is not supported by adequate major infrastructure. This reduction is in line with the constraints percentage of 50% applied by Woking Borough Council. This would result in a more acceptable and practically achievable HOUSING TARGET of 250 homes per annum which over a 20-year period would be 5,000 homes. All of these homes could be built in the existing urban brownfield areas of the borough and would in part satisfy the 20,000 objections made by residents to the 2014 draft plan and also relieve the additional problems of inadequate infrastructure. It would also mean that there is currently 8.5 years supply of housing (2131/250) which is made up of existing permissions granted (1,518) and completions made (613) during 2013/2015. (Monitoring Report by GBC 2015) Whilst we have many significant objections to the GBC Local Plan we applaud the policy statement by GBC in their Monitoring Report, “We will continue to monitor the use of previously developed land, and continue to identify as many opportunities as possible for redevelopment of previously developed land.” We believe it will be to the benefit of all residents if GBC can apply themselves vigorously to this endeavour in order to protect the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/166  Respondent: 8640353 / Julian Cranwell  Agent:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (No)

The evidence base is far from adequate. The council is not in possession of the model used to calculate the OAN. Much of the remainder of the 'evidence base' appears to have been cobbled together to support as development agenda, with insufficient regard to infrastructure needs.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/1310  Respondent: 8640353 / Julian Cranwell  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to the paucity of the evidence base. The submission documents are unsound, unreliable and inconsistent.

Key parts of the evidence base are flawed or based on withheld assumptions. The current SHMA inflates the proposed housing figure due to the following factors:

- the failure to correct for errors in the historical data for international migration flows;
- the way it considers students and affordability, and;
- the flaws in the method for estimating the number of homes needed to support job growth;
- the treatment of vacant property.

The Green Belt and Countryside Study does not value the fundamental aim of Metropolitan Green Belt properly or look strategically at options for development in major settlements beyond. The way Green Belt is parcelled up and scored is not valid: serving 2 Green Belt functions is as valid as serving 4 functions. Green Belt is Green Belt, it does not require assessment or qualification. The Green Belt sensitivity analysis is not a valid basis for informing decisions. Exceptional circumstances clearly do not exist to justify amendments to Green Belt boundaries as part of the Local Plan process. It is quite achievable for realistically prepared and identified development needs to be accommodated in Guildford’s urban areas and villages.

The Transport Evidence has been produced very late and is incomplete, inaccurate and untested to the extent that the Plan is not ready for a Regulation 19 consultation. It is emerging that the Strategic Highway Assessment shows there will be congestion, even with all the highway schemes in the Plan. Many questions remain unanswered. E.g. Why would 1000 homes on Slyfield generate no extra traffic? The report only gives average speeds and information needed to understand how much congestion will occur and where it has not been provided in time to inform Plan proposals or responses. The available evidence suggests much of the proposed Sustainable Movement Corridor cannot be delivered due to narrow roads.
and pinch points. Evidence on bus travel is fundamentally compromised because no clear and workable location for a bus interchange is proposed. No information has been provided on the demand for and capacity of rail services. The main line to London is already extremely busy in peak periods. Information about the town centre as regards traffic, buses and parking is lacking. It is not credible to proceed without this given existing levels of congestion, the number of transport routes that rely on the town centre to cross the Downs, the shortage of crossing points over the railway and river and the fact that narrow roads and steep slopes make Guildford unsuitable for a ring road approach. The Strategic Highway Assessment 2016 is flawed. It is invalid to base this on less traffic growth than the proposed housing growth. The report points to overcapacity use of the A3, M25, A31, A320, Millbrook, Ladymead, Woodbridge Road, York Road, London Road but understates the congestion consequences. Various suggested queue reductions are unexplained.

The consequences of major proposed reductions in road space in the town centre (eg closure of Walnut Tree Close, narrowing of Woodbridge Road, reduced capacity of the gyratory) and of developing Burnt Common are not included. More time is needed to assess and refine this crucial 11th hour report which seems incomplete, understates the consequences of traffic overload, shows inconsistencies, and does not supply assumptions or information needed to understand queues at junctions.

The Guildford Retail Study Update lacks credibility and there is no proven case for expanding comparison retail space which is undermined by failure to implement existing retail consents at the North Street development over the last 10 years. The Guildford Retail Study does not take account of changing retail patterns in relation to the threat of the internet and the "clicks and mortar" conflict. The study also assumes a number of logged retail requirements from companies already in liquidation or with national requirements that exclude Guildford. We believe that it was unacceptable to stop monitoring air quality, where NO2 emissions exceed limits, on the unrealistic assumption congestion would reduce. Estimates of premature deaths have doubled and issues with vehicle emission controls have emerged. Traffic noise from the A3 should also be reported.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Key parts of the evidence are missing, flawed or based on withheld assumptions. We consider therefore that it is questionable as to whether the Local Plan meets all legal requirements. The Strategic Housing Market Assessment overstates need, the Green Belt and Countryside Study uses a flawed approach and the Transport evidence is too late and incomplete to be relied upon to inform the Plan. The Plan preparation process has had inadequate regard for national policy which attaches “great importance” to the “openness” and “permanence” of Green Belt. The test of “exceptional circumstances” that might justify allocating Green Belt land for development in a Local Plan has not been rigorously and transparently applied at a strategic level. The Sustainability Appraisal seems to have lost sight of the concept of Sustainable Development as described in the National Planning Policy Framework to the extent that we question whether it complies with the requirement. It is unacceptable to treat Green Belt as a readily available source of development land during Plan preparation. The Mayor of London intends to respect Green Belt. The test of “exceptional circumstances” that might justify allocating Green Belt land for development in a Local Plan has not been rigorously and transparently applied at a strategic level. Releasing Green Belt to fund infrastructure or build on open, previously-developed Green Belt does not pass this test. Opportunities to channel development towards brownfield locations beyond the outer Green Belt boundary, linked to sustainable transport, have not been adequately considered. It is not credible to suggest the Green Belt is being treated as permanent when its boundary was changed as recently as 2003 as part of the last Local Plan review. Indeed, land released in 2003 is neither fully developed nor efficiently used. An approach of eroding the Green Belt at each Local Plan review is not sustainable. If there is a case for Green Belt development, it needs to be proven through the application of policy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/168   Respondent: 8640353 / Julian Cranwell   Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (No)
Object. The plan is completely unsound, for the reasons already given, in response to questions 1 and 2.

The housing number has been prepared behind closed doors, without the council having the facility to verify the calculations, or assumptions used.

There is no desire or need to remove the 14 villages from the greenbelt.

The proposals would change the character of the villages forever.

The council has made almost no effort to utilise the large brownfield assets it controls to provide housing, as directed by central government.

The principal architect of the plan is a convicted forger, who behaved fraudulently while in office.

The following changes are necessary to ensure the plan is made sound:

1. No building on the greenbelt, until all available brownfield land has been used up.
2. Require developers to use up their land banks, before any new greenbelt is released.
3. Start from scratch on a new plan rather than tinker with the discredited previous plan, virtually unchanged, with no objections dealt with.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/1312  Respondent: 8640353 / Julian Cranwell  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We consider that the Local Plan is unsound. Guildford is physically constrained being a gap town set in the Surrey Hills AONB and in Metropolitan Green Belt. Significant parts are affected by the Thames Basin Heath Special Protection Area. There are also notable areas of river, surface water, groundwater and surface water flood risk. Constricted road and rail routes converge to cross the downs seeking to avoid both high ground and floodplain. These compete with housing for land and there is no space for road widening or a conventional ring road approach. The Local Plan process envisages that the housing target should be lower than the “objectively assessed need” if there are valid constraints. **GBC have failed to apply any reduction. We consider this makes the plan undeliverable and unsound.** We believe it would be harmful to the character, quality of life and economy of Guildford to apply the housing figure to a number of 13,860 new homes by 2033. We submit it would be counter to sustainable development as a whole (in particular to living within environmental limits and achieving a sustainable economy) and contrary to policy to develop on the scale currently proposed. We are concerned that insufficient attention has been paid to cumulative impacts with constraints considered separately for each site. In view of the extent of physical and policy constraints, the inflated SHMA figure, and the transport evidence indicating that the Plan would lead to congestion, the OAN figure should be **500 homes per annum.** After application of
constraints the target should be in the range of 250 homes per annum and kept under regular review. The extent to which the Sustainability Appraisal fails to test the sustainability of the spatial options in a meaningful way casts doubt over whether sustainability has been assessed. The report treats various major development sites in Green Belt, contrary to the importance attached to protecting Green Belt, as “a given”, fails to consider options that constrain development or that make greater use of brownfield or previously released greenfield land, focuses on a range of options that involve developing on even more Green Belt around Guildford in order to protect Green Belt around Woking does not consider environmental limits or impact on the next generation in terms of weighing demand for homes for the young alongside the use of all possible last resort greenfield options by one generation. The National Planning Policy Framework requires that objectively assessed needs should be met unless: "any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole; or specific policies in this Framework indicate development should be restricted." The specific policies described include several of particular relevance to Guildford including sites protected under the Birds and Habitats Directive, Sites of Special Scientific Interest, Green Belt, Local Green Space, Area of Outstanding Natural Beauty, designated heritage assets and locations at risk of flooding. In this situation, we would question whether it is appropriate for the Appraisal to propose meeting needs in full from a sustainability perspective. Notwithstanding guidance that the Sustainability Appraisal should be proportionate, strategic and look at significant matters, the assessment appears deficient and biased in the spectrum of alternatives it considers to the point that it is questionable whether it meets the requirements. GBC has not included details of its Town Centre Master Plan and urban development proposals in time for and as a part of the Guildford Local Plan consultation. GBC has failed to provide an Infrastructure Report in time for and as a part of the Guildford Local Plan consultation. GBC has proposed an OAN of 693 houses per annum in the GL Hearn Strategic Housing Market Assessment (SHMA) which we consider is unsupported. Highways England will not start to consider what it intends to do as regards the A3 in the vicinity of Guildford until 2018. This is too late.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/169  Respondent: 8640353 / Julian Cranwell  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 4: Duty to cooperate

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (No)

Object. Whilst GBC has cooperated on a joint SHMA, with Waverley and Woking Councils, the other 2 subcontracted the SHMA development to GBC.

GBC subcontracted the work to G.L. Hearn, who in turn sub-contracted to Justin Gardner, which ised its own proprietary model to calculate the housing need. The model used has not been released to any of the 3 councils, or the public, in order for the workings to be independently verified, as required by the NPPF.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/170  Respondent: 8640353 / Julian Cranwell  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (Yes)

I would like to be involved, as I have devoted much energy to this matter over the past 3 years, and have had many interactions with the council. None of the objections I raised, in relation to the previous draft have been addressed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/171  Respondent: 8640353 / Julian Cranwell  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 7: Any other comments?

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (Yes)

Rather than respond to the 20,000 objections to the previous draft, GBC has taken the easy route of trotting out the previous plan, almost unchanged, apart from an increase in the OAN, for some explained reason. They have spent a fortune on PR consultants to plug their achievements, whereas they should have gone back to the drawing board, and started from scratch.

The constraints, which are required to be applied, under the NPPF, such as the purpose of the greenbelt have not been applied.

The GBC Tory party promised in its 2015 election manifesto to protect the greenbelt, and yet this plan proposes the wholesale destruction of the greenbelt.

There is little or no proposed solution to improving the infrastructure, which is already under strain.

This plan is not fit for purpose.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/10061  Respondent: 8640353 / Julian Cranwell  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Vision and ambition
We consider that the vision underlying this Local Plan is inadequate and that the ambitions proposed are inappropriate.

The vision is to build 693 dwellings a year, an inflated housing target, produced by using a “black box” model that takes no account of anomalies in the ONS statistics for the borough that underpin this model. One such anomaly is the increase in the number of university students during the base years used to generate ONS population projections. Consultants used by GBC ignored this, so the housing target is far in excess of the needs of residents. This housing target will result in the borough’s permanent resident population increasing at 4.5 times the rate of population increase during the period 2001 to 2011, as measured by the censuses in these years. Given the existing strain on infrastructure in the borough the “vision” in this plan will create a nightmare for existing residents.

The only ambition in this plan is to build on a scale across the borough never before seen, driven by the ambition to “roll back the green belt”. There is no regeneration programme for urban areas of Guildford, and instead of using the Local Plan as an opportunity for redevelopment within Guildford’s deprived areas, the focus is on large developments outside Guildford, mostly in green belt. The plan has nothing for low paid workers in Guildford, and very little for young people who wish to live in the town. It is a plan to benefit developers, not residents; a plan rooted in the past, but without learning lessons from the past.

There are many contradictions within this Local Plan, and a few of examples of these are given below:

- The plan proposes a major increase in traditional “bricks and mortar” retail in the town centre, as well as an expansion in warehousing and distribution. Workers in these sectors tend to be among the lowest paid, at or just above the minimum wage. The plan places an emphasis on the provision of “affordable” housing, but those on the minimum wage cannot afford “affordable” housing, it is a misnomer. Workers in these sectors need social housing, but there are no plans for a significant expansion in Guildford’s social housing.

- As well as an increase in town centre retail, etc it is proposed to locate new employment sites in or close to the urban area of Guildford. Only 20% of the housing proposed is to be within the town, with the remainder outside Guildford town. This means that if employers take up the buildings in the centre of the town (this is a big if, as in surveys many employers complain about congestion) workers in these employment centres will have to live outside the town. Inevitably this means they will rely on cars and vans to get to their place of work. This is not sustainable, Guildford already has a problem with congestion and air pollution.

- The rate of growth (averaging more than 693 dwellings a year to 2031) means if employment is to be provided locally (for about 1,200 new adult residents a year) Guildford’s economy would have to expand at a rate well above anything seen in the recent past, and be sustained at this rate for 16 years – a period when history indicates there will be at least two national/international economic downturns. This sustained growth would be unprecedented. Without an expansion in local employment, Guildford will become a dormitory town for workers commuting long distances to other areas. This is not sustainable.

- The delivery of housing is entirely in the hands of private companies that currently enjoy record profits due to their control of the delivery of new homes. These companies will simply not build if anything has a major impact on their profitability, be it a global economic downturn or a local oversupply of housing, whatever. Similarly, much of the infrastructure required has to be built by private companies, over which GBC have no powers. In effect, GBC are proposing a Local Plan over which they have minimal control. They have no powers to force the delivery of their targets in that plan. This means the plan is an exercise in fantasy, but a fantasy that blights the lives of thousands of people, especially those who live close to proposed development areas.

These examples serve to illustrate inconsistencies within the plan. Other specific points addressing the declared “Vision and Ambition” are detailed below.

**Spatial Vision**
A plan that will increase car journeys as much as this one will, especially in an area that already suffers from heavy congestion with associated high levels of air pollution, could not be described as a “vision”. It is more of a nightmare than a vision. The Metropolitan Green Belt was established to prevent the urban sprawl that has blighted many countries, such as the USA, but the goal of this plan is to set aside the protection offered by the Green Belt, and to create urban sprawl, with large extensions to the urban area of Guildford and the creation of urban areas in the countryside.

A contributor to the nightmare vision is the ongoing lack of investment in infrastructure, which will be exacerbated by this plan. In terms of infrastructure, the Surrey County Council Infrastructure Plan estimated that the borough would need investment totalling £2.5 billion, based on the provision of about 9,300 dwellings through the period of the plan. GBC plan for at least 13,860 dwellings, most of them outside the urban areas of Guildford and so infrastructure needs will be higher than estimated. Of the £2.5 billion, SCC estimated that £2 billion would be available from various sources, leaving a shortfall of £0.5 billion. In an address to a council meeting, Mike Murray, speaking on behalf of Wisley Property Investments estimated that the developments outlined in the Local Plan would raise £100 million for infrastructure investment. This leaves an obvious shortfall of £400 million – but in fact the shortfall will be much greater than this, due to the housing target in the Local Plan being about 50% higher than in the Surrey County Council estimate, and because of probable changes to the Community Infrastructure Levy. This means that the borough cannot possibly meet its infrastructure needs, which is not recognised in the infrastructure plan that forms part of the evidence base of this Local Plan.

Another contributor to the nightmare vision is the lack of recognition of the air quality problem in some areas of the borough. That there is an air quality issue is illustrated by nitrogen dioxide (NO2) concentrations that are higher than the legal maximum. One of the proposed development sites is close to one of the “official” NO2 measuring stations, at Wisley, and this reveals that nitrogen dioxide concentrations have been higher than the legal maximum of an annual average of 40µg/m³ for several years. Other measurements have been made in villages that have roads that serve the A3 and have high traffic levels, and these have shown concentrations well in excess of the legal maximum concentrations, to the extent that one village has formally requested that their village be designated as an air quality management area. This has not been put into effect, and the whole issue of air quality has been entirely ignored in the Local Plan, specifically in the spatial vision. The spatial “vision” proposed in this plan is the reverse of that recommended by the Institute for Air Quality Management, who said “The pattern of land use determines the need for travel, which is in turn a major influence on transport related emissions. Decisions made on the allocation of land use will dictate future emissions, as many people and businesses will make significant use of road transport for journeys between places that form part of their daily lives.”[1]

This has not been recognised in the spatial planning within this plan, which proposes that a large majority of new dwellings should be in rural areas, some considerable distance from the urban centre and employment centres. It is a plan that could have been written specifically to increase journeys by road.

This report[1] also suggested that

“Ideally, air quality should be a prime consideration for long term planning, so that land is used and allocated in ways that minimise emissions and that reduce the exposure of people to air pollution, so that land is used and allocated in ways that minimise emissions and that reduce the exposure of people to air pollution.”

This has not been part of spatial planning, but it should have been, even though there is no statutory requirement to do so. However, there is a statutory requirement to declare an air quality management area (AQMA) in areas that are known to have high pollution levels, but this has not been done. The spatial planning in this draft plan will expose more people to air pollution. Instead of what is proposed, more housing developments should be within Guildford town, which could be achieved by recognising that an expansion in retail and warehousing and distribution is not sustainable, and the land set aside in the town centre for these used instead to provide housing. GBC should also have used the local plan to set targets for air quality planning, with proposals to reduce noxious emissions, for example, through the use of LPG fuelled public service vehicles, as is happening in other areas, such as Birmingham. This has not been done; there is no proposal to tackle existing air pollution or to alleviate the pollution caused by adding approximately 30,000 cars and vans to those already in use within the borough. This is the approximate number of vehicles that the proposed housing additions would bring.

There are many areas where the text within the “spatial vision” section does not accord with reality, and a few examples are given below:
The opening text of the Spatial Vision reads

"The Local Plan: strategy and sites makes provision to meet the identified growth needs of the borough in terms of housing, employment and retail and leisure. This is achieved by maintaining the extent and function of the Green Belt in such a way as to protect the existing character of the borough through maintaining the clear distinction between urban and rural areas and safeguarding the natural built and historic environment”.

If this were what is planned, there would be little room for complaint. In fact, the clear distinction between urban and rural areas will be very considerably blurred with large holes punched into the Green Belt. More than 6% of the Green Belt will lose that designation.

The plan calls for a very large, high density development at Wisley, close to the boundary of the borough, in what is currently open countryside in the Green Belt. Another large development is planned at Garlick’s Arch, less than 3km south on the A3, and within another 3 km another at Gosden Hill Farm, all of which are in the Green Belt. When considering the view from the A3 the current appearance of open countryside from the junction with the M25 to Guildford along the A3 will be lost, replaced by two large developments in open countryside and a large extension to the urban area of Guildford, extending into the countryside. Thus the extent of the Green Belt will not be protected.

Two of the villages to be removed from the Green Belt are East Horsley and West Horsley, with a total of 363 ha (3.6 km2) to be removed from the Green Belt. The justification for insetting of villages is given in Policy D4, and this is to increase housing density within villages. From some of the plans given in the Local Plan showing proposed sites it is clear that it is expected that the provision of a number of development sites and the insetting of these villages is designed to lead to the coalescence of villages, such as East and West Horsley, and Normandy and Flexford. As the housing layout and style in these villages is an open pattern of development, they both make a contribution to the openness of the Green Belt, and this will be lost because the housing density for the developments proposed (averaging approximately 18 dwellings/ha) is considerably higher than the average density in these settlements.

It is not clear why new Green Belt will be created in and around Ash and Tongham to prevent Ash and Tongham merging with the village of Ash Green, when the result of removing East and West Horsley from the Green Belt together with several new development sites will be their coalescence. If it was important to prevent existing villages from merging then both East and West Horsley would remain in the Green Belt, and proposed developments would be smaller, in proportion to the existing villages.

Similar considerations apply to the settlements of Flexford and Normandy. The area to be inset is approximately 134 ha (1.3 km2) including a very large 67 ha development site, located between the two settlements. This will result in the coalescence of the settlements of Normandy and Flexford. As both make an important contribution to the openness of the Green Belt, they should not be inset, and this development site is inappropriate development in the Green Belt. Again, if it is important to prevent existing settlements of Ash and Tongham merging with Ash Green, then similar considerations should apply to these settlements, especially given that they are in the Green Belt, whereas Ash and Tongham are not.

The Spatial Vision goes on to say

“The plan provides for the delivery of 13,860 homes by 2033. The preferred location for this development is existing brownfield sites. Over 2,800 units are proposed in the urban areas to take advantage of the existing infrastructure and services, reduce the need to travel and offer alternatives modes of transport to the private car.”

Or, to put it another way: 11,060 homes are proposed on sites which cannot take advantage of the existing infrastructure and services, which will increase the need to travel and which cannot offer alternatives modes of transport to the private car.

The low proportion of housing within the urban centre is because there is so much emphasis on providing employment sites within the urban area, for example, by expanding retail premises, etc but not enough on using these sites for housing – to take advantage of the benefits defined in the above quotation. There is no emphasis on using land in the urban area.
efficiently, for example, by replacing existing land hungry surface car parks with multiple level car parks, thus freeing up land for housing development. A few employment centres have multi-level car parks and this should be encouraged in other centres, and all new employment centres should be required to have multi-level car parks, ideally with several levels underground. Steps such as this would increase the availability of brownfield land within the urban area, and permit higher levels of housing provision. Another step would be to encourage the University of Surrey to do the same, to be more efficient in their land use, and to house a much higher proportion of students within the university campus – as they previously agreed to do. There is adequate space for this within the existing campus, especially if surface car parks were replaced by multi-level car parks. This would free up many houses within Guildford which would then be available to residents, either to rent or purchase.

The Spatial Vision refers to the need to the economy and steps planned to support local employers. However, one of the major issues that employers have with Guildford is severe traffic congestion, and this is not addressed adequately in the plan, and the Spatial Policy outlined will make it much worse. As stated above, a very considerable shortfall in funds required for infrastructure has been highlighted by Surrey County Council. Proposals for many of the changes to local roads are light on detail, and the funds suggested as being required (which in fact are unlikely to be available) fall well short of what is actually necessary to effect an improvement in congestion.

The Local Plan includes the provision of additional sites and premises to meet employment needs across the borough, as well as 120 houses per year for new workers for new employers in the borough. However, the rosy picture painted in the employment report by the authors AECOM does not adequately reflect the actual condition of the local economy. The strength of the local economy as painted in the Employment Land Assessment Report[2] was exaggerated through the careful selection of supporting statistics. As an example, in the section with the heading Policy and Socio-Economics (page 1) the increase in employment within the borough was given as 4.1% during the period 2010 - 2013. This was a period when Guildford was still emerging from a recession, and so employment growth was strong, but not typical of a full business cycle. Employment growth over a longer period should have been given, to give a more accurate picture of the local economy. Using NOMIS statistics the number of residents employed in 2005 averaged 68,000 and this had increased to an average of 68,500 in 2015, so that the growth in employment over this 10 year period was less than 1%. Note too that the average employment in 2015 was considerably lower than peak employment reached in 2007, when it was 74,400. According to NOMIS statistics there has been very considerable variations in the number of residents employed and this is not captured by the Employment Land Assessment report. Although the NOMIS statistics refer to employment by residents of the borough rather than jobs within the borough (a similar time series for these is not readily available), jobs available locally should be reflected in the employment of residents. In fact, NOMIS statistics also reveal that the average weekly pay of residents in the borough is significantly higher (6% in 2015) than pay for those employed within the borough, suggesting the local economy is weaker than neighbouring economies. Residents commute outside the borough to get higher pay.

It is simply astonishing that the Local Plan suggests that jobs can be created over a 15 year period at a rate well in excess of anything that Guildford has seen in the past. It is simply a nonsense to add an additional 120 houses so that additional workers will come to the borough. The housing target of a minimum of 693 per year will result in an additional adult population of about 1,200 potential employees per year, and the local economy will not be able to supply employment for these people. Historical employment data provides no evidence that over a 15 year period an additional 18,000 jobs will be created within the borough, given that the number of residents in employment increased by only 0.7% in the 10 years from 2005 to 2015. Consequently, a large majority of new residents will be forced to commute out of the borough to find employment, adding enormously to traffic congestion and air pollution.

There are many other instances of selective use of statistics in the Employment Land Assessment Report, far too many to elaborate on. As the report concludes there is a need for additional land for employment premises, and because a large part of this land set aside for employment is within Guildford town, it is worth commenting on a few more instances of the use of statistics. This is because this land should be used for housing within the town, which is where the need for housing is, not in the countryside beyond the town. In Section 6.6 of this report2, an explanation of employment forecasts were given. Data was used by AECOM from 3 separate forecasting organisations for employment growth between 2015 to 2033, namely

- Cambridge Econometrics
- Experian
- Oxford Economics
These forecasts exhibited a very wide range – in the case of office employment the range was 0.55% to 1.18% per annum, so the highest forecast was 2.1 times the lowest. This may be acceptable in a short range forecast, but is wholly unacceptable for long range use. Similarly, the forecast for employment in the industrial/storage category ranged from 0.58% to 1.14%, so in this case the highest forecast was 2.0 times the lowest. Again, this range should be unacceptable for use in long range forecasts. These individual forecasts were averaged by AECOM to provide a number used to project the requirement for floor space for these respective employment categories. In this case, with forecasts from various sources exhibiting such a wide range, averaging is not appropriate. As an example of the dangers of averaging consider a human with half of their body in a deep freeze, at about -25°C, and the other half in an oven at 100°C. Their average temperature would be 37.5°C – an ideal body temperature, but that would be irrelevant because they would be dead. Averaging must take account of the range, etc and this has not been done. In fact, the variation given in these separate forecasts indicate that the quality of the forecasts is very debateable, given that they are all for the same variable, and over an extended period of time each forecast would result in a very different outcome.

In addition, the emphasis on these two employment categories is unwise as the total employment market is important – it is likely employment in some employment categories will fall, so if there is growth in any employment category it must serve to mop up unemployment as well as create new opportunities. Finally, statistics given for actual changes within Guildford cover the period 2004 to 2012 – but this should be unacceptable for a report published in September 2015, data up to 2014 must have been available at the time of publication.

A final example of the selective use of statistics is from section 6.11.2, in which the OPDM Employment Land Reviews Guidance Note is quoted. This was used to provide a ratio of land to premises on that land, over one storey, so that the area required for industrial land could be calculated. Quoted ratios ranged from 1:0.35 to 1:0.45 (ratio of land : premises) for manufacturing and from 1:0.40 to 1:0.60 for warehouse uses. AECOM used the average of the median of these to provide a ratio used in producing forecasts for land requirements, namely 1:0.45. However, using an average of the medians was inappropriate in Guildford – land costs are high in the borough, and a large part of the borough (89%) is designated green belt and so using this average ratio betrayed a lack of ambition to use land efficiently. An ambitious goal would be to do better than the best, and this would be provided by using an average ratio slightly beyond the range given, for example, 1:0.60. This could be achieved, for example, by ensuring that all car parking was provided by underground parking, beneath buildings, so that open space could be retained, and by building several storeys above ground where this is possible. Surface car parking and single storey buildings are inefficient in their land use. Using an average land to premises ratio, as AECOM did, showed a total lack of ambition to use land efficiently. Using land efficiently would mean there would be no requirement for additional land to be set aside for employment purposes – and this land could be used instead for housing.

Overall, the Employment Land Assessment displayed a selective use of statistics to give an inaccurate overoptimistic picture of the growth potential in local economy as well as displaying a complete lack of ambition to use land efficiently. Consequently, its conclusions regarding land requirements for employment use should be disregarded.

In the paragraphs devoted to transport, there is a statement

“During the plan period Guildford will experience significant improvements to transport infrastructure including new stations at Guildford West (Park Barn) and Guildford East (Merrow).”

This is presented as a factual statement. However, Network Rail has made no commitment to approval of these stations, despite having recently published a study that examines investment needs on this route up to 2043[3]. In this study, the possibility of these new stations is mentioned, but only as a response to the consultation that preceded the publication of the report. Details given of proposed projects that will be included in their next spending plans (to cover the period 2019 to 2024) include no provision of any description for these new stations, and in fact the emphasis is on increasing the number of trains per hour during peak periods. Adding a further two stops would reduce the ability to add additional trains, and so goes against the need to increase capacity on the line by adding trains. Thus it seems highly unlikely that these new stations would be provided within the time frame of this Local Plan, if ever. In addition, it is clear from the Network Rail report that changes to platforms in Guildford Station will not be made in the next budget period (up to 2024) and that the inclusion of this project in the next budget period (after 2024) is dependent on further studies. Similar timing constraints apply to the electrification of the North Downs Railway. So the delivery of many of the infrastructure improvements, particularly the new stations, within the timeframe of the Local Plan is, at best, doubtful. To present their provision as a certainty was simply dishonest.
Finally, according to the Spatial Vision, the delivery of housing as described in the plan is predicated on the delivery of infrastructure, yet there is no monitoring system in place to ensure that infrastructure is delivered, with necessary services provided. As an example, consider the need for GP services. It is possible to build a doctor’s surgery, but there is a national shortage of GPs, so there are considerable problems in recruiting doctors needed to man existing surgeries. Thus building premises are no guarantee that services will follow, even assuming funds are available. No monitoring systems or programmes are described in this spatial vision and so one has to assume there are none in place to monitor this programme to ensure that services, as part of necessary infrastructure, are actually delivered. No red lines for specific developments have been provided, so that it is clear exactly what infrastructure must be provided before a specific development can be started. As no monitoring systems are in place, there is nothing in this vision to suggest that the promise made by Councillors, that infrastructure will be delivered before additional housing is built, will be honoured.


What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I wish to object most strongly to the proposed change to the Shalford Green Belt and Settlement Boundary contained within the new version of the Guildford local Plan.

These changes run the risk of destroying the Village environment that is so important to both current and future residents.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Respondent: 8643393 / Sue Baker</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base</td>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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However, I have no confidence in the numbers in the SHMA because the basis on which they calculated has not been disclosed. The Council cannot expect the electorate to accept a figure that, without this disclosure, might as well be picked out of the air. I cannot understand why Mr Spooner has refused to publish the analysis behind the numbers so that people can at least have some confidence that the figure of new housing being used by GBC to inform their planning decisions is accurate. This failure to be transparent unfortunately can only serve to make people even more suspicious of the motives of the Council.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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I also object to GBC’s use of the term “affordable” housing. As I understand it, their definition of “affordable” is that the property should be 20% below market value. However, this is in reality a nonsense. This is because developers will want to maximise their profits by building big houses. If a house has a market value of £800,000 the “affordable” price for that house would be £640,000. Surely it is ridiculous to call this “affordable” for the target market of young professionals and families as this level would be out of reach to most of them.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9590  Respondent: 8643393 / Sue Baker  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Furthermore, the infrastructure proposals put forward in the plan are totally inadequate to cope with the current needs of residents in these villages and the additional strain on local services would be unacceptable if these proposals go ahead.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9588  Respondent: 8643393 / Sue Baker  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Rather than insist that a small number of Green Belt villages cope with several hundred new homes, it would be fairer and less damaging if smaller numbers of new houses were built over a much larger number of villages.

This would mitigate the negative impact on local services, such as GP surgeries, schools, and transport, and the electorate would have more confidence that GBC is working in an equitable way and not unfairly sparing those areas where some local councillors live (Ash South and Tongham, for example).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I accept that provision must be made for new housing, in particular for young people and others who need an affordable housing solution. But I don’t think the Draft Local Plan is the answer. The majority of the proposed new housing (65%) is slated for Green Belt land. I find this totally unacceptable and I do not believe that GBC has properly and fully investigated the available brown field and other sites for this development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Finally, I object to the undemocratic process that has produced this plan. We have just had a referendum on this country’s membership of the European Union. Whether one is in favour of leaving or remaining, it was right to give the electorate a direct say in such a momentous decision.

Yet a decision of this magnitude, which has far-reaching implications on local life, should not be in the hands of a few elected officials.

So GBC, do the right thing. Accept that a majority of the electorate are against it. Hold a poll to confirm that this is the case. Accept that the plan is flawed and think again.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
In this latest version of the Plan, Guildford Borough Council has totally ignored the views of tens of thousands of their constituents (including my own) who wrote with objections last year in the hope that they might have some influence over the process.

Specifically, it is with regret and anger that I note that no changes are being proposed since the 2016 consultation in terms of removing (in planning double speak I believe this is called “insetting”) parts of West and East Horsley from the Green Belt. This means that several sites that are currently protected by their Green Belt status will be available for housing developments and these are in addition to those sites already earmarked in the Plan as suitable for development.

I further believe that the proposed housing target is flawed and the process has not been transparent with the Council refusing to publish details of evidence, data and assumptions used in reaching the target figure.

This flawed “evidence” is being used to justify over-expansion, particularly in the Horsleys, where local services and infrastructure are insufficient for the proposed numbers of new homes. The Plan has failed to include measures to improve the sustainability of development these sites.

Deletion of the constraints on housing density in Policy H1 is a retrograde step and will give developers a free hand to use land inefficiently (but at maximum profit for them) and the policy relating to AONBs serves only to weaken the current protection against inappropriate development.

The Council in my view has failed to prioritise the use of brownfield sites in urban settings for housing and is instead intent on compromising the Green Belt against the wishes of a large majority of borough residents.

Instead, these brownfield sites, especially in Guildford, are being allocated for retail and commercial development. I don’t believe we need more shops; we need more affordable housing in suitable locations, with good transport links and local services.

The Council’s website encourages residents to “help shape the borough’s future” by commenting on the Local Plan. However, the latest version of the Plan shows very little if any evidence that the Council is listening to the views of local people.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/4917  Respondent: 8654849 / David Wilkinson  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
• ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
• adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: PSLPA16/1317  Respondent: 8655233 / Kay Mackay  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Guildford New Local Plan

Transport June 2016 Topic Paper

Policy Infrastructure and deliver

- Existing infrastructure problems must be solved before any more development is permitted
- Not clear where the funding for new infrastructure need will come from nor whom will provide it.
- Economic viability clause weakens policy, development should not be allowed if infrastructure cannot be provided.
- Existing road already inadequate or under pressure and would worsen with the planned development reducing quality of life, A247, Send,

Policy

- New rural development is car dependent and inadequate/unsafe cycle routes and footways resulting in more traffic accidents.
- Scale of proposed development is too much for local infrastructure/
- The A247 experiences a significant accident rate including many minor accidents associated with peak time traffic, off peak accidents associated with speeding, vehicles mounting the payment.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/1320  Respondent: 8655233 / Kay Mackay  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. The housing needs assessment is flawed in various respects and overstates housing need. In addition since it was produced, the referendum Brexit decision has almost certainly reduced future housing need and rendered the previous assessment seriously out of date. As a result any assessment of Green Belt sites which took place to consider whether “exceptional circumstances” existed to outweigh the harm to the Green Belt was based on false premises and should be reconsidered.

2. Having determined housing need the Council was entitled to consider constraints before determining the housing number. I believe that as III as being entitled to do this the Council was required to give proper consideration to
constraints. The scarcity of sites outside the Green Belt as ill as infrastructure (most notable roads) considerations all represented constraints which should have been taken into account in determining the final housing number. Accordingly in this regard our objection to the allocation of Green Belt sites is twofold. First I believe constraints should have been applied. Secondly I believe the Council did not properly consider constraints and that their decision making process was flawed and thus subject to being set aside by the Inspector.

3. Even if having properly applied constraints there is a need to develop in the Green Belt then specific Green Belt sites should not be included in the plan unless “exceptional circumstances” for development are proven in relation to that specific site, as stipulated repeatedly in the NPPF. The Green Belt should trump short-term considerations such as perceived housing need, as case law has established. There needs to be a specific balancing exercise conducted on each Green Belt site weighing the harm to the Green Belt against the very special circumstances which are argued in favour of development at that particular site. There is no evidence this has been done. Instead the council have appeared to say that having chosen a housing needs figure and decided it cannot be met without building on Green Belt then there is no need for any further consideration and any convenient Green Belt site can be allocated for building at will.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Answer (if comment is on questions 1-7 of the questionnaire): ()

1. **APPENDIX D**

   I OBJECT to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)

   1. The “objectively assessed need” figure of 693 homes a year is too high.
   2. A professional review by NMSS has concluded that, even basing the calculations on a period of stronger economic and student growth, the housing need figure should be revised down to 510 homes a year and the method changed to consider student housing need separately due to the distorting effects.
   3. The current SHMA inflates the proposed housing figure due to

      - failure to correct for errors in the historical data for international migration flows,
      - issues with the way it considers students and affordability and
      - flaws in the method for estimating the number of homes needed to support job growth.

   1. It is unacceptable that demographic and economic model assumptions have been withheld and cannot be checked making the process unaccountable.

The Plan’s proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the borough, it is over double the previous figure of 322 used in previous plans. The SHMA report methodology is I believe inaccurate; it inflates the needs of the borough by distorted student numbers. However, it is based on commercially
confidential modelling assumptions that cannot be checked or reviewed. There is no transparency to this evidence base and it is therefore impossible to assess its accuracy. This is not democratic and is not appropriate for consultation of the Plan.

The National Planning Policy Framework allows the overall housing target to be reduced to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** PSLPS16/2372  **Respondent:** 8655233 / Kay Mackay  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A25

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. **POLICY A25 - Gosden Hill Farm**

I OBJECT to Policy A25 with proposals for Gosden Hill Farm.

The Green Belt at this point serves the important function of separating West Clandon from the edge of urban Guildford. Development here will cause the two to coalesce defeating one of the objectives of the Green Belt. If this development proceeds I believe the narrow strip of Green Belt remaining between Guildford and Clandon at this point will be too narrow and will come under further pressure.

It will represent an undesirable ribbon development along the A3. It will be highly visible from the A3 when approaching Guildford and will, in conjunction with A43a at Garlick’s Arch give the appearance of almost continuous development from Send through to Guildford.

The Plan does not put forward any evidence that exceptional circumstances exist to justify removing this site from the Green Belt.

The development will overburden the local road network and increase congestion on the A3 and A247 through the centre of West Clandon. This is already very heavily used whilst being unsuitable for designation as an A road. In places it is too narrow for two lorries to pass causing them to mount the pavement.

Note the following accident data:

2010 – 2014 from Crashmap data

- Clandon Cross Roads Area to Bulls Head - 17 incidents
- Bulls Heads Head to Bennett Way - 8 incidents
- Bennett Way to Highcots Lane - 15 incidents
- Tithebarn Lane to Portsmouth Road Birch Close - 8 incidents

2015

- 21 Oct 2015 – A247 near shell garage - Three vehicles collided causing delays
Surrey Fire and Rescue deployed.

2016

- 15 April 2016 12 year old boy injured in The Street – A247 closed in both directions
- 28 April 2016 A3 West Clandon London bound between A247 Tythebarns Lane (Burntcommon and M25J10 (Wisley Interchange) congestion on A3 to A3100 Clay Lane Burpham
- 30 6 2016 Motorcyclists with injuries airlifted to hospital Send Marsh Road

Attempts have been made over many years to reduce traffic, traffic speeds and accident risks through West Clandon, however little has been achieved as the road cannot be widened and SCC is reluctant to impose further speed limits as congestion is already very high.

I object most strongly to the proposal for a link road to bring traffic from the Gosden Hill development to the proposed 4 way junction at Burnt Common. This has the potential to generate large volumes of traffic (including commercial vehicles) on the A247 through West Clandon - a road which is already under traffic stress (see below).

The land in Gosden Hill does exactly what the Greenbelt was designed to achieve. It provides a green buffer between the Guildford Urban Area and West Clandon, gives Burpham a defined green boundary and breathing space and it hides Guildford town from visitors until they pass the off-slip to Burpham.

No exceptional circumstances have been demonstrated for building on this site and therefore it does not comply with paragraphs 87-89 of the NPPF. It stops the sprawl of Guildford town, assists in safeguarding the countryside from encroachment and assists in urban regeneration by encouraging the recycling of derelict and other urban land. All of these are requirements of the NPPF.

The scale of Gosden Hill is out of proportion to West Clandon. It would have four times the amount of housing plus shops, offices/factories, GP surgery, schools. Development on this scale would blight a historic village with a history going back to the doomsday book and beyond.

Gosden Hill is the most obvious location for the north end of an A3 tunnel. It has rising ground and is situated just before the urban area. If it is built on, it will be very difficult to construct a tunnel.

The development will generate in the region of 6,000 vehicles which will pour on to the A3 which is stationary every day during rush hours. The linking of the A3100, B2215 and A247 would channel thousands of cars through the narrow, winding road through West Clandon, a road where large lorries mount the pavement virtually every day and through Send and Ripley which are also severely constrained.

The volume of traffic will greatly increase air pollution which is particularly critical given the proposal to build two schools.

Currently, a two way junction at the site would require vehicles wanting to go north on the A3 to go through Burpham which is grid-locked every day.

Burpham’s sewers are at capacity. Sewage would have to be pumped to Slyfield for processing, a project of enormous cost.

There is inadequate fresh water in Guildford and current supplies could not meet the needs of a development of this size.

Electricity supply is also inadequate and would require a big infrastructure development.

The railway station was rejected by Guildford Borough Council in 1984 because it feared Gosden Hill would become a dormitory estate for London.

The wording of the Local Plan with regard to Gosden Hill is so loose that the developer could virtually do whatever it wants.
The remaining agricultural land between Gosden Hill and West Clandon is so small that it is highly likely to be uneconomic and therefore a prime candidate for further development which would roll the Guildford Urban Area over West Clandon towards East Clandon and Wisley.

If the Strategic Sites are developed, the north of Guildford will deliver 36%, 5,036 houses towards the total of around 14,000. The infrastructures of the existing villages and the A3 will be overwhelmed by the scale of development.

A new on-slip at Burpham would only be 1.8km from the on-slip at Burnt Common which is against Highway England’s requirement of 2km.

Development of the A3 at best will not start until after 2020 and the building of a tunnel, which is only an “aspiration” in the Local Plan, is likely to be many years after. In the meantime given that developers build houses to provide cash-flow for infrastructure, Gosden Hill will have a crippling effect on villages like West Clandon and the A3.

Gosden Hill already has surface water problems. Merrow Stream crosses the site. No hydrological survey has been carried out to assess the implications. Electricity pylons run through the centre of Gosden Hill which have health and safety issues.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/2374   Respondent: 8655233 / Kay Mackay   Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. POLICY A43 AND A43a – Garlick’s Arch

I OBJECT to Policy A43 and A43a on Garlick’s Arch.

The site was only inserted in the draft plan at a late stage just before publication of the consultation draft which is a shabby way for the Council to proceed. The site is not a sustainable site being far from any infrastructure facilities and transport links. The bus service is infrequent and it is almost certain any future residents will rely almost entirely on cars for journeys. Similarly any employees at the employment areas will almost undoubtedly arrive and leave by car.

The site is susceptible to flooding and will not make a suitable site.

The Green Belt at this point serves the important function of separating West Clandon from Send. Building here will cause the two to coalesce defeating one of the objectives of the Green Belt.

I have seen no evidence that exceptional circumstances exist to justify removing this site from the Green Belt or that this important issue has been addressed. The Green Belt and Countryside study did not even consider this site.

It is understood the Council's eyes may have been turned by the possibility of receiving for free the land which might be used for new A3 slip roads in return for allowing this development, thus justifying it as some form of enabling development. However the slip road land if needed could be safeguarded in the plan and acquired by compulsory purchase when required. Lack of current funding for the slip road is not a justification for allowing the development of this site. If the slip road is genuinely needed then government funding will be available for it. (One of the reasons for turning down the so called enabling development proposal intended to fund the rebuilding of the Howard of Effingham School was that...
the redevelopment of the school was not essential. As and when it became essential Government funding would become available. Accordingly enabling development was not necessary. The same principle applies here.

The A247 running south past this site through the centre of West Clandon is already very heavily used whilst being unsuitable for designation as an A road. In places it is too narrow for two lorries to pass causing them to mount the pavement- often at speed. It has narrow bends with poor sight lines, an infants school and a hump-backed bridge concealing the entrance road to the station for southward traffic. In addition, there are no continuous footpaths which forces pedestrians to cross and re-cross the road. Development at Garlick’s Arch will only exacerbate the problem and make the road even more congested and unsafe for pedestrians.

The development will cause harm to the ancient woodland on and by the site.

Taken together with the Gosden Hill site, there will be a ribbon of development along the A3 in contrast to the current “soft” edge approach to Guildford.

Garlick’s Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8). There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).

The Plan states the preference is to making the best use of previously developed land. Yet at the 11th hour a perfectly acceptable brown field site at Burnt Common, capable of accommodating approximately 100 houses, was removed from the Plan and replaced with the Garlick’s Arch site. There was no proper consultation in relation to the inclusion of this site. Why was a brownfield site removed and replaced with a Greenfield site? There is no evidence that Section 18 of the Planning and Compulsory Purchase Act 2004, which requires local planning authorities to produce a Statement of Community Involvement, has been complied with for this site. This only came to light for local residents following a Council meeting on 11th May 2016.

Moreover, Guildford Borough Council’s own Green Belt & Countryside Report does not address Garlick’s Arch at all, so there is no evidence base to support the inclusion of this site.

National Planning Policy promotes sustainable developments, with sustainable transport. With ever reducing bus services in the area and no train station within reasonable walking distance it is impossible for any development on this site to offer a sustainable transport solution. Development on this site is wholly inappropriate (Policy I3).

The stream, which runs through the site, is identified as having a high risk of flooding by the Environment Agency. There are other sites that do not flood that can be developed and therefore this site should be removed from the Plan (Policy P4).

This site is bordered by Ancient Woodland and within it a number of trees are protected by Tree Preservation Orders (Policy D3).

The site has an abundance of wildlife, some of which are protected. It is home to many types of owls and bats, with the woods having cuckoos and woodpeckers. In addition there are regular sightings of badgers, deer and red kites. The development of the site will result in the loss of habitat. No wildlife report has been conducted on the site. (Policy I4)

It is clear that with this site being added at the 11th hours no infrastructure planning has been undertaken. The Infrastructure Schedule makes no provision for any infrastructure improvements for this site. How will the local services such as schools and doctors cope, many of which are already at capacity? (Policy I1)

Furthermore, several electricity pylon runs through the site, which will have the potential to be a health hazard for any residents.

I OBJECT to the inclusion of the land for new on/off ramps at Burnt Common (A43a)

The addition north facing ramps to the A3 at Burnt Common would be a disaster for local communities. There is no requirement for local traffic to access the A3 to the north, but the addition will draw in a huge amount of ‘through’ traffic.
The route from London/M25 to Woking or would now be through Burnt Common and Send. Equally traffic from the east of Guildford (Merrow etc) and the A25 will now go through West Clandon and Burnt Common. This will cause immense damage to those areas on small roads which cannot be improved.

This Plan does not address the needs of local communities or the Borough in this regard. There has again been no Section 18 consultation on this.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5227  Respondent: 8655233 / Kay Mackay  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I strongly object to development plans that are not necessary and have not taken into account the affect it will have on small villages, that will ruin the village structure.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5240  Respondent: 8655233 / Kay Mackay  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. POLICY D3

I OBJECT to the damage to the historic environment as a result of the scale of the proposed development (Policy D3)

I OBJECT to the local plan based on the impact it will have on the special countryside of the borough.

The proposed development at Garlick’s Arch (A43) will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
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<th>Comment ID: PSLPP16/5247</th>
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1. **POLICY D3**

I OBJECT to Policy D3 - Historic environment

I object to this policy as it is very weak and I do not think it is clear enough in its support for the conservation of the historic environment. It provides for development which will “enhance” heritage assets which I fear is a developer’s charter as it leaves plenty of room for abuse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D4</td>
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1. **POLICY D4**

I OBJECT to Policy D4 - Development in urban areas and inset villages

The policy should place much greater emphasis on residential development in the existing urban centres. In this way housing needs can be met without resorting to large developments in the Green Belt. There are urban areas in need of regeneration but these are ignored in favour of Green Belt development.

The policy should not be applied to the villages which should remain in the Green Belt. Unrestricted application of this policy to the villages intended to be inset will change their characters radically and for the worse. The development it encourages will increase traffic and congestion disproportionately.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. POLICY E1

I OBJECT to the sustainable employment policy (Policy E1)

I object to the inclusion of a strategic employment site at Gosden Hill Farm. Employment sites should be concentrated on previously developed land in more sustainable locations with good transport links where the infrastructure can support development. Warehousing, distribution and industrial premises cause considerable commercial traffic, noise, pollution and general disruption. They are not good neighbours for schools and 2000 houses. Many of the jobs will be taken by people outside the area leading to additional congestion in Burpham and on the A3.

I object to the inclusion of a strategic employment site at Garlick’s Arch. It is in a non-sustainable location remote from any facilities of any kind and with poor public transport links. It is unlikely jobs there will be taken by local residents and it is likely all travel to and from work will be by car adding to local congestion. Employment sites should be concentrated on previously developed land in more sustainable location with good transport links where the infrastructure can support development.

The site is in any event subject to frequent flooding and unsuitable for development.

If developed, the new employment site at Garlick’s Arch, Send Marsh/Burnt Common (A43), would be treated as a Strategic Employment Site.

The proposed development of up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8) at Garlick’s Arch (A43) is in the scheme of industrial development relatively small. Just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m. The Garlick’s Arch site which is in the Green Belt should not be developed as a Strategic Employment Site when there is a suitable alternative brownfield site very close by, which is far more sustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I strongly object to the fact that there are many empty industrial buildings in Surrey and therefore to build more that are not required when these could be utilised instead.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/5238  Respondent: 8655233 / Kay Mackay  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. **POLICY E2**

I OBJECT to the location for new employment floorspace (Policy E2)

I object to this policy. It would be more sensible to confine new office and research and development floor space to the urban Guildford area. I also oppose the policy of expanding the Research Park onto Blackwell Farm. No exceptional circumstances, as defined under the NPPF, have been advanced to justify incursion into this permanent and high-quality area of Green Belt.

Proposals for new industrial, warehousing and storage (use Class B1c, B2 and B8) floorspace will be directed to the Industrial Strategic Employment Sites.

There is no need for the new employment floorspace to be located at Garlick’s Arch or Gosden Hill Farm, when near to these sites at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/5239  Respondent: 8655233 / Kay Mackay  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
1. POLICY E5

I OBJECT to the loss of rural employment (Policy E5)

Policy E5 supports the retention and development of local services and community facilities in our inset and identified villages. Yet the development at Garlick’s Arch (A43) would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises. The Plan does not promote rural employment; rather it will result in the loss of existing local rural businesses.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/5252  Respondent: 8655233 / Kay Mackay  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E6

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. POLICY E6

I OBJECT to Policy E6 - The leisure and visitor experience.

The policy should acknowledge that whilst in some areas new and enhanced leisure facilities are valuable (for example the new Opera House at West Horsley Place Towers), much tourism depends on the undeveloped nature of Green Belt areas surrounding Guildford. Accordingly the policy should recognize that in many rural areas new and enhanced visitor facilities may be unnecessary and counterproductive, particularly away from existing buildings and development. For example the attraction of Newlands Corner is its undeveloped nature. Significant development of visitor facilities there is likely to diminish rather than increase its attractions. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment. Heritage sites and the Green Belt are particularly vulnerable to harm.

Tourism and visitors do not depend on new visitor “attractions” and could actually be damaged by them, as compellingly argued in the current debate over Newlands Corner. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment/“Disneyfication”. Heritage sites and the Green Belt are particularly vulnerable to harm.

Guildford has many “leisure and visitor attractions” already. The case for creating more is not made and no examples are given. Instead, the plan’s explicit priorities should be:

1. To protect the borough’s prime leisure and tourism asset, its countryside, from inappropriate development. This is all the more valuable because of its accessibility from London, the rest of Britain and the Continent, in that order. Rural residents are its custodians and require no Council interference. Economically, the most valuable forms of tourism, such as walking and cycling, require no new development. In the overcrowded South-East of England, lack of development is a leisure and tourism asset, not a liability.
2. To help make Guildford’s river landscape less off-putting and support town-break packages for high-value tourists. To achieve this, the policy needs to define what leverage, if any, Council planners have to influence normal tourism market mechanisms.
3. To help private providers market local tourism. This need not involve extra spending. The Council could, for instance, help co-ordinate ready-made, local tourism packages under a distinctive brand at an all-in price. An “English town break” (including B&B accommodation, a walking tour of Guildford, a pub lunch in the Surrey Hills, a visit to Wisley Gardens and a National Trust property and a Southwest Trains travelcard for a day out in London) would be highly attractive to many European visitors who currently by-pass Guildford to go to Bath, Oxford or Cambridge instead.

4. To rule out the redevelopment of scarce rural hotel sites (e.g. Thatchers, East Horsley, earmarked for 40 new houses under Site A37 of the plan yet just a short walk from the new opera house).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5246  Respondent: 8655233 / Kay Mackay  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E7

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. POLICY E7

I OBJECT to Policy E7 Guildford Town Centre

The policy “vision” describes protecting the Guildford’s unique setting and historical character and sets out some of the ways this will be done. However none of this is included in the formal Policy wording in the blue box. I suspect the Vision wording is effectively of little or any force. These principles should be included in the formal policy.

There should be a much greater focus on residential use of the town centre where many people would like to live and where the necessary amenities and infrastructure exist. The policy misses the opportunity to propose forward looking sustainable residential development plans in, for example the Walnut Tree Close area, where very significant numbers of new homes could be provided. Such town centre sites could meet much of the housing need over the plan period without harming the countryside.

There is an urgent need for a strategy to focus on brownfield redevelopment before considering development outside the existing urban area.

The policy does not address any of the major issues raised by the Council’s own Town Centre Master Plan, the Guildford Vision Group’s proposal for new river and rail crossings or plans for the redevelopment of Guildford Station, all of which are already the subject of public discussion.

The policy also fails to provide guidance on design requirements, as required by the NPPF.

The policy and surrounding text concentrates too much on shopping without regard to its nature which risks a proliferation of dull high-street chain stores. The policy should seek to enhance Guildford’s character and encourage a wider variety of small shops including locally owned businesses and shops of use to consumers. (For example there is no butcher in Guildford.)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. **POLICY H1**

I OBJECT to Policy H1 – Homes for all. Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan period. It fails to set rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions.

The housing mix is based on out-of-date, pre-Brexit projections and on assumptions set out in a flawed SHMA that has not been scrutinised or evaluated.

I support higher density development in the urban area, without resorting to dehumanising, high-rise buildings that developers commonly claim are necessary for financial viability. Much of Guildford town could usefully be regenerated with 4-5 storey blocks with landscaping and underground parking, as often seen on the Continent and, recently, in London.

Student accommodation should provided for 100% of new students and more than 60% of existing students, which would free up ideal family accommodation in the urban area. Other university cities (e.g. Oxford) insist on higher percentages than those proposed in the plan. In my view, the Council’s timidity is a case of “regulatory capture” by Surrey University, which has failed to use its existing planning permissions (dating from 2004) to accommodate 3,000 students or to improve the efficient development of its campus (e.g. by building on its extensive and under-used surface car parks). If all students were accommodated in this way, 2,000 homes would be freed up in town and there would be no need to build on the Hog’s Back.

It is not appropriate to release Green Belt land to house students who could be accommodated on the Surrey campus or other university sites. The plan should take account of the university's ability to house its own students and reduce the housing number accordingly.

Guildford borough has already a higher proportion of traveller sites than most comparable boroughs. Over-provision is inappropriate given other constraints.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. POLICY H2

I OBJECT to this policy on affordable homes (Policy H2) on the grounds of feasibility and that it should be more firm and explicit on unviability in paragraph 4.2.40.

In particular a scheme is only unviable if the value of developing the land (including some allowance for development risk and a normal level of profit) falls below the sale vale of the land for alternative non-premium uses such as agriculture. The price paid for the land is not relevant. The possibility of avoiding the affordable housing obligation through use of unviability arguments only serves to inflate land values. It will become clear that developments are unviable when developers start selling land for alternative non-development uses.

It should be noted in the plan that because of Guildford's relative popularity as a place to live combined with its location close to others towns and within the London Commuter belt no amount of building will meet demand. Similarly no amount of affordable housing will ever meet demand.

In addition the definition of an ‘affordable home’ is 80% of market value. With even a 2 bedroom flat in Guildford now having a market value of +£360,000 the discounted price is still not going to be affordable to anyone on a normal income.

And at what point will ‘affordable homes’ be able to go onto the market at full market price?

As we have seen with council houses it is not long before the discounted property is sold at full market value with the original owner simply pocketing the profit.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5250  Respondent: 8655233 / Kay Mackay  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. POLICY H3

I OBJECT to Policy H3 – Rural Exception Homes as this Trojan horse policy. It says that homes can be built anywhere near a settlement of any form (including agricultural land and the AONB). These homes are meant for people with a village connection, but they could be for anyone on the Guildford borough housing list. To make the housing viable, or to improve the “mix” this can include “market” housing (i.e. normal commercial development which in Guildford usually means large executive homes). This policy means building anywhere, and ignoring all historic planning restrictions.
The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove “exceptional circumstances.”

The wording of the policy is far too wide and drives a coach and horses through all other aspects of planning policy. As drafted the planning authority could be obliged to grant permission for inappropriate and unsuitable developments.

The wording provides no ability to balance the desirability of the development against other considerations including harm to the Green Belt or the AONB. (If the housing would meet identified need and adjoins a settlement under this policy wording permission would have to be granted even in the most sensitive AONB location, even if more suitable locations are available.) The policy should include the need for a balancing exercise including consideration whether more suitable locations exist.

The policy wording should not allow market housing. The ability to include market housing is likely to inflate land values, leading to a self-perpetuating need to include market housing. It may lead to spurious developer led proposals which will be difficult to resist.

The policy wording should define small, either in land size or number of units. I am concerned that if small is left undefined the policy could be used to justify significant developments. In the context of the plan a development of 150 homes might be argued as small. (If Wisley at 2,500 homes is a big development then 500 homes might be a medium development and 150 could be small.)

The policy wording should be restricted to adjoining sites or define the concept of being "closely related". In particular I believe adding the concept of safe and easy walking distance extends the potential radius within which sites will be argued to be “closely related” Many people would regard a mile or so as an easy walking distance. (School children are expected to walk further than that before being eligible for free school travel.)

The wording of the policy itself does not require the local connection requirement for tenants to be secured in perpetuity - only the affordability must be secured in perpetuity. (For example housing could be built for retired Cabinet Ministers under this policy so long as the first tenant was required to have a local connection.) The introduction to the policy mentions this point, but it is not part of the policy itself and may carry little weight at appeal.

The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove “exceptional circumstances.” The size and location of sites should be better defined and it should be clear market housing cannot be included.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5224   Respondent: 8655233 / Kay Mackay  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I strongly object to the fact that there has been no forward planning regarding the infrastructure with regard to water supply (water companies need 10 years advance warning of large supply requirements) which is under great pressure in the local area.

I strongly object to a plan that has made no extra provision for the pressure this will put on the local hospital with no provision or planning.

I strongly object to a plan that has made no provision for waste disposal of the large developments.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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I OBJECT, due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1)

Our villages are already suffering from severe congestion for much of the day, for example the Newark Road & Rose Lane junction in the centre of Ripley and the A247 through West Clandon. The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.

Furthermore, many of the country lanes around the villages of Ripley, Send and Clandon are narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition.

I OBJECT to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces.

Many of the affected villages, such as West Clandon, already suffer from traffic congestion. Further development around these villages will only result in more traffic and more parking problems.

With some 5,000 houses being proposed close to the village of Ripley, the roads serving the village will become even more congested. Cycling has become an ever popular past time, particularly at weekends hundreds of cyclists past through the villages on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road accidents involving cyclists as a result of the development proposed under the local plan.

The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the road becoming ever more dangerous for pedestrians.

The council has a statutory obligation to protect the public and the additional traffic flows will bring added accidents, noise, pollution and injury of the public. In the case of West Clandon the Street often only has a narrow footpath on one side of the road making it very dangerous, especially when vehicles mount the pavements.
This policy as it is inappropriate and inadequate and fails to respond to the challenges raised by the proposed significant Green belt developments. The borough’s infrastructure is already heavily strained. However the plan’s determination to build large housing estates across the Guildford countryside significantly increases the need for infrastructure investment without securing the means for its provision. Placing housing in the established urban areas would reduce the need for enhanced infrastructure as would a more realistic housing number.

The policy wording says nothing about roads and traffic. The Council’s methodology for assessing traffic congestion - averaging it over periods of several hours and ignoring the effects of junctions - simply hides the problem, which will get worse as development proceeds. The schemes referred to in this policy will not solve existing congestion and the local road network has not been given sufficient consideration. Some proposed development locations would require highway schemes that are unlikely ever to happen.

Adequate infrastructure provision is a pre-condition of sustainable development. But in this plan it is an afterthought buried away in Policy I1. By prioritizing greenfield over urban, brownfield regeneration, the plan creates insurmountable (and unnecessary) obstacles for itself. Common sense suggests a local plan should first assess the borough’s infrastructure capacity for sustainable development, and then tailor development accordingly. This plan, however, assumes infrastructure will follow on the heels of housebuilding as if by magic. It makes implementation critically dependent on providers outside the Council’s control and on the vagaries of CIL income. Instead of recognizing this as a key constraint, the plan is based on hope. It is also highly likely that developers faced with the imposition of large infrastructure requirements will go to court to invoke the NPPF provision that prevents authorities from imposing conditions that make a development non-viable.

Policy I1 requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.

Despite the Garlick’s Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents’ in the locality will see their quality of life significantly deteriorate in many ways.

Many of the utilities in the Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers. No plans to improve these services should mean no development of the Garlick’s Arch site.

Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are already at capacity and suffering from funding cuts or freezes. Any further development without funding will place further stress upon existing health services.

Police services are seeing funding reduced. The development of the proposed 13,860 homes during the plan period will stretch the police services further and is unsustainable.

There is no provision of the increased capacity of Guildford hospital, where is this assessed and remedied?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
1. POLICY I2

I OBJECT due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2)

I object to this policy as it is too vague and optimistic. Significant improvements to the road infrastructure are like to be many years away even if they ever happen. The draft plan, however, commits to building massive housing estates in the countryside before any of these road improvements are in place. This is inappropriate and will lead to massive traffic disruption during the construction phase and will add permanently to an already congested network (about 3,000 private cars from the 2,100 new homes at Wisley Airfield alone).

Road infrastructure represents a major constraint that should have been applied to the housing target at a much earlier stage in the plan process and not left as an unresolved difficulty in the draft plan.

There is no certainty that either the A3 or M25 in the borough will be improved to increase capacity and reduce congestion during the Plan period. Highways England has no plans to even examine improving the A3 before 2020. I have considerable concerns that development of the large residential sites identified at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), will take place before any improvements are made to the trunk road network. The A3 & M25 are already at capacity during peak hours and any development prior to improvement of these roads will only make the situations worse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/5223  Respondent: 8655233 / Kay Mackay  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Re: Responses to Guildford Borough Proposed Submission Local Plan (June 2016)

I OBJECT in the strongest possible terms to the Guildford Borough Proposed Submission Local Plan (June 2016). This Plan is unsustainable, unworkable and, in many provisions, unnecessary.

I set out below my objections to specific policies and matters within the Plan.

I strongly object to GBC Plan in that it has made no provision whatsoever in the Plan to protect the residents in West Clandon (A247) from the vast amount of increased traffic on a road that cannot possibly cope with the additional vehicles yet alone all the HGV’s that would be travelling backwards and forwards to these proposed sites in the building of the proposed developments.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
PODICY I3

1. I OBJECT to poor air quality concerns (Policy I3)

Paragraph 4.6.27 of the Plan states that “Development must also mitigate its traffic impacts, including its environmental impacts and impacts on amenity and health.” The significant level of development being proposed, particularly in the north east of the borough will lead to considerable further congestion, despite any attempts to mitigate this through travel plans. This will be particularly acute in built up residential areas and will only lead to greater levels of air pollution, which will have a detrimental effect on local residents and their health and can result in early death.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

1. POLICY P2

1. I OBJECT to not protecting the Green Belt (Policy P2)

This policy does not sufficiently safeguard the Green Belt even though Green Belt constitutes 89% of the borough and should be the cornerstone of all local planning policy. The Green Belt is not the Council’s to give away and once it is gone it is gone forever. Sacrificing areas of the Green Belt to a developer influenced growth agenda is a betrayal of future generations and does not constitute sustainable development.
The Green Belt should be protected in perpetuity, but Policy P2 seeks to justify excessive development in supposedly protected areas. This is in breach of party manifesto commitments and contrary to previous responses to public consultation. It is disreputable to argue, as the Council does, that the Plan would involve the loss of “only” 1.6% of the borough’s Green Belt. Leaving aside the reliability of that statistic, the NPPF does not set an “acceptable” percentage. The fact remains that the plan proposes that 65% of the housing plus industrial development be built on land to be taken out of the Green Belt.

Paragraph 4.3.16 is seriously deficient in simply stating that the Council considers that exceptional circumstances exist to justify amendment of Green Belt boundaries. The exceptional circumstances are not identified. It is clear from national guidance that unmet housing need is not on its own an exceptional circumstance. Even to the extent that exceptional circumstances exist, these have to be balanced against the harm to the Green Belt in the specific sites proposed to be taken out of the Green Belt. This balancing exercise appears not to have been done.

The Countryside Study which the Council may argue fulfilled the need to demonstrate the exceptional circumstances required to justify removal of areas from the Green Belt was a simplistic tick box exercise. Within limits it may have answered certain questions about different attributes of different areas of Green Belt but it did not carry out the balancing exercise needed to determine whether specific exceptional circumstances justified removal of specific areas of land from the Green Belt. I believe that each of the identified Green Belt site proposed to be removed from the Green Belt should be carefully assessed against any exceptional circumstances in deciding whether it should be removed from the Green Belt in the final plan. This exercise should bear in mind that housing need in itself is not an exceptional circumstance and nor is the Council’s growth aspiration. An important consideration is that more housing need could be met on urban sites than is currently planned. The Plan has fallen into the developers’ hands and developers prefer building on undeveloped land rather than brown field sites.

I note that the Summer 2016 edition of “About Guildford” (published by the Council) on page 5 states that “... the Plan rejects any schemes that would have a detrimental impact on the Green Belt.” This is demonstrably untrue and I consider this to be a deliberate untruth which compromises the consultation process. I would ask that this untruth be corrected and the consultation period restarted after the correction has been given the same distribution as the original statement. (I assume the document was delivered to most houses in the Borough.) I reserve the right to argue before the inspector that the consultation process was flawed and ineffective because of this.

I object to the “insetting” of 14 villages from the Green Belt. Contrary to assertions made in the Plan process many of these villages do contribute to the openness of the Green Belt and there is no need to inset them.

I also object to the wholesale extensions to the settlement boundaries in many villages to allow for infilling and that infilling is also proposed outside the settlement boundaries of 11 further villages. Many Guildford villages are linear. It is all too easy to square off boundaries by including countryside bounded on only one or two sides by existing development, claiming it contributes nothing to the “openness” of the Green Belt, a term which neither the plan nor the NPPF defines. The NPPF’s other 4 tests of Green Belt status, including the prevention of urban sprawl, are ignored. Effectively, this policy makes all villages within the Green Belt vulnerable to large blocks of new development and seems almost calculated to secure the rejection of the plan as a whole.

To “inset” two-thirds of the borough’s rural villages on the grounds that they no longer contribute to the purposes of the Green Belt is extreme and inherently implausible, given the borough’s location on the edge of Metropolitan London. I cannot see how such extensive areas fail to contribute to the purposes of the Green Belt under the NPPF, but this could quickly be the case if the proposed “insetting” and boundary extensions go ahead.

This policy is wildly disproportionate in terms of any foreseeable development need and has caused tidal waves of opposition from residents. It flies in the face of NPPF paragraph 17’s aim of “empowering local people to shape their surroundings” and other NPPF provisions.

Paragraph 4.3.17 states that “the general extent of the Green Belt has been retained.” I believe this should be deleted as an untruth.

In addition I OBJECT to the proposals to remove from the Green Belt the so called ‘strategic sites’ of W ready Airfield (A35), Gosden Hill Farm (A25) and Garlick’s Arch (A43) and all other strategic sites. National Planning Policy requires...
there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these sites and villages (as mere housing need does not constitute a ‘special circumstance’) to be taken from the Green Belt. Once taken from the green belt they will be lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached.

GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site.

Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5253  Respondent: 8655233 / Kay Mackay  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. SITES - POLICIES A1 TO A57

I OBJECT to all strategic sites proposed in the draft Plan to be built in the Green Belt.

1. I object to the identification and allocation of sites in this plan without regard to Green Belt, infrastructure or other constraints. The plan says that “allocating these sites does not grant planning permission for development.” However, each of the sites will be removed from the Green Belt and will be available in principle for development and non-Green Belt uses. The inclusion of these sites without detailed site by site justification shows contempt for the thousands of detailed comments the Council have received about individual sites ever since the Issues and Options consultation in 2013. The plan has hardly changed since the Council received 20,000 objections to its first draft plan in 2014. The Inspector considering the plan may conclude that the consultation has not been properly conducted.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5235  Respondent: 8655233 / Kay Mackay  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4
1. POLICY P4

I OBJECT to development in areas which are at risk of flooding (Policy P4)

National Planning Policy states that Local Plans should take account of climate change over the longer term, including factors such as flood risk. It goes on to say that new development should be planned to avoid increased vulnerability to the range of impacts arising from climate change.

The Plan states that in accordance with national planning practice guidance, the Level 1 SFRA has been used to guide development towards areas at the lowest risk of flooding and identify areas unsuitable for development. However, the document concludes that land outside of the area of flood risk is not capable of accommodating all of the borough’s identified development needs. A Level 2 SFRA has therefore also been produced and will help the Council apply the exceptions test (as described in the NPPG) as necessary to development proposals in areas at risk of flooding.

The site at Garlick’s Arch (A43) is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. Knowing the area well I am aware that this site often floods during the winter months and the flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5231  Respondent: 8655233 / Kay Mackay  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. POLICY S1

I OBJECT to this Policy as the development proposed will not be sustainable (Policy S1)

The NPPF states that the presumption in favour of sustainable development “should be seen as a golden thread running through both plan-making and decision-taking.” As the first policy in the Plan, Policy S1 ought to set a clear framework. Instead, no definition of “sustainable development” is given. The policy also fails to set out any principles for applying sustainable development in practice to local planning decisions, which often have serious long-term impacts.

The policy states that it aims “to secure development that secures the economic, social and environmental conditions in the area”. This fails to recognize that economic growth, social justice and environmental protection often conflict. The policy
does not say how each element is to be weighted or conflicts resolved. As a practical guide to the planning decision to be taken in the Plan period it is seriously deficient. The policy is likely to be used by developers to justify inappropriate developments on economic grounds. Under this policy, virtually any development will qualify as “sustainable”, in breach of the NPPF’s most important guideline.

Policy S1 is also seriously deficient in making no mention of the Green Belt. The Green Belt is a long term Government policy enshrined in primary legislation to protect green areas in perpetuity. The Green Belt is a living example of sustainable development in practice and is one of the most important factors affecting sustainable development in the area covered by the Plan and should be acknowledged in this policy. Policy S1 should include a commitment to protect the Green Belt from inappropriate development and to uphold Green Belt boundaries and protections. This would set at least one clear boundary to planning decisions. The Plan and the Council have treated the Green Belt as a developable land bank rather than as a constraint to development.

The commitment to approve planning applications “wherever possible” and “without delay” reveals the pro-development bias of the plan. Countervailing references to sustainability are so vague that the NPPF presumption in favour of sustainable development becomes a presumption in favour of any development at all.

This policy also ignores, as if they are inconvenient constraints, most of the 12 Core Planning Principles set out in NPPF paragraph 17.

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill Farm (A25) are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are also unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/5226  Respondent: 8655233 / Kay Mackay  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I strongly object to the fact that there are many brownfield sites in Surrey and Greater London that could be used to build homes and these should be used first and foremost.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5233  Respondent: 8655233 / Kay Mackay  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )

1. POLICY S2

I OBJECT to the Borough Wide Strategy (Policy S2)

The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

The housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.

The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guildford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

The assumptions and calculations in the SHMA are widely regarded as flawed and even before Brexit, produced an inflated housing needs number. The figure of 13,860 new homes is completely unsubstantiated. It has not been scrutinized by Councillors despite repeated requests for debate. The assumptions and calculations underlying the model are hidden, protected by a claim to intellectual property by a commercial sub-contractor used in preparing the SHMA. I have serious doubts about the objectivity of the SHMA because it has been produced by consultants whose website openly proclaims their pro-development agenda leading to reasonable suspicion that the figures are inflated. Guildford’s OAN is not
transparent but has been taken on trust by the authors of the plan. Given that almost every element of the plan is predicated on this OAN, the plan as a whole cannot be considered “sound”.

The status of the 13,860 figure is ambiguous. The Council has said that the housing number and the OAN are identical because the OAN is “deliverable” and is by definition objective and cannot be contradicted. The OAN is only deliverable because of the Council’s cavalier approach to the Green Belt in contravention of the NPPF, ministerial statements and local and national Conservative Party manifesto commitments. The plan also states that infrastructure or other constraints may in due course affect deliverability. It is also unlikely that the number of houses can be built at the rate proposed. In recent years, housing starts have on average been less than half the proposed rate. This is not because developers do not have the land or cannot get planning permission. Constraints in the supply chain and maintaining profit levels have been more important.

The plan cannot be considered “deliverable”. In addition, the number of homes proposed, plus existing planning permissions, plus expected “windfall” sites, exceeds the total of 13,860. So how many homes (taking account of these adjustments) do the Council want built? The plan does not say. Without this figure it is hard to see how anything else can be planned. This undermines the validity of the whole consultation. It is unreasonable to ask the public to approve a “plan” that fails to propose a target number that takes all the standard constraints and adjustments realistically into account, leaving the Council to set one without further consultation. Even if the OAN is not flawed, it is at best only a baseline figure and should not be passed off as a policy proposal.

It is unreasonable to embark on a radical transformation of the borough on the basis of an unclear housing target. Most of Guildford Borough is highly protected from development (89% Green Belt, 44% AONB and about 75% protected by SPA). Whether or not increasing the number of dwellings by up to a quarter is desirable, it would be a major and irreversible change, arguably turning a largely rural borough into a mainly urban or suburban one like Woking. The scale of the housing number increases the onus for it to be seen to be sound. A substantially lower number, on the other hand, would remove the need to build on Green Belt or open countryside, and instantly meet the single biggest public objection to the plan as a whole.

The Plan in general and this policy in particular does not address the point that Guildford exists as part of London’s commuter belt. Any increase in supply of housing in Guildford, particularly if the increase is proportionately greater than elsewhere in the commuter belt, will simply result in a shift of population into the area. It will not reduce prices or increase availability except imperceptibly. The Plan also ignores the point that many of those working in the area live elsewhere. Accordingly in considering the housing number the Plan should take into account that in this part of London’s commuter belt, demand for housing is, in practical terms, unlimited.

This policy does not take proper accounts of the constraints to development which exist, principally posed by the Green Belt and by infrastructure limitations. I believe the Council is under a duty to properly consider applying these constraints. It is clear the Council has failed to do this. This approach differs from all the other boroughs in Surrey. The Plan appears to have deliberately been manipulated towards a growth agenda without disclosing why this is being done. The housing that is needed should be concentrated on urban brown field sites and through increasing the housing density of existing built up urban areas.

The development of 13,860 homes in the Plan period with 65% in the Green Belt does not constitute sustainable development. It will have a permanently detrimental impact on the Borough in general and on West Clandon and surrounding area in particular. The developments at Garlick’s Arch and Gosden Hill Farm do not meet the needs of the local communities. The road infrastructure in and around West Clandon will be unable to cope with additional demand. The edge of urban Guildford will creep that much closer to West Clandon, thus negating the purposes of the Green Belt in the area which include safeguarding the countryside from encroachment, checking the unrestricted sprawl of large built up areas and preventing neighboring towns merging into one another.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill Farm (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of
identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/886  Respondent: 8655233 / Kay Mackay  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. Questions posed by Guildford Borough Council as part of its consultation.

Questions from GBC

24.A. Question 1: The evidence base and submission documents

The Proposed Submission Local Plan: strategy and sites is based on up-to-date evidence. The evidence base documents contributing to the preparation of the plan are listed and can be found.

Do you agree that the evidence used for the Proposed Submission Local Plan Strategy and Sites is adequate, up-to-date and relevant?

ANSWER

I do not agree that the evidence used for the Proposed Submission Local Plan Strategy and Sites is adequate, up-to-date and relevant.

The fundamental driving forces for much of the development proposed in the Plan (particularly that on Green Belt land) are based on:

1. An excessive ambition to expand the local economy which is neither warranted nor wanted by the local population. Guildford is already one of the highest ‘value creation’ areas in the country and has one of the lowest unemployment rates. There is no evidence that massive and accelerated expansion is required.

1. SHMA figures which are neither transparent nor justifiable, especially in view of previous figures set. Independent assessments of the SHMA (eg from Guildford Residents’ Association and David Reeve) show it is set far too high and so cannot be said to be adequate, up to date or relevant.

In addition the recent vote to leave the EU and the impact this will have on the economy and migration have not been taken into account.

The Plan should be re-assessed and the methodology for arriving at housing need figures should be fully transparent.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** SQLP16/887  **Respondent:** 8655233 / Kay Mackay  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 2: Legal compliance

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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**24.B. Question 2: Legal Compliance**

Do you consider the Proposed Submission Local Plan: strategy and sites as a whole is legally compliant? Please provide the following information being as precise as possible:

- why you consider it is or is not legally compliant and
- what change(s) (if any) you consider necessary to make it legally compliant, explaining why this is the case.

**ANSWER**

I do not consider the Proposed Submission Local Plan: strategy and sites as a whole to be legally compliant because it mainly ignores the consultation process for the 2014 draft Plan it is claimed to be based on.

That consultation process was absolutely clear by some +20,000 responses that that Plan was flawed and no development should be carried out on Green Belt land.

Instead this 2016 draft Plan actually increases the number of dwellings being built on the Green Belt, in direct contradiction to the consultation process, yet is stated to be a Regulation 19 proposal.

As a result I do not see how the 2016 draft Plan can be Legally Compliant.

The 2016 draft Plan should be re-assessed and should take into account the views of the majority of responses from the consultation process for the 2014 draft Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** SQLP16/888  **Respondent:** 8655233 / Kay Mackay  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
Answer (if comment is on questions 1-7 of the questionnaire): ()

24.C. Question 3: Soundness

Do you consider the Proposed Submission Local Plan: strategy and sites as a whole to be sound? Please provide the following information being as precise as possible:

• why you consider it is or is not sound and
• what change(s) (if any) you consider necessary to make it sound, explaining why this is the case.

ANSWER

I do not consider the Proposed Submission Local Plan: strategy and sites as a whole to be sound, because, but not limited to, the following reasons:

1. "Only sites that propose sustainable solutions have been included in the Plan and the Plan rejects any schemes that would have a detrimental effect on the green belt." Summer 2016 edition of "About Guildford" (published by the Council) on page 5. This is demonstrably untrue and appears designed to bias the consultation process.
2. The housing OAN figure has been calculated by a process which is not transparent. It has not been properly examined by Councillors before being adopted.
3. The OAN has been adopted as the housing number without the application of any constraints to take account of Guildford's circumstances, including in particular the Green Belt, AONB and road infrastructure. National policy permits such constraints to be applied and it is inappropriate not to consider the need to do this.
4. The draft Plan does not accord with the NPPF policies on protecting the Green Belt.

Exceptional circumstances need to be shown to justify removing areas from the Green Belt and this has not been done. The housing need number is not justification in itself according to published ministerial statements. Having properly calculated an OAN, constraints should be applied to it to reflect the Green Belt, AONB and infrastructure. Each proposed Green Belt site then needs to be justified on its own merits. The benefits of the proposed development need to be identified together with the harm to the Green Belt. Only if there are exceptional circumstances and following a proper balancing exercise demonstrating that these exceptional circumstances outweigh the harm to the Green Belt can the proposal proceed. The draft Plan does not demonstrate that this has been done. The housing number has been used as a blanket justification for all Green Belt sites—amount to 65% of the proposed housing number.

1. Whatever the justification for the assumptions made in calculating the OAN, those assumptions are now almost certainly incorrect following the referendum.
2. The housing number is at least twice the achieved rate of building in the Borough over the last few years. There is no evidence in the Plan to show that this rate is achievable and sustainable.
3. Much of the infrastructure required to support the level of development proposed is outside the Council’s control. The Infrastructure Plan is long on possibilities and aspirations and very short on commitments. The infrastructure requirements placed on developers are supposed to be in place before development commences. This is utterly unrealistic and indicates a lack of knowledge of developer’s business models which depend on positive cash flow. It seems very clear that at best, infrastructure provision will seriously lag development and leave higher levels of congestion than now. This will reduce the quality of life for residents through congestion and disruption.
4. The 40-45% requirement for affordable homes together with infrastructure such as railway stations, park and ride facilities, schools and roads is highly likely to be challenged on a site by site basis by developers using the NPPF provision that Councillors cannot impose conditions which make development non-viable.
5. GBC has not included details of its Town Centre Master Plan and urban development proposals in time for and as a part of the Guildford Local Plan consultation
6. GBC has failed to provide an Infrastructure Report in time for and as a part of the Guildford Local Plan consultation
7. GBC has proposed an OAN of 693 houses per annum in the GL Hearn West Surrey Strategic Housing Market Assessment (SHMA) which many, including independent assessors, consider unsound.

8. Highways England will not start to consider what it intends to do as regards the A3 in the vicinity of Guildford until 2018.

9. Network Rail have not made available for the public consultation any plans for a new railway station at Merrow with an adjacent Park & Ride for 1,000 cars.

10. The GBC proposals for Gosden Hill Farm do not appear to be in coordination with the Neighbourhood Plan for Burpham.

11. The draft Local Plan will cause further linear development along the A3 between Burpham and West Clandon PC and encroachment onto open Green Belt countryside in clear conflict with the National Planning Policy Framework.

12. The proposal for Garlick’s Arch was added to the draft Local Plan without any prior consultation under Regulation 18.

13. The Land Availability Assessment (LAA) indicates a range of planning difficulties for Gosden Hill Farm and Burpham which have to be met by the developer involved. These include Electricity Grid supply problems and foul sewage and surface water issues that suggest the development proposed cannot easily be implemented both technically and financially.

14. No adequate explanation is given as to how the aspirational proposal for a tunnel will be used to overcome traffic issues relating to the quality of life and amenity of Burpham, West Clandon, Send and Ripley citizens.

15. In common with many others I do not believe the housing figure has been properly calculated and I believe it overstates housing need. The Council has prevented councillors or others from properly considering the SHMA by refusing to make public the basis on which it was drawn up.

16. The housing figure, when properly recalculated, should be subject to constraints to reflect Guildford's circumstances, including in particular the Green Belt and road infrastructure. National policy permits such constraints to be applied and it is inappropriate not to consider the need to do this.

17. Even once a housing number has been calculated it cannot be used to justify taking land out of the Green Belt on a wholesale basis.

18. Cast iron commitment should be included in the plan that development can only commence when required infrastructure improvements have been secured.

19. The status of the text which accompanies each policy box is not clear. If the accompanying text does not have the force of policy a number of the policies (i.e. the text in blue) are so vague and general that they commit the Council to very little.

The draft Plan should be re-assessed with housing on brownfield sites made a priority over commercial development and Greenfield sites and each of the above points addressed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
24.D. Question 4: Duty to cooperate

Do you consider the Proposed Submission Local Plan: strategy and sites as a whole has complied with the Duty to cooperate? Please provide the following information being as precise as possible:

- why you consider it has or has not complied with the Duty to cooperate and
- what change(s) (if any) you consider necessary to make it comply with the duty to cooperate, explaining why this is the case.

ANSWER

I do not consider the Proposed Submission Local Plan: strategy and sites as a whole has complied with the Duty to cooperate.

This 2016 draft of the Local Plan clearly demonstrates Guildford Borough Council’s refusal to co-operate with the wishes and requirements of the vast majority of the residents in its Borough.

The Council has failed to co-operate with the results of the consultation process for the 2014 draft Plan which was meant to inform and guide this 2016 draft Plan.

Despite campaigning on a clear statement ‘Conservatives Say Green Belt To Stay’, the ruling party on GBC is now intent on pushing through a Plan which will devastate Green Belt land and extend the Guildford Urban Area to further merge into surrounding rural villages.

This is not cooperation by any definition.

In addition the Council has failed to cooperate in providing any transparency to the housing need figures commissioned by the Council from GL Hearn.

The 2016 draft Local Plan should be reassessed with a reviewed and transparent SHMA and revised to reflect the views of the residents of the Borough, who pay for Guildford Borough Council to act in their interests, and not those of developers and central government.

I trust that the objections made above are fully taken into consideration and that the 2016 draft Local Plan is amended accordingly.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
1. I object to the changed policy A43 Garlick’s Arch for 400 homes and 6 travelling show people pitches
2. It ignores all the thousands of previous objections made by local people
3. There is no proven demand for travelling show people plots in this location
4. There is no need for putting houses on this site because the local plan housing target is incorrect and inflated and ignores constraints.
5. The allocation of 28.9 ha is an excessive land grab into the Green Belt. If we take a normal density of 30 homes per ha and it is at the end of the day proven that there is a need for 400 homes in this location the land requirement is 13 ha not 28.9 ha which is more than double. This replicates a similar over land grab at Burnt Common where the factor is 7 times the land required.
6. This confirms the worrying impression that GBC have a pre-determined policy of building on the Green Belt at every opportunity. The arithmetic does not stack up. One would have thought that they would as custodians of the green Belt be intent on conserving it rather than exploiting it.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/4705  Respondent: 8655233 / Kay Mackay  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
7. The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

8. Garlick’s Arch (A43) is in an unsustainable location. It does not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. The site is unsuitable due to lack of access to sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick’s Arch in the Infrastructure Plan. Residents will be dependent on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

9. The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

10. I object to the proposal to remove Garlick’s Arch from the Green Belt. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for this land to be taken from the Green Belt. Once taken the green belt is lost forever. There is a real danger that the loss of this Green Belt will result in urban sprawl and the neighbouring villages merging into one another. The significant development in West Clandon, Send and Ripley will result in the character of these villages being lost and the countryside encroached.

11. I object to the development at Garlick’s Arch because of flood risk. The site at Garlick’s Arch is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. Knowing the area well I am aware that this site often floods during the winter months and the flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.

12. I object to the loss of rural employment on the site. The development at Garlick’s Arch would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises.

13. I object to the potential loss of Ancient Woodland on the site. The proposed development at Garlick’s Arch will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees that existed in the year 1600.

14. I object due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1). Our villages are already suffering from severe congestion for much of the day, for example the Newark Road and Rose Lane junction in the centre of Ripley and the A247 through West Clandon. The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.

15. Furthermore, many of the country lanes around the villages of West Clandon, East Clandon, Ripley, and Send are narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition. I object to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces.

16. Many of the affected villages, such as West Clandon, East Clandon, Send and Ripley, already suffer from parking problems. Further development around these villages will only result in more traffic and more parking problems.

17. With some 5000 houses being proposed close to the villages of West Clandon, East Clandon, Send and Ripley, the roads serving the village will become even more congested. Cycling has become a popular past time, particularly at weekends hundreds of cyclists past through the village on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road accidents involving cyclists as a result of the development proposed under the local plan.

18. The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the roads becoming ever more dangerous for pedestrians.

19. I object to the lack of proper infrastructure planning for sites (Policy I1). Policy I1 requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.
20. Despite the Garlick’s Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents’ in the locality will see their quality of life significantly deteriorate in many ways.

21. Many of the utilities in the West Clandon, East Clandon, Burpham, Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers. No plans to improve these services should mean no development of the Garlick’s Arch site.

22. Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are already at capacity and suffering from funding cuts or freezes. Any further development without funding will place further stress upon existing health services.

23. I object due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2). There is no certainty that either the A3 or M25 in the borough will be improved to increase capacity and reduce congestion during the Plan period. Highways England has no plans to even examine improving the A3 before 2020. I have considerable concerns that development of the large residential sites identified at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), will take place before any improvements are made to the trunk road network. The A3 & M25 are already at capacity during peak hours and any development prior to improvement of these roads will only make the situations worse.

24. I object to poor air quality concerns (Policy I3). Paragraph 4.6.27 of the Plan states that “Development must also mitigate its traffic impacts, including its environmental impacts and impacts on amenity and health.” The significant level of development being proposed, particularly in the north east of the borough will lead to considerable further congestion, despite any attempts to mitigate this through travel plans. This will be particularly acute in built up residential areas and will only lead to greater levels of air pollution, which will have a detrimental effect on local residents and their health.

25. I object to the inclusion of the land at Garlick’s Arch, Send Marsh/Burnt Common and Ripley (A43). Garlick’s Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8). There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).

26. It is clear that with this site being added at the eleventh hour and no infrastructure planning has been undertaken. The Infrastructure Schedule makes no provision for any infrastructure improvements for this site. How will the local services such as schools and doctors cope, many of which are already at capacity? (Policy I1)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
build 7,000 sq m at Burnt Common this development would only require 1.4 ha at a standard plot ratio density of 50% not 9.26 ha. There is no justification for zoning an additional 7.86 ha in the Green Belt.

4. There is in fact no justification for building any more industrial development in the borough particularly at Burnt Common. The current industrial pipeline of granted consents of 38,357sqm in B1c, B2 or B8 use class space is double the 19,000 sq m said to be needed by Aecom who justify the need for new space on top of the existing pipeline by a completely unsubstantiated suggestion that “there is the possibility that some pipeline developments may not come forward at all, or be developed in different quantities by use class than has been consented.”

5. There is no need to build industrial or warehouse development in the middle of the Green Belt when Slyfield and Guildford still have empty sites and industrial units.

6. The 2017 Employment Land Need Assessment shows a reduction in demand to 3.9 hectares for industrial land for the whole borough not a huge over allocation of 9.26 hectares at Send in the Green Belt.

7. The Employment Land Needs Assessment update 2017 (ELNA) states “that the pipeline for employment floorspace defined by planning permissions yet to be implemented and prior approvals suggests the potential for an additional 33,607sqm of B use class floorspace to come forward. This figure comprises a net loss of 4,750sqm of B1a use class floorspace and a net gain of 38,357sqm in B1c, B2 or B8 use class space.”

8. 38,357 sq m of B1c, B2 or B8 use class is quite sufficient supply for the plan period and is in fact more space than the 3.9 ha of industrial land that is said to be needed for the plan period by Aecom. Since if you were to develop 3.9 ha at a plot ratio of 50% it would provide new industrial development of 19,000 sq m approximately half of current planning permissions granted. This does not justify the need for new development of industrial space on the Green Belt in such areas as Burnt Common.

9. The reality of demand for industrial space is that it is both nationally and locally in decline and this is evidenced by old existing permissions that have not been taken up and developed. The ELNA alludes incorrectly to the poor quality of existing space being a “constraint” on supply and fails to acknowledge that this assertion cannot apply to potential newly developed space e.g. the undeveloped pipeline of 38,357sqm.

10. The impact on small surrounding roads will create traffic gridlock.

11. It will join up existing villages and defeat the purpose of the Green Belt.

12. The ongoing poor quality of the updated research undertaken by Aecom in the Employment Land Needs Assessment 2017 does not support industrial development on land in the Green Belt at Burnt Common.

13. The Aecom research is generally superficial and lacks sufficient detail and analysis between B1c, B2 and B8 use classes and no reliable individual analysis has been undertaken of the widely different supply and demand dynamics of light industrial, general industrial and warehousing and distribution floor space.

14. The potential inclusion of a waste management facility mentioned at paragraph 4.4.23a lacks enough detail for proper consultation and is completely inappropriate.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Do you consider this section of the document; complies with the Duty to Cooperate? ( No ), is Sound? ( No ), is Legally Compliant? ( No )

Answer (if comment is on questions 1-7 of the questionnaire): ()
If residents come first then much of what is proposed would be scrapped. And the biggest issue facing these proposals is safety. We have 2nd class roads that are A roads which are totally unsafe. This can not be legally compliant and is unsound.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/3153  Respondent: 8655233 / Kay Mackay  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The Plan now states: “the presumption in favour of sustainable development will not automatically apply to policies relating to sites protected under the Birds and Habitats Directives and/or designated as Sites of Special Scientific Interest (SSSIs), land designated as Green Belt, Local Green Space, the Surrey Hills Area of Outstanding Natural Beauty, designated heritage assets and locations identified as at risk of flooding.”

Gosden Hill and Blackwell Farm (both currently in the green belt) are called “urban extensions” surely a euphemism for urban sprawl? Garlick’s Arch and Burnt Common developments take land from the green belt to extend Ripley/Send. One of the important specific purposes of the green belt is to prevent urban sprawl.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/10  Respondent: 8655233 / Kay Mackay  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( No ), is Sound? ( No ), is Legally Compliant? ( No )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Guildford Borough Council have a duty to the residents to protect the environment, to protect green belt land, to protect residents and their families. This fails in every area. There is no case for taking villages such as Send, Ripley, Burnt Common and part of West Clandon out of the Green Belt. There is no case to extend the University if it impacts on residents in the area. The roads in this area are over flowing with traffic and at times is almost at a standstill. To protect put in policies that mean people can not enjoy the Countryside, can not sit in their gardens because of noise pollution is not compliance.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Scrap the proposed building on Green Belt and use the brownfield sites. Stop expanding the University at the cost of residents.

Attached documents:

Comment ID: pslp17q/633  Respondent: 8655233 / Kay Mackay  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Question 4: Duty to cooperate

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The NPPF states para 155: “Early and meaningful engagement and collaboration with neighbourhoods, local organisations and businesses is essential. A wide section of the community should be proactively engaged, so that Local Plans, as far as possible, reflect a collective vision and a set of agreed priorities for the sustainable development of the area, including those contained in any neighbourhood plans that have been made.”

The changes in this latest version of the Guildford Local Plan show little or no willingness of Guildford Borough Council to reflect a collective vision. Despite the many thousands of responses to previous versions of the Plan which overwhelmingly rejected building on Green Belt land this latest version has as much, if not more, building on the Green Belt and increased problems of infrastructure and traffic which will bring increased noise and air pollution and danger to residents.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/1395  Respondent: 8656417 / Allan Howlett  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A42

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to Policy A42 of the Local Plan because you have ignored my original objection and increased the number of houses from 45 to 60 houses. This will further increase the traffic entering Send Barnes Road. This road and intersection is already too narrow to take the existing traffic. The footpath at the nearby traffic lights is far too narrow, this footpath is used by mothers and children on the way to and from school. The path is so narrow that mothers cannot walk side by side. This is an accident black spot about to happen. This development is a further erosion of the green belt, which the Prime minister has said will not happen.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
I object to policy A43, the development of 400 houses at Garlick's Arch. This is a huge development to be built on the green belt. This is unreasonable and out of all proportion to local needs. The Old Portsmouth Road from Burnt Common to the A3 roundabout is already overloaded. The intersection in Ripley regularly blocks solid during busy periods as does the slip road onto the A3. At the Burnt Common intersection the roundabout is regularly blocked with queues in all directions trying to feed from and on to the A3 slip into and onto Send Barns Lane.

I also wish to object to the setting aside for travellers and show people. There is no justifiable need. Your addendum notes state that you determined the need by 'asking them' very scientific. They children and mothers on these uncontrolled sites are particularly denied access to proper healthcare, and education. We need to break the cycle and provide permanent occupation, close to the services they need. Local services are already overloaded, local children already have to be bussed out of the area for their education.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attended documents:

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I object to Policy A58 the construction of an industrial complex at Burnt Common. There is no need. If there is a need in Guildford it needs to be closer to Guildford Centre. There are several light industrial sites in Guildford and Woking that are an inefficient use of the space available. All need rebuilding with proper access to local roads, and some would provide space on the River Way frontage for council houses. I object to the term low cost housing, they are not value for money but cheap, poorly designed with insufficient storage, narrow staircases and little parking, irregular bus service and too far from the needs of those resident.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Already the traffic at morning and evening rush hour is extremely heavy and so much more development would only make things worse.

Senior school places for the children already living here are a struggling to get places.

The doctors surgery is already very busy with patients in a large catchment area. The next surgery is at Old Woking.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Altogether, it seems that there will be hundreds of houses, commercial premises erected all over the area. It will ruin the whole rural ambience of the area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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While at Woking cinema last week I saw a presentation of the “new village at Wisley Airfield “ with all it has to offer, so is this already been done and dealt with?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

| Comment ID: pslp171/519 | Respondent: 8658657 / Alice Fowler | Agent: |
| Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy H1 |
| Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( ) |
| Answer (if comment is on questions 1-7 of the questionnaire): () |

Tannery Lane, this a a very narrow and winding lane, how it will cope with commercial and residential development in such a tight roadway.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

As a Guildford resident I am extremely concerned about the high number of new homes proposed in the latest version of the local plan. This would lead to loss of substantial amounts of Green Belt land and loss of local character.

The method used to calculate the number of proposed new homes has never been explained. I am concerned that population growth has been overestimated due to under recording of students leaving at the end of their studies. I also believe that, as a campus university, Surrey University should provide more student accommodation on site, thus freeing up affordable housing stock in the town.
As a cyclist, walker and bus user I am only too aware that the town does not provide adequate provision for non-car modes of transport. The town needs more and better cycle lanes, far more pedestrian crossings (for example on the Epsom Road) and a more sensible ticketing system on buses (eg the 'kangaroo ticket' used in London) to encourage sustainable transport.

Such changes are discussed but sadly not implemented.

Substantial increases in housing numbers will add to congestion, which is already a huge problem in the town. A single incident regularly creates gridlock throughout Guildford.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Any development that impinges on the Thames Basin Heaths Special Protection Area should be vigorously opposed. These are special environments and should not be impacted by a growth in human population. ‘we need to adapt to our numbers by increasing the density of housing.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The proposed development on this site has been turned down by GBC for a range of reasons: the inaccuracies in describing the site by the developers; poor air quality; no access to A3; roads too narrow for additional traffic; no parking at the stations; no public transport; lack of affordable housing or housing to rent; inappropriate housing density and height of buildings; eyesore when viewed from AONB of Surrey Hills. Add to this that the land has no dwellings currently; only 15% comprises of the runway and the rest is all agricultural land. It is entirely in the Green Belt and is a SANG for the Thames Heaths Basin conservation area. I cannot understand why GBC has included this site in its new Local Plan. It makes no sense that the recent proposals were rejected by GBC and yet here it is again.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/889  Respondent: 8659489 / Helen Bennett  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( Yes ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The Ramada Hotel does not provide a local amenity of much value. It is a suitable site for redevelopment, as long as it keeps within the current building footprint and does not extend into any open areas of grassland which surround it. Horsley has a need for smaller dwellings, especially for downsizing. A courtyard development, perhaps with some flats, combed with starter homes and flats would for younger people starting out would provide a lively new community base in East Horsley.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/894  Respondent: 8659489 / Helen Bennett  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
The Bell & Coleville site is suitable for housing development, but these plans seem to include a large tract of land behind the brownfield site. Every time an extra field is taken into building part of the rural nature of the Horsleys disappears for ever. The actual site of the garage, showroom and parking should be redeveloped, but no more.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/895  Respondent: 8659489 / Helen Bennett  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy A38

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

As there needs to be some development this site seems to be more appropriate than some as it is already concealed behind the ribbon development. However the field facing long reach should be taken out of consideration as it provides the open green space that is so special for the villages.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/902  Respondent: 8659489 / Helen Bennett  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy A39

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

This area of land is largely hidden from view and consequently is less damaging visually. However, this is a very large piece of open field in the green belt. A more limited, high density form of starter homes etc would be appropriate her which used up lessor the undeveloped lend.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/906  Respondent: 8659489 / Helen Bennett  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy A40
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<td><strong>Answer (if comment is on questions 1-7 of the questionnaire):</strong> ()</td>
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<td>This is a very large tract of agricultural land in the green belt. It is difficult to visualise the changes to the village landscape when all of these proposals are added together, but if every piece of open land is built on it will simply be an enormous housing estate with few amenities and no social centre. Some limit development adjacent to Nightingale Close and Nightingale Avenue to the south of the footpath/track could be absorbed but not the several acres being proposed.</td>
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<tr>
<td>This land is entirely wrong for building. It is plainly open field, with no adjacent building.</td>
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<td>Although this land is not particularly desirable, being alongside the A3, it does contain important woodland that should be preserved and conserved as a wildlife habitat. Some high density small homes could be built on the boundary of the current housing line. Any thoughts about commercial, light industrial or stage facilities are entirely inappropriate and would bring nothing to benefit the local community. Anyone employed there would need to travel in by car. There is no sense of sustainability in planning for this kind of industrial development. If homes are needed some could be built here, but not unwanted and unnecessary industrial units.</td>
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<td>It is very important to monitor travellers sites to prevent them from becoming permanent residences for a small number of people, who are not from the local community. Any informal building or hard landscaping that turns them from temporary travellers pitches into permanent dwellings should be prohibited and vigorously enforced.</td>
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<td>It is important that Travellers sites are carefully monitored to ensure that no casual building or hard landscaping turns a temporary site for Travellers into a permanent dwelling for the lucky few on a precious green belt site. Any permanent structures or landscape changes should be prohibited and vigorously enforced.</td>
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Station Parade in East Horsley cannot be considered a District Centre. It is a small collection of shops and food outlets. It should not be considered an urban centre but a village centre.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1664  Respondent: 8659489 / Helen Bennett  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Student accommodation: it would be very beneficial for the housing stock in Guildford if all students either lived at home or on campus.

HMO: rather than assuming that HMOs are a poor quality option, it would be a good plan to encourage new building of this type which could provide good quality accommodation for rent for single people who work in Guildford.

Smaller, manageable homes for downsizing, perhaps in a courtyard development, with some help that would make the process manageable for older people, would benefit them and release larger homes to the market.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1665  Respondent: 8659489 / Helen Bennett  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
The "right" to live in a village because your parents do has never been an affordable option. Social housing in villages that is now privately owned has become "unaffordable". All this policy does is to provide subsidised housing to a few who can then maximise the profit a few years later. It has been more than 50 years since people lived in the same streets as their relatives. The world has moved on with university education and the car. There is no return to some nostalgic idyll of cosy country life.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/1818  **Respondent:** 8659489 / Helen Bennett  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy ID4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( Yes ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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Everything that can be done to conserve natural green landscapes, be they woodland, hedges, commons, heaths, agricultural land or parks and gardens should be done. We are the custodians of the landscape and the biodiversity that depends on us for its survival. It should be our pleasure and our duty to offer protection to our wildlife and its habitats. The maintenance of clean, lifeful water courses is essential. The blue and green infrastructure should be kept as wild as possible, not turned into playing fields and mown dog walking areas. The open green landscape is not there just to be tamed by us but as a living habitat, which still gives enormous pleasure to those who wish to walk in it.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/1648  **Respondent:** 8659489 / Helen Bennett  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( Yes ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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GBC must be very energetic in its protection of Surrey Hills AONB and AGLV. The Green Belt protections must be preserved. The open landscapes, woodland, commons and agricultural land are vital for wildlife and for people. We are in danger of creating a huge conurbation or ribbon development linking Leatherhead, Woking and Guildford, thereby destroying all that is special about Surrey. The villages beyond the North Downs are very precious in this area where we are burdened by 20th and now 21st century suburbia. New homes need to be kept within the existing built boundaries of the borough and not encroach onto the countryside.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**
Objection: Changes to the Green Belt

I am particularly concerned about the changes to the Green Belt. The areas of open country in Surrey define its nature and provide a natural environment for wildlife, agriculture and for people. All of which are essential and, once lost, is gone forever. GBC seems to be intent on reducing the Green Belt and its protections. Surrey Hills AONB needs to be vigorously protected and not dismissed as having little protection in law. Two thirds of the proposed developments are on Green Belt land. This is unacceptable: any incursion will provide opportunity for more damage in the future.

Objection: East Horsley is in the Green Belt and this affords it protection from suburban sprawl. Its Green Belt status has been a key factor in preserving that character. One third of East Horsley is composed of woodlands. The Green Belt has preserved the rural character of the village. There is a proposal to move the East Horsley settlement boundary to the edge of Lollesworth Wood is unacceptable. These are agricultural fields. A change to Green Belt boundaries require ‘exceptional circumstances’. More land for housing is not a sufficient justification for changing a Green Belt boundary.

Objection: The proposal to remove Kingston Meadows out of the Green Belt is non-sensical. Kingston Meadows is the recreational space of East Horsley. It has sports facilities and playing fields. What possible benefit can there be in taking it out of the Green Belt and then leaving it vulnerable to “enterprising” developers in the future to offer some minor inducements for future facilities as a trade off for building plots.

Sites for development

Objection: I question the need for the level of house building set out in the plan. The statistical basis is flawed and overestimates the number of houses required for those living and working here. Certainly, it has not been demonstrated that this increased housing stock is required in East Horsley.

Support: However, the site of Thatcher’s Hotel is a possibility as long as it keeps within the current building boundary and does not extend to the open fields behind.

Objection: the green-field site behind the houses on the western side of Ockham Road North is Green Belt land and should not be developed.

West Horsley

Objection: The 405 houses proposed represents an increase of one third in the current housing stock, most of which are on open fields in the Green Belt. This is an overwhelming number for a small village and will fill-in every bit of its green space, destroying its character.
Objection: Proposal to remove Wisley Airfield from the Green Belt.

Despite the objections by GBC to the recent proposal to build what amounted to a small town on the airfield. The proposal to build 2000 houses still seems to be on the Local Plan. The objections included concerns about air quality; lack of public transport; the housing density; the visual impact from AONB of the North Downs. In addition to the many inaccuracies in the planning application about the nature of the land and the access to major roads and the railway stations. What has changed? The A3 and M25 interchange will not move; the stations will not get nearer. The rural character of the roads and environment will be destroyed by such a proposal. GBC should be protecting the true rural character of Surrey, not seeking to destroy it.

I hope that GBC will act to support its current residents and their wishes, rather than pursue some ideological process for urbanising the this corner of England and facilitating a continuous sprawl of housing with few social facilities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1651 Respondent: 8659489 / Helen Bennett Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I have little confidence in the GBC desire to protect the Green Belt. There should be no loss no Green Belt protection in any local area. Every hedge and field is important. Once lost or encroached upon it is lost forever and provides a precedence for further planning proposals on this precious resource. Why is the proposal for 2000 houses on the disused Wisley runway even being contemplated as it was rejected for a range of misleading information and inappropriate plans? This is almost entirely agricultural land in the Green Belt. It is not attached to a village; it is a new town. The scale of the housing proposed for many of the villages, almost entirely on Green Belt and green field sites, will change the local environment for ever. The GBC should be working for its current inhabitants not on some strange policy venture of its own.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1658 Respondent: 8659489 / Helen Bennett Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Any SPA must be protected as a matter of priority. SANGs are needed to protect these areas and to provide space for people and their pets, whilst allowing the natural world to exist. Nature is under threat. It is people and their housing needs who can and must adapt. We should be proud of our environmental stewardship, rather than be prepared to build over it.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

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The housing target is a complete invention, with no evidence demonstrated of the need for it in such numbers. All additional housing should be associated with urban areas i.e. Guildford. Any additions to the villages should be very restrained and small in number and size. The number should be restricted to the local plans put forward by individual villages and parishes. The proposal of a new town on Wisley airfield should be dismissed, as it has been already by GBC planning, as completely unacceptable in all regards - for the many reasons put forward in the objections by GBC landing themselves.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

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<td>Answer (if comment is on questions 1-7 of the questionnaire): (No)</td>
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The number of new houses proposed in the Strategic Housing Market Assessment has been generated without any visible evidence or explanation. The numbers are vastly inflated and the forecast population increase in the borough as a whole is 70% higher than the official national estimates for the borough. These inflated numbers become even more inaccurate when looking at individual villages: the proposals for the Horsleys, Effingham and Ripley/Ockham far exceed the number of houses required by the local population. The proposed increases in households in these areas can be as high as 35-50%. It will destroy a semi-rural pocket of Surrey. All on false numbers.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

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<td>Much of the proposed housing is on Green Belt land. The GBC should be very energetic in preserving the special qualities of the borough i.e. its open spaces and agricultural land and not be actively trying to encroach on it. Once this land is lost, it is gone forever. One encroachment will lead to many more.</td>
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<td>In order to preserve our natural environment we need to defend the green belt, Surrey Hills AONB and its associated agricultural landscape and the Thames Basin Heaths Special Protection Area, all SSSI’s and all other precious green environments. How does GBC intend to do this while taking villages out of the green belt; changing village boundaries and building 2000 new home on the green belt on the old Wisley air strip? We must prioritise our green environments; once lost they never return.</td>
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'What are we going to do with West Horsley in the New Local Plan?’ asked John.

‘Well’ said Jack ‘the village has about 11/1200 houses and we propose to increase the size by 40 to 50% and build a further 500 to 600 houses’

‘Won’t that put a huge strain on all the services because I understand the area is close to gridlock in any case?’ said John ‘ and what do the residents have to say about it?’

‘Almost without exception the residents are extremely upset but we have learnt to ignore the torrent of protests from the last plan and have produced a new plan that incorporates the same sites as our previous plan. As far as strain on services is concerned, I must admit that doctor’s surgeries are full, the local schools are all full, the railway station car park is full and has no potential for expansion, parking in the village is well nigh impossible at peak times, the narrow unlit lanes cannot possibly cope with more traffic and the road surfaces are appalling and always have been, the road junction to the A3 has dangerous levels of pollution let alone the congestion and of course we all know that the M25 at Junction 10 is a complete lottery but normally blocked’ said Jack.

‘I am no rocket scientist’ said John ‘but why on earth therefore are you intending to make matters so much worse?’

‘Well you see we have been forced by the Government to identify large swathes of land on which houses can be built in order to accommodate our burgeoning population and we feel we have no option.’

‘But isn’t Surrey already the most densely populated county in the whole of England with 683 people per sq.km. so who decides what quantity of extra housing is needed?’ enquired John.

‘That’s a moot point’ replied Jack ‘but we have conducted something called the SHMA and have come up with a figure but I must admit it is a touch subjective’

‘Surely however, since Brexit there is now an intention to control our borders and thereby reduce immigration and ergo the demand for housing. I note that the biggest losers on the stockmarket as soon as ‘Leave’ was confirmed were the housebuilders (down 30%) so I would imagine I am not alone in this contention. Will you be revising your SHMA downwards in light of this?’

‘Probably not. It’s gone too far.’

‘And what’s this I hear that you intend to build on protected Greenbelt land and in many cases before you have attempted to develop Brownfield sites?’ John demanded.

‘We have come up with what we think is a master stroke’ said Jack. ‘Brownfield sites are invariably more expensive to develop so Greenbelt sites are cheaper and less time consuming. In the case of West Horsley we have decided, subject to the Govt. Inspector agreeing with us, to remove the village from the Greenbelt so we can build anywhere and render any local protest impotent.

Incidentally we are proposing to try this ruse on approximately 15 equally pretty Greenbelt Surrey villages. It will make our lives so much easier’.
‘That’s verging on scandalous’ said John ‘so what is the point of involving the local residents in your ‘presentations’ if nothing can be altered?’

‘Transparency old boy’ said Jack ‘transparency.’

Further to the above I OBJECT to the proposal to build 135 houses at The Manor Farm site for the following reasons:-

1) My amenity will be severely blighted with the houses in the adjacent field to the north of my house having complete visual access over my garden and swimming pool.

2) The light will be reduced and the gorgeous sunsets will not be seen.

3) The road of Long Reach is a 4.6 metre wide lane with no pavements or lighting. I believe it is suggested that there should be an access to the site from Long Reach. It would be impossible for two construction lorries to pass each other and, as I have mentioned many times in the past, the road is reduced to a single lane because of a half mile queue of cars parked nose to tail with no passing places by those using the football club. I have sent many photos already of the mayhem caused. How fire engines/ambulances etc. could get through is beyond me. It is worth taking into account that the current single track lane to the site is used and was originally constructed solely for access to the Montesori school and was only granted on the basis that the entrance gate is closed by 18.00 hrs every day. Any building work would be a real and significant hazard for the young children who go there.

4) The field in question is used every year as a car park for over 250 cars for the annual Horsley Football Club tournament (please see photo). The organisers have told me that the tournament, which has been running for over 25 years, will have to close if this field becomes unavailable as there is no viable parking alternative. I would have thought that GBC should be promoting sport and not reducing it.

5) If, heaven forbid, a housing estate gains approval it will have to cope with the floodlights already in place and also those that have recently been approved by GBC for the main pitch and of course the noise. Not ideal.

6) Councillor Paul Spooner of GBC has proudly trumpeted that only 1.6% of Greenbelt land in the Borough will be affected by the building proposals. This of course is massively misleading and is probably designed so to be. After all it makes good reading but a great proportion is A.O.N.B. which cannot be built on. At a rough estimate 25% of Horsley’s current Greenbelt land is being put up for building. Nobody was able, or willing, to answer my question on this point at last week’s presentation at East Horsley village hall.

7) I am non-plussed as to why West Horsley is being so disproportionately targeted. Perhaps it’s because it is the second closest village to London in the borough and developers will make more money here than elsewhere. How do you quantify an ‘affordable’ house in this area?

8) The plan is that all four of the sites adjacent or near to my house will now be developed simultaneously in years 0-5 (whereas the Manor Farm Site was originally proposed for years 6-10). Can you imagine what traffic carnage this would cause let alone dust, noise etc.. The developers (Thakeham Homes) have advised that because of the high water table at the Manor Farm site all the 135 houses will need to be piled which will probably drive us all bonkers.

9) A Department for Communities and Local Government spokesman said ‘Ministers have repeatedly been clear that demand for housing alone will not justify changing Green Belt boundaries’. (Daily Telegraph 25/4/16). What has empowered GBC to believe they are entitled to do otherwise. Surely a truly exceptional circumstance is required?? GBC call the removal from the Green Belt ‘inserting’ but the field next to my house which is set in beautiful quiet countryside is outside the curtilage of the village as has been declared in previous appeals by a Govt. Inspector.

10) Lastly, and most importantly, my wife and I feel we will have to abandon the house we have loved and nurtured for over 35 years. We could not stand the awful intrusion but our option to sell is already severely reduced because I doubt if anyone else could as well. A local Estate Agent reckons the house is already devalued by £300,000 because of the proposed development and that is if a buyer can be found which he says will now be difficult.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents: DSC04220 2305843009213841397.JPG (6.5 MB)
I wish to register my objection to the proposal that "In total, 1.6% of green belt land will be removed and allocated for development during the plan period". I see no reason why a principle of no net loss of green belt could not be followed.

I note the statement that "4.3.13 The following villages are now inset from the Green Belt: Chilworth, East Horsley, Effingham, Fairlands, Flexford, Jacobs Well, Normandy, Peasmarsh, Ripley, Send, Send Marsh/ Burnt Common, Shalford, West Horsley and Wood Street Village". Does this mean that they were inset prior to the current planning process, that they are proposed to be inset, or that additional areas are proposed to be inset to provide a more uniform village/green belt boundary?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/3252  Respondent: 8662689 / Richard Waple  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North

I have familiarised myself with the Draft Plan (CD disc version) and have attended the Council’s exhibition held at East Horsley Village Hall on Tuesday 21st June 2016. I would like to make the following representations;

1. I wish to object, most strongly, to the Council’s Green Belt policy in relation to the removal of Green Belt land for housing development. In particular I am concerned about the proposed release of the open fields known as Allocation Sites A38, A39, A40 and A41 in West Horsley. My objections are that the Council’s proposal is contrary to Government advice contained within the National Planning Policy Framework 2012;

   • Paragraph 79 states that “the Government attaches great importance to Green Belts. The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence”.

   • Paragraph 82 states that “New Green Belts should only be established in exceptional circumstances”. Therefore if existing Green Belt land is sacrificed for housing, the quantum of Green Belt will reduce and will not be replaced.
• Paragraph 83 provides “Once established, Green Belt boundaries should only be altered in exceptional circumstances. The Council has not demonstrated “exceptional circumstances” but states that the shortage of available housing land is an exceptional circumstance. The problem is that Green Belt land, which is not Previously Developed Land (PDL), should be regarded as sacrosanct and should only be released as a very last resort and after the re-use of Brownfield and PDL has been exhausted. GBC has made no real attempt to survey and review the availability of Brownfield and PDL but, instead, has targeted Green Belt land predominantly in single ownership, as this is easier to deliver. Good town planning is not about easy deliverability and knee-jerk solutions. This is “lazy” planning and should be rejected.

• Paragraph 87 says “As with previous Green Belt policy, inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances. Insufficient “special circumstances” have been advanced by GBC to justify the release of previously undeveloped Green Belt, which still serves its original purpose as Green Belt land.

• The proposal is also contrary to paragraph 88 of the NPPF, which states that exceptional circumstances will not exist unless the harm caused to the Green Belt is outweighed by other considerations. I do not agree that a shortage of housing land is to be considered as an exceptional circumstance but, even if I am wrong, the harm to Green Belt is not outweighed by other considerations.

• Paragraph 89 states that a local planning authority should regard the construction of new buildings as inappropriate in Green Belt.

• In summary the proposal to release Green Belt land is contrary to Government advice and there are, in fact, two distinct tests. Firstly GBC has to prove “exceptional circumstances” to change the boundaries of the Green Belt and secondly it has to prove “exceptional circumstances” to justify inappropriate development.

1. There is case law concerning “special circumstances” and, in particular, whether a housing shortage is a “special circumstance” of sufficient weight to justify the release of Green Belt. I list below the relevant synopsis;

• In Hunston Properties Ltd [2013] EWCA Civ 1610; [2014] JPL 599, it was held that;
On the facts, the Inspector was obliged to find a housing shortfall. However, the weight to be given to such a housing shortfall (and whether it constituted “very special circumstances” for the purposes of NPPF 87) was a matter of planning judgment. The weight to be attached to the shortfall may, as a matter of planning judgment, be reduced where a shortfall is inevitable due to a district being subject to policies, which restrict development (such as AONBs, National Parks or Green Belts).

• Further it was held in R (Lee Valley Regional Park Authority) v Broxbourne Borough Council [2015] EWHC 185 (Admin) that;
“A shortfall in housing land supply can, as a matter of policy, be a very special circumstance, although the occasions when it is likely to suffice by itself to warrant the grant of permission for housing development in the Green Belt are expected to be few and far between”.

Page 1557 of 3335
The case of R (Luton Borough Council) v Central Bedfordshire Council [2015] EWCA Civ 537 it was stated that;

“...paras. 87-88 of the NPPF provide guidance regarding the approach to be adopted if there is a proposal for development of an area within the Green Belt set out in a local plan: “very special circumstances” have to be shown. This is a stricter test than that in para. 83 in respect of changing the boundaries of the Green Belt in the local plan.”

As can be seen none of the case law to date supports the development of new housing in the Green Belt.

1. The proposal to build 385 new houses will swamp the small village of West Horsley, which in 2011 had 1,111 homes in the Parish. This is a 35% increase. There is insufficient infrastructure in terms of roads, parking, public transport, medical provision, education and schooling, drainage and sewerage. This is contrary to paragraph 47 of the NPPF, which requires local planning authorities set out their own approach to housing density to reflect local circumstances.

1. The Council has not done enough to encourage the re-use of Brownfield and Previously Developed Land (PDL). For example, application 16/P/00783 relating to Oldfields Field Yard concerns the proposed re-development of a builder’s yard and buildings for residential housing in the Green Belt. The property benefits from an Established Use Certificate for B1, B2 and B8 and sui generis uses to include scaffolding yard, car servicing, restoration, motor repairs and storage. Consequently, the Green Belt use has already been lost and the aim of providing permanent open land to prevent urban sprawl can no longer be maintained. Notwithstanding GBC’s alleged housing land crisis, this application was refused. One of the reasons for refusal was that the applicant had not demonstrated any “special circumstances” to justify the inappropriate development.

It seems to me to be inconsistent and inappropriate to refuse the re-use and redevelopment of PDL in the Green Belt and to propose the release of Green Belt in the Local Plan, which is open in character and has never previously been developed.

1. There is no precedent for releasing existing Green Belt land where its original aims and functions are still being met. The original Green Belt legislation and particularly circular 42/55 only envisaged and to a limited scale the “infilling” and “rounding off” within the Green Belt and existing towns and villages should not be allowed to expand any further.

1. I would like to challenge the Council’s Evidence Base as paragraph 47 of the NPPF states that local planning authorities should provide sites sufficient for 5 years supply of housing land with an additional 5% buffer to allow for choice and competition in the market for land. Where there has been persistent under delivery this buffer should be increased to 20% This means that GBC is required to identify deliverable housing land for the
next 6 years and not for the whole Local Plan period to 2032. LPAs are then required to identify and update annually a supply of specific deliverable sites.

1. I would like to write in support of GBC’s proposal for “insetting” (i.e. removing from the Green Belt) the existing settlement areas. I do not agree that the village boundary should be enlarged but I do think that it serves no planning purpose for the established built environment to be retained in the Green Belt.

Where the function and purpose of Green Belt has already been lost it makes no sense to determine planning applications by reference to Green Belt policy. A case example is planning reference 14/P/00484 in Mount Pleasant where the surrounding area was a linear pattern of development either side of the road but located in the Green Belt.

The Guildford Borough Local Plan 2003 allows for limited infilling within identified settlements where the land is substantially surrounded by existing development. This is only partly consistent with the NPPF. The main distinction being that the NPPF does not support the restriction of development to land that is “substantially surrounded by development”.

Further paragraph 85 of the NPPF states that when defining boundaries, local planning authorities should not include land, which it is unnecessary to keep permanently open. Here the land in question cannot be kept permanently open because it is already developed.

In paragraph 86 the NPPF sets out that a village should be included in the Green Belt if its open character makes an important contribution towards the openness of the Green Belt. However, if the character of the village needs to be protected for other reasons such as conservation or development management policies, then it should be excluded from the Green Belt.

The removal of the Green Belt designation from the existing settlements (without their extension) would comply with the Central Government advice contained in the NPPF and would allow sensible brownfield redevelopment to help alleviate the housing land shortage.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I refer to the land behind the Christmas Hill properties and Shalford Village Hall.

I see that you are proposing to move the green belt boundary to exclude these fields and extend the village boundary to include these fields, making it easier to develop.

I object to these changes because:

The elevation of this land is 32 ft above Christmas Hill and Kings Road. Any housing development would tower over the village community facilities and surrounding area including the ancient Shalford Common. Any development would be easily seen from Chinthurst Hill, from the Chantry and the Downs link national trail.

The land contributes to the open character of the village and provides an attractive setting for the village community facilities.

Access to this land is via Chinthurst Lane, an already heavily congested lane.

Over 700 residents signed a petition objecting to the proposed settlement boundary changes last year. The Parish Council also objects to the boundary changes. As you can imagine the issue has united the local community.

If Guildford Borough Council support the express views of the local residents to protect these fields from development, they should retain them within the current green belt boundary and keep them outside the village settlement boundary.

The boundary has been there for a very long time and should remain in place.

There is no justification for the proposed change.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

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<thead>
<tr>
<th>Comment ID: pslp171/223</th>
<th><strong>Respondent:</strong> 8667425 / Onslow Village Residents Association (Anthony Jacques)</th>
<th><strong>Agent:</strong></th>
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<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
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<td><strong>Answer (if comment is on questions 1-7 of the questionnaire):</strong> ()</td>
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<td><strong>I wish to add my voice to the increasing number who feel the Local Plan needs extensive further amendment.</strong></td>
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<td><strong>In view of flawed new evidence, Guildford’s proposal for more than 12,426 homes (plus a buffer of 1,155 homes) is excessive and will result in needless loss of Green Belt and green character, and increased congestion, that cannot be justified in our already heavily constrained borough.</strong></td>
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<td><strong>I object to the proposal to move the Green Belt boundary in Shalford and extend the village settlement boundary especially in regard to the fields behind Shalford Village Hall and Shalford Tennis Club.</strong></td>
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<td><strong>There is no valid reason to change these boundaries and the over 700 residents have signed a petition objecting to this proposal.</strong></td>
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<td><strong>The land contributes to the open character of the village and would spoil the amenities of the village halls, the tennis club and the bowls club. The land is elevated above these amenities and any development would be detrimental to the village.</strong></td>
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<td><strong>The access from these fields on to Chinthurst Lane is simply not suitable for further development.</strong></td>
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<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule</td>
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Answer (if comment is on questions 1-7 of the questionnaire): ()

22. APPENDIX C

I OBJECT to the proposed Infrastructure Schedule (Appendix C)

The Infrastructure Schedule sets out the key infrastructure requirements on which the delivery of the plan depends. For each of the Key Allocated Sites in the borough it identifies infrastructure projects that are required, except for Garlick’s Arch (A43) which is not mentioned. It is clear that the Plan takes no account of the infrastructure required for this site and is therefore not fit for purpose.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/1261  Respondent: 8667713 / Victoria Sinnett  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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1. The housing needs assessment is flawed in various respects and overstates housing need. In addition since it was produced, the referendum Brexit decision has almost certainly reduced future housing need and rendered the previous assessment seriously out of date. As a result any assessment of Green Belt sites which took place to consider whether “exceptional circumstances” existed to outweigh the harm to the Green Belt was based on false premises and should be reconsidered.

2. Having determined housing need the Council was entitled to consider constraints before determining the housing. I believe that as Ill as being entitled to do this the Council was required to give proper consideration to constraints. The scarcity of sites outside the Green Belt as Ill as infrastructure (most notable roads) considerations all represented constraints which should have been taken into account in determining the final housing number. Accordingly in this regard our objection to the allocation of Green Belt sites is twofold. First I believe constraints should have been applied. Secondly I believe the Council did not properly consider constraints and that their decision making process was flawed and thus subject to being set aside by the Inspector.

3. Even if having properly applied constraints there is a need to develop in the Green Belt then specific Green Belt sites should not be included in the plan unless “exceptional circumstances” for development are proven in relation to that specific site, as stipulated repeatedly in the The Green Belt should trump shortterm considerations such as perceived housing need, as case law has established. There needs to be a specific balancing exercise conducted on each Green Belt site weighing the harm to the Green Belt against the very special circumstances which are argued in favour of development at that particular site. There is no evidence this has been done. Instead the council have appeared to say that having chosen a housing needs figure and decided it cannot be met without building on Green Belt then there is no need for any further consideration and any convenient Green Belt site can be allocated for building at will.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
23. APPENDIX D

I object to the Strategic Housing Market Assessment (SHMA) figure of 693 houses per annum in the borough being too high (Appendix D).

- The “objectively assessed need” figure of 693 homes a year is too high.
- A professional review by NMSS has concluded that, even basing the calculations on a period of stronger economic and student growth, the housing need figure should be revised down to 510 homes a year and the method changed to consider student housing need separately due to the distorting effects.
- The current SHMA inflates the proposed housing figure due to:
  - failure to correct for errors in the historical data for international migration flows,
  - issues with the way it considers students and affordability and
  - flaws in the method for estimating the number of homes needed to support job growth.
- It is unacceptable that demographic and economic model assumptions have been withheld and cannot be checked making the process unaccountable.

The Plan’s proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the borough, it is over double the previous figure of 322 used in previous plans. The SHMA report methodology is inaccurate; it inflates the needs of the borough by distorted student numbers. However, it is based on commercially confidential modelling assumptions that cannot be checked or reviewed. There is no transparency to this evidence base and it is therefore impossible to assess its accuracy. This is not democratic and is not appropriate for consultation of the Plan.

The National Planning Policy Framework allows the overall housing target to be reduced to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
20. POLICY A25 Gosden Hill Farm

I OBJECT to Policy A25 with proposals for Gosden Hill Farm.

The Green Belt at this point serves the important function of separating West Clandon from the edge of urban Guildford. Development here will cause the two to coalesce defeating one of the objectives of the Green Belt. If this development proceeds I believe the narrow strip of Green Belt remaining between Guildford and Clandon at this point will be too narrow and will come under further pressure.

It will represent an undesirable ribbon development along the A3. It will be highly visible from the A3 when approaching Guildford and will, in conjunction with A43a at Garlick's Arch give the appearance of almost continuous development from Send through to Guildford.

The Plan does not put forward any evidence that exceptional circumstances exist to justify removing this site from the Green Belt.

The development will overburden the local road network and increase congestion on the A3 and A247 through the centre of West Clandon. This is already very heavily used whilst being unsuitable for designation as an A road. In places it is too narrow for two lorries to pass causing them to mount the pavement.

Note the following accident data: 2010 –2014 from Crashmap data

- Clandon Cross Roads Area to Bulls Head 17 incidents
- Bulls Heads Head to Bennett Way 8 incidents
- Bennett Way to Highcotts Lane 15 incidents
- Tithebarn Lane to Portsmouth Road Birch Close 8 incidents 2015
- 21 Oct 2015 – A247 near shell garage Three vehicles collided causing delays Surrey Fire and Rescue

2016

- 15 April 2016 12 year old boy injured in The Street – A247 closed in both directions
- 28 April 2016 A3 West Clandon London bound between A247 Tythebarns Lane (Burntcommon and M25J10 (Wisley Interchange) congestion on A3 to A3100 Clay Lane Burpham
- 30 6 2016 Motorcyclists with injuries airlifted to hospital Send Marsh Road

Attempts have been made over many years to reduce traffic, traffic speeds and accident risks through West Clandon, however little has been achieved as the road cannot be widened and SCC is reluctant to impose further speed limits as congestion is already very high.

I object most strongly to the proposal for a link road to bring traffic from the Gosden Hill development to the proposed 4 way junction at Burnt Common. This has the potential to generate large volumes of traffic (including commercial vehicles) on the A247 through West Clandon a road which is already under traffic stress (see below).

The land in Gosden Hill does exactly what the Greenbelt was designed to achieve. It provides a green buffer between the Guildford Urban Area and West Clandon, gives Burpham a defined green boundary and breathing space and it hides Guildford town from visitors until they pass the offslip to Burpham.
No exceptional circumstances have been demonstrated for building on this site and therefore it does not comply with paragraphs 8789 of the NPPF. It stops the sprawl of Guildford town, assists in safeguarding the countryside from encroachment and assists in urban regeneration by encouraging the recycling of derelict and other urban land. All of these are requirements of the NPPF.

The scale of Gosden Hill is out of proportion to West Clandon. It would have four times the amount of housing plus shops, offices/factories, GP surgery, schools. Development on this scale would blight a historic village with a history going back to the doomsday book and beyond.

Gosden Hill is the most obvious location for the north end of an A3 tunnel. It has rising ground and is situated just before the urban area. If it is built on, it will be very difficult to construct a tunnel. The development will generate in the region of 6,000 vehicles which will pour on to the A3 which is stationary every day during rush hours. The linking of the A3100, B2215 and A247 would channel thousands of cars through the narrow, winding road through West Clandon, a road where large lorries mount the pavement virtually every day and through Send and Ripley which are also severely constrained.

The volume of traffic will greatly increase air pollution which is particularly critical given the proposal to build two schools.

Currently, a two way junction at the site would require vehicles wanting to go north on the A3 to go through Burpham which is gridlocked every day.

Burpham’s sewers are at capacity. Sewage would have to be pumped to Slyfield for processing, a project of enormous cost.

There is inadequate fresh water in Guildford and current supplies could not meet the needs of a development of this size.

Electricity supply is also inadequate and would require a big infrastructure development.

The railway station was rejected by Guildford Borough Council in 1984 because it feared Gosden Hill would become a dormitory estate for London.

The wording of the Local Plan with regard to Gosden Hill is so loose that the developer could virtually do whatever it wants.

The remaining agricultural land between Gosden Hill and West Clandon is so small that it is highly likely to be uneconomic and therefore a prime candidate for further development which would roll the Guildford Urban Area over West Clandon towards East Clandon and Wisley.

If the Strategic Sites are developed, the north of Guildford will deliver 36%, 5,036 houses towards the total of around 14,000. The infrastructures of the existing villages and the A3 will be overwhelmed by the scale of development.

A new onslip at Burpham would only be 1.8km from the onslip at Burnt Common which is against Highway England’s requirement of 2km.

Development of the A3 at best will not start until after 2020 and the building of a tunnel, which is only an “aspiration” in the Local Plan, is likely to be many years after. In the meantime given that developers build houses to provide cashflow for infrastructure, Gosden Hill will have a crippling effect on villages like West Clandon and the A3.

Gosden Hill already has surface water problems. Merrow Stream crosses the site. No hydrological survey has been carried out to assess the implications. Electricity pylons run through the centre of Gosden Hill which have health and safety issues.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
20. POLICY A43 AND A43a – Garlick’s Arch

I OBJECT to Policy A43 and A43a on Garlick’s Arch.

The site was only inserted in the draft plan at a late stage just before publication of the consultation draft which is a shabby way for the Council to proceed. The site is not a sustainable site being far from any infrastructure facilities and transport links. The bus service is infrequent and it is almost certain any future residents will rely almost entirely on cars for journeys. Similarly any employees at the employment areas will almost undoubtedly arrive and leave by car.

The site is susceptible to flooding and will not make a suitable site.

The Green Belt at this point serves the important function of separating West Clandon from Send. Building here will cause the two to coalesce defeating one of the objectives of the Green Belt.

I have seen no evidence that exceptional circumstances exist to justify removing this site from the Green Belt or that this important issue has been addressed. The Green Belt and Countryside study did not even consider this site.

It is understood the Council’s eyes may have been turned by the possibility of receiving for free the land which might be used for new A3 slip roads in return for allowing this development, thus justifying it as some form of enabling development. However the slip road land if needed could be safeguarded in the plan and acquired by compulsory purchase when required. Lack of current funding for the slip road is not a justification for allowing the development of this site. If the slip road is genuinely needed then government funding will be available for it. (One of the reasons for turning down the so called enabling development proposal intended to fund the rebuilding of the Howard of Effingham School was that the redevelopment of the school was not essential. As and when it became essential Government funding would become available. Accordingly enabling development was not necessary. The same principle applies here.)

The A247 running south past this site through the centre of West Clandon is already very heavily used whilst being unsuitable for designation as an A road. In places it is too narrow for two lorries to pass causing them to mount the pavement often at speed. It has narrow bends with poor sight lines, an infants school and a humpbacked bridge concealing the entrance road to the station for southward traffic. In addition, there are no continuous footpaths which forces pedestrians to cross and recross the road. Development at Garlick’s Arch will only exacerbate the problem and make the road even more congested and unsafe for pedestrians.

The development will cause harm to the ancient woodland on and by the site.

Taken together with the Gosden Hill site, there will be a ribbon of development along the A3 in contrast to the current “soft” edge approach to Guildford.

Garlick’s Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8).

There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).

The Plan states the preference is to making the best use of previously developed land. Yet at the 11th hour a perfectly acceptable brown field site at Burnt Common, capable of accommodating approximately 100 houses, was removed from
the Plan and replaced with the Garlick’s Arch site. There was no proper consultation in relation to the inclusion of this site. Why was a brownfield site removed and replaced with a Greenfield site? There is no evidence that Section 18 of the Planning and Compulsory Purchase Act 2004, which requires local planning authorities to produce a Statement of Community Involvement, has been complied with for this site. This only came to light for local residents following a Council meeting on 11th May 2016.

Moreover, Guildford Borough Council’s own Green Belt & Countryside Report does not address Garlick’s Arch at all, so there is no evidence base to support the inclusion of this site.

National Planning Policy promotes sustainable developments, with sustainable transport. With ever reducing bus services in the area and no train station within reasonable walking distance it is impossible for any development on this site to offer a sustainable transport solution. Development on this site is wholly inappropriate (Policy I3).

The stream, which runs through the site, is identified as having a high risk of flooding by the Environment Agency. There are other sites that do not flood that can be developed and therefore this site should be removed from the Plan (Policy P4).

This site is bordered by Ancient Woodland and within it a number of trees are protected by Tree Preservation Orders (Policy D3).

The site has an abundance of wildlife, some of which are protected. It is home to many types of owls and bats, with the woods having cuckoos and woodpeckers. In addition there are regular sightings of badgers, deer and red kites. The development of the site will result in the loss of habitat. No wildlife report has been conducted on the site. (Policy I4)

It is clear that with this site being added at the 11th hours no infrastructure planning has been undertaken. The Infrastructure Schedule makes no provision for any infrastructure improvements for this site. How will the local services such as schools and doctors cope, many of which are already at capacity? (Policy I1)

Furthermore, several electricity pylon runs through the site, which will have the potential to be a health hazard for any residents.

I OBJECT to the inclusion of the land for new on/off ramps at Burnt Common (A43a)

The addition north facing ramps to the A3 at Burnt Common would be a disaster for local communities. There is no requirement for local traffic to access the A3 to the north, but the addition will draw in a huge amount of ‘through’ traffic.

The route from London/M25 to Woking or would now be through Burnt Common and Send. Equally traffic from the east of Guildford (Merrow etc) and the A25 will now go through West Clandon and Burnt Common. This will cause immense damage to those areas on small roads which cannot be improved.

This Plan does not address the needs of local communities or the Borough in this regard. There has again been no Section 18 consultation on this.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

**Comment ID:** PSLPP16/5045  **Respondent:** 8667713 / Victoria Sinnett  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
8. POLICY D3
I OBJECT to the damage to the historic environment as a result of the scale of the proposed development (Policy D3)
I OBJECT to the local plan based on the impact it will have on the special countryside of the borough.
The proposed development at Garlick’s Arch (A43) will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/5052</th>
<th>Respondent: 8667713 / Victoria Sinnett</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

15. POLICY D3
I OBJECT to Policy D3 Historic environment

I object to this policy as it is very weak and I do not think it is clear enough in its support for the conservation of the historic environment. It provides for development which will “enhance” heritage assets which I fear is a developer’s charter as it leaves plenty of room for abuse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
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<tr>
<th>Comment ID: PSLPP16/5053</th>
<th>Respondent: 8667713 / Victoria Sinnett</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D4</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
16. POLICY D4

I OBJECT to Policy D4 Development in urban areas and inset villages

The policy should place much greater emphasis on residential development in the existing urban centres. In this way housing needs can be met without resorting to large developments in the Green Belt. There are urban areas in need of regeneration but these are ignored in favour of Green Belt development.

The policy should not be applied to the villages which should remain in the Green Belt. Unrestricted application of this policy to the villages intended to be inset will change their characters radically and for the worse. The development it encourages will increase traffic and congestion disproportionately.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSL16/5042  **Respondent:** 8667713 / Victoria Sinnett  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):**(

5. POLICY E1

I OBJECT to the sustainable employment policy (Policy E1)

I object to the inclusion of a strategic employment site at Gosden Hill Farm. Employment sites should be concentrated on previously developed land in more sustainable locations with good transport links where the infrastructure can support development. Warehousing, distribution and industrial premises cause considerable commercial traffic, noise, pollution and general disruption. They are not good neighbours for schools and 2000 houses. Many of the jobs will be taken by people outside the area leading to additional congestion in Burpham and on the A3.

I object to the inclusion of a strategic employment site at Garlick’s Arch. It is in a nonsustainable location remote from any facilities of any kind and with poor public transport links. It is unlikely jobs there will be taken by local residents and it is likely all travel to and from work will be by car adding to local congestion. Employment sites should be concentrated on previously developed land in more sustainable location with good transport links where the infrastructure can support development.

The site is in any event subject to frequent flooding and unsuitable for development.

If developed, the new employment site at Garlick’s Arch, Send Marsh/Burnt Common (A43), would be treated as a Strategic Employment Site.

The proposed development of up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8) at Garlick’s Arch (A43) is in the scheme of industrial development relatively small. Just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m. The Garlick’s Arch site which is in the Green Belt should not be developed as a Strategic Employment Site when there is a suitable alternative brownfield site very close by, which is far more sustainable.
I object to the location for new employment floorspace (Policy E2)

I object to this policy. It would be more sensible to confine new office and research and development floor space to the urban Guildford area. I also oppose the policy of expanding the Research Park onto Blackwell Farm. No exceptional circumstances, as defined under the NPPF, have been advanced to justify incursion into this permanent and high-quality area of Green Belt. Proposals for new industrial, warehousing and storage (use Class B1c, B2 and B8) floorspace will be directed to the Industrial Strategic Employment Sites.

There is no need for the new employment floorspace to be located at Garlick’s Arch or Gosden Hill Farm, when near to these sites at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m.

I OBJECT to the location for new employment floorspace (Policy E5)

Policy E5 supports the retention and development of local services and community facilities in our inset and identified villages. Yet the development at Garlick’s Arch (A43) would result in the loss of four existing successful rural businesses,
which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ
dozens of people; none of them want to leave their premises. The Plan does not promote rural employment; rather it will
result in the loss of existing local rural businesses.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5055  Respondent: 8667713 / Victoria Sinnett  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E6

Do you consider this section of the document; complies with the Duty to Cooperate? (), is Sound? (), is Legally
Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. POLICY E6

I OBJECT to Policy E6 The leisure and visitor experience.

The policy should acknowledge that whilst in some areas new and enhanced leisure facilities are valuable (for example the
new Opera House at West Horsley Place Towers), much tourism depends on the undeveloped nature of Green Belt areas
surrounding Guildford. Accordingly the policy should recognize that in many rural areas new and enhanced visitor
facilities may be unnecessary and counterproductive, particularly away from existing buildings and development. For
example the attraction of Newlands Corner is its undeveloped nature. Significant development of visitor facilities there is
likely to diminish rather than increase its attractions. In this policy, the presumption in favour of development runs the risk
of becoming an excuse for overdevelopment. Heritage sites and the Green Belt are particularly vulnerable to harm.

Tourism and visitors do not depend on new visitor “attractions” and could actually be damaged by them, as compellingly
argued in the current debate over Newlands Corner. In this policy, the presumption in favour of development runs the risk
of becoming an excuse for overdevelopment/“Disneyfication”. Heritage sites and the Green Belt are particularly
vulnerable to harm.

Guildford has many “leisure and visitor attractions” already. The case for creating more is not made and no examples are
given. Instead, the plan’s explicit priorities should be:

1. To protect the borough’s prime leisure and tourism asset, its countryside, from inappropriate This is all the more
valuable because of its accessibility from London, the rest of Britain and the Continent, in that order. Rural
residents are its custodians and require no Council interference. Economically, the most valuable forms of
旅游, such as walking and cycling, require no new development. In the overcrowded SouthEast of England,
lack of development is a leisure and tourism asset, not a liability.
2. To help make Guildford’s river landscape less off-putting and support town-break packages for highvalue
tourists. To achieve this, the policy needs to define what leverage, if any, Council planners have to influence
normal tourism market mechanisms.

1. To help private providers market local This need not involve extra spending. The Council could, for instance,
help coordinate readymade, local tourism packages under a distinctive brand at an allin price. An “English town
break” (including B&B accommodation, a walking tour of Guildford, a pub lunch in the Surrey Hills, a visit to
Wisley Gardens and a National Trust property and a Southwest Trains travelcard for a day out in London) would
be highly attractive to many European visitors who currently bypass Guildford to go to Bath, Oxford or
Cambridge instead.
2. To rule out the redevelopment of scarce rural hotel sites (e.g. Thatchers, East Horsley, earmarked for 40 new houses under Site A37 of the plan yet just a short walk from the new opera house).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5051  Respondent: 8667713 / Victoria Sinnett  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E7

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. POLICY E7

I OBJECT to Policy E7 Guildford Town Centre

The policy “vision” describes protecting the Guildford’s unique setting and historical character and sets out some of the ways this will be done. However none of this is included in the formal Policy wording in the blue box. I suspect the Vision wording is effectively of little or any force. These principles should be included in the formal policy.

There should be a much greater focus on residential use of the town centre where many people would like to live and where the necessary amenities and infrastructure exist. The policy misses the opportunity to propose forward looking sustainable residential development plans in, for example the Walnut Tree Close area, where very significant numbers of new homes could be provided. Such town centre sites could meet much of the housing need over the plan period without harming the countryside.

There is an urgent need for a strategy to focus on brownfield redevelopment before considering development outside the existing urban area.

The policy does not address any of the major issues raised by the Council’s own Town Centre Master Plan, the Guildford Vision Group’s proposal for new river and rail crossings or plans for the redevelopment of Guildford Station, all of which are already the subject of public discussion.

The policy also fails to provide guidance on design requirements, as required by the NPPF.

The policy and surrounding text concentrates too much on shopping without regard to its nature which risks a proliferation of dull highstreet chain stores. The policy should seek to enhance Guildford’s character and encourage a wider variety of small shops including locally owned businesses and shops of use to consumers. (For example there is no butcher in Guildford.)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5049  Respondent: 8667713 / Victoria Sinnett  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

12. POLICY H1

I OBJECT to Policy H1 – Homes for all. Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan period. It fails to set rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions.

The housing mix is based on outofdate, preBrexit projections and on assumptions set out in a flawed SHMA that has not been scrutinised or evaluated.

I support higher density development in the urban area, without resorting to dehumanising, highrise buildings that developers commonly claim are necessary for financial viability. Much of Guildford town could usefully be regenerated with 45 storey blocks with landscaping and underground parking, as often seen on the Continent and, recently, in London.

Student accommodation should provided for 100% of new students and more than 60% of existing students, which would free up ideal family accommodation in the urban area. Other university cities (e.g. Oxford) insist on higher percentages than those proposed in the plan. In my view, the Council’s timidity is a case of “regulatory capture” by Surrey University, which has failed to use its existing planning permissions (dating from 2004) to accommodate 3,000 students or to improve the efficient development of its campus (e.g. by building on its extensive and underused surface car parks). If all students were accommodated in this way, 2,000 homes would be freed up in town and there would be no need to build on the Hog’s Back.

It is not appropriate to release Green Belt land to house students who could be accommodated on the Surrey campus or other university sites. The plan should take account of the university's ability to house its own students and reduce the housing number accordingly.

Guildford borough has already a higher proportion of traveller sites than most comparable boroughs. Overprovision is inappropriate given other constraints.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5050  Respondent: 8667713 / Victoria Sinnett  Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
13. POLICY H2

I OBJECT to this policy on affordable homes (Policy H2) on the grounds of feasibility and that it should be more firm and explicit on unviability in paragraph 4.2.40.

In particular a scheme is only unviable if the value of developing the land (including some allowance for development risk and a normal level of profit) falls below the sale value of the land for alternative nonpremium uses such as agriculture. The price paid for the land is not relevant. The possibility of avoiding the affordable housing obligation through use of unviability arguments only serves to inflate land values. It will become clear that developments are unviable when developers start selling land for alternative nondevelopment uses.

It should be noted in the plan that because of Guildford's relative popularity as a place to live combined with its location close to others towns and within the London Commuter belt no amount of building will meet demand. Similarly no amount of affordable housing will ever meet demand.

In addition the definition of an ‘affordable home’ is 80% of market value. With even a 2 bedroom flat in Guildford now having a market value of +£360,000 the discounted price is still not going to be affordable to anyone on a normal income.

And at what point will ‘affordable homes’ be able to go onto the market at full market price? As we have seen with council houses it is not long before the discounted property is sold at full market value with the original owner simply pocketing the profit.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5054  Respondent: 8667713 / Victoria Sinnett  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

17. POLICY H3

I OBJECT to Policy H3 – Rural Exception Homes as this Trojan horse policy. It says that homes can be built anywhere near a settlement of any form (including agricultural land and the AONB). These homes are meant for people with a village connection, but they could be for anyone on the Guildford borough housing list. To make the housing viable, or to improve the “mix” this can include “market” housing (i.e. normal commercial development which in Guildford usually means large executive homes). This policy means building anywhere, and ignoring all historic planning restrictions.

The bluebox policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 8789) fully applies, including the need to prove “exceptional circumstances.”

The wording of the policy is far too wide and drives a coach and horses though all other aspects of planning policy. As drafted the planning authority could be obliged to grant permission for inappropriate and unsuitable developments.

The wording provides no ability to balance the desirability of the development against other considerations including harm to the Green Belt or the AONB. (If the housing would meet identified need and adjoins a settlement under this policy wording permission would have to be granted even in the most sensitive AONB location, even if more suitable locations Ire
available.) The policy should include the need for a balancing exercise including consideration whether more suitable locations exist.

The policy wording should not allow market housing. The ability to include market housing is likely to inflate land values, leading to a self-perpetuating need to include market housing. It may lead to spurious developer led proposals which will be difficult to resist.

The policy wording should define small, either in land size or number of units. I am concerned that if small is left undefined the policy could be used to justify significant developments. In the context of the plan a development of 150 homes might be argued as small. (If Wisley at 2,500 homes is a big development then 500 homes might be a medium development and 150 could be small.)

The policy wording should be restricted to adjoining sites or define the concept of being "closely related". In particular I believe adding the concept of safe and easy walking distance extends the potential radius within which sites will be argued to be “closely related” Many people would regard a mile or so as an easy walking distance. (School children are expected to walk further than that before being eligible for free school travel.)

The wording of the policy itself does not require the local connection requirement for tenants to be secured in perpetuity only the affordability must be secured in perpetuity. (For example housing could be built for retired Cabinet Ministers under this policy so long as the first tenant was required to have a local connection.) The introduction to the policy mentions this point, but it is not part of the policy itself and may carry little weight at appeal.

The bluebox policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 8789) fully applies, including the need to prove “exceptional circumstances.” The size and location of sites should be better defined and it should be clear market housing cannot be included.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/5046  **Respondent:** 8667713 / Victoria Sinnett  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ()**

**9. POLICY II**

I OBJECT, due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy II)

Our villages are already suffering from severe congestion for much of the day, for example the Newark Road & Rose Lane junction in the centre of Ripley and the A247 through West Clandon. The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.

Furthermore, many of the country lanes around the villages of Ripley, Send and Clandon are narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition.
I OBJECT to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces.

Many of the affected villages, such as West Clandon, already suffer from traffic congestion. Further development around these villages will only result in more traffic and more parking problems.

With some 5,000 houses being proposed close to the village of Ripley, the roads serving the village will become even more congested. Cycling has become an ever popular past time, particularly at weekends hundreds of cyclists past through the villages on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road accidents involving cyclists as a result of the development proposed under the local plan.

The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the road becoming ever more dangerous for pedestrians.

The council has a statutory obligation to protect the public and the additional traffic flows will bring added accidents, noise, pollution and injury of the public. In the case of West Clandon the Street often only has a narrow footpath on one side of the road making it very dangerous, especially when vehicles mount the pavements.

This policy as it is inappropriate and inadequate and fails to respond to the challenges raised by the proposed significant Green belt developments. The borough’s infrastructure is already heavily strained. However the plan’s determination to build large housing estates across the Guildford countryside significantly increases the need for infrastructure investment without securing the means for its provision. Placing housing in the established urban areas would reduce the need for enhanced infrastructure as would a more realistic housing number.

Adequate infrastructure provision is a precondition of sustainable development. But in this plan it is an afterthought buried away in Policy I1. By prioritizing greenfield over urban, brownfield regeneration, the plan creates insurmountable (and unnecessary) obstacles for itself. Common sense suggests a local plan should first assess the borough’s infrastructure capacity for sustainable development, and then tailor development accordingly. This plan, however, assumes infrastructure will follow on the heels of housebuilding as if by magic. It makes implementation critically dependent on providers outside the Council’s control and on the vagaries of CIL income. Instead of recognizing this as a key constraint, the plan is based on hope. It is also highly likely that developers faced with the imposition of large infrastructure requirements will go to court to invoke the NPPF provision that prevents authorities from imposing conditions that make a development nonviable.

Policy I1 requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.

Despite the Garlick’s Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents’ in the locality will see their quality of life significantly deteriorate in many ways.

Many of the utilities in the Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers. No plans to improve these services should mean no development of the Garlick’s Arch site.

Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are already at capacity and suffering from funding cuts or freezes. Any further development without funding will place further stress upon existing health services. Police services are seeing funding reduced. The development of the proposed 13,860 homes during the plan period will stretch the police services further and is unsustainable.
There is no provision of the increased capacity of Guildford hospital, where is this assessed and remedied?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5047  Respondent: 8667713 / Victoria Sinnett  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. POLICY I2

I OBJECT due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2) I object to this policy as it is too vague and optimistic. Significant improvements to the road infrastructure are like to be many years away even if they ever happen. The draft plan, however, commits to building massive housing estates in the countryside before any of these road improvements are in place. This is inappropriate and will lead to massive traffic disruption during the construction phase and will add permanently to an already congested network (about 3,000 private cars from the 2,100 new homes at Wisley Airfield alone).

Road infrastructure represents a major constraint that should have been applied to the housing target at a much earlier stage in the plan process and not left as an unresolved difficulty in the draft plan.

There is no certainty that either the A3 or M25 in the borough will be improved to increase capacity and reduce congestion during the Plan period. Highways England has no plans to even examine improving the A3 before 2020. I have considerable concerns that development of the large residential sites identified at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), will take place before any improvements are made to the trunk road network. The A3 & M25 are already at capacity during peak hours and any development prior to improvement of these roads will only make the situations worse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5036  Respondent: 8667713 / Victoria Sinnett  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Page 1577 of 3335
The link road that runs through the village of West Clandon (A247) is currently a 'hazardous' road as highlighted in a traffic survey, and only today there has been yet another accident on this road with the colliding vehicles mounting the pavement.

At present, infant school children walking to the small local school are forced to walk along narrow pavements close to a road which is unsuited to the volume and type of traffic that uses it. Last week I had to jump across the pavement to avoid being hit by a lorry who drove up onto the pavement to avoid another passing the other way, and had my own car struck by another travelling at speed a few months ago. Large vehicles such as lorries and buses are frequently seen mounting the pavements at significant speeds to avoid collisions with one another and will no doubt in time lead to serious injury or death. A development as proposed in the local plan will significantly increase the likelihood of this occurring, as a direct result of the obvious increase in traffic in the area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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11. POLICY I3

I OBJECT to poor air quality concerns (Policy I3)

Paragraph 4.6.27 of the Plan states that “Development must also mitigate its traffic impacts, including its environmental impacts and impacts on amenity and health.” The significant level of development being proposed, particularly in the north east of the borough will lead to considerable further congestion, despite any attempts to mitigate this through travel plans. This will be particularly acute in built up residential areas and will only lead to greater levels of air pollution, which will have a detrimental effect on local residents and their health and can result in early death.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Re: Responses to Guildford Borough Proposed Submission Local Plan (June 2016)

I am writing to express my serious concerns relating to the most destructive policy ever to be imposed on the population of Surrey, or as you call it the 'Guildford Borough Plan'. In addition to my comments below which directly relate to the outlined proposals, I am disappointed and perplexed as to how the council feels to is right to make such ludicrous plans at the significant expense of areas of outstanding natural beauty in the Guildford area.

The plan is a total attack on the beautiful green areas which surround the northeast of Guildford, and it is not only unethical to propose building on Greenbelt land but destructive to a small local village community within this region. Greenbelt land is intended to protect small village settlements, such as West Clandon, from the urban sprawl of larger town and cities, and the residents of such communities live away from urban areas out of choice. As such it is totally unacceptable to be proposing to build on such large green spaces as an urban extension, when it will totally transform the number of residents living within a parish.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5040  Respondent: 8667713 / Victoria Sinnett  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. POLICY P2

I OBJECT to not protecting the Green Belt (Policy P2)

This policy does not sufficiently safeguard the Green Belt even though Green Belt constitutes 89% of the borough and should be the cornerstone of all local planning policy. The Green Belt is not the Council’s to give away and once it is gone it is gone forever. Sacrificing areas of the Green Belt to a developer influenced growth agenda is a betrayal of future generations and does not constitute sustainable development.

The Green Belt should be protected in perpetuity, but Policy P2 seeks to justify excessive development in supposedly protected areas. This is in breach of party manifesto commitments and contrary to previous responses to public consultation. It is disreputable to argue, as the Council does, that the Plan would involve the loss of “only” 1.6% of the borough’s Green Belt. Leaving aside the reliability of that statistic, the NPPF does not set an “acceptable” percentage. The fact remains that the plan proposes that 65% of the housing plus industrial development be built on land to be taken out of the Green Belt

Paragraph 4.3.16 is seriously deficient in simply stating that the Council considers that exceptional circumstances exist to justify amendment of Green Belt boundaries. The exceptional circumstances are not identified. It is clear from national guidance that unmet housing need is not on its own an exceptional circumstance. Even to the extent that exceptional circumstances exist, these have to be balanced against the harm to the Green Belt in the specific sites proposed to be taken out of the Green Belt. This balancing exercise appears not to have been done.

The Countryside Study which the Council may argue fulfilled the need to demonstrate the exceptional circumstances required to justify removal of areas from the Green Belt was a simplistic tick box exercise. Within limits it may have answered certain questions about different...
attributes of different areas of Green Belt but it did not carry out the balancing exercise needed to determine whether specific exceptional circumstances justified removal of specific areas of land from the Green Belt. I believe that each of the identified Green Belt site proposed to be removed from the Green Belt should be carefully assessed against any exceptional circumstances in deciding whether it should be removed from the Green Belt in the final plan. This exercise should bear in mind that housing need in itself is not an exceptional circumstance and nor is the Council’s growth aspiration. An important consideration is that more housing need could be met on urban sites than is currently planned. The Plan has fallen into the developers’ hands and developers prefer building on undeveloped land rather than brown field sites.

I note that the Summer 2016 edition of "About Guildford" (published by the Council) on page 5 states that "... the Plan rejects any schemes that would have a detrimental impact on the Green Belt." This is demonstrably untrue and I consider this to be a deliberate untruth which compromises the consultation process. I would ask that this untruth be corrected and the consultation period restarted after the correction has been given the same distribution as the original statement. (I assume the document was delivered to most houses in the Borough.) I reserve the right to argue before the inspector that the consultation process was flawed and ineffective because of this.

I object to the “insetting” of 14 villages from the Green Belt. Contrary to assertions made in the Plan process many of these villages do contribute to the openness of the Green Belt and there is no need to inset them.

I also object to the wholesale extensions to the settlement boundaries in many villages to allow for infilling and that infilling is also proposed outside the settlement boundaries of 11 further villages. Many Guildford villages are linear. It is all too easy to square off boundaries by including countryside bounded on only one or two sides by existing development, claiming it contributes nothing to the “openness” of the Green Belt, a term which neither the plan nor the NPPF defines. The NPPF’s other 4 tests of Green Belt status, including the prevention of urban sprawl, are ignored. Effectively, this policy makes all villages within the Green Belt vulnerable to large blocks of new development and seems almost calculated to secure the rejection of the plan as a whole.

To “inset” twothirds of the borough’s rural villages on the grounds that they no longer contribute to the purposes of the Green Belt is extreme and inherently implausible, given the borough’s location on the edge of Metropolitan London. I cannot see how such extensive areas fail to contribute to the purposes of the Green Belt under the NPPF, but this could quickly be the case if the proposed “insetting” and boundary extensions go ahead.

This policy is wildly disproportionate in terms of any foreseeable development need and has caused tidal waves of opposition from residents. It flies in the face of NPPF paragraph 17’s aim of “empowering local people to shape their surroundings” and other NPPF provisions.

Paragraph 4.3.17 states that “the general extent of the Green Belt has been retained.” I believe this should be deleted as an untruth.

In addition I OBJECT to the proposals to remove from the Green Belt the so called ‘strategic sites’ of Wisley Airfield (A35), Gosden Hill Farm (A25) and Garlick’s Arch (A43) and all other strategic sites. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these sites and villages (as mere housing need does not constitute a ‘special circumstance’) to be taken from the Green Belt. Once taken from the green belt they will be lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached.

GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site.

Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5056  Respondent: 8667713 / Victoria Sinnett  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

19. SITES POLICIES A1 TO A57

I OBJECT to all strategic sites proposed in the draft Plan to be built in the Green Belt.

1. I object to the identification and allocation of sites in this plan without regard to Green Belt, infrastructure or other The plan says that “allocating these sites does not grant planning permission for development.” However, each of the sites will be removed from the Green Belt and will be available in principle for development and nonGreen Belt uses. The inclusion of these sites without detailed site by site justification shows contempt for the thousands of detailed comments the Council have received about individual sites ever since the Issues and Options consultation in 2013. The plan has hardly changed since the Council received 20,000 objections to its first draft plan in 2014. The Inspector considering the plan may conclude that the consultation has not been properly conducted.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5041  Respondent: 8667713 / Victoria Sinnett  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

4. POLICY P4

I OBJECT to development in areas which are at risk of flooding (Policy P4)

National Planning Policy states that Local Plans should take account of climate change over the longer term, including factors such as flood risk. It goes on to say that new development should be planned to avoid increased vulnerability to the range of impacts arising from climate change.
The Plan states that in accordance with national planning practice guidance, the Level 1 SFRA has been used to guide development towards areas at the lowest risk of flooding and identify areas unsuitable for development. However, the document concludes that land outside of the area of flood risk is not capable of accommodating all of the borough’s identified development needs. A Level 2 SFRA has therefore also been produced and will help the Council apply the exceptions test (as described in the NPPG) as necessary to development proposals in areas at risk of flooding.

The site at Garlick’s Arch (A43) is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 having between a 1% and 0.1% annual probability of river flooding. Knowing the area well I am aware that this site often floods during the winter months and the flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5037  Respondent:  8667713 / Victoria Sinnett  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Furthermore, the additional information below supports the need to scrap these plans:

I OBJECT in the strongest possible terms to the Guildford Borough Proposed Submission Local Plan (June 2016). This Plan is unsustainable, unworkable and, in many provisions, unnecessary.

I set out below my objections to specific policies and matters within the Plan.

1. POLICY S1 Sustainable Development

I OBJECT to this Policy as the development proposed will not be sustainable (Policy S1)

The NPPF states that the presumption in favour of sustainable development “should be seen as a golden thread running through both planmaking and decisiontaking.” As the first policy in the Plan, Policy S1 ought to set a clear framework. Instead, no definition of “sustainable development” is given. The policy also fails to set out any principles for applying sustainable development in practice to local planning decisions, which often have serious longterm impacts. The policy states that it aims “to secure development that secures the economic, social and environmental conditions in the area”. This fails to recognize that economic growth, social justice and environmental protection often conflict. The policy does not say how each element is to be weighted or conflicts resolved. As a practical guide to the planning decision to be taken in the Plan period it is seriously deficient. The policy is likely to be used by developers to justify inappropriate developments on economic grounds. Under this policy, virtually any development will qualify as “sustainable”, in breach of the NPPF’s most important guideline.

Policy S1 is also seriously deficient in making no mention of the Green Belt. The Green Belt is a long term Government policy enshrined in primary legislation to protect green areas in perpetuity. The Green Belt is a living example of sustainable development in practice and is one of the most important factors affecting sustainable development in the area covered by the Plan and should be acknowledged in this policy. Policy S1 should include a commitment to protect the
Green Belt from inappropriate development and to uphold Green Belt boundaries and protections. This would set at least one clear boundary to planning decisions. The Plan and the Council have treated the Green Belt as a developable land bank rather than as a constraint to development. The commitment to approve planning applications “wherever possible” and “without delay” reveals the prodevelopment bias of the plan. Countervailing references to sustainability are so vague that the NPPF presumption in favour of sustainable development becomes a presumption in favour of any development at all. This policy also ignores, as if they are inconvenient constraints, most of the 12 Core Planning Principles set out in NPPF paragraph 17.

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact existing local communities by overdevelopment, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill Farm (A25) are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are also unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick’s Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5039  Respondent: 8667713 / Victoria Sinnett  Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2  

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. POLICY S2 Borough Wide Strategy

I OBJECT to the Borough Wide Strategy (Policy S2)

The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

The housing number is based on preBrexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.
The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” triborough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the triborough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guilford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

The assumptions and calculations in the SHMA are widely regarded as flawed and even before Brexit, produced an inflated housing needs number. The figure of 13,860 new homes is completely unsubstantiated. It has not been scrutinized by councillors despite repeated requests for debate. The assumptions and calculations underlying the model are hidden, protected by a claim to intellectual property by a commercial subcontractor used in preparing the SHMA. I have serious doubts about the objectivity of the SHMA because it has been produced by consultants whose website openly proclaims their prodevelopment agenda leading to reasonable suspicion that the figures are inflated. Guildford’s OAN is not transparent but has been taken on trust by the authors of the plan. Given that almost every element of the plan is predicated on this OAN, the plan as a whole cannot be considered “sound”.

The status of the 13,860 figure is ambiguous. The Council has said that the housing number and the OAN are identical because the OAN is “deliverable” and is by definition objective and cannot be contradicted. The OAN is only deliverable because of the Council’s cavalier approach to the Green Belt in contravention of the NPPF, ministerial statements and local and national Conservative Party manifesto commitments. The plan also states that infrastructure or other constraints may in due course affect deliverability. It is also unlikely that the number of houses can be built at the rate proposed. In recent years, housing starts have on average been less than half the proposed rate. This is not because developers do not have the land or cannot get planning permission. Constraints in the supply chain and maintaining profit levels have been more important.

The plan cannot be considered “deliverable”. In addition, the number of homes proposed, plus existing planning permissions, plus expected “windfall” sites, exceeds the total of 13,860. So how many homes (taking account of these adjustments) do the Council want built? The plan does not say. Without this figure it is hard to see how anything else can be planned. This undermines the validity of the whole consultation. It is unreasonable to ask the public to approve a “plan” that fails to propose a target number that takes all the standard constraints and adjustments realistically into account, leaving the Council to set one without further consultation. Even if the OAN is not flawed, it is at best only a baseline figure and should not be passed off as a policy proposal.

It is unreasonable to embark on a radical transformation of the borough on the basis of an unclear housing target. Most of Guildford Borough is highly protected from development (89% Green Belt, 44% AONB and about 75% protected by SPA). Whether or not increasing the number of dwellings by up to a quarter is desirable, it would be a major and irreversible change, arguably turning a largely rural borough into a mainly urban or suburban one like Woking. The scale of the housing number increases the onus for it to be seen to be sound. A substantially lower number, on the other hand, would remove the need to build on Green Belt or open countryside, and instantly meet the single biggest public objection to the plan as a whole.

The Plan in general and this policy in particular does not address the point that Guildford exists as part of London’s commuter belt. Any increase in supply of housing in Guildford, particularly if the increase is proportionately greater than elsewhere in the commuter belt, will simply result in a shift of population into the area. It will not reduce prices or increase
availability except imperceptibly. The Plan also ignores the point that many of those working in the area live elsewhere.

Accordingly in considering the housing number the Plan should take into account that in this part of London’s commuter belt, demand for housing is, in practical terms, unlimited.

This policy does not take proper accounts of the constraints to development which exist, principally posed by the Green Belt and by infrastructure limitations. I believe the Council is under a duty to properly consider applying these constraints. It is clear the Council has failed to do this. This approach differs from all the other boroughs in Surrey. The Plan appears to have deliberately been manipulated towards a growth agenda without disclosing why this is being done. The housing that is needed should be concentrated on urban brown field sites and through increasing the housing density of existing built up urban areas.

The development of 13,860 homes in the Plan period with 65% in the Green Belt does not constitute sustainable development. It will have a permanently detrimental impact on the Borough in general and on West Clandon and surrounding area in particular. The developments at Garlick’s Arch and Gosden Hill Farm do not meet the needs of the local communities. The road infrastructure in and around West Clandon will be unable to cope with additional demand. The edge of urban Guildford will creep that much closer to West Clandon, thus negating the purposes of the Green Belt in the area which include safeguarding the countryside from encroachment, checking the unrestricted sprawl of large built up areas and preventing neighboring towns merging into one another.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill Farm (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/867 Respondent: 8667713 / Victoria Sinnett Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

24. Questions posed by Guildford Borough Council as part of its consultation. Questions from GBC

24.A.Question 1: The evidence base and submission documents
The Proposed Submission Local Plan: strategy and sites is based on up-to-date evidence. The evidence base documents contributing to the preparation of the plan are listed in Appendix D and can be found on our website (links open in a new window).

Do you agree that the evidence used for the Proposed Submission Local Plan Strategy and Sites is adequate, up-to-date and relevant?

ANSWER

I do not agree that the evidence used for the Proposed Submission Local Plan Strategy and Sites is adequate, up-to-date and relevant.

The fundamental driving forces for much of the development proposed in the Plan (particularly that on Green Belt land) are based on:

1. An excessive ambition to expand the local economy which is neither warranted nor wanted by the local Guildford is already one of the highest ‘value creation’ areas in the country and has one of the lowest unemployment rates. There is no evidence that massive and accelerated expansion is required.

2. SHMA figures which are neither transparent nor justifiable, especially in view of previous figures Independent assessments of the SHMA (eg from Guildford Residents’ Association and David Reeve) show it is set far too high and so cannot be said to be adequate, up to date or relevant.

In addition the recent vote to leave the EU and the impact this will have on the economy and migration have not been taken into account.

The Plan should be reassessed and the methodology for arriving at housing need figures should be fully transparent.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** SQLP16/868  **Respondent:** 8667713 / Victoria Sinnett  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 2: Legal compliance

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

24.A. Question 2: Legal Compliance

Do you consider the Proposed Submission Local Plan: strategy and sites as a whole is legally compliant? Please provide the following information being as precise as possible:

- why you consider it is or is not legally compliant and
- what change(s) (if any) you consider necessary to make it legally compliant, explaining why this is the

ANSWER

I do not consider the Proposed Submission Local Plan: strategy and sites as a whole to be legally compliant because it mainly ignores the consultation process for the 2014 draft Plan it is claimed to be based on.
That consultation process was absolutely clear by some +20,000 responses that that Plan was flawed and no development should be carried out on Green Belt land.

Instead this 2016 draft Plan actually increases the number of dwellings being built on the Green Belt, in direct contradiction to the consultation process, yet is stated to be a Regulation 19 proposal.

As a result I do not see how the 2016 draft Plan can be Legally Compliant.

The 2016 draft Plan should be reassessed and should take into account the views of the majority of responses from the consultation process for the 2014 draft Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/869  Respondent: 8667713 / Victoria Sinnett  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

20.A.Question 3: Soundness

Do you consider the Proposed Submission Local Plan: strategy and sites as a whole to be sound? Please provide the following information being as precise as possible:

- why you consider it is or is not sound and
- what change(s) (if any) you consider necessary to make it sound, explaining why this is the

ANSWER

I do not consider the Proposed Submission Local Plan: strategy and sites as a whole to be sound, because, but not limited to, the following reasons:

1. “Only sites that propose sustainable solutions have been included in the Plan and the Plan rejects any schemes that would have a detrimental effect on the green” Summer 2016 edition of "About Guildford" (published by the Council) on page 5. This is demonstrably untrue and appears designed to bias the consultation process.

2. The OAN has been adopted as the housing number without the application of any constraints to take account of Guildford's circumstances, including in particular the Green Belt, AONB and road National policy permits such constraints to be applied and it is inappropriate not to consider the need to do this.

3. The draft Plan does not accord with the NPPF policies on protecting the Green Exceptional circumstances need to be shown to justify removing areas from the Green Belt and this has not been done. The housing need number is not justification in itself according to published ministerial statements Having properly calculated an OAN, constraints should be applied to it to reflect the Green Belt, AONB and infrastructure. Each proposed Green Belt site then needs to be justified on its own merits. The benefits of the proposed development need to be identified together with the harm to the Green Belt. Only if there are exceptional circumstances and following a proper balancing exercise demonstrating that these exceptional circumstances outweigh the harm to the Green Belt can
the proposal proceed. The draft Plan does not demonstrate that this has been done. The housing number has been used as a blanket justification for all Green Belt sites which amount to 65% of the proposed housing number.

1. Whatever the justification for the assumptions made in calculating the OAN, those assumptions are now almost certainly incorrect following the
2. The housing number is at least twice the achieved rate of building in the Borough over the last few There is no evidence in the Plan to show that this rate is achievable and sustainable.
3. Much of the infrastructure required to support the level of development proposed is outside the Council’s The Infrastructure Plan is long on possibilities and aspirations and very short on commitments. The infrastructure requirements placed on developers are supposed to be in place before development commences. This is utterly unrealistic and indicates a lack of knowledge of developer’s business models which depend on positive cash flow. It seems very clear that at best, infrastructure provision will seriously lag development and leave higher levels of congestion than now. This will reduce the quality of life for residents through congestion and disruption.

1. The 4045% requirement for affordable homes together with infrastructure such as railway stations, park and ride facilities, schools and roads is highly likely to be challenged on a site by site basis by developers using the NPPF provision that Councils cannot impose conditions which make development nonviable.
2. GBC has not included details of its Town Centre Master Plan and urban development proposals in time for and as a part of the Guildford Local Plan consultation
3. GBC has failed to provide an Infrastructure Report in time for and as a part of the Guildford Local Plan consultation
4. GBC has proposed an OAN of 693 houses per annum in the GL Hearn West Surrey Strategic Housing Market Assessment (SHMA) which many, including independent assessors, consider unsound
5. Highways England will not start to consider what it intends to do as regards the A3 in the vicinity of Guildford until 2018
6. Network Rail have not made available for the public consultation any plans for a new railway station at Merrow with an adjacent Park & Ride for 1,000 cars
7. The GBC proposals for Gosden Hill Farm do not appear to be in coordination with the Neighbourhood Plan for Burpham

1. The draft Local Plan will cause further linear development along the A3 between Burpham and West Clandon PC and encroachment onto open Green Belt countryside in clear conflict with the National Planning Policy Framework
2. The proposal for Garlick’s Arch was added to the draft Local Plan without any prior consultation under Regulation
3. The Land Availability Assessment (LAA) indicates a range of planning difficulties for Gosden Hill Farm and Burpham which have to be met by the developer These include Electricity Grid supply problems and foul sewage and surface water issues that suggest the development proposed cannot easily be implemented both technically and financially.
4. No adequate explanation is given as to how the aspirational proposal for a tunnel will be used to overcome traffic issues relating to the quality of life and amenity of Burpham, West Clandon, Send and Ripley citizens
5. In common with many others I do not believe the housing figure has been properly calculated and I believe it overstates housing The Council has prevented councillors or others from properly considering the SHMA by refusing to make public the basis on which it was drawn up.
6. The housing figure, when properly recalculated, should be subject to constraints to reflect Guildford’s circumstances, including in particular the Green Belt and road National policy permits such constraints to be applied and it is inappropriate not to consider the need to do this.
7. Even once a housing number has been calculated it cannot be used to justify taking land out of the Green Belt on a wholesale
8. Cast iron commitment should be included in the plan that development can only commence when required infrastructure improvements have been
9. The status of the text which accompanies each policy box is not If the accompanying text does not have the force of policy a number of the policies (i.e. the text in blue) are so vague and general that they commit the Council to very little.
The draft Plan should be reassessed with housing on brownfield sites made a priority over commercial development and Greenfield sites and each of the above points addressed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/870  Respondent: 8667713 / Victoria Sinnett  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 4: Duty to cooperate

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

20.A. Question 4: Duty to cooperate

Do you consider the Proposed Submission Local Plan: strategy and sites as a whole has complied with the Duty to cooperate? Please provide the following information being as precise as possible:

• why you consider it has or has not complied with the Duty to cooperate and
• what change(s) (if any) you consider necessary to make it comply with the duty to cooperate, explaining why this is the

ANSWER

I do not consider the Proposed Submission Local Plan: strategy and sites as a whole has complied with the Duty to cooperate.

This 2016 draft of the Local Plan clearly demonstrates Guildford Borough Council’s refusal to cooperate with the wishes and requirements of the vast majority of the residents in its Borough. The Council has failed to cooperate with the results of the consultation process for the 2014 draft Plan which was meant to inform and guide this 2016 draft Plan.

Despite campaigning on a clear statement ‘Conservatives Say Green Belt To Stay’, the ruling party on GBC is now intent on pushing through a Plan which will devastate Green Belt land and extend the Guildford Urban Area to further merge into surrounding rural villages.

This is not cooperation by any definition.

In addition the Council has failed to cooperate in providing any transparency to the housing need figures commissioned by the Council from GL Hearn.

The 2016 draft Local Plan should be reassessed with a reviewed and transparent SHMA and revised to reflect the views of the residents of the Borough, who pay for Guildford Borough Council to act in their interests, and not those of developers and central government.

I trust that the objections made above are fully taken into consideration and that the 2016 draft Local Plan is amended accordingly.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Attached documents:

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**Comment ID:** pslp173/223  **Respondent:** 8667713 / Victoria Sinnett  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Appendix H: Maps - West Horsley North

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

**Policies A37, 38, 40, 42, 44 & 45 – My Objections**

Some 295 houses in various smaller developments in West Horsley, 100 in Send and 15 in Ripley. These will generate traffic on the A247 to access the A3.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

**Attached documents:**

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**Comment ID:** pslp172/2101  **Respondent:** 8667713 / Victoria Sinnett  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy A25

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Gosden Hill development of 1700 houses. Reference to a potential link road from the development to the A247. The clear implication is for an access from the development to the A247 with enormous traffic implications for the A247.

South bound off- and on- slip roads to service the development and replace the existing off- slip road to Burpham. The only North bound access to the A3 will be via the existing slip road off Clay Lane. (See later, Burnt Common).

A 4-entry form secondary school, a primary school, a retail centre and a park and ride for up to 700 cars.

When developed, the new employment site at the north side of Gosden Hill Farm (site allocation A25) will be treated as an Office and Research & Development Strategic Employment Site (7000sq.m). This could mean several hundred employees.

1. I object to the changed policy A25 Gosden Hill for the development of 1700 homes which is still far too much.
2. There is no need for housing on this site because the local plan housing target is incorrect and inflated and ignores constraints.
3. Gosden Hill is located entirely within the Green Belt. No exceptional circumstances have been demonstrated for building on this site and therefore development here does not meet paragraphs 87-89 of the NPPF. Furthermore, Gosden Hill performs all five functions of green belt.

4. The site has no provision for foul or surface water sewerage and adjoining sewerage is at capacity.

5. The Green Belt at this point serves the important function of separating West Clandon from the edge of urban Guildford. Development here will cause the two to coalesce defeating one of the objectives of the Green Belt. If this development proceeds I believe the narrow strip of Green Belt remaining between Guildford and Clandon at this point will be too narrow and will come under further pressure. It will represent an undesirable ribbon development along the A3. It will be highly visible from the A3 when approaching Guildford and will, in conjunction with A43a at Garlick's Arch give the appearance of almost continuous development from Send through to Guildford.

6. The development of this site cannot be sustainable and will cause massive congestion onto surrounding roads. The development will generate in the region of 6,000 vehicles which will exit straight on to the A3 which is stationary every day during rush hours. The linking of the A3100, B2215 and A247 would channel thousands of cars through the narrow, winding road through West Clandon.

7. I object to the proposal for a link road to bring traffic from the Gosden Hill development to the proposed 4 way junction at Burnt Common. This has the potential to generate large volumes of traffic (including commercial vehicles) on the A247 through Send and West Clandon - a road which is already under traffic stress (see below).

8. The volume of traffic will greatly increase air pollution which is particularly critical given the proposal to build two schools.

9. A new on-slip at Burpham would only be 1.8km from the on-slip at Burnt Common which is against Highway England’s requirement of 2km.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** pslp172/2102  **Respondent:** 8667713 / Victoria Sinnett  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy A43

**Do you consider this section of the document; complies with the Duty to Cooperate?** ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

Garlick’s Arch development of 400+ houses and facilities for travelling showmen (implies storage yards and long vehicles). This will generate traffic on the A247.

1. I object to the changed policy A43 Garlick’s Arch for 400 homes and 6 travelling show people pitches
2. It ignores all the thousands of previous objections made by local people
3. There is no proven demand for travelling show people plots in this location
4. There is no need for putting houses on this site because the local plan housing target is incorrect and inflated and ignores constraints.
5. The allocation of 28.9 ha is an excessive land grab into the Green Belt. If we take a normal density of 30 homes per ha and it is at the end of the day proven that there is a need for 400 homes in this location the land requirement is 13 ha not 28.9 ha which is more than double. This replicates a similar over land grab at Burnt Common where the factor is 7 times the land required.
6. This confirms the worrying impression that GBC have a pre-determined policy of building on the Green Belt at every opportunity. The arithmetic does not stack up. One would have thought that they would as custodians of the green Belt be intent on conserving it rather than exploiting it.
7. The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

8. Garlick’s Arch (A43) is in an unsustainable location. It does not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. The site is unsuitable due to lack of access to sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be dependent on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

9. The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

10. I object to the proposal to remove Garlick’s Arch from the Green Belt. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for this land to be taken from the Green Belt. Once taken the green belt is lost forever. There is a real danger that the loss of this Green Belt will result in urban sprawl and the neighbouring villages merging into one another. The significant development in West Clandon, Send and Ripley will result in the character of these villages being lost and the countryside encroached.

11. I object to the development at Garlick’s Arch because of flood risk. The site at Garlick’s Arch is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. Knowing the area well I am aware that this site often floods during the winter months and the flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.

12. I object to the loss of rural employment on the site. The development at Garlick’s Arch would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises.

13. I object to the potential loss of Ancient Woodland on the site. The proposed development at Garlick’s Arch will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees that existed in the year 1600.

14. I object due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1). Our villages are already suffering from severe congestion for much of the day, for example the Newark Road and Rose Lane junction in the centre of Ripley and the A247 through West Clandon. The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.

15. Furthermore, many of the country lanes around the villages of West Clandon, East Clandon, Ripley, and Send are narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition. I object to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces.

16. Many of the affected villages, such as West Clandon, East Clandon, Send and Ripley, already suffer from parking problems. Further development around these villages will only result in more traffic and more parking problems.

17. With some 5000 houses being proposed close to the villages of West Clandon, East Clandon, Send and Ripley, the roads serving the village will become even more congested. Cycling has become a popular past time, particularly at weekends hundreds of cyclists past through the village on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road accidents involving cyclists as a result of the development proposed under the local plan.

18. The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the roads becoming ever more dangerous for pedestrians.

19. I object to the lack of proper infrastructure planning for sites (Policy I1). Policy I1 requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.
20. Despite the Garlick’s Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents’ in the locality will see their quality of life significantly deteriorate in many ways.

21. Many of the utilities in the West Clandon, East Clandon, Burpham, Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers. No plans to improve these services should mean no development of the Garlick’s Arch site.

22. Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are already at capacity and suffering from funding cuts or freezes. Any further development without funding will place further stress upon existing health services.

23. I object due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2). There is no certainty that either the A3 or M25 in the borough will be improved to increase capacity and reduce congestion during the Plan period. Highways England has no plans to even examine improving the A3 before 2020. I have considerable concerns that development of the large residential sites identified at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), will take place before any improvements are made to the trunk road network. The A3 & M25 are already at capacity during peak hours and any development prior to improvement of these roads will only make the situations worse.

24. I object to poor air quality concerns (Policy I3). Paragraph 4.6.27 of the Plan states that “Development must also mitigate its traffic impacts, including its environmental impacts and impacts on amenity and health.” The significant level of development being proposed, particularly in the north east of the borough will lead to considerable further congestion, despite any attempts to mitigate this through travel plans. This will be particularly acute in built up residential areas and will only lead to greater levels of air pollution, which will have a detrimental effect on local residents and their health.

25. I object to the inclusion of the land at Garlick’s Arch, Send Marsh/Burnt Common and Ripley (A43). Garlick’s Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8). There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).

26. It is clear that with this site being added at the eleventh hour and no infrastructure planning has been undertaken. The Infrastructure Schedule makes no provision for any infrastructure improvements for this site. How will the local services such as schools and doctors cope, many of which are already at capacity? (Policy I1)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
2. This previous allocation for B1c, B2 and B8 development was removed from the 2014 draft due to all the objections made previously.

3. The word “minimum” is a change from the previous “maximum” in the 2016 plan and since that time there has been a decline in demand for industrial land. This change alone is unacceptable since even if there was a need to build 7,000 sq m at Burnt Common this development would only require 1.4 ha at a standard plot ratio density of 50% not 9.26 ha. There is no justification for zoning an additional 7.86 ha in the Green Belt.

4. There is in fact no justification for building any more industrial development in the borough particularly at Burnt Common. The current industrial pipeline of granted consents of 38,357sqm in B1c, B2 or B8 use class space is double the 19,000 sq m said to be needed by Aecom who justify the need for new space on top of the existing pipeline by a completely unsubstantiated suggestion that “there is the possibility that some pipeline developments may not come forward at all, or be developed in different quantities by use class than has been consented.”

5. There is no need to build industrial or warehouse development in the middle of the Green Belt when Slyfield and Guildford still have empty sites and industrial units.

6. The 2017 Employment Land Need Assessment shows a reduction in demand to 3.9 hectares for industrial land for the whole borough not a huge over allocation of 9.26 hectares at Send in the Green Belt.

7. The Employment Land Needs Assessment update 2017 (ELNA) states “that the pipeline for employment floorspace defined by planning permissions yet to be implemented and prior approvals suggests the potential for an additional 33,607sqm of B use class floorspace to come forward. This figure comprises a net loss of 4,750sqm of B1a use class floorspace and a net gain of 38,357sqm in B1c, B2 or B8 use class space.”

8. 38,357 sq m of B1c, B2 or B8 use class is quite sufficient supply for the plan period and is in fact more space than the 3.9 ha of industrial land that is said to be needed for the plan period by Aecom. Since if you were to develop 3.9 ha at a plot ratio of 50% it would provide new industrial development of 19,000 sq m approximately half of current planning permissions granted. This does not justify the need for new development of industrial space on the Green Belt in such areas as Burnt Common.

9. The reality of demand for industrial space is that it is both nationally and locally in decline and this is evidenced by old existing permissions that have not been taken up and developed. The ELNA alludes incorrectly to the poor quality of existing space being a “constraint” on supply and fails to acknowledge that this assertion cannot apply to potential newly developed space e.g. the undeveloped pipeline of 38,357sqm.

10. The impact on small surrounding roads will create traffic gridlock.

11. It will join up existing villages and defeat the purpose of the Green Belt.

12. The ongoing poor quality of the updated research undertaken by Aecom in the Employment Land Needs Assessment 2017 does not support industrial development on land in the Green Belt at Burnt Common.

13. The Aecom research is generally superficial and lacks sufficient detail and analysis between B1c, B2 and B8 use classes and no reliable individual analysis has been undertaken of the widely different supply and demand dynamics of light industrial, general industrial and warehousing and distribution floor space.

14. The potential inclusion of a waste management facility mentioned at paragraph 4.4.23a lacks enough detail for proper consultation and is completely inappropriate.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/640  Respondent:  8667713 / Victoria Sinnett  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Although much is made of the need for new infrastructure to support these developments and for this to be in place as needed, the Plan admits … “we forecast that there will also be an absolute increase in overall traffic volumes” and this is assuming all the infrastructure (listed in App. C to the Plan) is in place in a timely fashion. GBC has little or no control over the plans of Surrey County Council as the local highways authority and Highways England for trunk roads. Worryingly, the Plan now has less substantive information about improvements to the A3 South of the M25 from Highways England and it appears that their plans are not yet formed (Policy ID2). In the absence of such information, the infrastructure proposed is specific to each proposed development and does not address cumulative effects. What would be the case with regard to planning approval if SCC and/or HE do not provide timely infrastructure?

The Plan now calls for nearly all infrastructure to be funded by developers (see APP. C). We question how realistic it is to expect developers not only to pay for all the infrastructure but also to have it in place in a timely fashion. The Plan says that planning permission will be refused if timely provision of infrastructure cannot be secured. Such refusals will almost certainly be settled in the courts. Developers’ business models are based on building and selling houses to create the cash to provide infrastructure. People will be living on the sites well before infrastructure is complete. Will GBC prevent development of Gosden Hill until slip roads etc. are provided off and onto the A3? Again, the infrastructure is site specific and does not address cumulative effects.

If development were to be refused the land would still have been removed from the green belt and its future rendered uncertain.

Residents are being asked to accept very large amounts of development with little or no detail being provided on measures which would relieve existing congestion and limit future problems. The cumulative effects of the developments listed below are certain to have a devastating effect on the A247 through our village (and of course on Send) and it is hard to see how any of the infrastructure proposed in the Plan (App. C) will do anything to mitigate the effects of these developments on the A247 and hence our village.

**Summary of the Impacts on the A247 – My Objections**

All of these developments will draw additional traffic to the A247 through the village. It would be naïve to think that the employment sites and schools will serve only the developments themselves. Apart from the normal movements of residents to and from the new sites there will be considerable additional traffic on the A247 generated by:

- children from elsewhere being delivered to schools and collected
- the employees of the offices and industrial sites getting to work and returning home
- the vehicle movements generated by distribution and storage activities
- traffic from Wisley wishing to travel South and returning
- traffic from Gosden Hill wishing to travel South and returning
- traffic from Slyfield wishing to travel South and returning
- private and commercial traffic originating in the South and accessing Gosden Hill, Burnt Common or the A3 and returning (including traffic from Dunsfold)

The A247 although an A road:

- is less than 2 vehicle wide in places
- does not have continuous footpaths
- has several sharp bends
- has a hump-backed bridge with poor site lines
- has a very difficult junction to access the station
- is largely unlit
- has a primary school
- is already very congested at times

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

**Comment ID:** pslp17q/73  **Respondent:** 8667713 / Victoria Sinnett  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Question 4: Duty to cooperate

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ( )**

**Non-plan Items– My Objections**

Surrey County Council’s business plan for Newlands Corner (not referenced in the Local Plan) to attract 100,000 more visitors a year. A significant proportion of these can be expected to use the A247.

Waverly B. C. has approved the development of 1,800 homes at Dunsfold which has the potential to feed traffic trying to avoid Guildford, onto the A247 to access the A3 (not referenced in the Local Plan).

**Cumulative impact of changes – My Objections**

Changes to the Plan have done nothing to alleviate the problems (particularly of traffic and congestion) raised in residents’ previous responses. Indeed it is now clear that the problems will be made much worse. There do not appear to be any changes which would be of benefit to the Clandons and indeed the cumulative effect of what is in the Plan and some external factors not in the Plan will have a much worse impact on the A247 through West Clandon and Send than the 2016 draft. Note that the A247 is the only road over the Guildford to Waterloo railway, North of Guildford that doesn’t involve travelling through the town centre.

**Duty to Cooperate – My Objections**

The NPPF states para 155: “Early and meaningful engagement and collaboration with neighbourhoods, local organisations and businesses is essential. A wide section of the community should be proactively engaged, so that Local Plans, as far as possible, reflect a collective vision and a set of agreed priorities for the sustainable development of the area, including those contained in any neighbourhood plans that have been made.”

The changes in this latest version of the Guildford Local Plan show little or no willingness of Guildford Borough Council to reflect a collective vision. Despite the many thousands of responses to previous versions of the Plan which overwhelmingly rejected building on Green Belt land this latest version has as much, if not more, building on the Green Belt and increased problems of infrastructure and traffic which will bring increased noise and air pollution and danger to residents.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**
The eradication of 72-hectares of virgin green belt land between West Ward Lane and Glaziers Lane is going to be a complete lottery for those that have houses on this site. It is a very badly thought-out idea. Flooding problems in Normandy are well documented, so water running off houses, roads and driveways of 1,150 homes will only make the matter worse. We have enough problems in Glaziers Lane with sewage backing-up out of residents toilets as it is. What happens when new house owners start getting sewage coming up through their new toilets, I wonder! Will Taylor Woodrow give them their money back?

I am fortunate enough in having 4-head teachers as neighbours living very close by and they all tell me every school in Guildford is under subscribed. This is a fact. So why build a school that is not needed in an area that has poor transport links. Thus bringing even more traffic into an all ready over congested area. The building of a school is little more than a sweetener to catch the eyes of the planners. Once again, this is a badly thought-out idea.

I would ask the GBC planners to scrap the idea of such a lot of houses being built in Normandy. The present infrastructure cannot cope with this type of large housing scheme.

The facts I have given are truly relevant to the future of Normandy and its residents.

I strongly object to the Local Plan and the chaos it will bring to Normandy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Before every blade of grass is destroyed, every tree hacked down and every living creature is slaughtered to accommodate 1,150 houses in Normandy, I would ask you to make sure the roads that service this area are in-place before a house is built. The roads concerned are the A3, A31, A323, Westward Lane (D class) and Glaziers Lane (D class). A 'D' class lane is one that has no structural foundations and is little more than a farm track. With the influx of thousands of lorries and cars these roads and lanes are not fit for purpose in their present state. This would have to be addressed immediately and be the first priority.

The railway line from Aldershot to Guildford must be up-dated and have more stations in order to get some of the cars off the roads. New stations for the Guildford University, Park Barn, Wanborough and Ash must be in-place and free adequate parking to accompany these stations. Without these travelling arrangements it goes without saying that chaos will be achieved to those unfortunate enough to buy a house in these areas. The level crossing at Ash station must be done away with and a bridge put in place because this is a major pinch-point on the A323. The bridge is essential and must be one of your first considerations. The traffic in this area is a total shambles in the rush-hour let alone when hundreds more homes are built.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/3240  Respondent: 8668225 / Cecil Hinton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Objection to the settlement boundary change behind Shalford Village Hall

I strongly object to the proposal in the Guildford Borough Council’s Local Plan to take the land behind Shalford Village Hall out of its present Green Belt and Area of Great Landscape Value status. The effect would be to remove this land from its protected position and open the way for future housing development. This is highly undesirable for the following reasons:

1. We need to protect the open character of this land for the enjoyment of future generations. Users of the Halls often comment how delightful it is to have the open green fields at the back and the Common and pond to the front. A couple of years ago I arranged a large family reunion at the Village Hall and relatives came from all parts of England, Wales and Scotland as well as Australia and Canada and many expressed their pleasure at the lovely site.

2. The land behind the Village Hall is on one of the highest elevations in the area. The ground level is at the same elevation as the roof of the main Village Hall. Any 2 or 3 storey buildings would be widely visible from the road and significantly impact upon the open character of the village and green nature of the locality.
1. Any development would undermine the character at the heart of the village where so many people come from far and wide to enjoy the facilities within the Tennis and Bowling clubs and the Village Hall. Houses and gardens overlooking the village hall and its sports facilities would spoil this.

2. **Environmental damage and localised flooding** will increase if development takes place in the areas directly surrounding this elevated open space.

1. Access for any future housing development on this site will be via Chinthurst Lane, which is not equipped to take any **more traffic** and even now is often highly dangerous for pedestrians.

1. Whilst this proposal only involves a relatively small site, the **environmental damage** is quite disproportionate to any perceived benefits.

1. In summary, it is wrong to take these fields out of the Green Belt boundary and put them within the settlement of Shalford. Only a small adjustment to the 2003 boundary is necessary to reflect the 1999 development behind the Village Hall and thus keep its Green Belt status.

All present and future users of the Village Hall will appreciate full and sympathetic consideration being given to this objection.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents: 

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**Comment ID:** PSLPS16/1230  **Respondent:** 8668865 / S Davies  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Introduction

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ( )

I wish to comment regarding sites A36-A41 in the draft plan.

There are no real 'exceptional circumstances' for building over 500 homes in a small village with the infrastructure of a small village.

Within GBC, as in many parts of the South East, there is a need for affordable housing for younger people, families and downsizers.
If these people were to be the beneficiaries in Horsley, many would accept a modest increasing in house building. However building homes with a nod to affordability, with the criteria set for affordability a % of the average price of a house in the village (high), is not going to meet this need. The houses will be occupied by those priced out of London and the only beneficiaries the housebuilders.

These families will require school places - there are insufficient; parking - there is insufficient; access to transport-insufficient capacity and parking; facilities - the local PO depot is closing at the end of the year; shops - limited with insufficient parking; medical services - stretched. The streets of E&W Horsley are littered with potholes and flood heavily in rain. There is no provision to improve any of these essential services.

A SHMA has been undertaken - but meeting this inflated need would have a catastrophic impact on the Horsleys, current and future residents.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** PSLPS16/6978  **Respondent:** 8668993 / Christopher Noon  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I am of the opinion that new houses are required but that they should be placed in locations where there is adequate supporting infrastructure in place in advance and where impact studies on existing populations are carried out first. I believe that development at Wisley is a viable option but only with road infrastructure improvements at the A3 carried out first, road improvements to Horsley station, as well as the station itself, being described and funding secured first and for healthcare and school provision being described and secured first. Descriptions of infrastructure already in place does not support the case for an increase in population which existing infrastructure does not cater for.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** PSLPP16/15394  **Respondent:** 8668993 / Christopher Noon  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E8

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I am in addition concerned with how definitions within the report have been made. For example, Horsley Village’s “Station Parade” is described as a “District Centre” which is used to support the case for a very large number of new houses in the vicinity. At present local provision for food, education, as well as the roads themselves are either appropriate for the current population, or in some cases, inadequate. The proposals in the local plan would turn the Horsley’s into a single town with roads, schools and healthcare designed for Village life.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15393  Respondent: 8668993 / Christopher Noon  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Infrastructure failings and shortcomings. In materials published and videos produced, repeated mentions of the requirement for infrastructure investment but what is required, where and at what cost, both monetarily, environmentally and culturally is not described or accounted for. There is mention of new rail infrastructure, but no supporting evidence for what specific need this addresses and to what extent it will solve it. There is mention of DfT investment in A3 at Wisley and Guildford being delivered during the plan period but no account of what any lack of delivery or a change in DfT priorities would mean to the local plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15395  Respondent: 8668993 / Christopher Noon  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I do not believe that the local plan in its current form sufficiently communicates requirements and possibilities to the current population. There is mention with the local plan of possibilities such as Guildford East and West stations, of which there has been little to no mention of before and no supporting literature from Network Rail or the DfT. The local plan should have briefly and simply stated needs and goals followed by in-depth analysis of each and every potential development so costs and benefits can be measured alongside one another.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
**Comment ID:** PSLPP16/15392  **Respondent:** 8668993 / Christopher Noon  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

“Insetting” or removal of Green Belt status which is meant to take place only in extraordinarily circumstances. I have not seen any evidence to support urbanisation of Villages is necessary over modest house building spread across a wider area, focused in city centre development and development of land immediately adjacent to the city centre. There is no account of why the Green Belt status should remain, even prior to a conclusion that on balance it should not. On your website you describe how you are “protecting the green belt” (video quotation), its removal contradicts this statement.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPP16/15396  **Respondent:** 8668993 / Christopher Noon  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Finally, I strongly feel the process has been described to residents in a purposefully and unnecessarily complex manner which has disenfranchised much of the population from fair comment. Whilst there is the need to make reference to and speak in a legal context, it is a barrier to many and produces a failing on behalf of the council to its citizens to effectively communicate and act in a democratic manner.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPA16/502  **Respondent:** 8671969 / Valerie Thompson  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
2 West and East Horsley

I object to the over-development of West Horsley in particular.

We feel we are being punished for exposing the illegal activities of GBC’s former Planning Officer, Monika Juneja. GBC’s Leader and Chief Executive never apologised for their support of this former Councillor, neither did she apologise for the threats she sent in emails and in the local paper, when she knew she had broken the law. Indeed she still continued to protest her innocence even after conviction.

Her legacy has left the Borough with HER megalomaniac intent to ruin our environment.

West Horsley does not want to be a dormitory town.

Sites A36-41 will completely change the feel of the village, ruining what is at present a large natural green break between houses.

The planned number is far too great for a small village.

The planned number is far greater than anywhere else in the Borough

The wastewater(sewerage) system will not be able to cope.

The surgery is full and would be very difficult to enlarge

The carparks are full

Schools are full

Children cannot walk to Ripley or Effingham for alternative schools and there is no bus service to Ripley, neither are the roads safe for cycling.

There are no proposals for improving the roads.

If the Wisley site is also developed there will be a further 2000+ houses using the same facilities.

The proposal to build 120 houses at Waterloo farm will make the present Camping Site unusable as a rural facility.

Flooding is a regular problem down Ripley lane and Ockham Road North, both of which have been closed several times during the past year.

Traffic travels on The Street in West Horsley and Ockham Road North (both 30mph zones) at up to 80mph, and regularly travels at recorded speeds of 52mph. Traffic has doubled on these roads in the last 15 years. There are no speed cameras or traffic calming measures. Pavements are narrow and impossible to widen. Both roads are narrow and cannot reasonably be expected to regularly accommodate a further 1500 cars.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/723  Respondent: 8671969 / Valerie Thompson  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/702  Respondent: 8671969 / Valerie Thompson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

3 Three Farms meadow

I object to development on this site. Various reasons have been stated elsewhere in this letter. What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/1180  Respondent: 8671969 / Valerie Thompson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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Attached documents:
GBC has included fields adjacent to the Bell and Colville site, at present in the greenbelt and partly in a Conservation area for 40 houses...a density double that of any nearby housing, and within 400 metres of 4 listed houses. One of the reasons for turning down the latest Wisley application was because of its detrimental effect on several listed houses, in fact these were more than 400 metres from the planned development.

GBC wish to remove the opportunity to appeal against inappropriate development. This is appalling!

Better Places! No, considerably worse!

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

I object to the fact that GBC has not referred in its documents to any consideration of vernacular styles, or materials in the preservation of the surroundings of historic, or even listed houses, even in existing Conservation areas.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
D2 Sustainable design construction and energy

What is sustainability? Surely it means that the infrastructure of an area is also considered when development is planned. I object to the fact that the GBC has taken none of these considerations into account when drawing up its Draft Local Plan and encouraging a further approximately 30,000 cars onto the local roads.

There are no plans for better roads apart from the A3.

There are no plans for extending the Hospital.

There are no plans for sufficient school places (Wisley proposed a couple of schools, but only after 500 houses were built, where, in the meantime will the children from these houses go?)

There are no plans for more surgeries (The above statement also applies here)

There will be a considerable increase in light pollution

There will be a considerable increase in noise pollution

There will be a considerable increase in exhaust pollution. (The Wisley site is already polluted severely from the A3/M25 junction)

There are no facilities to supply the Combined Cooling, Heating and Power and Communal Heating networks proposed by GBC

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/2322</th>
<th>Respondent: 8671969 / Valerie Thompson</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3</td>
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</table>

D3 Historic environment

How on earth can development enhance our heritage assets? Not NPPF paras 126 and 131-133.

Development adjacent to historic buildings or landscape damages those assets and should be prohibited.

I object to any suggestion that our heritage can be improved by development.
History is what it is, history, and historic buildings only need looking after, preventing decay, and GBC should support those who care for such properties and landscape.

Subtle improvements to access to the Museum and its links with the Castle do not need aggressive developments.

The Electric Theatre should remain a community asset, and rents based on what local, amateur groups, for whom it was created, can reasonably pay. GBC should never have considered selling it off. They should have spent some of the money wasted on useless sculptures around the Borough on improving these facilities, making the car-park more efficient and opening up the riverside to the general public.

GBC should not have spent a small fortune on improving their own offices at the expense of facilities for the public.

GBC should not have overspent on buying an office building at a price well beyond that agreed by the Council.

GBC have wasted our rates on pointless vanity projects.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

| Comment ID: | PSLPP16/2323 | Respondent: | 8671969 / Valerie Thompson | Agent: |
|-------------|--------------|-------------|---------------------------|
| Document:   | Proposed Submission Local Plan: strategy and sites 2016 / Policy D4 |

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

**D4 Development in urban areas and inset villages**

See my comments under P2 and H1/H2

I object to any policy which proposes greenfield development over brownfield sites.

I OBJECT in the strongest terms for any Villages to be “inset”.

The need is for more truly affordable homes not mansions in the countryside, which is what will happen under GBC’s control.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

| Comment ID: | PSLPP16/2311 | Respondent: | 8671969 / Valerie Thompson | Agent: |
|-------------|--------------|-------------|---------------------------|
| Document:   | Proposed Submission Local Plan: strategy and sites 2016 / Policy E1 |
### E1 Meeting employment needs

I object to a policy which promotes low employment warehousing

Industrial development should be concentrated in existing areas of development such as Slyfield, not placed in the rural environment.

Rural environments should be used for small businesses in redundant farm or other existing buildings or for tourism.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPP16/1403  **Respondent:** 8671969 / Valerie Thompson  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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### E2 Location of new offices

I object to new offices being built, other than those commissioned, rather than speculative building. There are many empty offices at present.

Any buildings allowed should be placed in urban areas eg. Guildford Town centre, rather than in rural locations.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPP16/1404  **Respondent:** 8671969 / Valerie Thompson  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E3
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

E3 Surrey Research Park

I object to Surrey University dictating how and where they may develop and extend the Research Park into an even larger Business Park.

There is a conflict between the University’s public role as a University and it’s private intention to be profit-making.

The University should not be permitted to extend their Research Park onto land at Blackwell Farm, which is visible for miles around. Development here will ruin views of the Hogs Back for ever

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1406  Respondent: 8671969 / Valerie Thompson  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

E5 Rural Economy

I object to the fact that localism is being ignored.

Villages need to be protected from inappropriate development, not swamped with semi-urban housing estates as GBC proposes.

The Rural character of many villages will be lost; especially West Horsley.
The building of the new Theatre in the Woods (Opera House) and the accompanying Arts Centre in the adjoining barns and outbuildings at West Horsley Place, will rely for its success on bringing tourists and visitors from far and wide, who will not appreciate its position in a village full of ticky-tacky, over-dense housing estates.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/1407  Respondent: 8671969 / Valerie Thompson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E6

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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E6 Leisure and Visitor experience

I object to the over-development of essentially simple rural sites, such as Newlands Corner.

Heritage sites should be left as natural as possible, while still preserving them for the enjoyment of visitors (new loos will always be appreciated…cafes in plain view for miles around will not!)

Guildford could make more of its existing tourism sites, such as linking the Castle with the Museum and publicising the heritage trail with better public information panels.

The Tourist Office is barely visible under a welter of items for sale at a commercial shop at its rear.

Guildford still has a beautiful High Street, though from a high viewpoint (the café on top of the House of Fraser for instance), most of the attractive roofs are lost in the later developments with flat roofs. For the visitor, Guildford is already losing its appeal.

GBC should remove the use of Hotels from redevelopment plans. Thatchers in E Horsley will be needed when the Opera House is functioning.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/1410  Respondent: 8671969 / Valerie Thompson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E7

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
E7 Guildford Town Centre

This policy is worthless and I object to the “vision” as a reference to the “Unique setting “ of Guildford, when that setting will be destroyed by GBC’s intention to over-develop the countryside and remove Greenbelt status from Villages.

There should be better use of the Riverside in Guildford, particularly in the old bus station, now a car park, in one of the most visible of sites in Guildford. Walnut tree Close should also be included in a re-planned riverside development. The Riverside could be connected through Guildford as a pedestrian channel with attractive gardens, benches and cafes at strategic points.

According to the NPPF, there should be design requirements, but these have not been considered. The designs should consider references to existing historic buildings and local materials. This is an opportunity, which seems to be neglected by GBC, to improve the look of Guildford, ruined in part by 60s/70s/80s/ brutalist architecture.

There is too much emphasis on shopping. Rates should be reduced for food shops, who cannot afford (and are therefore not available) the rates paid by chain stores, of which there are far too many already.

GBC made a big mistake developing the new Waitrose site with on-ground, rather than below-ground parking, or even multi-story parking.

The open air car parks should all be re-developed including the large one near the River (Yvonne Arnaud) where shops, a large development of flats and parking could be built.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2319  Respondent: 8671969 / Valerie Thompson  Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E8  

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
E8/E9 District Centres

I object to the idea that sites on the edge of District Centres should be developed further with retail opportunities. There is a proposal to increase the number of shops at East Horsley for the use of the 600+ houses planned for West and East Horsley. It is in West Horsley that we need a few shops, the GBC having given permission for the PO to be turned into flats. The general stores is also shortly closing, leaving West Horsley with NO shop at all. Part of the Bell and Colville site, should have been proposed for a small general store, chemist and PO.

However, the increase in shops in East Horsley will exacerbate the problem, already there, of insufficient parking places, and nowhere to create more. There will also be increased traffic on already narrow and crowded roads, impossible to use during school-run time.

GBC should reduce rates for existing shops to allow them to flourish.

GBC is encouraging urbanisation of rural communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2303 Respondent: 8671969 / Valerie Thompson Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

H1/H2

I OBJECT as homes for all is an impossible dream, as there always will be people who cannot afford the inflated prices of the so-called "affordable homes."

Only if GBC were able to build more Council Houses, rather than selling them off, would it be possible to house everyone.

There is no "right" to own a home; other countries have many more rented properties than England.

GBC should not have allowed the University to renege on the deal it struck several years ago, to build student accommodation, rather than encouraging students to fill houses needed by Guildford's own people.

GBC needs to build low-rise flats and underground parking to accommodate people, who want to live and work in Guildford.

Developers will use the viability clause (4.2.40) to get out of providing ANY affordable homes on each site.

This policy does not state by what rules will be applied to constraints, such as existing density in Villages.

GBC has proposed density more than twice that which exists at present in every site they want to build on in West Horsley. At present there are 1100 homes in WH, but GBC are proposing to increase this by a 35%, turning what is at present a semi-rural community into a small town. The Parish Council and the Neighbourhood Plan Committee have twice surveyed the need in WH for new homes and have reached a number approximately one fifth of that proposed in the Draft Local Plan.
There should be fewer traveller pitches. The proposals are for too many, more than other similar Boroughs.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

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<table>
<thead>
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<th>Comment ID:</th>
<th>PSLPP16/1372</th>
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Answer (if comment is on questions 1-7 of the questionnaire): ()

**H3 Rural Exception Homes**

I object to this, the most frightening policy proposed by GBC, as it will encourage development on AONB land and Agricultural Land as has recently been proposed by a developer on a site, not included in the Draft Local Plan, at the junction of the A246 and Shere Road in West Horsley, with access onto an already overcrowded roundabout.

The original intention of these developments was to allow people in a village to downsize, or for their children to remain in the village, but GBC intend to allow anyone on the Guildford housing list to take advantage of this building.

The NPPF (paras 87-89) must be applied when demonstrating "exceptional circumstances".

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

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Attached documents:

Comment ID:  PSLPP16/2324  Respondent:  8671969 / Valerie Thompson  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

11/12/13 Infrastructure and delivery and Dept of Transport Strategy

See my comments under D2/D4

I object to the Draft Local Plan in every respect on these policies.

Plans are too vague and too far in the future to beneficially affect, new residents encouraged by GBC to settle around Guildford, and as for the existing residents, their lives will be made a misery by excessive road widening, footpaths and cycletracks changing the whole image of the Borough.

Buses were not able to travel between the proposed Wisley site and Effingham station. There are not sufficient buses anywhere, and are underused, generally, as people prefer to commute by car.

Station carparks are full already, with no possibility of extension at Horsley or Effingham.

The elderly, children and disabled are not able to walk or cycle long distances. The idea that most people will return to these primitive ways of getting around is unrealistic.

Many roads cannot be widened for footpaths or cycletracks.

The new stations proposed will slow commuter trains to London, but may relieve the other carparks. It is uncertain from documents whether these are a reality or just a dream.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID:  PSLPP16/2325  Respondent:  8671969 / Valerie Thompson  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy ID4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
14 Green and Blue infrastructure

I object to the idea that biodiversity can be extended if the rest of the countryside is covered with houses. No mention is made of large gardens or the benefits of hedgerows and natural strips beside fields, or of the impact of removing farmland for building or SANGs on food production.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2305  Respondent: 8671969 / Valerie Thompson  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

P1 Surrey Hills AONB

I object to this policy as under the Surrey Hills Management Plan there will be housing development in unsuitable places in the AONB

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1418  Respondent: 8671969 / Valerie Thompson  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
1 Green belt sites

I object to any land that is at present in the greenbelt being designated as suitable for building.

Allowing these areas to be included in the DLP will give the green light to developers to put in applications anywhere they choose, not just on land proposed by GBC.

Indeed, at West Horsley, there is already a proposal by a developer to build on a large, sloping and very visible field at the junction of the A246 and Shere Road, a site which was previously in the 2014 DLP, but had been removed in the latest one.

20,000 objections were sent in to GBC to the 2014 DLP.

GBC has taken no notice of local opinion.

GBC has increased the number of houses overall to be built in the Borough

GBC has identified even more sites to be built on in the Greenbelt

The Government requires that use of Greenbelt land should only be done in exceptional circumstances, but SPECIFICALLY says that demand for house is not a good enough reason, so why is GBC still persisting with their ridiculous proposals.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2306 Respondent: 8671969 / Valerie Thompson Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

P2 Green Belt

I object, as this policy is a downright lie. No Greenbelt land should be lost.

Greenbelts should be protected for the values for which it was created:
Agriculture,
Leisure activities
Tourism
Water catchment
Flood control
Biodiversity
Heritage of nature, landscape views, open spaces
Heritage of historic villages and houses
Parks
Burial grounds
Benefit for public health and wellbeing

Objections have been voiced by thousands of local residents to previous plans and applications for greenbelt development but GBC have ignored, even ridiculed the public and claimed that such a policy is necessary, even desirable, which it is not!

Villages should not be "inset" (what a fatuous, mealy-mouthed, non-sensical word that is) and their greenbelt status lost forever, particularly in West Horsley.

I object to the other 13 villages around Guildford also being inset.

The policy of insetting was arrived at by GBC through a flawed Greenbelt and Countryside policy which was commissioned without the Councillors consent.

I object to the Village envelopes (boundaries,) being enlarged in order to develop large tracts of greenfields and woodland, as proposed by GBC in West Horsley at Manor Farm, land opposite Greta Bank on East Lane and at Waterloo Farm or land adjoining Bell and Colville Garage.

I object to the planned “infilling” of Villages, especially outside settlement boundaries.

I object to the resulting “urban sprawl” which is against NPPF policy.

Development in Villages outside Guildford will result in even more congestion on the approach roads, which are already clogged at commuter and school-run times. People will not cycle or walk from Villages to Urban centres, nor take irregular buses, but will want to drive themselves in cars.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

SITES
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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2307 Respondent: 8671969 / Valerie Thompson Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

P3 Countryside

This is another appalling policy, directed towards protecting specific areas in which some of the more influential Councillors live.

I object to this misuse of Councillors’ powers as new greenbelt is to be created and the areas of Ash and Tongham, which are not at present in the greenbelt will not be inset, and will have greater protection from development. This policy is immoral.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPP16/2309  **Respondent:** 8671969 / Valerie Thompson  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

**P4 Flood risk and Water sources**

I object to a policy which states that building on the footprint of existing buildings is the only way to offset flood risks. Building on land, such as the Arriva bus depot, which are already on hardstanding will create NO extra risk.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPP16/1377  **Respondent:** 8671969 / Valerie Thompson  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

**P5 Thames Basin Heath**

I object to such a weak policy, where the mitigation of cash compensation is too small to be meaningful.

I object to the use of SANGs for most of the proposed sites as these areas are already farmland, woodland or open green spaces.

SANGs should not be positioned near nesting birds, which will be threatened by the pet cats and dogs resident in the new homes

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: PSLPP16/2310  Respondent: 8671969 / Valerie Thompson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1369  Respondent: 8671969 / Valerie Thompson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy S1

I object to the policy that sustainable development should be paramount in GBC's planning, particularly as no explanation of what this means is given in the paperwork.

There is therefore no obvious framework to support this intention.

The Plan intends to "secure development that secures the economic, social and environmental conditions in the area" but fails to discuss how conflicts between these various aims will be resolved.

Basically I object in the strongest terms to ANY development in the Greenbelt for housing, on the promise of the protection of which, the GBC Councillors were elected.

Government guidelines state that development for housing is not a valid reason for building on Greenbelt, even if there is not enough other land available, which I dispute as GBC are intending to develop most of the brownfield sites with businesses, shops and industry, rather than housing.

Obviously, GBC's intention to encourage building and approve planning applications "without delay," and "wherever possible" suggests that building will be allowed anywhere, without proper consideration.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/2300  Respondent: 8671969 / Valerie Thompson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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OBJECTIONS TO DRAFT LOCAL PLAN 2016

Policy S1

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Obviously, GBC's intention to encourage building and approve planning applications "without delay," and "wherever possible" suggests that building will be allowed anywhere, without proper consideration.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/2302  Respondent: 8671969 / Valerie Thompson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
S2  I object to the number of new homes proposed

13860 is well beyond the actual "need" in the Borough. There may be a "demand" for more houses, (many people would love to live in the so-far, "leafy," will-be “concreted-over” Surrey,) but this is an excessive number, reached by GBC sub-contracting to a company who sub-contracted again, thereby being able to claim that the results of their surveys were their own "intellectual property" and therefore not available to either the Councillors or the general public ( even after requests under the FOI Act).

That the Scrutiny Committee of the GBC did not discuss or even have access to these documents is appalling. It is immoral, if not illegal to withhold this information, because, without it, no one can know why the number of houses is so large. What is more, the companies employed are connected to the construction industry and therefore are likely to benefit from development around Guildford.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Policy D1 Place Shaping

I object to 4.5.8 which formerly was a reference to development, responding to local character, history or vernacular architecture. This direction has been removed, indeed GBC appear to be encouraging unsuitable modern buildings in sensitive sites.

GBC have removed all reference to sensitive development, including being aware of and noting the characteristics of an area, constraints such as hedges and trees, and local distinctiveness.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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SHMA

I object to the fact that research resulting in the SHMA has not been made public

GBC have broken a lot of rules in preparing the SHMA.

They subcontracted to GL Hearn, who subcontracted the work to Justin Gardner. This was against their own rules. Justin Gardner then claimed that the research which led to the numbers of houses needed was their “intellectual property”, therefore they were not obliged to share this information with anyone, not even the Councillors! Mr Spooner, Leader of the Council, claims not to have seen the research. How can he and his executive team make any reasoned decision without seeing the evidence?

The document Strategic Housing Market Planning states that consultants “should ensure that there will be no data protection or commercial restrictions on the storage and sharing of data used in the assessments”. This was not done

The Strategic Housing Market Assessment Practice Guidance document V2 Aug 2007 (1.1.2.5) states that “assumptions, judgements and findings are fully justified and presented in an open and transparent manner.” This has not been done.

These last two points have been entirely and ruthlessly ignored by GBC as they have refused on many occasions, even when information was requested under the FOI Act to divulge any research.

With regards to the student numbers in Guildford, the fact that most of them leave and live elsewhere, after finishing their degree, has not been taken into consideration, and plans to accommodate students have skewed the numbers of houses required by the GBC, probably by about 25%.

The University should be forced to build the student accommodation for which it was given land and building permission. GBC should not allow any further increase in student numbers, nor any further buildings on the site, until the university has fulfilled their agreements regarding student accommodation. This would release large numbers of inexpensive flats in Guildford for local occupation and reduce the numbers of houses needed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Infrastructure

I object to most of GBC’s plans as they have proposed no realistic infrastructure improvements.

The A3/M25 interchange will cause even more air pollution than already exists, which is well above permitted levels for development.

It will swallow up huge amounts of common land.
It will direct **Wisley Garden traffic** onto an already over-used junction (Ripley/East Horsley), which, it is suggested will also be the exit and entrance point for the proposed development of Three Farms Meadows, (erroneously re-named Wisley airfield).

The congestion will result in tailbacks even further West in a London-bound direction, along the A3, than there are at present. (often 2 miles before the A3/M25 junction)

Ripley is threatened with ALL the traffic from Wisley, heading West on the A3, going through the village, which was bypassed in order to reduce the traffic.

**I object** to the plans to close roads around Wisley or to make some one way only. This will be very disruptive to traffic from other places trying to get through Ripley, or on to the A3 or from Ockham to Cobham.

**A3:** There are no proposals for meaningful improvements to the **A3** around Guildford. At present one may be stuck in heavy traffic for 45 minutes on a daily basis, as one covers no more than 2 miles travelling Westwards. A tunnel might help but is there any realistic prospect of that being completed in the Plan period?

**Roads:** There are no proposals to widen or improve the surface of poor roads in and around Guildford. Many roads cannot be widened, therefore the increased traffic from the planned 12,426 new houses (approximately 24,000 extra cars) will cause grid-locks and serious congestion, within the town and in the small rural roads in and around villages.

**Surgeries:** There are no proposals for new surgeries in most of the areas GBC proposes to develop.

At present, most surgeries are managing at the limit of their capabilities. Many surgeries have no room to expand, even if they could find sufficient doctors, nor to expand their car-parks.

**Schools:** Most schools are at full capacity. Not enough new schools have been proposed.

**Water and sewage:** Many of the sites proposed will have difficulty in bringing in sufficient water supplies. New sewage farms would need to be built at most of the sites. At Wisley, proposals suggest that the Ripley sewage works could accommodate the waste from an extra 2000 houses. **It cannot.**

**Trains:** a new station at Burpham is a good idea. It might take the pressure off Horsley and Effingham.

**Buses:** Suggestions by the Wisley developers that buses might run every 10 minutes to Woking station are ludicrous. It is also unrealistic to run buses to Effingham as the road is too narrow and unsafe.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
Flawed evidence is exaggerating the need for expansion as shown clearly by the GRA report on housing;

Transport evidence is not yet fit for use and major transport issues are unresolved eg another river crossing, a central bus facility;

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<tr>
<th>Comment ID: PSLPA16/1525</th>
<th>Respondent: 8672161 / Simon Page</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<tr>
<th>Comment ID: PSLPP16/6222</th>
<th>Respondent: 8672161 / Simon Page</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

- I oppose unjustified Green Belt development;
- It is irresponsible to squander every last resort greenfield site in a single Plan, robbing future generations;

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
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<tr>
<th>Comment ID: PSLPP16/6220</th>
<th>Respondent: 8672161 / Simon Page</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

- Expansion should be constrained to protect the character of town and country in our congested gap town;
- It is unacceptable that, unlike other places, Guildford is choosing not to constrain its overall housing growth;
- Allowing Green Belt development to pay for transport schemes will simply generate yet more traffic from more homes, fuelling congestion;
- Brownfield opportunities are being ignored – we need homes in the centre (not 40% more shops), much more accommodation on campus for students, and homes for the elderly to free up family houses;

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
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<tr>
<th>Comment ID: PSLPA16/2798</th>
<th>Respondent: 8672609 / Warren Hazelby</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Shalford (north)</td>
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</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

- The Plan is not ready for an inspector.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I am writing to object to the planned proposal to move the green belt boundary to exclude the fields behind Shalford Village Hall. The idea behind the green belt is to protect our countryside from development. However I understand that as new roads are built and towns expand there is a case in extreme cases to change this, for example the area either side of the A3 between Guildford and the M25. THIS IS NOT THE CASE in Shalford, there are no new roads or motorways, expanding Town etc, and therefore no case to infringe the green belt. Being next to the Village Hall this is an area in constant use and the path leads to the beautiful area of Chinthurst Hill. Also the elevation of this land means that any housing development would be visible from most of the village.

One of the biggest problems for Shalford is the rush hour traffic. The failure of Surrey County Council to build a North/South bypass has meant the A281 is the only North/South road and has to go through the centre of Guildford. Both the A281 & A2128 (from Cranleigh) meet at the Shalford roundabout and very long queues form. Many cars now use Chinthurst Lane as an alternative route and this often backs up past my house making it difficult to turn right from my drive. Coming back is almost impossible because of parked cars on the right makes Chinthurst Lane a one way Lane in rush hour. I think it would be irresponsible to allow any development South of Guildford until a viable alternative route through Guildford is built.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15202  Respondent: 8672993 / Kes Heffer  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

This policy is endorsed, but safeguards to make sure that high quality traditional building in keeping with surroundings is strictly enforced need to be included. There is a lot of motherhood and apple pie in the sentiments of the current statements in Policy D1, which are also occasionally conflicting: e.g. the Blairite, ‘third-way’ fudge: ‘reflecting the identity of its surroundings whilst allowing for innovative and forward thinking design’ (paragraph 4.5.8). That just allows a gigantic loophole for developers to jump through. Also it is not clear how the emphasis of the Draft Local Plan on development in rural villages can possibly aid the stated objective: ‘to facilitate and promote walking, providing a high quality environment for pedestrians, and where possible allowing short walking distances to amenities’; employment and major amenities will generally not exist within short walking distances of rural villages. Those moving to proposed new houses in the rural villages (existing or proposed at Wisley airfield) will mostly have jobs elsewhere, and quite likely children will go to schools elsewhere. Car use can only increase under the assumptions of the Draft Local Plan. No quantitative assessment has been made by GBC of the effect of the proposals on car use in the Borough in the future.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15203  Respondent: 8672993 / Kes Heffer  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D2
All measures to improve energy efficiency by better insulation etc. are laudable. However, this policy should explicitly preclude the possibility of building wind-farms or solar electricity farms in the Borough, which are extremely inefficient forms of energy production12. Both suffer from the intermittency problem, and, as a consequence for wind turbines, even the contributions to reducing carbon dioxide emissions are highly dubious13,14,15. Those analyses rigorously demonstrate that wind developments of various sizes cause extra fuel consumption (and hence carbon dioxide emissions) instead of fuel saving, when compared to electricity production with modern high-efficiency gas turbines only. However, power from so-called renewable sources receives large Government subsidies which are attractive to landowners, and, under the proposed policy D2 would be allowed.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** PSLPP16/15204  **Respondent:** 8672993 / Kes Heffer  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy D4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I Object - It needs strengthening.

The weak provisions of this policy for development within villages that have been ‘inset’ from the Green Belt by the proposals elsewhere in this draft Local Plan imply that the density of housing within the villages will inexorably increase over time, through a ratchet effect, destroying their rural character. The wording that supposedly protects such character against inappropriate development is extremely vague and weak, and needs strengthening.

12

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** PSLPP16/15166  **Respondent:** 8672993 / Kes Heffer  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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Page 1629 of 3335
The statement on housing mix in policy H1 that ‘New residential development is required to deliver a wide choice of homes and meet a range of housing needs as set out in the latest Strategic Housing Market Assessment’ is misconceived. All detailed surveys of housing need in the Borough conducted by local organisations (i.e. by local people who, by dint of NPPF paragraph 17, should be empowered; not by remote, development-biased consultants) conclude that the most pressing need is for affordable housing. Consequently, the proportion of affordable housing catered for in the Local Plan should be as high as possible, ideally about 80% of total projections. These are the only houses that the borough actually needs for its indigenous population. Students at Guildford University are the only migrants that the borough needs in significant numbers; they should be accommodated in dedicated buildings around the University. There is a shortage of homes for local older people, especially in the rural villages: if they could be accommodated in specialised, attractive smaller homes, they would free up a number of larger houses for younger people. The Borough does NOT need many more 5-bedroomed mansions in order that wealthy families can move to a (currently) attractive area, either as owners or renters of property owned by foreign investors. Allowing such developments will mean that they will comprise an excessive (relative to proper need) proportion of the housing mix provided by developers, simply because most profit can be obtained from them – especially if built in greenfield sites such as the PDAs earmarked around West Horsley and other rural villages. This is a beautiful area and therefore attractive to many. Catering for all of them will destroy that beauty and the continuity of the Green Belt. There is no ‘right’ for people to be able to fulfill a desire to live in one of the most beautiful parts of the country (certainly in the over-crowded South-East of England). It would be perverse to the point of madness to try to assuage such desire by additional development. Providing infrastructure in attempts to meet the new needs of migrants into the Borough would simply encourage even more. As with policy S2 this policy would also inevitably lead to exponentially growing numbers without end.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15170  Respondent: 8672993 / Kes Heffer  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

My comments under Policy H1 are also pertinent here. This policy is too weak to be effective in increasing the availability of affordable homes. 40% is insufficient as a percentage for the numbers of affordable homes in a development; it should be at least 80%. (This percentage has even declined since the 2014 version of the draft Local Plan, in which it was set at 40-45%). Nor should there be a lower limit of 5 houses or minimum area criterion for the developments that are affected by this policy. No new housing off the campus of Guildford University should be provided for its students; sufficient planning provision was made in earlier years to cater for student housing on the Manor Farm site, which the University has failed to develop for that purpose.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15200  Respondent: 8672993 / Kes Heffer  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H2
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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Answer (if comment is on questions 1-7 of the questionnaire): ()

The key statement in the ‘Green Belt and Countryside Study’ policy-based ‘evidence’ document (in paragraph 4.111) concerning removal of rural villages from the Green Belt is: ‘National planning policy states that only those villages whose open character make an important contribution to the openness of the Green Belt should be included in the Green Belt.’ The assessment of whether the villages have an open character to make an important contribution to the openness of the Green Belt was made principally by Pegasus Planning Group (whether under covert direction from GBC or not is unknown) in the ‘Green Belt and Countryside Study’. Pegasus of course are not ‘local people’ wishing to ‘shape their surroundings’ as they see fit; rather they are a remote business, making money from lucrative council contracts. They have rather cornered the market in studies such as this, commissioned by councils trying to react to central Government diktat: this shows in their output.

Nowhere in the GBCS Summary document is the first sentence on the Green Belt policy reproduced: ‘The Government attaches great importance to Green Belts’. No weight has been given in these documents to this fundamental Government sentiment about the Green Belt. It is obvious that any importance that GBC or Pegasus Planning Group attach to the Green Belt is not ‘great’. Instead the documents’ recommendations are predominantly evasions of this sentiment, finding intricate and even artificial ways of justifying its lack of concern. In addition nowhere in GBCS Summary or briefing note that commissioned the GBCS does the word ‘permanence’ appear: this is an essential characteristic of the NPPF policy on the Green Belt. So the claim in the title of Appendix IV of GBCS that it is ‘in accordance with the NPPF’ is fallacious.

Rather than protecting the permanence and openness of the Green Belt, the paramount objective of the GBCS is finding areas to develop. Indeed the key requirement of the study as identified in the briefing note from GBC was: 2.1 The Green Belt and Countryside Study must:
provide a robust, independent assessment of Guildford Borough’s Green Belt and Countryside beyond the Green Belt with a view to potential release for development purposes in the longer-term, should this be necessary within the GDF plan period - 2006-2026 (and up to 2031), identifying realistic sustainable location(s) for green field release.

If the PDAs identified by this study are retained in the finalised Local Plan, they will be early targets for development because of the high house prices that can be imposed. The ‘finger’ of urban development that is currently extending through the Green Belt from London south-westwards via Epsom, Ashtead, Leatherhead, and Bookham towards Merrow and Guildford would be more densely formed. In partnership with the parallel ‘finger’ of development through Kingston, Walton, Weybridge, Byfleet to Woking a double barrier to circumferential continuity of the Green Belt in its SW corner is rapidly and inexorably being created. In addition to the loss of unspoilt landscape that is valued so highly by so many (not only those who live within the Green Belt), it is well-known that continuity of the countryside is of vital importance to the flourishing of wildlife.

For PDAs in and around urban areas, GBCS used the following screening criterion for whether a site was safe from bulldozers: at least 3 out of 4 of the purposes of the Green Belt, listed on page 19, paragraph 80 of the NPPF, need to be met (the encouragement ‘to recycle urban land’ was considered a common purpose at all sites and therefore not used in the assessment; i.e., actually, 4 out of 5 purposes need to be met). Meeting only 1 or 2 of the 4 purposes doesn’t count for anything in this study. But the NPPF states that ‘The Government attaches great importance to Green Belts’ and does not give any indication that the purposes of the Green Belt can be scaled in this fashion. The Government’s attachment of importance is absolute, not gradational depending upon the number of purposes served by parts of it. If a plot of land within the Green Belt serves only 1 of the 5 purposes, then it is making an important contribution to it. Conversely, to dismiss even 1 of the purposes that a plot of land currently meets in the Green Belt is to dismiss the importance that the Government places on the Green Belt, and would be inconsistent with the NPPF. The short-sighted, objective-enabling, unilaterally-decided exercise undertaken by Pegasus is almost certainly not going to maintain the permanence of the Green Belt for the future, particularly with regard to the purpose ‘to assist in safeguarding the countryside from encroachment’. However, even that gradation of purposes proved too lenient for the rural villages; too many sites would escape development. So even sites that served 3 or 4 Green Belt purposes (out of 4) were given more exacting criteria. To determine the potential suitability or appropriateness of each village for insetting within the Green Belt (or perhaps to meet GBC’s requirement that enough villages should be inset), a three stage assessment was devised. Those 3 stages deserve further detailed discussion.

Stage 1: Assessing the degree of openness within each village through analysis of urban form, density and the extent of developed land

Key to the recommendations made as to whether rural villages should be dismissed from the Green Belt or not is paragraph 86 of the NPPF, which states:

‘If it is necessary to prevent development in a village primarily because of the important contribution which the open character of the village makes to the openness of the Green Belt, the village should be included in the Green Belt. ‘Pegasus have assessed ‘openness’ of the villages ‘through analysis of the urban form, density and the extent of developed land’. Pegasus have unilaterally decided to assess the openness of a village’s character in their ‘professional judgement’. But given that there is no official definition, ‘openness’ can be assessed equally well by any person, professional or lay in planning matters. Professionalism in planning is of no advantage to judging ‘openness’; in fact it may be a disadvantage since the priorities of a planning consultancy must be towards development and inconsiderate of protecting openness. It was written by Pegasus Group, yet another contractor chosen by GBC whose every commercial, or ‘professional’, incentive, is to promote development, and who have no commercial interest in protecting the countryside, Green Belt or other. Whilst such bias is doubtless unwitting, it is safe to say that their contracts would soon dry up in the absence of development. Why was not an appropriate body commissioned to work alongside and provide counter-balance to the development-biased Pegasus assessment of ‘openness’, organisations such as the Campaign to Protect Rural England, or The Wildlife Trusts, have members who are in line with the Government in that they do attach great importance to the Green Belt, its permanence and openness? Alternatively or additionally a poll of local residents, whose daily experience with the degree of openness in their villages would enable an assessment just as objective, if not more so, than that of Pegasus. Relevant here is the exhortation in the Ministerial Foreword to the NPPF for planning to be a collective exercise and not to exclude people and communities. As an example, consider how differently the parishioners of West Horsley view the importance of ‘openness’ in their village. Given how greatly they value the open character of their village, there is a strong chance that most parishioners would, perhaps aided by their lack of professional bias, consider that its open character is an important contribution to the openness of the Green Belt, and that this is the prime reason to prevent development within it, contrary to the opinion(s) of a handful of ‘professionals’ in the Pegasus Group. Whilst GBC have studiously ignored the West Horsley Parish Plan in all planning decisions since its publication on the grounds that it is a
will harm the open character of the Green Belt. It is obvious that expansions of settlement areas that encroach on previous remaining Green Belt from many vantages (e.g. West Horsley from Sheep Leas and nearby locations in the North Downs) fine, as far as they go, but are also too weak. Also remember that development of the rural villages, visible from the countryside and rural villages from inappropriate development. It also stops the outward spread of London and contributes to regional policy for the South East seeking to redirect development pressures to the eastern part of the region.

If the Green Belt has provided those significant benefits in the past, weakening it now will reduce those benefits, to policy P2 regarding those parts of the Green Belt that are left after its diminution by insetting villages are particularly in terms of protection of the rural villages from inappropriate development.

What has changed since 2003? Remember that at issue now is whether the openness of the rural villages is important to the openness of the Green Belt. So, if boundaries of settlements were drawn in 2003 to limit development to where it would not impinge upon the openness of the Green Belt, then transgressing those boundaries with development at any time must still impinge upon the openness of, and therefore harm, the Green Belt. Similarly, if only limited development was permitted in 2003 within the settlement area so as not to cause detriment to the character of the countryside or the settlement, then major development within the settlement area at any time must still cause detriment to the character of the countryside or the settlement. This is not a question of policy, changing with the political wind or economic cycle; it is an issue of judgement about the importance of openness in and around the rural villages to the openness of the Green Belt. The judgement, accepted by GBC and all stakeholders in the Local Plan in 2003, cannot be gainsaid by a few Pegasus ‘professionals’ using dodgy definitions and dodgy statistics. Nor can ‘rural villages’ in 2003 come to be called ‘urban areas’ within a democratic poll.

Objective evidence about the openness of the rural villages is also to be found in the previous Guildford Borough Local Plan of 2003. This paragraph is relevant:

10.14 under policy RE3: The settlements identified are free standing villages surrounded by countryside which are of a sufficient size to contain a number of supporting services such as shops and community facilities. They may also be capable of accommodating limited development without detriment to the character of the countryside or the settlement. In defining settlements, the boundaries have been drawn to limit the areas in which development may take place to those parts of the settlement where it will conform to the purposes of the Policy, that is to say it will not affect the scale or appearance of the village or impinge on the openness of the Green Belt. The Policy does not envisage extension of the built up area of the settlement beyond the defined boundaries or other than very limited development taking place within settlements.

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Also relevant from the 2003 Local Plan is:

3.36 The Green Belt has provided significant benefits to Guildford Borough, with long-term protection of the Borough's countryside and rural villages from inappropriate development. It also stops the outward spread of London and contributes to regional policy for the South East seeking to redirect development pressures to the eastern part of the region. If the Green Belt has provided those significant benefits in the past, weakening it now will reduce those benefits, particularly in terms of protection of the rural villages from inappropriate development.

The sentiments of policy P2 regarding those parts of the Green Belt that are left after its diminution by insetting villages are fine, as far as they go, but are also too weak. Also remember that development of the rural villages, visible from the remaining Green Belt from many vantages (e.g. West Horsley from Sheep Leas and nearby locations in the North Downs) will harm the open character of the Green Belt. It is obvious that expansions of settlement areas that encroach on previous
Green Belt have no real natural boundaries in practice; no more so than current boundaries. There is therefore no reason to trust that further encroachment will not be made onto the Green Belt as the iterative circle of development, inward migration, joining of immigrants by extended families, greater need for more housing and jobs, further development etc. spirals out of control, and the ‘finger’ of development from the NE to Guildford and beyond is completed. The provisions of the policy should give stronger protection to the Green Belt. There is too much ‘wriggle room’ for developers to work around in the current proposal.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15162  Respondent: 8672993 / Kes Heffer  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY S2: Borough Wide Strategy – I object

The housing requirements proposed under policy S2 flow from the flawed Strategic Housing Market Assessment produced by the remote consultants GL Hearn, now a subsidiary of Capita Real Estate, whose main business is concerned with property development. Contracting out the estimation of housing requirements to property developers is akin to asking foxes to design chicken coops; it ensures that the results are highly compromised because of conflict of interest. The SHMA is consequently flawed, principally because a) it over-estimates future migration trends; and b) its assessment of housing requirements is subjectively inflated over even such high demographics, without proper disclosure of methodology.

In addition, this policy has totally ignored the following key requirements from paragraph 17 of the NPPF:

• “take account of the different roles and character of different areas, promoting the vitality of our urban areas, protecting the Green Belts around them”
• “recognising the intrinsic character and beauty of the countryside and supporting thriving communities within it”
• “contribute to conserving and enhancing the natural environment and reducing pollution”
• “encourage the effective use of land by reusing land that has been previously developed (brownfield land) provided it is not of high environmental value”
• “conserve heritage assets in a manner appropriate to their significance”
• “actively manage patterns of growth to make the fullest possible use of public transport walking and cycling and focus significant development on locations which can be made sustainable”.

Removing West Horsley and other rural villages from the Green Belt by ‘insetting’ them, and expanding the boundaries of the settlement areas into neighbouring green fields (i.e. reducing the Green Belt) does NOT protect the Green Belt. Nor does it give adequate recognition to the intrinsic character and beauty of the countryside.

Nor, by giving developers the option of building more cheaply on green fields does it encourage the effective use of land by reusing land that has been previously developed (brownfield land). By turning West Horsley into a rural town, it does not conserve the heritage assets of West Horsley. By encouraging 35% more houses in a rural village without intrinsic employment, rather than brownfield urban sites, it does not make fullest possible use of public transport, walking and
empowering local people to shape their surroundings”

It is obvious from the degree of protest that there has been throughout Guildford Borough to the previous (2014) Draft Local Plan and the preceding ‘Issues and Options’ ‘consultation’ that local people wish to shape their surroundings in ways that are entirely different from that which is projected by the Draft Local Plan. As strong evidence of the lack of empowerment, West Horsley Parish has already twice recently provided democratically robust opinion on the way they wish to shape their surroundings and that shaping involves minimal development. The West Horsley Parish Plan 1 of 2008/9, compiled under the auspices of the West Horsley Parish Council and collating the opinions of those households responding to a questionnaire (430, or 38% of all in the parish), begins its section on the ‘Environment’: ‘This section achieved the most clear-cut answer of all. All but one respondent values the rural character of the village.’ Furthermore, under ‘Housing and Planning’, the results of the questionnaire showed that: ‘A large majority (337) of respondents believe that West Horsley should not be one of the village settlements identified for meeting new housing requirements’. With the background that nine sites in West Horsley had been suggested in the GDF process for possible development, ‘over half of respondents (180) consider that no area, either inside or outside the current settlement area, is appropriate for development of the village’. ‘Of the respondents who answered more than zero area as appropriate for development most believed that any development should have an emphasis on affordable and sheltered housing and be distributed over more than one site. There was little support for any development of commercial facilities’. ‘Confirming the majority opinion for zero area of development, almost exactly half of respondents (128) considered that West Horsley can currently accommodate no additional dwellings.’

The 2015 Emerging Neighbourhood Plan of West Horsley2 essentially confirmed these majority sentiments. Again evidenced by a comprehensive survey of residents for the Neighbourhood Plan itself, together with the results of research by West Horsley Parish Council and Surrey County Council, Policy 2 of the emerging Neighbourhood Plan is: “The emerging Neighbourhood Plan provisionally provides for the development of between 40 and 75 new homes within the area covered by West Horsley Parish Council, between 2016 and 2031”. This is consistent with Policy 1 which states: “We will ensure that the village maintains its rural and open style, architectural heritage and special atmosphere and character and we will resist the urbanisation of the village. Specifically we will protect, conserve and, where appropriate, improve: ? The designated Green Belt status ? Open spaces, parkland, green space, trees and hedges ? The open aspect and strategic natural spaces along East Lane, The Street, Ripley Lane, the A246 (Epsom Road), Long Reach and Ockham Road North, which reinforce the village’s rural nature”. In addition: “When asked about where new housing development should take place, only 3.4% suggested that the designated Green Belt should be considered.”

In stark contrast, the GBC Draft Local Plan entails the addition of 385 extra homes within West Horsley, an increase of approximately 35%; and the addition of 533 homes within East and West Horsley parishes together, most of it outside the current Settlement Area, and therefore in the current Green Belt. Over the whole of Guildford Borough the new plan proposes some 13,860 houses, of which almost two-thirds are on current Green Belt. The imbalance makes a mockery of the supposed Policy P2 (“Green Belt”) which states ‘We will continue to protect the Metropolitan Green Belt, as shown on the proposals map, against inappropriate development’. It is illuminating to contrast this revised statement with that in the previous policy #10 of the 2014 draft Local Plan; this stated: ‘We will continue to protect the Metropolitan Green Belt against inappropriate development in accordance with national planning policy to maintain its openness and open character’. A better paraphrase of the current version would be: GBC proposes to make use of the openness of the Green Belt for easier development now; in the future it may protect what is left of the Green Belt. This is despite the massive objections to the degree of Green Belt development proposed in 2014. For West Horsley the proposed development is entirely against the opinions expressed within the Parish Plan. The NPPF requirement to empower local people to shape their surroundings has been paid merely lip service by GBC. Although the old South East Plan3 has purportedly been abolished, a concatted crow of the Conservative Borough councillors in their manifesto when seeking election just a short time ago, it is apparent that the SE Plan’s designation of Guildford as a ‘centre for significant change’ still dominates the approaches of GBC. This blinkered, autocratic, patrician approach completely ignores the wishes of the local population. There appears to be a pride amongst GBC and many Borough Councillors that ignoring democratically-expressed wishes is somehow ‘strong governance’, and that this virility is laudable. Although it has issued manifold purported ‘consultation’ documents and ‘topic papers’ with colourful balloons all over their covers, GBC has patently ignored most of the critical comments that have been returned by residents: the council has taken not a jot of notice of popular petitions. That is not proper empowerment of local people. This is not ‘meaningful engagement and collaboration with neighbourhoods, local
organisations’ (NPPF 155); it has been collaboration with solely growth-minded businesses. How can key requirements of the NPPF be ignored in such a blatant fashion?

Pertinent here are the words from the Ministerial Foreword to the NPPF which encourages local participation in planning: ‘This should be a collective enterprise. Yet, in recent years, planning has tended to exclude, rather than to include, people and communities. In part, this has been a result of targets being imposed, and decisions taken, by bodies remote from them. Dismantling the unaccountable regional apparatus and introducing neighbourhood planning addresses this. In part, people have been put off from getting involved because planning policy itself has become so elaborate and forbidding – the preserve of specialists, rather than people in communities’.

If these words are to have any meaning in this context then local views on the benefits of local immigration should be taken into account in producing the SHMA and housing target. The specialists in Capita Real Estate themselves pronounce that their estimates of future housing ‘need’ are objective: they seem to be unaware that their approach is based on a particular viewpoint of how economic growth occurs, or how the balance between economic growth and other factors should be weighted. The predominance of Capita Real Estate in churning out these assessments, being the apparent market-leaders selected by Local Planning Authorities amongst contractors, is a dangerous concentration of national planning power in what is essentially a biased company with no interest in protecting the countryside, Green Belt or other. It is perhaps no coincidence, but also no consolation, that the scale of attack on the Green Belt envisaged in this draft Local Plan for Guildford Borough is not unique within the nation: the Campaign to Protect Rural England estimates that over 219,000 houses are now proposed to be built on Green Belt land across England. The original, inspired, far-sighted purposes of Green Belt, that has been, and is, valued by so many of past and present generations is rapidly being destroyed: if this trend continues future generations will not be able to value Green Belt because it will have disappeared, and their lives will be the worse for that. As with choice of Pegasus Group to perform the ‘Green Belt and Countryside Study’, another flawed document in the Guildford Borough ‘evidence’ base, every commercial, or ‘professional’, incentive, of Capita Real Estate is to promote development, as is easily ascertained from their website. People in communities can assess the migration trends that they want for their localities: these would be as objective, and no more subjective, than the development-biased view of Capita Real Estate specialists.

The increase in the number of homes (by past correlation almost exactly equivalent to increase in population) proposed for Guildford Borough in the draft Local Plan represents an increase of about 25% over the 17 years of its duration. This is equivalent to a compounding annual increase in homes of 1.32%. For those with short-sighted ambitions that may not sound much; but if such a rate of increase were to be maintained over future generations (a perspective that the NPPF insists upon when considering sustainability) then a simple calculation indicates that the Borough population would increase by nearly 40% in one generation (25 years) and almost double in 2 generations (50 years). It would increase by an order of magnitude (i.e. a factor of 10) in only 7 generations. Recall the definition of sustainable development: achieving growth while “ensuring that better lives for ourselves don’t mean worse lives for future generations”. There is no limit on the number of generations that is to be considered in this premise. Indeed, Councillor Paul Spooner professes in the Foreword to the draft Local Plan: “The borough of Guildford is a very special, beautiful place for all who live and work here. We want to keep it this way for generations to come.”, whilst endorsing development proposals that can only lead towards one outcome in less than a few generations at most: a dense urban sprawl interspersing just a few remnant open spaces. Before this draft plan can be submitted it is incumbent upon Guildford Borough Council to demonstrate, with hard evidence, just how the proposed Local Plan will ensure improvements to the lives of the majority of current residents, or indeed how a majority of future residents will have improved lives over those of current residents ‘for generations to come’. At face value the daily life of an average current resident will deteriorate as a direct result of the extra crowding that will ensue. If widespread improvements to daily life cannot be proven, the development cannot be considered ‘sustainable’ and the plan will therefore be contrary to the NPPF. The provision for all future generations mirrors that envisaged in the NPPF for the Green Belt: an essential characteristic of the Green Belt is its ‘permanence’ (NPPF, 79). Even the draft Local Plan makes this point in policy P2 (4.3.11): ‘The main aim of Green Belt is to prevent urban sprawl by keeping land permanently open’. GBC surely appreciate the meaning of ‘permanently’, which can only imply that they are deliberately ignoring this issue: one cannot keep land permanently open by locating 65% of new development on it.

Paragraph 159 from the National Planning Policy Framework requires the Strategic Housing Market Assessment to identify the housing that the local population is likely to need over the plan period which meets household and population projections, taking account of migration and demographic change. The problem for this task is that projection of migration is extremely uncertain at the moment. This is particularly important because, as noted by the report for GBC by Edge
Analytics in 2013, international migration has been a large proportion of population growth in Guildford Borough over the past decade, increasing over the past few years, especially since 2009. About half of the increase in population predicted for the SHMA regions is attributed to migration (paragraph 4.16; see also figure 9 of the previous draft SHMA). That the housing ‘need’ is indeed a very subjective quantity is clearly evident from the document ‘Guildford borough. How many new homes? Background paper, October 2013’. That document gave 11 estimates of housing ‘need’ for the borough, each based on different premises. Figure 18 of that report gives a summary plot of the estimates of yearly housing ‘requirements’ over the next 20 years, which makes 2 points crystal clear:

- The large spread in the distribution of estimates of annual ‘need’, and therefore how subjective the figure is. There is no ‘right’ housing number for the local plan as the Lead Member for Planning and Governance so naively thought at the time: estimates of ‘need’ will be a function of the respective priorities subjectively placed by individuals upon factors such as business development, staffing requirements, migration, adequacy of infrastructure, permanent sanctity of the Greenbelt, political considerations in Westminster etc.
- How large the GL Hearn / Capita Real Estate estimate of ‘need’ is compared with most of the others.

Given the subjectivity, it takes the biscuit that G.L.Hearn / Capita Real Estate specialists should have criticised the prior output of Edge Analytics specialists (section 4.7 and Table 12 of previous draft SHMA), who, in turn, themselves criticised the first draft produced by GBC specialist(s), adding into the mix the specialism that only the POPGROUP computer programme can provide. Is this not the perfect example of how planning has become the ‘preserve of specialists rather than local populace’?

Even Capita Real Estate's 2015 SHMA report itself considers sensitivities about its preference for the proposal of 517 dwellings per annum for Guildford Borough that range from 239 to 744, a ratio of 3:1. Such uncertainty in figures implies a very weak basis for calling circumstances sufficiently exceptional that the boundaries of the Green Belt must be altered.

Returning to the issue of migration, stated Government policy for the past 6 years has been to reduce national net immigration numbers down from ‘hundreds of thousands’ to ‘tens of thousands’. The new Secretary of State for Exiting the European Union, the Rt. Hon. David Davis, is also committed to modifying the principle of freedom of movement of people within the EU and so honouring a key persuasion of the majority of the national population that voted for ‘Leave’ in the recent referendum on whether the UK remains within the EU. A main reason why the ‘Leave’ result occurred from the referendum is because a majority of the indigenous population is exasperated with politicians pursuing policies that crowd increased numbers of people into their surroundings and result in a deterioration in their quality of life. A reduction in EU migration will surely result if a reduction in the free movement of EU citizens into the UK is negotiated in the near future: such an outcome is highly likely and therefore immigration is more likely to fall more than that projected by Capita Real Estate in future years. Estimates of the numbers of homes required for net immigrants in Guildford Borough should reflect the strong possibility of these migration reductions and be themselves correspondingly reduced: the assumption by Capita Real Estate of only a small decline in international immigration to the Borough must be a worst case scenario. A factor of 1/10 (say 10,000/100,000) in migration is more appropriate. Intuitively a policy of no net migration might be more widely supported by the local population, despite it being labelled ‘inappropriate’ according to the Capita Real Estate ‘specialists’. It is pertinent that net total migration into Guildford Borough is only predicted to be positive because of international migration: without foreign immigration, net migration into the Borough would be significantly negative (net internal migration efflux of 500 to 1000 persons per annum according to figure 15 of the SHMA). Such an efflux would approximately cancel the natural growth of the Borough's current population, leading to zero extra housing requirement.

Migration does not equate to housing ‘need’: by definition it is extra to indigenous need. Migration should be catered for in terms of housing plans only if that migration is generally and democratically seen to be of positive benefit to the local community, in both economic and social terms. The question of economic benefit from migration is a hotly contested subject. Although studies show that, initially, immigrant young working people make a positive contribution to the economy, over the longer term immigration is a net drain on the public purse (to the tune of £95 billion nationally over 1995-2011)4. Given a weak, possibly non-existent net benefit from inward migration, compared with the definite degradation of their environment and daily lives, it is a confident bet that most residents would opt for a lower quantity.

It is also quite uncertain that the large-scale immigration proposed in the draft plan will erase the differences in life expectancy that have identified between affluent and non-affluent areas in the Borough: such differences may indeed be exacerbated by the influx. Population growth, by itself, is no guarantor of increasing wealth per capita5. Capital- and
knowledge-intensive postindustrial societies sustain the highest growth rates: these are not necessarily associated with large population growth rates.

In other words the future ‘need’ for housing is anybody’s estimate; it is a very subjective entity, dependent upon the bias of the estimator: Capita Real Estate has erred on the high side given their predilection towards development. To predict and provide for such a large housing number could well be a self-fulfilling prophesy, but producing little benefit to, and more likely a negative effect on, the borough’s economy, let alone its social cohesion.

With the bullish estimates of net international immigration included in its initial demographic projections, Capita Real Estate predict a population increase of 15% for Guildford (21,179; SHMA table 13). But Capita Real Estate then further amplifies housing requirements (SHMA, 10:38, figure 63), such that housing would increase by 25% over the current number of homes in the Borough over the period of the plan. But, historically and generally, numbers of houses are tightly correlated to populations, so, contrary to the token logic, Guildford Borough population would grow by about the same 25%. Consider that the population of the whole UK is projected to grow by only ca. 11% over the same period (growth from 64m to 73m over the 25 years from 2013 to 2037, proportioned to a common 20 year time period). In other words Capita Real Estate are recommending that Guildford Borough cater for housing a population growth that is over twice as large as the national average! So a borough which provides some of the most beautiful scenery in the UK (certainly in the over-populated South-East), and which comprises 89% Green Belt on which the Government places great importance, is to take more than twice its share of the national population growth! This is perverse.

Key within that perversity are the factors that increase the annual extra housing requirement up from 517 to 693 (SHMA, 10:38, figure 63): Student Growth Impact (25); Improving Affordability (31); Supporting Economic Growth (120). The additive nature of these amendments is naïve, and did not the historical population growth include any student growth or support for economic growth? Will not the extra, extra population growth, from 15% to 25%, require even more houses to account for the factors of affordability and economic growth? Or will the affordability and economic growth be diluted by being spread across that extra, extra population growth? Guildford resident Lewis Carroll would have appreciated such logic, and the draft Local Plan might well be entitled “13,860 Alices Through the Looking Glass”. Building more houses to improve affordability is equally naïve. It is often stated that increased house building will lead to lower prices that will be more affordable by the local population: this is fallacious. The mechanisms of house prices are complex, but to a large extent they are governed by the availability of money for potential buyers; at the moment with very low interest rates, mortgages are cheap and prices have risen as a consequence. Such low interest rates are unlikely to continue for much longer. In addition, there is effectively an infinite market for housing in the borough given its current attractiveness and current national immigration numbers: build more houses, such that their prices drop infinitessimally, and more migration will occur to fill them and sustain the prices. The process is self-defeating and would lead to exponentially increasing housing numbers. Simon Jenkins wrote perceptively on these topics when the NPPF regime was first imposed. It is noteworthy and reprehensible that Capita Real Estate is not open about, nor gives proper justifications for, these hikes in housing numbers, even despite a Freedom of Information request.

Even more perverse, 65% of this inflated local growth is proposed by GBC to be located in the Green Belt, which implies that Green Belt growth in Guildford Borough will be far greater than 25%. West Horsley is proposed to be most severely affected, to suffer a 35% growth. Has anyone at GBC seriously considered the implications of that sort of expansion in a rural village: another 35% school places required; another 35% cars on the roads, constricted in many places by continual roadworks as the network attempts to cope; another 35% patients and medical staff at surgeries; another 35% passengers crowding onto already over-crowded trains; another 35% pressure on sensitive natural areas? Over the 20 years daily life being constantly disrupted by the development.

This is not sustainable. Already, as GBC themselves admit, ‘This growing population places pressure on our existing infrastructure and services like roads and schools. The demand for school places is high and access to amenities such as open spaces struggles to keep pace with Guildford borough’s popularity. Travel demand is concentrated in certain parts of the borough, creating high levels of congestion during peak times.’ These are factors that should have been included in the Sustainability Appraisal by AECOM Infrastructure & Environment UK Limited, rather than the restricted selection of 18 issues given in its paragraph 4.2. This firm is a subsidiary of AECOM, a worldwide group making money from development, whose headquarters are located in Los Angeles, USA, again hardly describable as local champions of empowerment for local people in accordance with the supposed spirit of the NPPF! Incidentally just how competent is AECOM Infrastructure & Environment UK Limited given that its accounts were overdue at Companies House on 18 July 2016 (the last day of public consultation)?
Furthermore, despite the proposed extra housing, there will almost inevitably be continuing shortages during this 20 years as the extra urbanization of the Green Belt will have a magnetic effect. It is naïve to imagine that a massive building programme of ‘mixed housing’ will bring down prices as a consequence. So, unless GBC learns a lesson, there is more likelihood of the pursuit of growth continuing and even acceleration beyond that period. Given how much extra development is proposed in this 2016 draft Local Plan compared with that of 2003, how long might it be before another revision of the plan is called for and further erosion of the Green Belt ensues?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/1205  Respondent: 8672993 / Kes Heffer  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

2) I object to the refusal of GBC to take proper account of the Green Belt Despite more than 30,000 objections to the 2016 draft Local Plan, GBC persists with its policies of removing villages from the Green Belt (“insetting”) and with directing the majority (56.7%) of development to the Green Belt. The retained relaxation of planning constraints implied by removing villages from the Green Belt will lead sooner or later to infilling and the villages becoming small dense towns, thereby providing a self-perpetuating and accelerating pressure towards further expansive growth. Despite all the concern expressed about the damage that will be visited upon the Green Belt by the draft Local Plan, no revision has been made to the ‘Green Belt & Countryside Study’ commissioned from the development biased Pegasus Planning Group. Note that the 1.32% p.a. compound growth of housing in Guildford Borough, mainly in the Green Belt, envisaged in the draft Local Plan will lead to a doubling of the house numbers in the Borough within 2 generations, 50 years; and an increase by an order of magnitude (i.e. a factor of 10) in only 7 generations. Recall the original definition of sustainable development accompanying the NPPF: achieving growth while “ensuring that better lives for ourselves don’t mean worse lives for future generations”. There is no limit on the number of generations that is to be considered in this premise. The importance of the Green Belt[5], despite fine words, has been underplayed in this draft Plan: the lives of future generations will certainly be worse than ours if this draft Plan is enacted.


What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1) Revised figures for future population growth: I object to those produced by GL Hearn[1]

The GL Hearn Addendum report identifies a need for 12,426 homes in Guildford Borough between 2015-34, equivalent to 654 dwellings per annum. This is 17% above the starting point demographic projections.

So in 3 years GL Hearn has managed to change its ‘objectively based’ estimate of how many homes per annum are required for Guildford from 652 in 2014 to 693 in 2016 and back to 654 in 2017. And what has happened during that period to cause the changes in these superficially accurate estimates? Why, the UK has decided to exit the European Union with the intention of reducing freedom of movement and therefore inward migration. Goodness knows how much the Council taxpayers of the Borough have had to pay GL Hearn for the expertise which has gone into increasing over the 3 years the estimate by that extra 2 homes per annum, with a slight wobble in between.

But in truth the exercise is an expensive charade. There is no ‘objectivity’ in estimating future numbers. Estimates of future trends by individuals, or even individual organisations, are always subjective and consequently usually turn out to be wrong. In fact, it has been demonstrated in many different fields that the average values chosen by many different individuals or organisations, even inexpert ones, can outperform single expert opinions.

“Wisdom-of-the-crowds research[2] routinely attributes the superiority of crowd averages over individual judgments to the elimination of individual noise an explanation that assumes independence of the individual judgments from each other. Thus the crowd tends to make its best decisions if it is made up of diverse opinions and ideologies.”

No exercise of gauging crowd estimates of required homes has been officially organised, although over 30,000 objections to GBC’s 2016 draft Local Plan might have provided some evidence that it has estimated very much on the high side. Of course the charge of self-interested NIMBYism might be levied on those objections, so let us instead take as a source for multiple and heterogeneous estimates of housing requirements a document published by GBC itself, even though it was nearly 4 years ago: “How many new homes? A background paper” by GBC October 2013[3]. Although from one, let us charitably say unbiased, publisher it did at least use various different methodologies to estimate housing need. From the Executive Summary:

“The options look at the future need for homes between 2011 and 2031 from three different perspectives, official CLG projections, demographic trend based, job-led and dwelling-led data. We have used projections to generate these options, as they are the best available evidence” (my italics).

These 3 different approaches, each with multiple sub-options, led to estimates of housing requirements per annum of: (a) 704, 415-474; (b) 591-674, 181-226; (c) 358-426, 572-655, 464-540; (d) 312, 322, 1066.


In the above there are 17 estimates (taking the upper and lower limits of each range as separate estimates) of required homes per annum over 2011-2031. They range from 181 to 1066. The mean of the estimates is 507 and the median (as many estimates below as above) is 474. For a pictorial view of the numbers, below is a full distribution of estimates from ‘How many homes?’, also showing the estimates from GL Hearn of 2014, 2016 and 2017.

[Chart]

As an indication of how high is the latest GL Hearn addendum estimate of 654, it falls into the uppermost quartile of the normal distribution fitted to the 17 GBC estimates in ‘How many homes?’ And yet GBC prefer this higher number from the
development biased GL Hearn consultancy; possibly because those numbers are consistent with its own expansive development schemes? Of course the exercise of estimating the required number of homes cannot be treated in terms of just statistics, but neither should it just be relinquished to a single development-dependent organisation, however expert, in 3 closely spaced years; naturally that organisation would be expected to, and did, provide self-consistent numbers in order not to ‘save face’, even despite contra-indications from many other people and organisations. For particular example, the consultant commissioned by West Horsley Parish Council, Neil McDonald, possessing equal, if not greater, expertise than GL Hearn, has examined[4] the latter’s addendum figures and also found that they overstate the future trends in Guildford population. In particular he states:

“It seems probable that the under-recording of out migration has continued after 2011. This has major implications. In particular, the ONS’s 2015 population estimate for Guildford may over-estimate the district’s population and DCLG’s 2014-based population projection may overstate the likely increase in housing by a substantial margin. An alternative calculation making plausible adjustments to the estimated outflows in the period 2001-15 would reduce the demographically-based estimate of the number of homes needed from 558 homes a year 2015-34 to 404.”

International immigration comprises a key component of the population changes in Guildford. In 2014/15 it was almost exactly 2/3. It is noteworthy that GL Hearn are content to consider that the effect of Brexit on reducing immigration to Guildford Borough is already subsumed within the ONS projections of future population growth.


What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:  Letter of objection.pdf (212 KB)
I am in total support of this policy A21.

Please, please keep the Aldershot Road allotment site for ALLOTMENTS, and ALLOTMENTS ONLY - NOT HOUSES.

We are losing all the green areas in the North West side of Guildford as opposed to other parts of the town. Houses are being shoe horned everywhere we look. Allotments are the very few areas of green land that we have in the GU3 area.

Allotments are increasingly popular, as can be seen by the waiting lists. Allotments not only give fresh air and exercise to those who don't have gardens, but a seasonal supply of fresh produce, organic and with no carbon footprint. The children at St Joseph's school have one and thoroughly enjoy their days out there.

The allotments attract all sorts of wildlife too, we have a bee keeper with 4 hives, and as we all know, bees are on the decline in this country and we need to encourage them.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I, the undersigned am in complete objection to the land at Blackwell Farm being built upon as part of the Guildford Plan. I have a young family, and we regularly go to walk and play in the land and woods adjacent to the Research Park and we enjoy the skylarks singing and the views where all but the cathedral tower is blocked by the mature woodland.

We are dismayed that this proposal is still on the Guildford plan and ask for it to be rejected on the following grounds.

**True boundaries of Area Outstanding Natural Beauty**

To build on Blackwell Farm and the Hogs Back would blight the views of the wonderful Surrey landscape for miles and miles. The building of this University campus would be in complete contradiction to the Area Outstanding Natural Beauty it is a part of.

This also includes the land up to the current Research Park boundary, as if these are built upon, this will be seen from the Hogs Back and ruin the views from the top. And therefore undermine the designation as an AONB.

Surrey University's proposal to build properties to high environmental standards that would be sympathetic to the locality is completely unachievable, as any building on that land would be to the detriment of the AONB.

There is already a recycling centre on the southern side of the Hogs Back which is an eye-sore and can be seen from the ridge, surely Surrey County Council is not going to do the same on the northern face of the ridge.

All of the land earmarked is either an Area of Outstanding Natural Beauty, Area of Great Landscape Value or Greenbelt and should be protected by law.

**Building on Greenbelt**

Originally defined to stop Urban sprawl, I feel that it is illegal and immoral to keep changing the boundaries of the Greenbelt, and this area should remain Greenbelt so that there is a clear rural area between developments.

**Risk of flooding to local area**

The Hogs Back, one of the highest points in the area, naturally drains onto Blackwell Farm, this then drains in to Park Barn. Currently there is insufficient waste water infrastructure for this site.

This is a huge concern to us as if our house were ever flooded it would affect our insurance premiums and make our house price fall considerably.

**Surrey University's poor use of the land that they have already developed**

A brief walk through the Research Park, or University Campus will soon show you that the University does not build things to high environmental standards, and instead build things that are noisy and do not fit in with their locality.
To allow a further 10 – 11ha extension to the Research Park when they have made such poor use of the land they have already built upon would be a poor decision by planners.

Their history so far does not show any evidence that they will make any environmental considerations, it will purely be financial.

**Proposed railway station**

This will be to the detriment of the local residents in Park Barn despite what the Local plan says. Firstly due to the added noise and light pollution, which is already bad enough as we have students for the University and hospital staff parking on the estate, it cannot take much more of this.

It is also proposed that it will serve existing housing developments. This is unnecessary as there are two extremely good bus routes for any prospective residents.

**Traffic**

To build the road that will provide access to the proposed development on an already busy junction of the A3 and A31 is ludicrous. The junction for the new road will also be on the ridge of the Hogs Back, therefore visible for miles around and a blight throughout the area.

To provide access from Gill Avenue will only add to the traffic on the west of Guildford around Park Barn, the Hospital and Research Park, yet the Research Park already has a large number of cars with more traffic to and from work. It will be purely for the Research Park, and if they were prepared to use public transport already, there is sufficient.

**Services**

There are already not enough school places on the proposed development side of Guildford, short-sighted planning by previous councils.

**Pollution**

I have already mentioned the noise and light pollution that comes from the Research Park, added to the additional light and noise pollution from the proposed development, this again would be to the detriment of the current AONB.

**Wildlife Habitat**

The land proposed to be built upon has a huge selection of natural flora and fauna: nesting skylarks, deer, kites, ancient woodland, nightjar, orchids, to name a few.

**Ancient Roman Road and Settlement**

The land to the rear of the Research Park has huge historic value, and is a scheduled ancient monument, this area should not be developed.
Unable to afford rural house prices

We chose our house because although it is in a town, it is right next to an area of natural beauty, and fields that you can walk through.

Green spaces

We do not believe that the University will provide enough green spaces - certainly how could they provide such long vistas as are already enjoyed by houses nearer the railway line, and those which the premium could be charged for will be in the higher locations.

True green spaces, and not manufactured ones are vitally important for the emotional and physical health of people. Anything that was on that site would destroy the open vista.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/7710  Respondent: 8674913 / Patricia Cleall-Harding  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We have been looking at the latest version of the Local Plan issued on 6 June 2016 in relation to the fields behind Shalford Village Hall and are very concerned as it could adversely affect the Bowling Club, which is somewhat unique in Surrey because of its artificial playing area. The Plan removes the fields from the Green Belt and puts them in the Shalford Settlement Boundary. This appears to remove the current long established Green Belt protection these fields have and would encourage the developer who has an option on the land to submit housing development proposals with access from Chinthurst Lane.

It is noted that the Plan does reserve these fields for "Open Space" but we have been advised that the wording on the Shalford plan is not clear and in any event is not as strong as its current Green Belt status so it could be open to challenge. It is understood that the Borough Council shares the local community’s view that the fields should not be developed and as we see it, this would be best met by retaining this land in the Green Belt with its additional AGLV protection.

The Bowling club was established in 1999 when the area was developed and the bowling green, two additional tennis courts and the smaller hall were added. The bowling green itself is unusual in that it is built and played on artificial turf. This enables bowling to continue throughout the winter which of course is not possible on natural grass greens and is very popular with members coming from all parts of Surrey to enjoy it. These fields rise up 32 feet from Kings Road and are over 25 feet above the Village Hall. Any development would be clearly seen from the Village Common and could dominate the bowling green and tennis courts and would take away the lovely open backdrop to the playing area which the players fully appreciate as do each year the many hundreds of users and visitors to the Village Hall.

The gift by the late E. C. Wigan in 1962 of the land for the main Village Hall building was made for the use of the inhabitants of Shalford and the neighbourhood "for use for meetings ...... and other forms of recreation and leisure-time occupations with the object of improving the conditions of life for the said inhabitants". The Village Hall site and the open space around it has been known and loved by many residents for over 50 years. The facilities offered in the Halls, the tennis courts, the bowling green and open space are a significant amenity value and are important in providing an attractive...
setting for the village. There is a real possibility that the recreational facilities could be expanded in the future: for example adding more tennis courts. We are very anxious to keep these options open and retain the site benefits for future generations.

In summary the proposed Green Belt boundary is in the wrong place by enclosing these fields on the edge of the village within the built up area of Shalford. Only a small adjustment to the 2003 boundary plan is necessary to reflect the 1999 development behind the Village Hall and thus keep its Green Belt status. Your full and sympathetic consideration to this objection will be appreciated by all users of the Village Hall.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/311  Respondent: 8675937 / J. L Morgan  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Objections to the proposed Local Plan

My strongest objection is the loss of the Green Belt in general and the removal of East and West Horsley villages in particular. I greatly admired the foresight which brought about the Green Belt at a time remember when much within it was green with gardens, parks, school playing fields even farms. Nowadays much of that inner green has been built over. Pollution in London and its adverse effect on children is a fact. The Green Belt provides the lungs of London and must be preserved.

Far too many houses are proposed for the Horsleys.

The Local Plan does not adequately provide associated infrastructure as indeed much needed present improvements let alone new for this area.

Councillors must not be influenced by developers offering for example "a school extension if you grant huge house development near by. Each planning application should stand or fail on its own merit. Do not fail those you represent. Bring genuine foresight and our concerns forward.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp171/562  Respondent: 8675937 / J. L Morgan  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to:

a) the extension of the settlement boundaries of the Horselys into GreenBelt;
b) the removal of extended village areas from Green Belt;
c) the original and remaining proposed large developments in Green Belt land, most especially that for the former Wisley Air Field.

The Green Belt was created to provide the lungs of London and to safeguard near by villages forests and farmland. Such green spaces are needed more than ever today. This generation must not thwart that important principle to line the pockets of developers. Heed these of all other objections and safeguard greenery.

P.s You are there to represent our view so please do so.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I write to object most strongly to the inclusion of the Wisley Airfield in the local plan. We must protect our green belt and exclude this site from the draft local plan without delay. I have written previously to object, our country lanes cannot hold the considerable amount of traffic that would need to be accommodated, the A3 junctions would be even more clogged up than usual at rush hour, air pollution would suffer, the site is unsuitable for a housing development and would spoil the green belt and the protected area and its environs. The potential schools are not needed here. We are served by excellent schools already. This is the wrong area to consider. There are many other sites that could and indeed should be considered. Please start afresh. Take a step back and consider how detrimental this would be to our landscape. Why build on this agricultural land which should be retained as such, as was the original historical intention. There are sites off the M25 that could be considered, and outside Guildford, where much of the housing could be contained.

Please consider carefully all the objections you will receive from residents of this picturesque hamlet of Ockham - don't spoil our countryside in this way. Expand elsewhere but not here at Wisley - green open space enjoyed by so many is becoming a rarity. Conserve and preserve our green belt as was intended.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to the proposed alteration of the Shalford Green Belt and Settlement Boundaries. They appear to be the simplistic drawing of straight lines for no apparent reason other than the cutting of corners and the saving of the draughtsman's ink. There are three areas of considerable concern to me.

1. The small triangle area of Chinthurst Lane, opposite Granary Cottage, lying within the Site of Nature Conservation Interest. It is Common Land (except the actual Highway); it cannot be built upon, so is not "ripe for development". There is therefore no need to exclude it from the Green Belt or bring it within the Settlement Boundary.

1. The area of land, currently Open Space, to the rear of the Village Hall complex but accessed from Chinthurst Lane. This is the highest ground in Shalford Village. If it is excluded from the Green Belt status which it currently enjoys, it will immediately become the subject of planning applications for development. Any house or houses will completely dominate the skyline when viewed from nearly anywhere within the village. Any house(s) built on this land would completely overlook all the surrounding houses and it would not be possible to screen them. The access from such dwelling(s) would have to be onto Chinthurst Lane, a narrow road without footways for much of its length and a "rat-run" for rush hour traffic trying to avoid Rices Corner or Bramley and the queues to the Shalford Roundabout.

The Council makes much of the need for affordable housing. No potential developer of this site will be prepared to provide such housing. The area is not big enough to build for profit and to provide houses in sufficient number which are small enough to be "affordable" and the density would be out of keeping with the area.

1. The triangle of land behind Christmas Hill. This is totally land locked, accessible only from adjoining property, a footpath or Common Land. It is quite unnecessary to bring that corner within the Settlement Boundary and exclude it from the Green Belt. It creates the suspicion that the Council has a hidden agenda for this area. Much is made of the need for transparency. The Council should make the reasons for this inclusion clear.

All this land falls within the Area of Great Landscape Value for which there is a current proposal for its inclusion within the existing adjoining Area of Outstanding Natural Beauty. The Council has backed this proposal so it is contrary to the Council's own policy to now seek to exclude these areas from that proposal.

I strongly believe that these areas should be protected from development.

It is essential that Shalford remains WITHIN the Green Belt. It is so close to Guildford that removal of Green Belt status would mean the rapid progress toward a joined-up conurbation when a buffer is really what is needed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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All this land falls within the Area of Great Landscape Value for which there is a current proposal for its inclusion within the existing adjoining Area of Outstanding Natural Beauty. The Council has backed this proposal so it is contrary to the Council's own policy to now seek to exclude these areas from that proposal.

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It is essential that Shalford remains WITHIN the Green Belt. It is so close to Guildford that removal of Green Belt status would mean the rapid progress toward a joined-up conurbation when a buffer is really what is needed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I am writing to object to the proposal to retain, and increase, the number of houses to be built at Keen’s Lane. (Policy A22 Land to the North of Keens Lane)

Responses on previous submissions have been ignored and in fact the number of dwellings has been increased from 140 to 150.

• This will increase traffic congestion on the surrounding routes, which are already congested.
• It will add to traffic problems around exits on to Keens Lane, which is unsuitable for more than minor use by vehicles.
• It will put the protected area at Whitmoor Common under increased footfall pressure.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/1990  Respondent: 8684833 / Adrian Hall  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

• disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
• directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
• ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
• adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/415  Respondent: 8686913 / John and Susan Burge  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule
This Local Plan appears to be very similar to the last one with a little tinkering to the detriment of most residents in the area. I think the bullying tactic of “if we don’t put in for sufficient building the Government will demand the Council does more” is not the way for the Council to work with local residents.

I object to the proposed Local Plan:

1. I cannot understand how anyone can expect residents to agree with a plan that is only half written. How can you suggest the building of hundreds of properties without detailed mention of the infrastructure. The infrastructure in East Horsley is already under great stress – full roads, full schools, full medical centre, full car parks and poor water supply and drainage. Main roads are not the total infrastructure of the community.

I OBJECT because of the lack of “total” infrastructure.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/416  Respondent: 8686913 / John and Susan Burge  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I would have hoped more facts about how the Council arrived at the number of houses required would have been more constructive but the Council appears not to be willing to be honest and open.

I OBJECT to the 2016 Draft Local Plan. I urge you to withdraw it and stop trying to force new development against the wishes of local residents and in a lot of cases common sense.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/549  Respondent: 8686913 / John and Susan Burge  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. Shortly before this Local Plan was published Guildford Borough Council totally rejected the application to redevelopment Wisley Airfield, yet here it is again. The current proposal would destroy the village of Ockham. In effect the proposal is for a New Town with houses and blocks of flats packed close together on a density scale more appropriate to an inner London borough and the site is largely Green Belt.

I OBJECT to the intense use of this largely Green Belt land for housing units.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1199  Respondent: 8686913 / John and Susan Burge  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. How can the Council remove Green Belt protection from villages and then expand the villages’ settlement boundaries whilst at the same time stating “We will continue to protect the Metropolitan Green Belt”. How much more contradictory can these two statements be? And where is the “exceptional circumstances” to build new houses on the Green Belt?

I OBJECT to the destruction of the Green Belt without evidence of need.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/1516  Respondent: 8686913 / John and Susan Burge  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
The idea of a new township on Wisley Airfield was, and continues to be a very bad idea. GBC has already objected to a planning application for the Wisley site and presented fourteen reasons to justify its position, yet keeps it in the Local Plan as a “policy site”!

The developers have presented what they call “minor” alterations to the original plan – I would query the use of the word “minor”.

I still **OBJECT** to the continued inclusion of the Wisley Airfield site in the revised Local Plan.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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Comment ID: pslp172/3583  
**Respondent:** 8686913 / John and Susan Burge  
**Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I refer to the draft local plan.

I object to the inclusion of policy A35, Three Farms Meadow for the reasons below:-

1. The much heralded bus service from the site to Horsley would be a major hazard to other road users as the lanes are not wide enough. I object to the scheme because it is both unsuitable and dangerous.
2. There would be minimal employment on site so almost all residents would have to travel to work by road. I object to the inevitable increase in traffic and fear for the lives of those who chose to cycle on narrow unlit country lanes.
3. The site would generate increased traffic at the A3/M25 junction which is already heavily congested. I object to the further overloading on this road system and the resulting additional pollution.
4. I object to further "grabbing" of green belt land.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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Comment ID: pslp171/373  
**Respondent:** 8686913 / John and Susan Burge  
**Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Before any proposals to new housing schemes are considered, the infrastructure, particularly in East & West Horsley, needs a vast amount of development – schools, doctors’ surgeries, supply of water and drainage, roads, railway car parks.

I OBJECT to new/revised proposals in the Horsleys until the infrastructure has been improved hugely.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/374  Respondent: 8686913 / John and Susan Burge  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The proposed increase of 22% in housing stock in the Borough bears no relation to the ONS population growth projections. I would suggest that the Consultants have misused the official data and the result is an unfair burden on those areas that are targeted to absorb such additional housing.

I OBJECT to these housing targets.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/1125  Respondent: 8687041 / Michael Aaronson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

If this Policy is adopted provision should be made at the developer's expense for improved public right of way crossing of the A31 so that those walkers denied access to the Blackwell Farm site are able more easily to access the south side of the Hog's Back. At present one has to take ones life in one hands every time one tries to cross it on foot.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? (No), is Sound? (No), is Legally Compliant? (No)

Answer (if comment is on questions 1-7 of the questionnaire): ()

I wish to OBJECT in the strongest possible terms to the inclusion of Policy/Site A46 in the Local Plan, on the following grounds:

Site A46 would fill in the whole area between the two settlements of Normandy and Flexford and would completely destroy the nature of our community (it would deliver an increase of 175% in the population over the Plan period). The claim that it would achieve greater sustainability is spurious.

There is no legal basis for claiming that housing is needed to build a school and that this constitutes the “exceptional circumstances” required to remove land from the Green Belt in advance of development.

The need for a 7/8FE secondary school on this site has not been established.

Even if the need for an additional 7/8FE secondary school were established, GBC has not demonstrated why development needs to take place on this sensitive Green Belt site as opposed to other alternative sites around the Borough.

There has been no proper assessment of the impact on the local transport and other infrastructure of such a huge development.

The site is less than 1 km away from the Thames Basin Heaths Special Protection Area (TBHSPA), where development should be restricted.

This site was not allocated for development in the previous version of the Local Plan and should not therefore have been included in this one.

I develop these arguments further below:

1. **Site A46 would fill in the whole area between the two settlements of Normandy and Flexford and would completely destroy the nature of our community (it would deliver an increase of 175% in the population over the Plan period). The claim that it would achieve greater sustainability is spurious.** No evidence has been sought/obtained by GBC to justify the assertion that the designation of Normandy/Flexford as a ‘strategic site’ “achieves greater sustainability for the village”. This is an unsubstantiated statement that is not underpinned by any research. The residents have made their views very clear at two public meetings organised by the Normandy Action Group and subsequently by Normandy Parish Council: they do not want the infilling of the open space between their two settlements under the development proposals for Policy/Site A46.

   Part of the rationale for this proposal was an argument in a ‘Green Belt and Countryside Study’ (GBCS) commissioned by GBC that the openness of the land between Normandy and Flexford did not make a sufficiently “important contribution to the openness of the Green Belt” to warrant its needing to remain in the Green Belt as per the National Planning Policy Framework (NPPF), para 86. This is complete nonsense. It assumes that these opportunities only present themselves to people who drive cars along the roads, as opposed to those who walk the public footpaths – in this case the one between Westwood Lane and Glaziers Lane that traverses one of the most rural landscapes in this part of the Borough, with a rich natural flora and fauna that most certainly does contribute to the openness of the Green Belt as per para 86 of the NPPF. It is also ludicrous to claim that the vista from Westwood Lane – or indeed looking down on the area from the Surrey Hills AONB on the Hog’s Back – would not be adversely affected by the construction of an estate of over 1000 new houses. Unsurprisingly, in the public consultation this proposition was heavily contested by local residents, among the other objections they made to the GBC proposals. However it has simply been ignored by GBC in this latest version of the Plan.
2. Closer examination of the GBCS and the Guildford Borough Settlement Hierarchy reveals that Normandy and Flexford are treated as separate settlements for the purposes of Green Belt ‘sensitivity’ but as one settlement for the purposes of ‘sustainability’. This double standard denies the openness of the 85 hectares of land between the two settlements, and the important contribution it makes to the openness of the Green Belt. The proposed merging of Normandy and Flexford is inconsistent with one of the five purposes of the Green Belt (NPPF para 80), namely, to prevent neighbouring towns from merging with each other. Normandy and Flexford may only be villages, rather than towns, but the spirit of the NPPF is clear, and it has been ignored in this case.

3. **There is no legal basis for claiming that housing is needed to build a school and that this constitutes the “exceptional circumstances” required to remove land from the Green Belt in advance of development.** In February 2016 the leader of GBC, Councillor Paul Spooner, and other GBC Councillors told a public meeting organised by Normandy Parish Council (NPC) that further work on the GBCS had established that the Normandy/Flexford site was at the highest level of sensitivity in terms of Green Belt protection, thereby giving the impression that it was safe from development. However Cllr Spooner also warned that if a proposal came forward to build a secondary school on the site that would “trump” its Green Belt sensitivity. It subsequently transpired that since at least the summer of 2014 GBC had been in discussions with a major developer, Taylor Wimpey, who had obtained an option on a large part of the site, and was offering to make part of it available for the construction of a 7/8FE secondary school. Cllr Spooner has justified the over-riding of the sensitivity criterion in the following terms:

“This is because it is considered an enabling development to fund a much needed secondary school in the West of Guildford and also achieves greater sustainability for the village”[1].”

1. However, the argument that it is an “enabling development” is circular as the claim that the school is needed rests on the argument for building additional houses on this and other sites, but the houses on this site can only be built if the school is allowed to be built. So it amounts to putting up houses to justify a school that would not be needed if the houses were not built.

2. **The need for a 7/8FE school on this site has not been established.** Responses to FoI requests from Surrey County Council disclose that there is no evidence that a 7/8FE secondary school is needed in the west of the borough. It is predicated on increased housing to be provided as part of the Plan in Ash and the Blackwell Farm site to the west of Guildford, as well as the Normandy/Flexford development. The latter alone would only justify a single form entry school, i.e. an insufficient number to justify a new school and one that could be met by utilising capacity in existing schools (as established by Surrey County Councillor for Normandy Keith Witham’s enquiries of local head teachers).

1. **Even if the need for an additional 7/8FE secondary school were established, GBC has not demonstrated why development needs to take place on this sensitive Green Belt site as opposed to other alternative sites around the Borough.** Other sites have been excluded on the basis that they lie in “sensitive red Green Belt land” (‘Secondary Schools Discounted Sites, pp 576-580 of the Plan document); exactly the same consideration applies to this site. In other words I wish to challenge SCC/GBC as to the robustness of the decision-making process that has led them to eliminate other potential sites for a secondary school in West Guildford, and in particular I would ask why the one in Normandy suddenly appeared in early 2016 given that SCC’s ‘School Organisation Plan’ of December 2015 contains no reference to the need for additional places in the west of the borough.

2. **There has been no proper assessment of the impact on the local transport and other infrastructure of such a huge development.** The road network in particular, but also the drainage and sewerage system, are already under severe pressure. The site for the proposed development is bounded by a C road and a D road, both of which include dangerous narrow bridges over and under the railway (one single lane traffic and one a blind summit) and both of which exit onto the A323 at one end and the A31, Hog’s Back, at the other. The A323 itself is, at rush hour, already congested and is identified in GBC’s OGiSTAR (Options Growth Scenarios Transport Assessment Report) study as being at full capacity already and the access up Wanborough Hill to the Hog’s Back is also a major bottleneck. It is very hard to see how this fragile transport infrastructure could support the additional 1,650 cars that would accompany the 1100 homes in GBC’s proposal, let alone the massive disruption from construction traffic over a period of years that such an enormous building project would entail.

3. **The site is less than 1 km away from the Thames Basin Heaths Special Protection Area (TBHSPA), where development should be restricted.** GBC has failed to take into account that the specific policies in the National Planning Policy Framework (para 14, especially footnote 9, and para 119 – with reference to the Birds and Habitats Directives) indicate that a development of this scale, in such proximity to the TBHSPA, should be...
restricted. In addition development of this scale on this site will cause untold damage to the rich flora and fauna, as detailed by the submission from the Friends of Normandy Wildlife. This summer my garden has seen young foxes, young deer, young Tawny Owls, hedgehogs, bats, and numerous species of bird. Two years ago it was visited by a raptor that on the basis of video footage provided by me led the RSPB to conclude: “So on balance, I think it could be a goshawk, which would be a fantastic sighting in a garden.” This bio-diversity will be irreparably damaged by a development that builds over the precious fields and woodland on the adjacent site, A46.

4. **This site was not allocated for development in the previous version of the Local Plan and should not therefore have been included in this one.** Site A46 has not been the subject of a Regulation 18 consultation. It is an entirely developer-led proposal that is driven by commercial considerations rather than the needs of the local community.

I believe that all these questions reveal fundamental weaknesses in GBC’s “Submission Local Plan” as far as Normandy is concerned. I fail to understand how removing valuable agricultural land and woodland from the Green Belt can be justified by the subjective and erroneous judgments about openness that the GBCS reveals, and how a developer-led proposal to make land available for a school in return for being allowed to build 1100 houses can be consistent with the principles of the NPPF, let alone be legally compliant.

At its Extraordinary Meeting on 24 May, and as a result of representations made by Normandy and Flexford residents to Councillors prior to the meeting, Guildford Borough Council approved the ‘Submission Local Plan’ for public consultation, subject to the following proviso:

*As strategic site allocation A46, Land to the south of Normandy and north of Flexford, is a land parcel coloured red on the Green Belt sensitivity map and is only included as a strategic site to support the provision of a new secondary school, this strategic site allocation be deleted should it be demonstrated that provision of such a school within this site is not required.*

The Leader of the Council maintained that SCC had before the meeting reaffirmed the need for a school in the west of the Borough, although it transpired that this was purely on the basis of “informal consultations”. FoI requests of SCC[2] (see point 2, above) have disclosed that:

> “Without taking into account any additional housing created by the Guildford Local Plan, there are no proposals for a new secondary school in the area west of Guildford, therefore no such considerations have taken place.”

In other words, a new strategic site, A46, which had not featured as such in the Regulation 18 consultation, was included in the Submission Local Plan as a purely developer-led initiative and on the basis of nothing more than informal consultations about the likely future requirement for secondary school places. This is an extraordinarily casual approach to planning and given the damage to the Green Belt that would follow I find it quite shocking that it forms part of the Plan. I repeat my OBJECTION in the strongest possible terms to the inclusion of this site.

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[1] In letter of 3 May to constituents from Jonathan Lord MP, attached. In this letter Mr Lord also says he is “appalled and aghast at the proposals” for Normandy contained in the Submission Local Plan.

[2] See attached ‘FoI Responses on Schooling needs from SCC May 2016’.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:  
- FoI Responses on schooling needs from SCC May 2016.docx (14 KB)  
- Jonathan Lord letter 3 May 16.pdf (804 KB)  

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**Comment ID:** PSLPS16/1118  
**Respondent:** 8687041 / Michael Aaronson  
**Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A47
Do you consider this section of the document; complies with the Duty to Cooperate? ( No ), is Sound? ( No ), is Legally Compliant? ( No )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I wish to OBJECT to the inclusion of Policy/Site A47 in the Local Plan, on the grounds that it forms part of an SNCI and is not appropriate for housing development; also that it would exacerbate existing flooding problems in the area, and that the local roads infrastructure is insufficient to support this level of housing.

This site lies within a 'Water Vole Alert Area'. It is astonishing that it can be proposed for development, given the damaging effect on biodiversity this would entail.

The site is regularly flooded; if it is built over it can only contribute to increased flooding in the surrounding area, notably at Wanborough Station, which is regularly inaccessible after heavy rain. I find it almost inconceivable that anyone could think it is an appropriate site upon which to build 50 houses.

Access to the site is via a narrow bridge over a stream running from the Hogs Back; this is completely unsuitable for the additional traffic that 50 houses would create, let alone the construction traffic that would accompany the development. Immediately after the bridge is a sharp left hand turn that would be almost impossible to negotiate for a low loader carrying the plant that would be needed for the construction works.

This is a poorly chosen site, not at all within the spirit of the NPPF.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/1119  Respondent: 8687041 / Michael Aaronson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A49

Do you consider this section of the document; complies with the Duty to Cooperate? ( No ), is Sound? ( No ), is Legally Compliant? ( No )

Answer (if comment is on questions 1-7 of the questionnaire): ()

This land should not be 'inset' in the Green Belt as it creates an urban enclave that serves to detract from the 'openness' of the village as per the NPPF. This does not constitute the 'exceptional circumstances' that allows Green Belt boundaries to be redrawn.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/1120  Respondent: 8687041 / Michael Aaronson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A50
Do you consider this section of the document; complies with the Duty to Cooperate? ( No ), is Sound? ( No ), is Legally Compliant? ( No )

Answer (if comment is on questions 1-7 of the questionnaire): ()

This land should not be 'inset' in the Green Belt as it creates an urban enclave that serves to detract from the 'openness' of the village as per the NPPF. This does not constitute the 'exceptional circumstances' that allows Green Belt boundaries to be redrawn.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1548  Respondent: 8687041 / Michael Aaronson  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the fact that the same Policy is made to apply to the urban areas and the inset villages. The factors relating to the latter are quite distinctive and they merit their own Policy. I have no confidence that the three points relating specifically to the villages will be respected in practice, and I offer in evidence the proposals for Policy/Site A46, which show zero respect for the distinctive settlement pattern of the villages of Normandy and Flexford, nor for the views of the villages from the surrounding landscape, nor for the views within the villages of local landmarks, both natural and man-made.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1546  Respondent: 8687041 / Michael Aaronson  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E6

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I OBJECT to the idea that my leisure experience can be enhanced by the creation of artificial sites such as the proposals for SANG while the countryside itself is degraded by the development proposed for the Green Belt. It is the natural countryside that enhances my leisure experience; for example the ability to cycle safely along peaceful rural lanes - which will seriously affected by the proposed level of housing development in this Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1547  Respondent: 8687041 / Michael Aaronson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E7

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

It is disappointing that there is so much emphasis on retail and other commercial development in the town, and so little emphasis on residential property. The town should not be just somewhere people come in to do their shopping by day; it should be a home for people at night. I OBJECT to the disproportionate weight given to commercial development in this Policy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1538  Respondent: 8687041 / Michael Aaronson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT: because this Policy rests on the flawed assumptions of the SHMA; because there is insufficient emphasis on high density urban development, which is more sustainable than building in the villages and on the Green Belt; because the University should be made to provide more student accommodation on campus; and because the provision for Travellers fails to acknowledge the already high level of provision for this group across the Borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: PSLPP16/1539  Respondent: 8687041 / Michael Aaronson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT, because I do not believe that these homes will be affordable to the people who need them. Allowing developers to include properties that will be sold at 80% of market rate is not an adequate response to the shortage of housing for first time buyers and people on low incomes.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1540  Respondent: 8687041 / Michael Aaronson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT, because this is simply a licence to build on the Green Belt. It is a Policy so weak in the way it is framed that it is open to all manner of exploitation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1549  Respondent: 8687041 / Michael Aaronson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I OBJECT to the fact that so much housing development is included in the Local Plan with so little realistic appreciation of the strain this will place on the transport and other infrastructure and so little evidence of advance planning. Reassurances from the Lead Councillor for Infrastructure that all this will be taken care of at the detailed planning stage are not adequate; it is irresponsible to base a Local Plan on infrastructure improvement that may or may not be forthcoming - especially when this entails taking land out of the Green Belt. The Leader of the Council has said he will not support the housing numbers in the latest draft of the Plan without the infrastructure improvements, but how can we have faith in future promises from third parties about the infrastructure that may or may not be delivered?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/1550  Respondent: 8687041 / Michael Aaronson  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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I OBJECT to the fact that, while this Policy claims "Permission will not be granted for proposals that are likely to materially harm the nature conservation interests of local sites unless clear justification is provided that the need for development clearly outweighs the impact on biodiversity", this is manifestly contradicted by other Policies, in particular the inclusion in the Plan of Policy/Site A46. If this site is developed as per the Plan, i.e. if 1100 new houses are built on it, it will completely destroy a precious wildlife habitat that is home to an extraordinary variety of flora and fauna, as evidenced by the separate submission from the Friends of Normandy Wildlife. And all this on the spurious grounds that building 1100 houses 'enables' the development of a new secondary school, the need for which has not been established. The same comments apply to the proposed Policy/Site A47, which is a SNCI - how can anyone justify building 50 houses on such a site? Thus this Policy clearly is not strong enough to achieve the objectives it sets itself.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/1541  Respondent: 8687041 / Michael Aaronson  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I OBJECT, because this is a weak Policy and provides insufficient protection against development within the AONB.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID:  PSLPP16/1542  Respondent: 8687041 / Michael Aaronson  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( No )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the cavalier approach to Green Belt protection revealed by this Policy. It flies in the face of manifesto commitments made when this Council was elected. The insetting of 14 villages from the Green Belt, the proposal to allow infilling within a further 12 villages within the Green Belt, plus the proposed extensions to the settlement boundaries of 11 more villages - allowing even more infilling there - will amount to a gradual erosion of the Green Belt and a degradation over time of the character of the villages concerned. The Green Belt makes a vital contribution to our well-being and deserves stronger protection. The villages are an essential part of it.

Specifically with regard to Normandy and Flexford, the settlement boundary proposals will need to be revisited when Policy A46 is withdrawn from the Plan (see separate submission) and if there is to be any change to the existing boundaries that will need to be the subject of further public consultation, as it is not possible to see from the existing proposals where they would lie in the absence of Site A46.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID:  PSLPP16/1543  Respondent: 8687041 / Michael Aaronson  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to this area having stronger protection than the Green Belt areas. However I do not support building on green fields in this area any more than anywhere else.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
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<td>I OBJECT not to the need to have robust flood protection measures but to the naive way they are applied in this Local Plan. Reading the descriptions of the flood risk at sites of which I have close acquaintance I wonder whether the planners have ever actually visited them. For example, the descriptions relating to Policies/Sites A46 and A47 bear no relation to the lived experience of wading through water in the car park to catch a train at Wanborough Station, or squelching along the footpath that runs through Site A47, or getting bogged down in the heavy clay that underlies most of Site A46. This Policy reveals wishful thinking on a grand scale.</td>
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<td>I OBJECT to the irresponsible application of the SANG concept in this Policy and in the Plan as a whole. Allowing developers to claim that taking over previously productive farmland or ecologically valuable woodland and calling it SANG justifies building on nearby green field sites is a travesty of what the SANG concept is intended to achieve. The net result is a degradation of the existing environment without any meaningful mitigation of the risk to the THBSPA, as increased numbers of dog walkers and others will prefer to use the latter rather than an artificially constructed so-called 'suitable alternative'. This really is a shockingly cynical approach.</td>
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<td>Although this follows the wording of the NPPF the Policy has to be set in the local context and be based on an honest understanding of what &quot;sustainable&quot; means. The Plan document takes a very narrow view of 'sustainability', appearing to equate it with housing development being near to a transportation link, without any consideration of the environmental aspects of 'sustainability'; a sustainable community is one with good community cohesion and spirit, based not least on an aesthetically agreeable environment that people want to live in. I OBJECT to the way the Plan treats the issue of 'sustainability' and uses it to justify placing the majority of new housing development in the Green Belt.</td>
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<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
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<td>Respondent: 8687041 / Michael Aaronson</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<td>I OBJECT to the use of a housing number based on an opaque methodology that has been shown to be flawed by two separate studies (Cllr David Reeve's analysis of July 2016 and the independent NMSS report commissioned by the Guildford Residents Association of June 2016) and that has then been applied without any constraints to justify an unacceptably high level of housing in the Green Belt.</td>
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<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
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The Strategic Housing Market Assessment (SHMA) is deeply flawed, as has been demonstrated by two separate authoritative studies: Councillor David Reeve's analysis published in July 2016 and the independent NMSS report commissioned by the Guildford Residents Association of June 2016. In turn this invalidates the statement of Objectively Assessed Need (OAN) and negates the basis on which so much development is proposed in the Local Plan. I OBJECT to the entire Local Plan's being predicated on a housing number that rests on a flawed methodology. I also OBJECT to the fact that constraints have not been applied to the OAN to arrive at a more rational housing number. I believe the number in the Plan to be grossly inflated as a result and not a sound basis for planning, especially as using this number has such devastating consequences for the Green Belt.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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<th>Comment ID: SQLP16/325</th>
<th>Respondent: 8687041 / Michael Aaronson</th>
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<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Question 2: Legal compliance</td>
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*Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )*

*Answer (if comment is on questions 1-7 of the questionnaire): (No)*

With reference to Site A46 I OBJECT to the fact that in the Section 18 consultation this site was not indicated for development as part of this Local Plan. I therefore do not believe it is legally compliant that it features as such in this Section 19 consultation. Furthermore the Council has not demonstrated that there are "exceptional circumstances" that would justify removing this land from the Green Belt; it has been claimed that it is an "enabling development" to allow the construction of a secondary school but there is no legal basis for this. I therefore OBJECT to the inclusion of this site as part of the Local Plan.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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<th>Comment ID: SQLP16/326</th>
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<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness</td>
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*Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )*

*Answer (if comment is on questions 1-7 of the questionnaire): (No)*

The Plan is unsound because it is not based on objectively assessed development and infrastructure requirements. The housing need is exaggerated (see answer to question 1) and the infrastructure requirements have not been adequately assessed. For example, with regard to Policy/Site A46, it is inconceivable that the local road infrastructure could be improved to an extent sufficient to bear the weight of the additional number of houses proposed; bland assurances that these matters will be addressed at the planning permission stage are simply inadequate. To remove land from the Green Belt is a significant step and should be based on sound, evidence-based requirements.

*What changes (2016)/further amendments (2017) do you suggest should be made to the document?*
Belt against a purely hypothetical, not to say fantastical, infrastructure plan is extremely dangerous and irresponsible. I therefore OBJECT to the Plan on the grounds that it is unsound.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/327  Respondent: 8687041 / Michael Aaronson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 4: Duty to cooperate

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (No)

The Plan fails to take into account the very significant impact of the housing development taking place to the West of the Borough, in Rushmoor (especially in Aldershot). This will have a significant impact on the transport infrastructure in the area, which is already at near full capacity. There is no indication in the Plan that the housing development proposals, especially Policy/Site A46 in Normandy/Flexford - which would themselves add a huge extra burden to the same infrastructure - have taken this into account. I therefore OBJECT to the Plan on the basis that there is evidence of a lack of planning co-operation across this local authority boundary.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/328  Respondent: 8687041 / Michael Aaronson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (Yes)

I wish to be able to provide the Inspector with evidence why the proposals for Normandy and Flexford (Policy/Site A46) are inappropriate and unsustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/329  Respondent: 8687041 / Michael Aaronson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 7: Any other comments?
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

This Plan was drawn up before the June 23 EU Referendum vote and the public's decision that the UK should leave the EU. This has such a material impact on the assumptions underpinning the Plan that it should now be revisited.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: pslp173/352</th>
<th>Respondent: 8687041 / Michael Aaronson</th>
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<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2017 / Appendix H: Maps - Normandy and Flexford</td>
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</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I strongly object to the proposal to 'inset' the three settlement areas of Normandy, Flexford, and Wyke/Walden Cottages as shown on the "Normandy and Flexford" maps. Previously these areas formed part of a much larger project (Policy/Site A46) to remove a huge part of Normandy Ward from the Green Belt. Although the withdrawal of the latter development is welcome I object to the insetting of these settlement areas along with the other proposed areas to be inset, on the following grounds. First, no case has been made for the 'exceptional circumstances' that are required to remove land from the Green Belt. If this happens it will become much easier in future for developers to make the case for further development in areas adjacent to the 'inset' areas and we will lose our Green Belt by attrition. Second, as recent Planning Inspector judgments have confirmed, the settlements of Normandy and Flexford make an important contribution to the 'openness' of the Green Belt which would be put at risk were they to be 'inset'. They should therefore remain 'washed over' by the Green Belt as at present.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
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<th>Comment ID: pslp172/2657</th>
<th>Respondent: 8687041 / Michael Aaronson</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A46</td>
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</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I strongly support the removal of Policy/Site A46 from the Plan. This was always a purely developer-led proposal that would have permanently destroyed the character of the Normandy/Flexford community. It was “the only site in the 2016 Proposed Submission Plan set to result in the loss of a significant area of ‘red-rated’ Green Belt.” (Sustainability Assessment 2017, para 10.11.15) and was strongly opposed by local residents, as was seen in the responses to the 2016 consultation. It was justified by the offer from the developer to provide land for a secondary school, the need for which was never conclusively established. The area makes a significant contribution to the openness of the Green Belt, and its development would have resulted in the coalescence of Normandy and Flexford in contradiction of the declared purposes of the Green Belt. Development on this site would also have involved the loss of Grade 3A agricultural land (Sustainability Assessment para 10.10.7). It would have been a travesty for it to have been included in the Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/2658  Respondent: 8687041 / Michael Aaronson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A47

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I strongly support the removal from the Plan of Policy/Site A47. This was in a highly inappropriate location, being both an SNCI and particularly prone to year-round flooding. It was purely developer-led and was justified solely by virtue of its proximity to Wanborough Station, which is now no longer to be considered a transport interchange.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/2659  Respondent: 8687041 / Michael Aaronson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A49

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Under the revised Plan this Policy/Site is to be inset from the Green Belt. Previously it formed part of a much larger project to remove a huge part of Normandy Ward from the Green Belt. Although the latter development is welcome I object to the insetting of this site along with the other proposed areas to be inset, on the following grounds. First, no case has been made for the 'exceptional circumstances' that are required to remove land from the Green Belt. If this happens it will become much easier in future for developers to make the case for further development in areas adjacent to the 'inset' areas and we will lose our Green Belt by attrition. Second, as recent Planning Inspector judgments have confirmed, the settlements of Normandy and Flexford make an important contribution to the 'openness' of the Green Belt which would be put at risk were
they to be ‘inset’. The site is rated “High Sensitivity” in the Sustainability Appraisal 2017 (Table 10.1) It should therefore remain 'washed over' by the Green Belt as at present.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/2660  Respondent: 8687041 / Michael Aaronson  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A50

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Under the revised Plan this Policy/Site is to be inset from the Green Belt. Previously it formed part of a much larger project to remove a huge part of Normandy Ward from the Green Belt. Although the latter development is welcome I object to the insetting of this site along with the other proposed areas to be inset, on the following grounds. First, no case has been made for the 'exceptional circumstances' that are required to remove land from the Green Belt. If this happens it will become much easier in future for developers to make the case for further development in areas adjacent to the 'inset' areas and we will lose our Green Belt by attrition. Second, as recent Planning Inspector judgments have confirmed, the settlements of Normandy and Flexford make an important contribution to the 'openness' of the Green Belt which would be put at risk were they to be 'inset'. The site is rated “High Sensitivity” in the Sustainability Appraisal 2017 (Table 10.1) It should therefore remain 'washed over' by the Green Belt as at present.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/1088  Respondent: 8687041 / Michael Aaronson  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy E2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I support the clear statement in para 4.4.17 that for the purposes of the sequential assessment the train station at Wanborough will not be considered to be a transport interchange because of its location within the Green Belt, and that it is not considered appropriate to direct office development over 100 sq m to this location. The weight that this station was made to carry in the 2016 version of the Plan, and its use to help justify the entirely developer-led Site A46, was completely inappropriate.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: pslp171/1089  Respondent: 8687041 / Michael Aaronson  Agent:  

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy E5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I much welcome the new statement in this Policy (para 3) that "Agricultural land will be protected as set out in national policy and the economic and other benefits of the best and most versatile agricultural land will be taken into account." Previous versions of the Plan have not sufficiently acknowledged the importance of agriculture in an age when the UK needs to become more self-sufficient in food production and reduce the harmful environmental effects of 'food miles'.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/1090  Respondent: 8687041 / Michael Aaronson  Agent:  

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy E7

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Although the number of houses planned for Guildford town centre has increased slightly compared to the 2016 version of the Plan I still object to the priority accorded to retail and other commercial developments over housing - especially affordable housing. Guildford town is where people - especially young people - want to live, rather than in locations that require them to travel. A positive and comprehensive vision for housing in the town centre is lacking from this Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/1091  Respondent: 8687041 / Michael Aaronson  Agent:  

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I strongly support the welcome emphasis in the 2017 Plan on improved infrastructure for cycling in, into, and around Guildford. At present there is no safe way of crossing Guildford on a bicycle, especially from east to west. The Plan document rightly refers to "a fragmented and disjointed network of cycle routes, consisting of routes both on and adjacent to local roads, with the latter often comprising shared lanes for pedestrians and cyclists. Many cycle lanes and tracks are narrow and some are unattractive to the average cyclist." This is very true, and I hope that as this Plan is implemented the Council is as good as its word and delivers a first class cycling infrastructure that will lead to a reduction in car journeys and improved quality of life for all.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: pslp17q/173</th>
<th>Respondent: 8687041 / Michael Aaronson</th>
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<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2017 / Question 1: The evidence base and submission documents</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (Yes)

I am glad that the revised Sustainability Appraisal 2017 provides a very clear statement of the sensitivity of the land between Normandy and Flexford, which was the previous Site/Policy A46 - now removed from the Plan - and also highlights that it includes Grade 3a agricultural land, falling in to the Environment Agency's "Best and Most Versatile" category.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (No)

While I appreciate that much good work has been done since the publication of the 2016 version of the Local Plan I am still not convinced of the soundness of the housing target figure, especially as the methodology by which it was generated has not been made public. This figure shapes so much else in the Plan and it therefore detracts from the credibility of the Plan as a whole if the public does not have confidence in it.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<th>Comment ID: PSLPA16/848</th>
<th>Respondent: 8687265 / Dagero Ltd (David Roberts)</th>
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<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base</td>
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**Do you consider this section of the document; complies with the Duty to Cooperate?**, **is Sound?**, **is Legally Compliant?**

**Answer (if comment is on questions 1-7 of the questionnaire):**

In addition to the long list of objections I have already sent to you, I'd like to add **one further objection** to the the so-called Objectively Assessed Number of 693 which the council has paid property developers G L Hearn to invent.

The two exhaustive studies attached, one by GGG Councillor David Reeve and the other by an independent expert commissioned by the non-political Guildford Residents Association, now suggest to me that a number around 400-500 dpa would be more realistic.

If the council stubbornly go on ignoring evidence such as this, the draft plan is bound to fail the soundness test when it goes to the planning inspector.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
- Guildford OAN Review.pdf (172 KB)
- GRA Report FINAL.pdf (1.6 MB)

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<th>Comment ID: PSLPA16/364</th>
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<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North</td>
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**Do you consider this section of the document; complies with the Duty to Cooperate?**, **is Sound?**, **is Legally Compliant?**

**Answer (if comment is on questions 1-7 of the questionnaire):**

1. Sites in East and West Horsley

I **OBJECT** in particular to including **Sites A36-41** (East and West Horsley). This is a back-door way to create a mega-village – essentially, a soulless new dormitory town. The Horsleys feel victimised by this plan, which has been masterminded by Council leaders representing Ash and Tongham at the other end of the borough, where (in a flagrant case of political double standards) the Green Belt is actually being extended under Policy P3.15

Whatever their merits as development sites, the 6 Horsley sites should not be considered individually but for their cumulative impact on the contiguous villages of East and West Horsley.

Building 533 new houses on these 6 sites, plus at least another 90 on small sites is (a) excessive in absolute terms and (b) disproportionate relative to the rest of the borough. It will destroy the rural character of these communities.16

Under the plan, rural West Horsley will take 35% of new homes, urban Ash and Tongham 16% and Guildford urban area only 11%. The total number of homes in West Horsley will increase by 35%, which is disproportionate when measured against the overall increase in housing across the borough and particularly in Guildford town. If the Council have justifiable
reasons to transform a particular community so radically, the plan should present a case rather than putting forward site proposals as a fait accompli.

These sites will put unsustainable strain on local facilities and infrastructure, including public transport, parking, schooling, medical facilities, sewage, surface drainage and shops. For instance:

- Thames Water have advised the Council that the current wastewater network will not cope and that the foul drainage system all the way to the treatment works North of Ripley will need to be upgraded.
- Guildford Council’s Education Review says “expansion options may need to be considered for primary” education in the Horsley area within the first 5 years of the plan, but Surrey County Council have no plans to do so. The Raleigh School is already full. The private Glenesk and Cranmore schools are also at or near to full capacity. The suggestion that schools in Ripley can be used contradicts the plan’s stated intention to reduce traffic on the A3 and strategic aim that primary schools should be within walking distance.
- The plan’s Infrastructure Schedule (Appendix C) imagines an “East Horsley and West Horsley traffic management and environmental improvement scheme between 2019 and 2023 by Surrey CC” but gives no details. This scheme is just wishful thinking. The proposed housing can only harm the local environment, not “improve”

The harmful impact of these sites is magnified by the proximity of the so-called Wisley Airfield site (Three Farms Meadow), with over 2,000 new homes only 2 miles away (see below).

The density of new housing on the 6 Horsley sites is inappropriate, being greater than anywhere in the locality at present. Sites situated on the periphery of existing development in the Horsleys encroach on surrounding open fields and require the extension of settlement boundaries for which the plan presents no arguments. Contrary to NPPF paragraph 79, this will contribute to creeping urbanisation by attenuating the Green Belt corridors separating the Horsleys from neighbouring settlements.

Collectively, these 6 sites militate against NPPF paragraph 81’s encouragement of access to the Green Belt and its amenity and recreation value. This has been a success story in the Horsleys, with the creation of an amenity wood and community garden, the purchase of adjacent fields (on the eastern side of Ockham Road North) by local residents in order to preserve their open aspect, well-maintained pitches for local football and cricket clubs, public tennis courts, open space for a high-quality campsite (at Waterloo Farm) used by many foreign tourists and the approval of plans for a “Theatre in the Woods” – making West Horsley the only village in Surrey with an opera house. The open nature of West Horsley determined that a long portion of the 2012 Olympic cycle races passed through the village. This route has since been adopted by cyclists as a permanent asset, including the annual

2. Councillor Paul Spooner and his predecessor, Councillor Stephen Mansbridge
3. Even some property developers complain about the Council’s bias in favour of oversized developments, g. Dandara, whose relatively small Green Belt site on the A245 (Epsom Road) in West Horsley is not considered in the plan.

Prudential cycle race. These and future examples of “positive planning” depend on protecting the Green Belt to maintain the openness and attractiveness of the local landscape and avoiding the urbanisation and traffic congestion that Sites A36-41 will bring.

By surrounding Waterloo Farm campsite with 120 new houses, Policy A40 on land to the North of West Horsley will make this rural tourism amenity unviable. This may accord with developers’ plans, since the site would then be vulnerable to infilling with yet more housing.

Site A40 is subject to an unacceptable flood risk from a combination of a high groundwater table and the lack of surface water run-off. This is flat, clay land on the downhill side of the Horsleys where floodwater from new development will
accumulate and back up onto existing properties nearby. I can provide photographs proving how badly these fields already flood at present. These problems will only get worse with the increase in extreme weather events associated with climate change. The “appropriate mitigation” suggested in Policy A40 exists only as an abstract notion. It should not overrule the need for Green Belt “exceptional circumstances”.

Policy A40 underestimates the problems of safe access and egress. Firstly, Ockham Road North was closed for several weeks in 2014 because of flooding, and still floods regularly. Secondly, access problems are not confined to flooding and are not addressed by the proposal to extend the existing 30mph zone past the site entrance. Repeated attempts made by Ockham Road North residents to extend this zone have been turned down by the local authorities, Highways England and Surrey Police, even though data collected in 2015 show that traffic has doubled over the last 15 years and that the average speed in the 40mph section of this road is 52mph, with maximum recorded speeds of over 80mph. No traffic calming measures have so far been achieved. Additional housing will add to several hazards along this stretch of road, including:

- Its use by pedestrians, especially children (using the Raleigh and Glensk schools and catching school buses to Guildford and Howard of Effingham), pensioners living in the string of bungalows at the northern end of the road, and visitors from the Waterloo campsite who are unfamiliar with the area.
- The existence of a narrow footpath on only one side of the road in any one spot. The layout means that walking half a mile between Green Land and East Lane requires crossing the road twice.
- The road’s increasing use by recreational cyclists (see above).
- Its winding nature, poor sight lines (especially when interrupted by summer vegetation) and dangerous, concealed driveways. Most of these were built in the 1930s. Some have been widened but many are too narrow for modern traffic. Since a deep ditch runs along most of the road, vehicles have to swing out dangerously when entering or leaving.
- The prospect of additional traffic, including 19,000 HGV movements (90 a day over a long period) if Surrey County Council approves the Drift Golf Course’s planning application to re-landscape its site using bulk waste transported from London.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/480  Respondent: 8687265 / Dagero Ltd (David Roberts)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

3. Three Farms Meadow site

I OBJECT also to the re-inclusion in the plan of Policy A35 (land at Three Farms Meadow, alias the former Wisley airfield, Ockham). Following a huge public outcry, Guildford Planning Committee have unanimously rejected a recent planning application for precisely this development on 14 separate grounds.17 This deceived many residents into thinking that it has been defeated. Scandalously, the site had been reinserted into the new draft local plan published just 24 hours before the planning decision – a clear signal to the developers to try again.

This is not an NPPF “presumption in favour of sustainable development” but a predetermined bias in favour of specific applicants, who had already been given many additional months to refine their application before it was rejected. Residents are disturbed by apparent political links between the ruling Conservative group on the Council and individuals connected to the developers, a shadowy Cayman Islands company.18
Policy A35 should be ditched from the plan for all the reasons the development was rejected by the Planning Committee, including:

- Green Belt location and absence of “exceptional circumstances”.
- Misrepresentation of the site as brownfield land: 17ha (less than 15%) is brownfield, it is adjacent to the SPA and therefore within the 400m exclusion zone for housing. The remains of the runway (14ha) are a habitat for rare flora and fauna and has never had any buildings on it.
- Proximity to RHS Wisley and Thames Basin Heath Special Protection Area (TBHSPA).
- Proximity to A3/M25 bottleneck and Ripley village and roundabouts.

1. Application reference 15/P/00012.
2. Including the Rt Hon. David Mellor QC (its erstwhile founder and former Minister), Mr Michael Murray (spokesman for the project and Conservative cabinet member for planning policy at the Vale of the White Horse District Council in Oxfordshire) and the Hon. Charles Balfour (director, descendant of the Tory Prime Minister).

- Absence of adequate traffic data.
- Further harm to air quality both onsite and nearby (e.g. the Cobham AQMA) and disregard for the health of children at the proposed secondary school.
- Loss of high-quality agricultural land (55% of the site), in breach of national policy.
- Disproportion of locating of over 2,000 dwellings within the ancient village of Ockham with just 159 households.
- Presence of a Surrey County Council safeguarded waste site.
- Cost of infrastructure required to the detriment of alternative more favourable sites.
- Lack of local transport possibilities owing to country lanes with no footpaths or cycle ways and the distance to railway stations which have no spare parking capacity.
- Impact on listed buildings.
- Difficulty of SANG siting and inability to divert residents and their pets away from the SPA.
- Extreme housing density with tiny garden spaces.
- Damage to neighbouring communities of creating a settlement of 5,000 residents, equivalent to East and West Horsley combined, with worse light pollution, noise and traffic, and competition for local amenities and infrastructure.
- Insufficient information about the impact on the local water table and run-off (see comments on flooding in Horsley above), and the possible aggravation of downstream flooding towards the Thames (e.g. Thames Ditton, which was under water during the winter of 2013/14).

- Failure to evaluate the cumulative impact of this and nearby development sites on the area.

*****

1. The River Mole would flood even more badly should a new runway be built at Gatwick.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1083  Respondent: 8687265 / Dagero Ltd (David Roberts)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
**POLICY D1 - Making better places**

I OBJECT to the absence of any reference to vernacular or historic design guidelines, even in Conservation Areas. Most of the borough, especially the rural areas, has vernacular design guidelines that are available to give suggestions as to appropriate design. These should have mandatory planning force.

The monitoring of this policy is inappropriate. Why should this policy result in a reduction of the number of appeals for poor design? Should it not result in better-designed buildings?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: PSLPP16/1084</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D2</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

**POLICY D2 - Sustainable design, construction and energy**

I OBJECT. Sustainability should be an overarching ambition, conditioning the whole local plan and running through it, as claimed in the NPPF, “like a golden thread”. It should be set out clearly in Policy S1, not buried away as a minor detail in Policy D2.

This policy amounts to “greenwashing”, expounding aspirational environmental targets while ignoring the plan to build dormitory towns across the Green Belt that are environmentally and socially unsustainable. These settlements will bring vastly increased car use and will lead to unacceptable traffic congestion, overstretched social infrastructure, and more greenhouse gas emissions, noise and light pollution. This policy should not be just about saving energy but about preserving the borough’s stock of natural capital, especially the countryside, from futile attempts to rig the housing market.

This policy’s emphasis on Combined Cooling Heating and Power and communal heating networks is meaningless, since no such networks are available locally.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: PSLPP16/1085</th>
<th>Respondent: 8687265 / Dagero Ltd (David Roberts)</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
POLICY D3 - Historic environment

I OBJECT. This policy clashes with the strongly pro-development agenda of the rest of the plan and fails to address the contradiction. History is unamenable to improvement, so the policy should commit the Council firmly to protecting and preserving our heritage assets from development. Instead, the specific policy pledge to “support development” that might “enhance” heritage assets leaves wide scope for abuse in the form of destructive commercialisation and financial leveraging of relevant sites.

This policy is based on the false premise that Guildford’s heritage is inherently in decay. This is a developer’s charter – a short step away from the idea that the historic environment needs to pay its way to be preserved. The Council’s aggressive reviews of Guildford Museum and the Electric Theatre support this interpretation. Whatever the “reasoned justification”, the actual policy wording in the blue box leaves too many loopholes.

Development close to historical assets is harmful and should be expressly prohibited. This policy fails to meet the requirements of NPPF paragraphs 126 and 131-133.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1086  Respondent: 8687265 / Dagero Ltd (David Roberts)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY D4 - Development in urban areas and inset villages

I OBJECT. This is a piously aspirational policy that does not address any of the obvious practical issues already touched on above:

- The plan envisages that 40% of homes built will be “affordable”, but this does not provide any accommodation for low-paid workers, for example, those on the minimum wage, who cannot afford to buy so-called “affordable” homes or pay an “affordable” rent. There is a need for some expansion in social housing, especially in urban areas, where there is a greater concentration of low-paid workers such as those employed in the retail, warehousing and distribution sectors (all of which this plan aspires to expand).
- The number of homes planned in the urban area is too low. There is a glaring need for regeneration in many urban areas, but this is ignored in favour of building homes on green-field sites instead. This will not address urban housing needs. It is also unsustainable, since building outside the town does disproportionate harm to road traffic, air quality and overstretched infrastructure.
- The plan envisages a large expansion of the traditional “bricks and mortar” retail sector, but this is a sector in rapid and continuous decline.
- All the stated policy aims for “inset” villages will be negated by the excessive weight of new housing development proposed which would radically change their character forever. Against this disruptive background, it is barely relevant to talk about preserving views!

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
POLICY E1 - Meeting employment needs

I OBJECT because -

- The evidence base is unreliable;
- There is unclear differentiation between B class uses;
- Only high value-added business uses, contributing to a modern “knowledge economy”, are desirable, not low-grade, low-employment warehousing which is also land hungry;
- Industrial and commercial businesses must be concentrated in the urban area or existing business parks (e.g. Slyfield) not in the rural environment which the infrastructure is unable to support;

1.  See footnote 3

- The rural environment must support micro- or high-tech businesses, agricultural industries, and tourism, and these sectors must not be damaged by general industrial development which is inappropriate.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
POLICY E2 - Location for new employment floorspace

I OBJECT. It would be more sensible to confine all new office and research and development (use Class B1a and B1b) floor space to Guildford town centre. I oppose the policy of expanding the Research Park onto Blackwell Farm (see my reference to “regulatory capture” of local public policy by the University, Policy H1, above). No exceptional circumstances, as defined under the NPPF, have been advanced to justify incursion into this permanent and high-quality area of Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1076  Respondent: 8687265 / Dagero Ltd (David Roberts)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY E3 - Maintaining employment capacity and improving employment floorspace

I OBJECT. The policy of resisting change of use from B1a to residential flies in the face of positive property market solutions for the regeneration of brownfield land and is contrary to national Government policy, recently reconfirmed, which permits changes of use from B1a (offices) to C3 (residential).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1077  Respondent: 8687265 / Dagero Ltd (David Roberts)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY E4 - Surrey Research Park

I OBJECT. The Council are required by the NPPF to facilitate commercial science and technology clusters. But, as with Policies H1 and E2 above, this policy seems to be dictated more by the ambitions of Surrey University than the public interest. In an extremely tangled sentence, it says that the Research Park will be “protected for business use… in any science… that is complementary to the activities of the University of Surrey.”
This fails to distinguish adequately between the University’s public role as a state-funded, academic institution and its private, financial interest in profit-making business spin-offs. It ignores enterprises that might be commercial rivals of the University. And it fails to consider the public harm done by turning the Research Park into a larger Business Park, such as the loss of Green Belt social and environmental capital.

B1b should be the primary use class for the Research Park and applications for B1a should be resisted given the danger of diluting the core purpose and reputation of the park. The inclusion of B1c uses is inappropriate and unnecessary.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

**Comment ID:** PSLPP16/1078  **Respondent:** 8687265 / Dagero Ltd (David Roberts)  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

**POLICY E5 - Rural economy**

I OBJECT. Use of rural areas for town centre uses without applying the sequential approach is against the principles of localism that require local people to be consulted and heeded, not ignored. Villages need protecting in terms of both design and scale.

Most of the economic activities listed in 4.4.44 depend on maintaining the rural character of our villages which would be endangered by the wholesale “insetting”, boundary expansion and house building proposed in other parts of the plan. This applies also to new and projected enterprises in the Green Belt (e.g. Grange Park Opera’s Theatre in the Woods in West Horsley, which requires a protected, rustic setting to be a success, not housing estates and congested roads). Policy E5 is incompatible with the high housing numbers proposed.

Previous commitments to improved high-speed broadband and mobile phone coverage have now been diluted, despite general support. This disregards the responses from the 2014 public consultation.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

**Comment ID:** PSLPP16/1079  **Respondent:** 8687265 / Dagero Ltd (David Roberts)  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E6

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
POLICY E6 - The leisure and visitor experience

I OBJECT. Tourism and visitors do not depend on new visitor “attractions” and could actually be damaged by them, as compellingly argued in the current debate over Newlands Corner. In this policy, the presumption in favour of development runs the risk of becoming an excuse for over-development/“Disneyfication”. Heritage sites and the Green Belt are particularly vulnerable to harm.

Guildford has many “leisure and visitor attractions” already. The case for creating more is not made and no examples are given. Instead, the plan’s explicit priorities should be:

1. To protect the borough’s prime leisure and tourism asset, its countryside, from inappropriate development. This is all the more valuable because of its accessibility from London, the rest of Britain and the Continent, in that order. Rural residents are its custodians and require no Council interference. Economically, the most valuable forms of tourism, such as walking and cycling, require no new development. In the overcrowded South-East of England, lack of development is a leisure and tourism asset, not a liability.

2. To help make Guildford’s river landscape less off-putting and support town-break packages for high-value tourists. To achieve this, the policy needs to define what leverage, if any, Council planners have to influence normal tourism market mechanisms.

3. To help private providers market local tourism. This need not involve extra spending. The Council could, for instance, help co-ordinate ready-made, local tourism packages under a distinctive brand at an all-in price. An “English town break” (including B&B accommodation, a walking tour of Guildford, a pub lunch in the Surrey Hills, a visit to RHS Wisley Gardens and a National Trust property and a SouthWest Trains travelcard for a day out in London) would be highly attractive to many European visitors who currently by-pass Guildford to go to Bath, Oxford or Cambridge instead.

4. To rule out the redevelopment of scarce rural hotel sites (e.g. Thatchers, East Horsley, earmarked for 40 new houses under Site A37 of the plan, yet just a short walk from the new opera house).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1080  Respondent: 8687265 / Dagero Ltd (David Roberts)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E7

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY E7 Guildford Town Centre

I OBJECT. The policy “vision” refers to protecting the Guildford’s “unique setting” (including, surely, its surrounding Green Belt and countryside views) but this is not carried over into the formal policy wording in the blue box. It is therefore a worthless commitment.

There should be much more residential use of the town centre where most people, especially the young and less well-off, want to live and where the necessary amenities and infrastructure exist. The policy misses the opportunity to propose a visionary regeneration plan for the River Wey/Walnut Tree Close area, where there is arguably enough brownfield land for 4,000 new homes, meeting near all the borough’s housing need over the plan period without harming the countryside.
There is an urgent need for a brownfield register and to focus on brownfield redevelopment before considering development outside the existing urban area. CIL strategy must promote brownfield redevelopment.

Strangely, the policy does not address any of the major issues raised by the Council’s own Town Centre Master Plan, the Guildford Vision Group’s proposal for new river and rail crossings or plans for the redevelopment of Guildford Station, all of which are already the subject of public debate.

This policy also fails to provide guidance on design requirements, as required by the NPPF.11

Instead, it is far too concerned with shopping. Town-centre shopping is in decline internationally as consumers move irreversibly online. There is no need to expand physical retail capacity or warehousing floorspace, which will only kill off existing shops while using up valuable housing land. The delays to the redevelopment of North Street is a flashing red light warning that consumer patterns are shifting. Guildford is a large town without a single butcher or fishmonger, showing that the Council need to use the fiscal and other mechanisms at its disposal to support niche retailers. To opt for large, impersonal department stores and dull high-street chain stores at the expense of Guildford’s unique character would be an historic blunder. For this type of shopping, most residents can go to Woking or Kingston, whose ugly town centres should serve as a dire warning to Guildford planners.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: PSLPP16/1081</th>
<th>Respondent: 8687265 / Dagero Ltd (David Roberts)</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E8</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY E8 - District centres

I OBJECT to the proposal that sites “on the edge” of District Centres should be considered for retail developments. This is another Trojan horse policy, allowing retail hubs to be vastly expanded in order to smooth the way for vast new housing estates outside in the countryside (e.g. to meet the “everyday shopping and service needs” of the roughly 1,500 people living in the 600 new homes planned for the Horsleys).

This is a case of back-to-front priorities. Expanded local retail hubs are being proposed in order to justify more housebuilding in the villages, and in a forlorn attempt to mitigate the serious traffic and infrastructure problems this will bring. The Council have no business preparing the way for new supermarkets in the Green Belt. Rural retail capacity should be left to local demand.

The policy proposes not a single measure to support existing rural shops and services that are the lifeblood of village communities, e.g. using business rates and other levers at the Council’s disposal.

1. NPPF 59: “Local planning authorities should consider... the overall scale, density, massing, height, landscape, layout, materials and access of new development in relation to neighbouring buildings and the local area more ”

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
**Comment ID:** PSLPP16/1082  **Respondent:** 8687265 / Dagero Ltd (David Roberts)  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E9

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

**POLICY E9 - Local centres**

I OBJECT (for the reasons given under Policy E8 above) to the proposal for retail development adjacent to the 6 rural centres, and sites on the edge of designated centres. This is creeping urbanisation, damaging to the Green Belt and to Guildford town revival as a thriving urban hub. It will contribute to local urban decay and depopulation, just as expansion of the suburbs did to mid-20th century London.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/1066  **Respondent:** 8687265 / Dagero Ltd (David Roberts)  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

**POLICY H1 – Homes for all**

I OBJECT. Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan period. It fails to set any rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions.

The housing mix is based on out-of-date, pre-Brexit projections and on assumptions set out in a flawed SHMA that has not been scrutinised or evaluated.

I support higher density development in the urban area, without resorting to de-humanising, high-rise buildings that developers commonly claim are necessary for financial viability. Much of Guildford town could usefully be regenerated with 4-5 storey blocks with landscaping and underground parking, as often seen on the Continent and, recently, in London.

1. This has been challenged by residents including, by Mr Ben Paton, as far as the Information Ombudsm But the Council have consistently refused to seek disclosure of the model.
2. See [http://www.glhearn.com/developer/Pages/Overview.aspx](http://www.glhearn.com/developer/Pages/Overview.aspx): “We act for many of the leading ” G L Hearn is now part of Capita Real Estate.
3. See letter from Neil Taylor, Director of Development at Guildford Borough Council, in the Surrey Advertiser of 3 June 2016: “I would like to highlight the difference between the Objectively Assessed Housing Need (OAN) figure produced by G L Hearn (693 homes per year) and the Housing Target for the Local Plan. Some opponents of the Local Plan appear to blur the edges of the two figures. The OAN figure is the one produced by the modelling tool. The Housing Target figure is the proportion of the OAN that the Council feels it can successfully
deliver. Based on the infrastructure that Highways England, Surrey County Council and others suggest they can provide over the next 15 years, the Council believes it can deliver the full OAN number as the Housing Target. However if, during this consultation, or later on, the anticipated infrastructure is not going to be provided then the council will be forced to apply further constraints to the OAN number, which may reduce the Housing Target number. Therefore, it is clear that the OAN and the Housing Target are not the same. The OAN is objective and the Housing Target is subject to constraints.”

Student accommodation should provided for 100% of new students and more than 60% of existing students, which would free up ideal family accommodation in the urban area. Other university cities (e.g. Oxford) insist on higher percentages than those proposed in the plan. In my view, the Council’s timidity is a case of “regulatory capture” by Surrey University, which has failed to use its existing planning permissions (dating from 2004) to accommodate 3,000 students or to improve the efficient development of its campus (e.g. by building on its extensive and under- used surface car parks). If all students were accommodated in this way, 2,000 homes would be freed up in town and there would be no need to build on the Hog’s Back.

Guildford borough already has a higher proportion of traveller sites than most comparable boroughs. Over-provision is inappropriate given other constraints.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1067  Respondent: 8687265 / Dagero Ltd (David Roberts)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY H2 – Affordable homes

I OBJECT. “Affordable” homes, under national definitions, means homes that are sold or rented at 80% of market value. Even if 70% of these are rented as proposed, the level of market prices in the South-East means (even post-Brexit) that these homes will remain well beyond most people’s means and that starter homes will not become available for local people.

In addition, the viability clause (4.2.40) means that in practice the policy could be unenforceable. Private financial viability has no place in a public policy and should be removed. It is a get-out-of-jail-free card for developers that will sacrifice countryside for no local benefit.

I question the assumptions that seem to underlie this policy: that people have a right (rather than a legitimate aspiration) to own a home; that they should be encouraged to live locally (contradicting the Government’s policy of encouraging labour mobility and development in poorer regions, where homes are cheaper anyway); that increasing local house-building will reduce overcrowding and congestion (rather than simply suck more people into the borough); and that it will stem the rise in house prices (even though 13,860 new homes will be a drop in the ocean, given that prices are determined by an infinite demand-pull from London, whose population is increasing by 100,000 a year, and by the currently low cost of capital for overseas and other buyers). The weak mechanisms proposed in the plan might influence the market in a more remote part of the UK, but not here.
This policy’s version of “affordability” is just a smokescreen for pushing through more development generally. Building more homes in Guildford cannot increase real affordability given the overhang of the London market.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1068  Respondent: 8687265 / Dagero Ltd (David Roberts)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY H3 – Rural Exception Homes

I OBJECT. This is a Trojan horse policy. It says that homes can be built anywhere near a settlement of any form (including agricultural land and the AONB). These homes are meant for people with a village connection, but they could be for anyone on the Guildford borough housing list. To make the housing viable, or to improve the “mix”, this can include “market” housing – i.e. normal commercial development which in Guildford usually means large executive homes. This policy means building anywhere, and ignoring all historic planning restrictions.

The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove “exceptional circumstances.”

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1087  Respondent: 8687265 / Dagero Ltd (David Roberts)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy I1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY I1 - Infrastructure and delivery

I OBJECT. Most of the borough’s infrastructure is antiquated, congested and straining to accommodate even current needs and organic growth. Yet this plan’s commitment to building housing estates across the Guildford countryside will mean either major infrastructure investment that no-one is prepared to pay for or else a catastrophic and simultaneous collapse in transport, educational, medical, energy, water and communications services.
The plan targets greenfield sites – requiring heavy infrastructure investment – in order to generate CIL income necessary to meet an infrastructure shortfall that is already serious. This is not sensible. The current draft CIL scale also encourages development on greenfield sites rather than brownfield.

The policy wording says nothing about roads and traffic. The Council’s methodology for assessing infrastructure needs in this area is inadequate, identifying only the tip of an iceberg of existing congestion. The schemes referred to in this policy will not solve existing congestion and the local road network has not been given sufficient consideration. Some proposed development locations would require highway schemes that involve demolishing property and road-widening in residential areas to solve the resultant congestion. The A3 improvements are not guaranteed to take place but they are being used to justify removing large areas from the Green Belt before detailed traffic assessments have taken place. These detailed investigations are being deferred until the planning application stage and will be left to developers to prepare. If a site then proves to be unsustainable its Green Belt protection will have been lost for no reason and unsuitable development will take place by a more insidious process.

Adequate infrastructure provision is a pre-condition of sustainable development. But in this plan it is an afterthought buried away in Policy I1. By prioritising greenfield over urban, brownfield regeneration, the plan creates insurmountable (and unnecessary) obstacles for itself. Common sense suggests a local plan should first assess the borough’s infrastructure capacity for sustainable development, and then tailor development accordingly. This plan, however, assumes infrastructure will follow on the heels of housebuilding as if by magic. It makes implementation critically dependent on providers outside the Council’s control and on the vagaries of CIL income. Instead of recognising this as a key issue, the plan is based on a wing and a prayer.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1088  Respondent: 8687265 / Dagero Ltd (David Roberts)  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY I2 - Supporting the Department of Transport’s “Road Investment Strategy”

I OBJECT. This policy is too vague and optimistic. Decisions by Highways England on improving the strategic road network (the M25 and A3) are still years off. The Council have suggested a very expensive tunnel under Guildford, but this is no more than a dream. Even if Highways England accepted this (which is highly unlikely in the post-Brexit public spending climate) it would not be built until the end of the plan period at the earliest. Other, less expensive A3 improvements, and changes to the Junction 10/Heathrow stretch of the M25, will also take years to agree and complete.

The draft plan, however, commits to building massive housing estates in the countryside before any of these road improvements are in place. This is foolhardy. Surrey is the most congested county in England, with 683 people per square kilometre, compared with an English average of 413. This policy will lead to massive traffic disruption during the construction phase and will add permanently to an already congested network (about 3,000 private cars from the 2,100 new homes at Wisley Airfield alone). This is a major development constraint that should have been applied to the OAN before this consultation, and not left up in the air.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
POLICY I3 - Sustainable transport for new developments

I OBJECT. This is another vaguely aspirational policy, based on wishful thinking and not grounded in the practical realities of daily life. It consists of a standard, box-ticking list of local government measures unrelated to the specifics of the plan. Like infrastructure, transport appears to be an afterthought; the policy fails in its essential job of guiding planning decisions, since it assumes development of any kind can be supported by sustainable transport.

The sustainability of the dormitory settlements which the Council want built across the countryside depends on a general “modal shift” from private car use to walking, cycling and public transport. This is unrealistic. The proposed sites are often miles away from the nearest railway station. Bus services even in the largest villages are almost non-existent – just one bus to and from Guildford each day in the Horsleys and none at weekends. Since bus services depend on profitability, they cannot be expanded and the Council are not proposing to subsidise new ones. Rural buses are too slow anyway for busy people. Most rural roads in the borough are narrow, winding, hilly, potholed, muddy and unlit. Many flood badly and have no footpaths.

The desired modal shift would require a comprehensive co-ordination of bus and train timetables with services every few minutes, seven days a week, to stops within walking distance of every home in the borough. This kind of integrated public transport system has been achieved in Switzerland, for instance, but only at huge public cost and thanks to a political consensus supporting state ownership of trains, buses and the post office, which delivers rural passengers as well as mail. There is absolutely no chance of this in the UK.

The vast majority of the borough’s residents are not, in practice, able to cycle. This includes children, the elderly, commuters who have to look smart, the infirm, the unfit and people carrying goods or shopping of any kind. Dependence on walking and cycling discriminates against these groups, which include some of the most vulnerable members of the community. It is socially unjust.

One in two working people in Guildford commute for up to 3 hours a day, as I used to do. They will not leave their cars for even part of their journey if it means longer travel times.
Park-and-rides are a welcome part of the transport mix but are too slow for commuters and others on a tight schedule. Well-off pensioners seem to be the main beneficiaries. For an adult couple going shopping it is still cheaper to park in town.

Forget about water buses. The Wey is too narrow and, with a river speed limit of 4mph, boats are too slow for anything but recreation. Except on the tideway, not even the Thames has such services.

The addition of two new stations appears attractive but will slow down train journeys, which are already slower than at any time since the 1930s. Knock-on effects on localities where the new stations are built have not been worked out or presented.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY I4 Green and blue infrastructure

I OBJECT. This policy is a box-ticking exercise with no teeth to it. It sits oddly with the plan’s onslaught on the Green Belt. The plan to build on large areas of countryside and to inset villages will cancel out any benefits from extending the principle of enhancing biodiversity beyond Biodiversity Opportunity Areas.

There is no mention of the value of wildlife gardening to biodiversity or the important role that larger gardens play in a village setting.

There is no mention of the impact of the plan on food production, or monitoring the loss of agricultural land.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1689
POLICY P1 – Surrey Hills Area of Outstanding Natural Beauty

I OBJECT. This policy weakens existing protection when it should strengthen it. It is dependent on the Surrey Hills Management Plan. The latter welcomes housing development. Even major (undefined) development in the AONB would be permitted if exceptional (undefined) circumstances could be demonstrated.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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POLICY P2 – Green Belt

I OBJECT. This policy states, “the general extent of the Green Belt has been retained.” This is a lie.

The policy wording is tepid in support of the Metropolitan Green Belt even though the latter forms 89% of the borough and should be the cornerstone of all local planning policy. It is precious beyond the short-term demands of the present Government’s policy or a 15-year local plan. As noted under Policy S1 above, it is a solemn legacy to future generations – an asset and amenity that belongs as much to Londoners and the whole nation as to the people who live in it. It is an inalienable public good. Once gone it is gone forever. It is not the Council’s to give away.

Policy P2 omits any assessment of the Green Belt’s value. The Green Belt is not just empty space but is an inhabited, working environment that safeguards a certain stock of natural capital. Building on it involves high opportunity costs, including an irreversible loss of:

- Agricultural production
- Rural leisure and tourism amenities
- Water catchment
- Flood control
- Biodiversity
- Natural heritage
- A carbon sink for air pollution
- Room for public facilities such as parks and burial grounds
- Profitable film locations (e.g. Shere)
- Future economic potential such as mineral extraction (even fracking)
- Natural beauty, landmarks, open space, rural views and sight lines
- Benefits to public health and wellbeing, physical and psychological (as well expressed in the NPPF)8

As a matter of law, morality and national and local policy, these assets should be protected in perpetuity, but Policy P2 seeks to justify excessive development in supposedly protected areas. This is in breach of party manifesto commitments and contrary to previous responses to public consultations.

It is disreputable to argue, as the Council do, that the plan would involve the loss of “only” 1.6% of the borough’s Green Belt. In reality the figure is nearer 7% when insetting, infilling and settlement boundary extensions are included. More...
importantly, there is no “acceptable” percentage (in the NPPF or anywhere else) of Green Belt that may be sold. No-one argues that we should sell 1.6% of the Crown jewels in order to build houses.

I am not opposed to appropriate development in the Green Belt and recently supported a major planning application in my own village. But I fail to see why a system of fair burden-sharing of new development cannot be applied to the borough’s existing settlements in proportion to their size. This alternative would minimise the strain on infrastructure and maximise the chances of retaining the character of each settlement through gradual growth. It is reasonable to ask urban Guildford, with x times the population of semi-rural East Horsley for instance, to accommodate x times the number of new homes over the plan period. Parish councils could be asked, and will no doubt be willing, to propose where their quota of houses should go. Most rural residents are reasonable people who, if not alienated by top-down planners, will support realistic numbers of new houses in their neighbourhoods. Unfortunately, this democratic, bottom-up approach has not been attempted.

Instead, while developers flip and land-bank urban sites as a financial speculation, this plan will dump most new development on greenfield sites where building costs are lower, covering the Green Belt with dozens of housing estates that few residents want. 8,086 new houses are planned for the Green Belt but only 1,135 for Guildford urban area. This is disruptive, socially inequitable and unnecessary. It will not only destroy countryside but will also delay and disincentivise much-needed urban regeneration. The remarkable revival and repopulation of central London shows that building dormitory satellite settlements is an out-of-date approach to planning.

I particularly protest at the “insetting” of 14 villages from the Green Belt, and at “infilling” 12 of the borough’s Green Belt villages. I am deeply disturbed that settlement boundaries are to be hugely extended in many villages and that infilling is also proposed outside the settlement boundaries of 11 further villages. Many Guildford villages are “leggy” in outline, reflecting the effect of ribbon development (often along just one side of existing roads) permitted between the Wars. It is all too easy to square off boundaries by including countryside bounded on only one or two sides by existing development, claiming it contributes nothing to the “openness” of the Green Belt, a term which neither the plan nor the NPPF defines. The NPPF’s other 4 tests of Green Belt status, including the prevention of urban sprawl, are ignored. Effectively, this policy makes all villages within the Green Belt vulnerable to large blocks of new development and seems almost hellbent on self-defeat.

I believe this policy is based on a flawed Green Belt and Countryside Study that, according to one Conservative Councillor, was irregularly commissioned by Council officers without the authority of Councillors. To “inset” two-thirds of the borough’s rural villages on the grounds that they no longer contribute to the purposes of the Green Belt is extreme and inherently implausible, given the borough’s location on the edge of Metropolitan London. I

1. See Ministerial foreword: “Our natural environment is essential to our wellbeing, and it can be better looked after than it has Habitats that have been degraded can be restored. Species that have been isolated can be reconnected. Green Belt land that has been depleted of diversity can be refilled by nature – and opened to people to experience it, to the benefit of body and soul.”

2. Councillor Matthew Sarti, Planning Committee meeting, 18 May

cannot see how such extensive areas fail to contribute to the purposes of the Green Belt under the NPPF, although they would quickly destroy them if the proposed “insetting” and boundary extensions go ahead. This policy is wildly disproportionate in terms of any foreseeable development need (especially post-Brexit) and has caused tidal waves of opposition from residents. It flies in the face of NPPF paragraph 17’s aim of “empowering local people to shape their surroundings” and other NPPF provisions.”

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

SITES

1. Green Belt sites

I OBJECT to the identification and allocation of sites in this plan without regard to Green Belt, infrastructure or other constraints. The plan says that “allocating these sites does not grant planning permission for development, however, it does identify the principle of development and uses.” This ignores the tens of thousands of detailed comments the Council have received about individual sites ever since the Issues and Options consultation in 2013. This amounts to a war of attrition by the Council in conjunction with developers, since many busy residents are sick and tired of repeating the same comments to deaf ears. The plan has hardly changed since the Council received 20,000 objections to its first draft plan in 2014.13 Some residents have concluded that commenting is a waste of time.

13 Further discredited by criminality on the Council. Former lead Councillor for planning Monika Juneja, architect of the 2014 draft plan, is currently serving a two-year sentence on 3 counts of forgery, pretending to be a barrister and obtaining dishonest pecuniary advantage.

All Green Belt sites should be removed from the plan until “exceptional circumstances” for development are proven, as stipulated repeatedly in the NPPF. The Green Belt should trump short-term considerations such as perceived housing need, as case law has established.14

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1071  Respondent: 8687265 / Dagero Ltd (David Roberts)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY P3 – Countryside (i.e. beyond the Green Belt)

I OBJECT. This is more protective – as a policy – than the proposals for the AONB and the Green Belt, so is anomalous and wrong. I am not in favour of building on this area, since urban, brownfield areas are sufficient to meet all reasonable housing targets. There is no need to build on any green fields if brownfield, previously developed land is used efficiently (without garden-grabbing).

This policy refers to the countryside near Ash and Tongham (see paragraph 4.3.28). This area does not justify stronger policy protection than any other part of the borough. The fact that the current and previous Council Leaders represent it should not give it preferential status: “we will seek to limit any development in the countryside unless it can be demonstrated that it is necessary in that location”. Green Belt and AONB areas should by definition have higher levels of protection than non-Green Belt areas.
It should also be noted that Ash and Tongham lie beyond Guildford far away from London and therefore make no contribution to controlling Metropolitan urban sprawl, unlike those villages which, ironically, are to be “inset”. That is presumably why Ash and Tongham are not in the Green Belt already. This policy, however, attaches higher priority to preventing the “coalescence between the Ash and Tongham urban area and Aldershot” than it does to the primary purpose of the Metropolitan Green Belt, which is to stop London sprawl.

Apart from being a scandalous misuse of local political patronage, this policy effectively says, “Look, we are not destroying the Guildford Green Belt because we are extending it in Ash and Tongham.” It is a cynical piece of tokenism. The leader of the Council needs to be seen to be above reproach by deleting this policy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
POLICY P5 - Thames Basin Heath Special Protection Areas

I OBJECT. This policy is weak. The mitigation (cash compensation) offered for development in the special protection area is so small as to be meaningless.

SANG (Suitable Alternative Natural Greenspace) is not beneficial since the sites identified or targeted are already green space. This is just using agricultural or wooded land as recreation land in order to justify building on other green spaces nearby. There is no actual increase in open space or environmental protection; instead, it is a ploy designed to permit building on otherwise protected areas. SANG – in part used to prevent dogs and cats attacking nesting birds – must also ensure that it is not using land which is adjacent to the Special Protection Areas.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

POLICY S1 – Presumption in favour of sustainable development

I OBJECT. The NPPF states that the presumption in favour of sustainable development “should be seen as a golden thread running through both plan-making and decision-taking.”1 Standing at the head of the draft plan, Policy S1 ought to set a clear framework. Instead, no definition of “sustainable development” is given. 

The promise “to secure development that secures the economic, social and environmental conditions in the area” omits to recognise that economic growth, social justice and environmental protection often conflict. It does not say how each element is to be weighted or conflicts resolved. As a practical guide to the tough choices Councillors will face, it is useless. Under this policy, any development will qualify as “sustainable”, thereby failing to apply the NPPF’s most important guideline.

The most gaping hole in Policy S1 is the Green Belt. As an inter-generational covenant (enshrined in primary legislation) to protect green areas in perpetuity, the Green Belt is a living example of sustainable development in practice. It is the envy of the world. Policy S1 should commit to uphold Green Belt boundaries and protections, setting at least one clear boundary to planning decisions. The plan’s contempt for Green Belt constraints is amply demonstrated in later policies.

The commitment to approve planning applications “wherever possible” and “without delay” reveals this draft plan’s pro-development bias. Countervailing references to sustainability are so vague that the NPPF presumption in favour of sustainable development becomes a presumption in favour of any development at all.

This policy also ignores, as if they are inconvenient constraints, most of the 12 Core Planning Principles set out in NPPF paragraph 17.3 In my view Policy S1 is a non-policy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
POLICY S2 – Borough Wide Strategy

I OBJECT. I have 5 objections to the proposal to build 13,860 new homes:

1. The number is based on pre-Brexit projections for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously. "4

2. The number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any commonsense view, “West Surrey” is much too sma Half of Guildford borough’s residents work elsewhere, and half the people who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent districts of Rushmoor and Mole Valley, minutes from Guildford town, are outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere. Unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and is part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council have failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so the housing numbers

1. NPPF paragraph 14
2. The most widely accepted definition is the 1987 United Nations one from the Brundtland Report: “Development that meets the needs of the present without compromising the ability of future generations to meet their own”
3. Including: “empowering local people to shape their surroundings… Take account of the different roles and character of different areas… protecting the Green Belts around them… recognizing the intrinsic character and beauty of the countryside and supporting thriving communities within it… Support the transition to a low carbon future… Contribute to conserving and enhancing the natural environment and reducing pollution… Encourage the effective use of land by reusing land that has previously been developed (brownfield land)... Conserve heritage assets… Actively manage patterns of growth to make the fullest use of public transport and cycling and focus significant development on locations which can be made sustainable.”
4. At the time of writing, about £8 billion (40%) has been wiped off the value of the UK’s top 4 housebuilders alone.
derived from it are unreliable. For instance, by juxtaposing Guildford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county (none in Mole Valley, for instance). This highly lopsided distribution is unexplained.

1. The figure of 13,860 new homes is unsubstantiated. It has not been scrutinised by Councillors despite repeated requests for debate. The assumptions and calculations underlying the model are hidden, protected by a claim to intellectual property by commercial sub-contractor used in preparing the SHMA.5 The Council say we should trust the contractors’ model because it is used by a large number of other local authorities. Wide usage, however, does not confer objectivity. Guildford’s OAN would fail the basic transparency test even if the methodology used were a universally admired ‘gold standard’. But it is not: it belongs to consultants whose website openly proclaim their pro-development agenda,6 provoking reasonable suspicion that the figures are inflated. External experts and members of the public have provided detailed critiques of the mode Its most fatal flaw, however, is that it has not been disclosed – not even to the authors of the plan, who have taken it on trust. This is irrational and unsound.

2. The status of the 13,860 figure is ambiguous. The plan fails to set a Housing Target of new homes to be built, or explain how this relates to the “Objectively Assessed Number” (OAN) for housing need. Elsewhere, the Council have said that the two are identical because the OAN is “deliverable” and is by definition objective and cannot be contradicted, but in the same breath say that infrastructure or other constraints may in due course affect deliverability.7 Despite the NPPF, the plan fails to address these constraints. In any case, the number of homes proposed, plus existing planning permission, plus expected “windfall” sites, exceeds the total of 13,860. So how many homes (taking account of these adjustments) do the Council want built? The plan does not say. Without this figure it is hard to see how can anything else be planned. This undermines the validity of the whole consultation. It is unreasonable to ask the public to approve a “plan” that fails to propose a Housing Target that takes normal constraints and adjustments credibly into account, and which leaves the Council to set one at any level without further consultation. Even if the OAN were not flawed, it is at best only a baseline figure and should not be passed off as a policy proposal.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

| Comment ID: | PSLPP16/1033 | Respondent: | 8692865 / Stuart Walker | Agent: |
|-------------|--------------|-------------|-------------------------|
| Document:   | Proposed Submission Local Plan: strategy and sites 2016 / Policy P2 |
| Do you consider this section of the document: | |
| ( ), is Sound? | ( ), is Legally Compliant? | ( ) |
| Answer (if comment is on questions 1-7 of the questionnaire): | () |
I wish to object to the above mentioned proposed boundary change.

This land contributes to the open character of this area of the village any change of usage i.e. development would tower over the village.

Chinthurst Lane is quite unsuitable to take more traffic being already burdened by people using it as a ‘rat run’ at certain times.

These boundaries have been there for many many years and I can see no valid reason for changing them.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPS16/1298  **Respondent:** 8693153 / Vicki Willetts  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Introduction

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

**SITES**

I OBJECT TO ALL POLICIES INVOLVING BUILDING IN THE GREEN BELT: • No “exceptional circumstances” shown, numbers excessive and the clearly expressed views of residents in previous consultations ignored.

I OBJECT ESPECIALLY TO 6 POLICIES: A36, A37, A38, A39, A40 & A41: • Amount of new housing far exceeds local need. • Housing density excessive when compared with existing development. • Would transform the Horsleys into a sizable town, something for which no case is made. • No local support. • Collective impact of these 6 sites on a small part of the borough not considered. Should not be treated as isolated, separate sites. • Total amount of new building out of scale with the planned development elsewhere the borough, especially less sensitive urban areas not protected by Green Belt. • Sites unsustainable. Key infrastructure lacking. No adequate provision is made to increase it – e.g. poor wastewater capacity, lack of schools, absence of traffic management plan, flooding. • No account taken of additional impact of Wisley Airfield site on Horsleys. • Extension of settlement boundaries too permissive. Horsleys characterised by streets with development along only one side of the road. Policies allow too many adjacent green fields to be developed by squaring off boundaries and claiming they don’t contribute to Green Belt “openness”.

6

• Green Belt gap with neighbouring settlements hugely narrowed, especially if Wisley Airfield is built on. • Will harm compliance with NPPF 81 – e.g. by making cycling (including Prudential cycle races) too dangerous, ruining the rural setting of Waterloo Farm campsite, destroying the ambience of Grange Park Opera’s new “Theatre in the Woods”. • Policy A40 especially unviable because of high water table and poor drainage, leading to regular winter flooding. • Safe access and egress at Site A40 unachievable, owing to flooding, high speed limits, poor sight lines, narrow access to existing properties, inadequate pavements for elderly and schoolchildren, increasing use by recreational cyclists etc.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**
I OBJECT ALSO TO POLICY A35 (WISLEY AIRFIELD): • Should not be in the plan for all the reasons the Planning Committee rejected the identical recent proposal by Wisley Investment Properties. • Irregularity of including this policy in the plan 24 hours before this planning application was rejected (like extending the time allowed for the developers to present their application). • Unacceptable Conservative Party links between the developers and the Council. • No Green Belt “exceptional circumstances” presented. • Not a brownfield site as stated – only 15% of it. • Proposed SCC waste site ignored. • Loss of farming land. • Too near RHS Wisley and Thames Basin Heath SPA. • SANG would harm on SPA. • Will aggravate traffic jams at A3 roundabout and M25 Junction 10. • Unacceptable increase in air pollution. • No existing public transport and stations miles away. • No proper traffic data. • Housing density far too great. • Over 2,000 houses will swamp and destroy Ockham conservation area, with impact on listed buildings. • Access confined to inadequate narrow lanes. • Water table and surface water flooding not considered either for site itself or for downstream areas on River Mole. • Major impact on neighbouring villages, especially Horsleys. • No assessment made of collective impact on area of this and 6 Horsley sites.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLP16/2635  Respondent: 8693153 / Vicki Willetts  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy D1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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<td>I OBJECT TO POLICY D2 (SUSTAINABLE DESIGN ETC): • Targets unachievable if Green Belt covered with amount of housing as proposed, causing traffic chaos, infrastructure failure and unacceptable levels of pollution.</td>
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<td>I OBJECT TO POLICY D3 (HISTORIC ENVIRONMENT): • Supports overdevelopment: you can’t “enhance” history. Doesn’t ban private interests from trying to make aggressive profits from privatising, commercialising and Disneyfying public historic assets. • Doesn’t ban development near historic assets. • Ignores NPPF 126, 131, 132, 133.</td>
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</table>
I OBJECT TO POLICY D4 (DEVELOPMENT IN URBAN AREAS AND INSET VILLAGES) • No commitment to expand social housing or accommodation for people who can’t afford so-called affordable homes. • Not enough new homes in urban areas, despite demand and need for urban regeneration and protection of Green Belt. • Objectives for inset villages cancelled out by plans for excessive housing growth there. • Too much emphasis on traditional shops, when a lot of this sector is in terminal decline.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/2626  Respondent: 8693153 / Vicki Willetts  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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I OBJECT TO POLICY E1 (EMPLOYMENT):

• Poor evidence base.

• Too much encouragement to low added-value employment that’s needed elsewhere in the country. • Fails to concentrate general business activity in urban areas or business parks that have the infrastructure.

• Fails to differentiate this from appropriate rural business.

• Too much encouragement of warehousing, for which Guildford is too congested.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/2627  Respondent: 8693153 / Vicki Willetts  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I OBJECT TO POLICY E3 (EMPLOYMENT CAPACITY AND FLOORSPACE): • Puts unnecessary obstacles in the way of using brownfield land into useful residential housing, contrary to government policy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2628  Respondent: 8693153 / Vicki Willetts  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT TO POLICY E4 (SURREY RESEARCH PARK): • Subordinates public planning policy to the University of Surrey’s private, commercial enterprises (not its public academic purpose). • No cost/benefit analysis of harm to Green Belt involved in extending research park. • Waters down research purpose of park, turning into a general business park.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2629  Respondent: 8693153 / Vicki Willetts  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT TO POLICY E5 (RURAL ECONOMY): • Incompatible with high housing numbers proposed for rural areas elsewhere in the plan. • Insetting and settlement boundary extension endanger appropriate rural activities listed that depend on maintaining rural areas’ character. • Town-centre uses for rural areas contradict government’s localism policy and need to consult and protect village environments. • Established commitments to high-speed rural broadband and mobile coverage watered down despite 2014 consultation responses.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2630  Respondent: 8693153 / Vicki Willetts  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E6
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<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<td>I OBJECT TO POLICY E6 (LEISURE AND VISITOR EXPERIENCE): • Danger of overdevelopment: success doesn’t depend on building “attractions” which can harm heritage and rural settings. No case made for creating new ones. • No policy of opposing reduction in rural hotel capacity. • No definition of what added value interventions by Council can make to normal visitor market mechanisms. • No policy of supporting Guildford countryside as its prime leisure and visitor asset, whose value rises as London gets bigger and busier. • No vision of what the ideal visitor experience of the borough actually is and how to support its various elements.</td>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
<td>Attached documents:</td>
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<th>Comment ID: PSLPP16/2632</th>
<th>Respondent: 8693153 / Vicki Willetts</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E7</td>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<tr>
<td>I OBJECT TO POLICY E7 (TOWN CENTRE): • No statement in policy wording of value of Guildford’s rural setting and views. • No consideration of Town Centre Master Plan, GVG proposals or station redevelopment plans. • Proportion of new housing in town far too small. Development pushed into countryside, ruining the latter and harming urban regeneration. • No brownfield register. • Too much big retail, despite online shopping revolution and decline of traditional high streets internationally. Futile to try to turn Guildford into Woking or Kingston. • No measures to support small, niche retailers in town, e.g. through business rates.</td>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
<td>Attached documents:</td>
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</table>
I OBJECT TO POLICY E8 (DISTRICT CENTRES): • Too much scope to expand rural retail centres to justify major housing expansion across the countryside, despite lack of demand. Will spoil character of villages while harming Guildford’s role as a retail hub. • No measures to support existing rural shops and services, e.g. through business rates.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2634  Respondent: 8693153 / Vicki Willetts  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E9

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT TO POLICY E9 (LOCAL CENTRES): • No need for retail development “adjacent” to rural centres for same reason as Policy E8.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2618  Respondent: 8693153 / Vicki Willetts  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT TO POLICY H1 (HOMES FOR ALL): • Policy doesn’t set any constraints on building. • Housing mix based on pre-Brexit growth and demographic assumptions and unreliable SHMA that wasn’t put out to formal public consultation and wasn’t scrutinised by Councillors. • Fails to compel University of Surrey to use its thousands of planning permissions and existing space, such as car parks, for student accommodation. • Lets University off the hook of accommodating all its students, so as to free up houses for the most needy in town.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2619  Respondent: 8693153 / Vicki Willetts  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H2
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<th>Comment ID: PSLPP16/2620</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H2</td>
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<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<tr>
<td>I OBJECT TO POLICY H2 (AFFORDABLE HOMES): • Using the official definition of Affordable is a joke. Affordable homes round here are not affordable! Pushing for these homes just means pushing for more development. • The viability clause lets developers off the hook of providing even these (non-) affordable homes. Too open to manipulation. • Contradicts government policy to develop less advantaged regions of the UK. People don’t have to live and work in Guildford but should be encouraged to move to cheaper, less congested areas. • This policy won’t affect market forces or house prices. Guildford is too small and too near London to influence these, however many homes it builds.</td>
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<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
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<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<tr>
<td>I OBJECT TO POLICY H3 (RURAL EXCEPTION HOMES): • It loosens the criteria by allowing “market housing” and development that changes the housing mix. Developers would be able to override NPPF 2 “exceptional circumstances” and other restrictions to build large houses in the Green Belt.</td>
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<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
<td>Attached documents:</td>
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</tbody>
</table>
I OBJECT TO POLICY I1 (INFRASTRUCTURE & DELIVERY) • Infrastructure considered here as an afterthought, rather than pre-condition of development. Should be a key issue for the rest of the plan. • Excessive housebuilding in countryside not supported by any funding or provision for infrastructure. • Heavy focus on building on greenfield sites inefficient and unnecessary: cheap for developers but much more expensive for the public who have to fund the infrastructure. • Draft CIL scale discourages use of brownfield land first. • No plan for organic increase in existing traffic congestion, let alone once thousands of houses are built across the countryside. Local roads hardly considered. Green Belt being eroded before road widening/improvement plans certain, encouraging over-development of greenfield sites.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** PSLPP16/2640  **Respondent:** 8693153 / Vicki Willetts  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy ID2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT TO POLICY I2 (SUPPORTING DTP’S ROAD STRATEGY): • Doesn’t allow for catastrophic increase in traffic resulting from spreading new housing estates across the borough. • Out of sync with DTp’s strategy: houses to be built and Green Belt destroyed before plans for A3 etc implemented. • Road plans too optimistic anyway, especially post-Brexit. Probably won’t happen.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** PSLPP16/2641  **Respondent:** 8693153 / Vicki Willetts  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I OBJECT TO POLICY I3 (SUSTAINABLE TRANSPORT): • Just a list of generic measures, not related to real life or the particularities of Guildford. • Fails to treat sustainability as a constraint. Assumes excessive levels of development proposed in the plan can be supported by sustainable development. • Unrealistic. Most people can’t or won’t walk or cycle – commuters in a hurry, the elderly, children, people who are unwell or unfit, people carrying heavy shopping or other goods. I.e. most residents! • Town’s eye view of transport. Ignores scarcity of existing rural public transport and commercial unviability of increasing it. Ignores terrible state of Surrey’s roads, potholes, flooding etc. Ignores extra stress to be created by huge new housing estates in countryside.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2642  Respondent: 8693153 / Vicki Willetts  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT TO POLICY I4 (GREEN & BLUE INFRASTRUCTURE): • No teeth. Policy cancelled out by huge developments across the countryside. No mention of opportunity costs of loss of Green Belt services and amenities (e.g. farming).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2621  Respondent: 8693153 / Vicki Willetts  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT TO POLICY P2 (GREEN BELT): • No declaration of support for protecting the Guildford Green Belt, contrary to NPPF and government statements. • No evaluation of value of local Green Belt as a public and private asset: it’s just treated as potential building land with a few inconvenient restrictions. • Impact of Green Belt development on local agriculture ignored. • Impact on rural leisure and tourism ignored. • Impact on carbon sink and knock-on effects for air pollution and climate change ignored. • Impact on biodiversity ignored. • Impact on natural heritage ignored. • Impact on water catchment ignored. • Impact on room for public space amenities (parks, cemeteries, waste facilities etc) ignored. • Impact on rural business (e.g. mineral mining, film making) ignored. • Impact on natural landmarks and views ignored. • Harm to public health and wellbeing (physical, psychological) ignored. • Allows excessive levels of development in breach of views expressed in last consultation and Conservative Party manifesto commitments at the last local elections. • Has allowed ruling Councillors to argue that there is an acceptable percentage of
Green Belt that should be sacrificed to development, when no such rule exists in the NPPF. • Ignores alternative approaches, such as fair burden-sharing under which settlements would undertake to accommodate new development in proportion to their size. • Disproportionate amount of development (most of it, in fact) to be in Green Belt. Too few new homes in urban areas where most people (especially the young and less privileged) want to live. This will act against much needed urban regeneration. • “Insetting” of most villages disproportionate and unjustified in terms of their contribution under the NPPF to the purposes of the Green Belt. Based on flawed Green Belt and Countryside Study. Idea that most Guildford villages do not contribute to “openness” is subjective. • Major settlement extensions allow indiscriminate housebuilding, as irregularly shaped villages are squared off to enclose green fields. • Overall harm to Guildford Green Belt unjustified by any objective development need post-Brexit. • Ignores most of NPPF 17 stipulations.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2623  Respondent: 8693153 / Vicki Willetts  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT TO POLICY P3 (COUNTRYSIDE BEYOND THE GREEN BELT): • Gives Ash and Tongham more protection than rest of borough, including existing Green Belt. But they don’t contribute to preventing London sprawl. • Special treatment of ward represented by current Council Leader and his predecessor. Politically biased. • A minor extension of Green Belt in one place does not justify its major destruction elsewhere (the inset villages).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2624  Respondent: 8693153 / Vicki Willetts  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT TO POLICY P4 (FLOOD RISK AND WATER PROTECTION): • Limits development of urban, brownfield, hardstanding sites, pushing development unnecessarily into the countryside.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
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<th>Comment ID: PSLPP16/2625</th>
<th>Respondent: 8693153 / Vicki Willetts</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P5</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT TO POLICY P5 (THAMES BASIN HEATH S.P.A.): • Compensation mechanism too feeble to provide protection. • Cynical encouragement of SANG to justify nearby development in protected areas. Does not extend protection or amount of green space, and can damage them (e.g. dog and cat attacks on wildlife).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT TO POLICY S1 (SUSTAINABLE DEVELOPMENT): • No definition given, no reference to its importance in the NPPF, no guidelines for applying it to planning. • No statement of how economic, social and environmental impacts should be balanced. • No mention of Green Belt, Guildford’s greatest legacy by far to Sustainable Development. No commitment to protecting it. • No reference to most of the NPPF Core Planning Principles.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT TO POLICY S2 (BOROUGH-WIDE STRATEGY): • Numbers based on growth and demographic data now invalidated by Brexit. • No justification given for 13,860 housing figure. Figure based on a secret formula used by consultants and never seen by anyone on the Council or by the public. Council has failed to seek its disclosure. • 13,860 figure confuses the OAN with a housing target. No definite housing target given, leaving too much scope for the Council to make one up. I can’t understand how we’re being consulted when we don’t know how many houses the Council want to build, taking all the contraints into account. • Figures based on a Housing Market Area that ignores 2 neighbouring districts (Rushmoor and Mole Valley) and is much too small, since most people commute or travel far outside the Area to shop or study. This distorts the figures: no reason why Guildford needs to build nearly twice as many large housing estates as the rest of Surrey put together, or half of all sites over 100 units. • High numbers involved would transform character of the borough from mainly rural/Green Belt to urban, creating a corridor of development out of London as per Woking or Croydon.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/4210  Respondent: 8694369 / Nicola Ogilvie Smals  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A38

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

NPPF section 17.5 specifically states that policies must take account of the different roles and character of different areas, protecting the Green Belts around them, recognising the intrinsic character and beauty of the countryside and supporting thriving rural communities within it. As outlined in the points below the insetting of West Horsley does not appear to comply with the overarching ethos of the NPPF.

The open spaces will be eroded by the infilling; In addition NPPF 17.7 states allocations of land for development should prefer land of lesser environmental value - site 38 is considered good agricultural land in the majority; site 38 also contains a grade II listed farmhouse which should be considered as part of NPPF 17.10 and a thriving nursery which is both a major employment provider and also an essential service provider for local families - it is unclear how this nursery would be retained in its current form if encircled within a dense housing development. The insetting of the village of West Horsley and the sites allocated can not be considered as sustainable development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/4212  Respondent: 8694369 / Nicola Ogilvie Smals  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A38
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Sites A37, A38, A40 and A41 are not practical for non-car based transport without alterative bus routes and improved pedestrian routes; this is further evidenced below.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8889  Respondent: 8694369 / Nicola Ogilvie Smals  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The NPPF and draft local plan emphasises the need to consider the historic environment. Site 38 contains a grade II listed farmhouse and West Horsley Village contains a number of listed buildings. The incorporation of so many houses within the curtilage of listed buildings does not comply with D3

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8890  Respondent: 8694369 / Nicola Ogilvie Smals  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Development should be commensurate to the size, character and function of existing settlements. Allocating a 100% increase in homes to West Horsley North is in no way commensurate to the size, character and function of this village. The local plan references the rich and varied mix of settlements and interspersed development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Policy S2 of the local plan specifically relates to the spatial development strategy; an additional clause should be inserted requiring development to respect the character and appearance of existing settlements. 4.1.6 states the preference is to focus growth making use of previously developed land. The proposed development locations in the village of West Horsley suggest a significant increase in the size of village, with limited use of previously developed land. The impact of these developments can be clearly seen on pg 346. These sites do not comply with 4.1.6.

Table 2 suggests that Station Parade, East Horsley is a Rural District Centre. Whilst the station parade contains limited shopping facilities the number of units is significantly smaller than a number of the local centres listed. This classification should be reconsidered. Whilst there are 3 parades of small shops spread between 2 distinct villages, this does not constitute designation as a district shopping centre either. Local residents are most likely to travel by car, to Cobham, Ripley or Guildford town centre to fulfil needs. Increasing the number of residents in this area will increase the substantially the number of car journeys.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
The local plan sets out the strategy relating to the mix of housing requiring most efficient use of land which is appropriate to the site size, characteristics and location. New residential development is required to make the most efficient use of land whilst responding to local character, context and distinctiveness.

The 2011 census indicates West Horsley is comprised of 1111 households; adding a further 345 homes by 20220 as detailed in sites A38, A40, A41 is a 35% increase to the current number of households in the village. The majority of new homes are proposed at the northern end of the village, the estimated number of households in the area classed as West Horsley north is around 400; the proposed sites therefore represent an increase of almost 100% to this area. This is in no way in accordance with the draft policies or with the NPPF guidelines. The character and community of this area of the village would be eliminated.

The current density within the current settlement boundaries of West Horsley is just under 10 dwellings per Hectare; the proposed density is 14-20 dwellings/ha which is a 40-100% increase to the established village density. The development densities are likely to increase once existing uses are considered (for example the grade II listed building and nursery school on site A38).

Furthermore the economic strategy does not make a case for the location of so many homes within the village of West Horsley and contradicts many statements in the local plan, not least the overarching presumption in favour of sustainable development. It is not sustainable to propose so many homes in one village; an increase of nearly 100% to one end of the village of West Horsley.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8885  Respondent: 8694369 / Nicola Ogilvie Smals  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

West Horsley, unlike East Horsley, can still benefit from the policy relating to Rural Exception Homes, this allows small affordable housing development in perpetuity. No sites were noted as allocated to this programme within the local plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8893  Respondent: 8694369 / Nicola Ogilvie Smals  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1
In order to accommodate the infrastructure upgrades required to accommodate the huge expansion of West Horsley a full study must be undertaken. As a minimum the following infrastructure issues are pertinent:

Primary schools; the Raleigh is already oversubscribed to the extent that many residents of West Horsley south are unable to secure places for their children resulting in twice daily car journeys to neighbouring villages of Effingham and Clandon, expansion of the school is not possible with the current confines of the school grounds therefore expansion of the village will exasperate the problem of capacity and will therefore increase local traffic to other schools;

Secondary schooling is generally obtained at the Howard of Effingham School, which is itself the subject of uncertainty as a result of the Draft Plan;

Drainage is a notable problem within the village currently, but any proposals must take into account the costs of upgrades;

There are poor provisions for pedestrians outside of East Horsley; West Horsley North does not have street lighting or appropriately sized pavements;

Local facilities such as the medical centre and parking for local shops must also be considered alongside capacity of the car park at Horsley Station.

The CIL as a tariff will pool resources however there are a number of specific local infrastructure improvements that must be taken into account. The infrastructure delivery plan makes little note of these local issues which are of significant importance given the proposed 100% increase in size to West Horsley North.

Site A38 contains an oversubscribed nursery school employing around 30 members of staff including support staff and around 100 children are on the role; it is unclear whether the proposals to develop this site include the retention the existing nursery leased from the land owner or whether it will be forced to close resulting in a loss of employment including many jobs for 18-24 year olds including training; furthermore this nursery school provides an essential service to residents. If the nursery school continues to operate there will be a considerable effect on the setting of the nursery and the planning application will require extensive consideration of size, access and safety issues. If the Nursery School remains, the density of the development at site A38 will be increased further which will be even less in keeping with the scale of the surroundings.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8894  Respondent: 8694369 / Nicola Ogilvie Smals  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy 13: sustainable transport for new developments

Sustainable transport modes are encouraged in various sections of the local plan. In order to embrace sustainable transport modes new developments must facilitate trips by walking and cycling. Whilst East Horsley has a railway station, the development sites A37, A38, A40 and A41 are not within reasonable (defined as less than 1km) walking distance therefore requiring trips to the station by car; the station car park is at capacity. Legible walking routes would require substantial upgrade to street scenes, for example there are no streetlamps in West Horsley North.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8886  Respondent: 8694369 / Nicola Ogilvie Smals  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

As noted in the Plan a large proportion of the borough is designated greenbelt; NPPF requires that greenbelt boundaries are amended in exceptional circumstances. I do not believe that meeting additional housing need when brownfield sites and limited local infilling is available within the borough, can be considered as exceptional. The function of the green belt, as defined by the NPPF is to check the unrestricted sprawl of large built up areas; to prevent neighbouring towns merging into one another; to assist in safeguarding the countryside from encroachment; to preserve the setting and special character of historic towns and to assist in urban regeneration by encouraging the recycling of derelict and other urban land. Removal of West Horsley from the greenbelt will allow the village to sprawl into the countryside, further exacerbate the merging of East Horsley and West Horsley North encroaching on settlement boundaries, the developments will encroach on the surrounding countryside, the character of the villages will be significantly altered and the recycling of available derelict land will not be encouraged. Insetting the village of West Horsley (North and South) cannot be considered to be in accordance with Policy P2. The development sites proposed can not be considered as “limited infilling” given the substantial increase in village size that will result from the proposed development sites.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8892  Respondent: 8694369 / Nicola Ogilvie Smals  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Paragraph 83-89 of the NPPF clearly state that alterations to the greenbelt are only permissible in exception circumstances, subsequent parliamentary directives issued to councils have confirmed that meeting housing targets cannot be considered as ‘exceptional’. The plan specifically states that only villages whose character make an important contribution to the greenbelt should be included in the green belt; the number of walkers and cyclists passing through West Horsley is a clear indication of the character of the village as a whole. 

I would like to note that I am not opposed to sensitive localised small scale housing within the existing settlement boundary of West Horsley, I also appreciate the need for villages to grow in order to retain vitality and viability, however the 100% increase in the number of homes proposed to the northern end of the village cannot be considered as localised infill and doubling the density does not respect the character and appearance of the existing village.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
Policy S1 – Presumption in Favour of Sustainable Development
In accordance with the local plan policy S1 and the National Planning Policy Framework 2012, there is a presumption in favour of sustainable development. Sustainable development, as defined in the NPPF section 14, should meet objectively assessed needs unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies [in the NPPF] taken as a whole or specific policies [in the NPPF] indicate development should be restricted. These additional paragraphs should be specifically referenced within the local plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Objections to Guildford BC proposed local plan (June 2016) and the continued inclusion in the plan of Three Farms Meadows (formerly Wisley Airfield) Allocation A35 phased development of new settlement of up to 2100 dwellings.

1. The site is in the Green Belt and the exceptional circumstances necessary for its removal have not been demonstrated.
2. The proposed development is too large scale and high density completely out of keeping with the surrounding area and swamping the village of Ockham.
3. There will be a very large increase in traffic around the site both during and after construction. Local roads are already congested and will struggle to cope with the new traffic volumes.
4. Air quality will also suffer as a result of the large increase in road traffic.
5. Parking is already inadequate at both of the local railway stations.
6. Schools and medical services in the area are already fully stretched and in view of this development, and those proposed on the Horsleys, will need to be substantially expanded. Will the developers be meeting the cost of this?
7. The sewerage system in the area is already overloaded and would need to be greatly expanded to cope with the very large increase in housing.
8. Likely to be a greater risk of flooding on and around the development site.
9. Loss of rural environment and local footpaths and bridle ways.
10. The planning application has already been unanimously rejected by Guildford BC's Planning Committee.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3578  Respondent: 8694785 / Nicolas Dixon  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The total number of houses proposed could lead to there being upwards of 5000 additional cars on the local roads.

Roads are already very busy and car parking provision is minimal. I therefore foresee severe traffic congestion particularly at the junction of Ockham Road North with the A3, unless there are major road improvements.

Both the local school and medical centre are already at virtually full capacity.
And there might eventually be at least 12000 alltime people living in the area, it is clear that these services would be unable to cope without major new provision.

There would also need to be a big expansion of local shops.

Can the developers be relied upon to finance the expansion of the extra services?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/3570  Respondent: 8694785 / Nicolas Dixon  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I have now had an opportunity to look at some of the issues ensuing from the New local plan and would like to mention the following matters.

I note that the council appears to have unilaterally decided to remove large parts of the area around the horsleys from the Green Belt, following which it is proposed to allow the building of some 450 houses within a radius of approximately one mile of my house, together with another 90 houses further afield.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/3583  Respondent: 8694785 / Nicolas Dixon  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The local services are already failing to cope particularly in times of heavy rain.

The manhole in my front garden overflows on various occasions when there has been high rainfall due to the backup of water in the main sewer.

During the very recent heavy rain one of the manholes in the main sewer in Green Lar has again overflowed leaving raw sewage in the road and surrounding ditches. Certain of the surrounding fields are also more to flooding and as in the long
term it is expected that we will have more extreme weather this is a continuing problem. The proposed developments will of course exentuate the problem and major new sewage and disposal methods will be required.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3588  Respondent: 8694785 / Nicolas Dixon  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The National Planning Policy Framework requires that new reseidential development must respect the character and density of housing in the area and be limited in quantity by the availability of infrastructure and local facilities.

We already do not have the infracstructure to cope with the influx of such large numbers of houses, people and cars. Neither do we wish to chanfe almost overnight from a semi-rural to an urban communtiy

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/248  Respondent: 8694849 / David Swinerd  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A21

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I support the proposal to keep the Aldershot Road Allotments as they are with no future development on that site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/208  Respondent: 8694849 / David Swinerd  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The proposal to build on Blakewell Farm is not justified as the farm is in the Greenbelt and is an area of natural beauty visible from one of Guildford's major landmarks, The Hogs Back. With developments being proposed for Normandy and Tongham development at Blackwell Farm will lead to the urbanisation of Guildford westwards to eventually join up with Aldershot with very little green space in between.

There would be no need for a development of this size if the University had by now met its obligations in building a student village for 7000 or so students at Manor Farm which was originally planned when that land was taken out of the Greenbelt a number of years ago. I understand that the University has still some way to go to meet the original planned numbers and if these had been met or exceeded then some 1200 to 1500 houses in the borough would have been available by now for the town's residents to buy or rent.

The proposals for a development of this size would mean that the infrastructure west of Guildford which is now at breaking point will seize up completely even with the new link roads that have been proposed as they will eventually lead onto the existing road system somewhere in the borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/2865  Respondent: 8694977 / James Lewis  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley South

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I would like to strongly object to the plans for developments in and around the West Horsley village and the removal of West Horsley from the green belt.

The village is a typical ribbon development consisting largely of one very long road with houses either side. West Horsley feels more Rural than East Horsley being surrounded by fields. The infilling of these fields with housing would irrevocably alter the very nature of the village and turn it into another part of the continuous conurbation that runs from London out to Bookham. If the intention of the council is to make Guildford an outer suburb of London than obviously this is one way of going about it. However, the developments are far larger than the service infrastructure, roads, schools, drainage, doctors etc would be able to sustain.

I am not sure with the proposed development at Wisley whether the train services would be able to cope either.

I do not understand Guildford Councils ardent desire to build over the greenbelt, this must be about the 4th time I have had to write in to object to your plans, is the intention to simply keep going until people give up?
I live adjacent to the Manor Farm proposed building site and do not think 135 houses is a reasonable number to put on what is a small plot.

The housing density would be completely out of character with the area.

Furthermore, I do not understand why the council is slavishly following government dictat regarding housing provision, surely it would be better served asking what the government is doing to redistribute people across the country rather than cramming them all into the south east.

I therefore object to the proposed plan

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14694  Respondent: 8694977 / James Lewis  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Then there are the infrastructure needs, sewerage etc., which will have to be be built, causing further traffic disruption.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14693  Respondent: 8694977 / James Lewis  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

There are huge uncertainties as to where and how transport needs will be met. I live off Burpham Lane and roads like that cannot cope with the volumes of traffic that will be generated as a consequence.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14695  Respondent: 8694977 / James Lewis  Agent:
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There are but vague hopes that a station may be built and no commitment for it from BR. Such a development would put further strain on Burpham roads.

If a tunnel is necessary then that must be planned first not fitted in some years later.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attched documents:

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I feel strongly that in view of the questionable way the housing need figures were compiled and now with the extra uncertainty following the Brexit vote, that a review of these needs must precede any other decision taking place. The housing need seems to be the key factor upon which all the other discussions hang. Appx d

These include the issue of Green Belt protections being removed, when brown field sites lie unused.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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</table>
In brief all these plans must be co-ordinated together, and before that a fundamental review of housing needs be undertaken.

It may show that some of the dilemmas do not have to be solved at all!

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/353  Respondent: 8695041 / Malcolm Biffen  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A21

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I agree with this policy to keep the land for allotment use only.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/925  Respondent: 8696577 / L.A Swain  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Normandy and Flexford

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I would like to state that I am against all the proposed development to our lovely countryside around our village and Normandy.

My family and I moved from London 44 years ago to live within this green and pleasant land around our village.

Please consider other locations which would be more appropriate for this scale of development. This surely does not have to be on our Green Belt landscape.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
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<th>Comment ID: PSLPP16/984</th>
<th>Respondent: 8697025 / Barry Pearce</th>
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<td>Having viewed the latest plans I wish to lodge my objection to these on the basis of my previous objection's, and in particular the effect they will have on the infrastructure and services which are already at the limit.</td>
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<td><strong>My objection is based upon the fact that after the 2016 Consultation it does not go far enough in reducing the still very large number of new dwellings proposed on the Green Belt. It is also totally unacceptable that Guildford Council is choosing not to constrain its overall housing growth as many other Councils have done to protect the Green Belt. Nothing has been put forward since last year's Consultation to improve the sustainability of the West Horsley development sites and therefore meet National policy requirements. Every home on the West Horsley sites will need at least one car to get to the shops, Medical Centre, and Horsley Station which are already over subscribed, with flawed evidence being relied upon to justify over expansion. Finally i wish to object to no changes being proposed since the 2016 consultation to insetting West and East Horsley from the Green Belt.</strong></td>
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<th>Comment ID: PSLPA16/1933</th>
<th>Respondent: 8697889 / Nicky Smart</th>
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I am writing to express my objections to the new Guildford Local Plan with regard to East and West Horsley on the following points:

I object to the proposed removal of the Horsleys from the Green Belt, I do not believe that 'exceptional circumstances' have been demonstrated. I also believe that all Green Belt areas should be conserved at all costs. To allow the Green Belt to be eroded is a slippery slope and we should be looking to conserve all of the Green Belt for our future generations; In light of the above, I also object to the proposed extension of the boundaries of the settlement areas of the Horsleys, since it would enable developments on currently undeveloped 'green' sites.

The proposed housing numbers are unrealistic and would place a severe burden on the existing infrastructure to the Horsleys. These are rural narrow roads that are already unable to cope with current traffic. I have to regularly wait 2 weeks for an available doctor's appointment, increasing the population density would inevitably lead to an even longer wait time.

I therefore also object to the proposed development at Wisley airfield, since local infrastructure is ill-equipped to cope with this scale of development, including local schools, medical facilities, road quality, transport links and local drainage.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/114  Respondent: 8699809 / Holmwood Close Residents Association (Liz Drew)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The move to allow increased development in villages previously protected by the greenbelt will substantially affect the look and feel of these villages and put unacceptable strain on already overstretched infrastructure.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/110  Respondent: 8699809 / Holmwood Close Residents Association (Liz Drew)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( Yes ), is Sound? ( No ), is Legally Compliant? ( )
The removal of these villages from the greenbelt will take away the open spaces that define these areas and lead to villages merging and becoming one urban sprawl. It is vital that the semi rural villages are kept as this defines Surrey and the guildford area.

It is also not sound to plan increases in the populations of these villages without also expanding infrastructure. The local schools, doctors and roads are all crowded and over subscribed. This plan is not viable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/109  Respondent: 8699809 / Holmwood Close Residents Association (Liz Drew)  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( No ), is Sound? ( No ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I do not think there is sound evidence for the number of homes needed. There needs to be more explanation of how these numbers have been arrived at.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/4963  Respondent: 8702817 / E C E Stubbs  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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<th>Respondent: 8703585 / N J Axten</th>
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<td>I object to raising the annual number of houses built per year. With no rational reason given, one must assume these are developers' numbers for financial gain and not for social need.</td>
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<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North</td>
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<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
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<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<tr>
<td><strong>Ref: A36, A37, A38, A39, A40, A41</strong></td>
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<tr>
<td>I wish to <strong>object</strong> to the 2016 Draft Local Guildford Plan for the following reasons:</td>
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<tr>
<td>1. Failure of the Local Plan to properly represent local needs or the needs of the Borough generally</td>
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<tr>
<td>A questionnaire produced by West Horsley Parish Council identified a local need for only 20 No. affordable homes.</td>
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<tr>
<td>The effect of these proposed developments will be only to draw in more people from outside the area and impoverish the quality of life for those of us who already live here.</td>
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</tbody>
</table>
| The number of houses being put forward has been assessed purely on empiric calculation and the Local Plan is being driven by a biased GBC planning executive committee, which puts its own members' self interest before the interest of those who
elected them. Furthermore, the figures cannot possibly be representative of accurate projected demand, not least because of the likely reduction of immigration following Brexit. The assessment is flawed and must be rejected.

2. Unauthorised removal of West Horsley from the Green Belt

By the guidelines set down by central government, and restated by successive government ministers, there should be no relaxation of Green Belt boundaries unless there are **exceptional circumstances.**

This condition is not being satisfied for any of the proposed development sites (A36, A37, A38, A39, A40, A41). The use of brown field sites is also a stated intention of central government - an option not fully explored by GBC.

For these reasons, the proposed West Horsley development sites must be rejected.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

---

**Comment ID:** PSLPS16/1551  **Respondent:** 8703585 / N J Axten  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

---

I object to new sites (Garlicks Arch) being introduced as an after thought when it was not even considered in the previous plan. A slip road on the A3 at Burnt Common has been added to the Draft Local Plan without Highways England consent.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

---

**Comment ID:** PSLPP16/3411  **Respondent:** 8703585 / N J Axten  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to a totally unrealistic number of houses for the country lanes to absorb.

I object to the 2016 Draft Local Plan as it has had no regard to schools required, additional medical or hospital facilities which would make a plan sustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3413  Respondent: 8703585 / N J Axten  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the removal of villages from the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6146  Respondent: 8703585 / N J Axten  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( No ), is Sound? ( No ), is Legally Compliant? ( No )

Answer (if comment is on questions 1-7 of the questionnaire): ()

GBC has cynically removed villages from the Green Belt in order to be able to say that they are complying with central government guidelines not to develop on Green Belt areas.

What are the exceptional circumstances that can be applied to the proposed development areas?

Stop trying to confuse people with ridiculous questions about legal compliance and get to the point ie. Housing numbers and the effect on the local community.

It is also absurd to have two pages of this questionnaire the same – pp. 7-9.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>PSLPP16/3412</th>
<th>Respondent: 8703585 / N J Axten</th>
<th>Agent:</th>
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<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
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<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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</table>

I object to the disproportionate distribution of houses across Guildford Borough, by far, the North East has taken an unsustainable number, in an area where country lanes are narrow and volume of traffic now using through routes makes roads gridlocked at rush hour.

I object to the methodology of drawing up the plan. Guildford Borough employs consultants who allegedly have planning expertise but have done so without taking account of Surrey County Council highway planners’ views, or the costs involved in improving the infrastructure, currently out side their financial capability.

The methodology is also flawed as this plan has been formulated without regard to village Neighbourhood plans. Surely, logic would suggest planning is best formed by a bottom up approach, not top down.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>PSLPP16/6150</th>
<th>Respondent: 8703585 / N J Axten</th>
<th>Agent:</th>
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<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
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</table>

The local plan should be withdrawn (again) and not reissued until such a time that proven agreement from residents has been obtained.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>SQLP16/985</th>
<th>Respondent: 8703585 / N J Axten</th>
<th>Agent:</th>
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</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents</td>
<td></td>
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<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
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</tbody>
</table>
Insufficient data on infrastructure analysts in particular traffic movements and journey times in the area immediately surrounding the proposed development sites in East/West Horsley.

Also, given that HS2 and other major capital projects are being put on hold, following recent government cut backs, how can extensive housing development take place whilst A3 upgrading is by no means certain?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
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<tr>
<th>Comment ID: SQLP16/986</th>
<th>Respondent: 8703585 / N J Axten</th>
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<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Question 2: Legal compliance</td>
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</table>

The question implies that there’s some doubt over the legality of the local plan

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<tr>
<th>Comment ID: SQLP16/987</th>
<th>Respondent: 8703585 / N J Axten</th>
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<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness</td>
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<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): (No)</td>
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</table>

It does not take account of the concerns from the overwhelming majority of residents about the extent of actual housing demand, which is considerably less than the numbers put forward in the local plan.

Also, it cannot reflect the demographic change now attributing to lower immigration numbers, following the UK leaving the EU

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
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<tr>
<th>Comment ID: SQLP16/988</th>
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<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Question 4: Duty to cooperate</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): (No)</td>
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<tr>
<td>The revised plan still fails to take account of the response from residents to the 2014 Plan.</td>
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<tr>
<td>GBC is running roughshod over the express wishes of the local people.</td>
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<td><strong>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</strong></td>
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<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): (Yes)</td>
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<tr>
<td>I will support any group which intends to challenge the Local Plan eg. GGG</td>
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<td><strong>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</strong></td>
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<tr>
<th>Comment ID: PSLPA16/601</th>
<th>Respondent: 8703937 / Alan Sussex</th>
<th>Agent:</th>
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<tbody>
<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Send</td>
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Answer (if comment is on questions 1-7 of the questionnaire): ()

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<th>Comment ID: PSLPS16/890</th>
<th>Respondent: 8703937 / Alan Sussex</th>
<th>Agent:</th>
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<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy A43</td>
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</table>

I object to the removal of Send and Ripley from the Greenbelt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Draft Local Development Plan - Send, Send Marsh & Burntcommon

I object to the removal of Send and Ripley from the Greenbelt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/901  Respondent: 8703937 / Alan Sussex  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to Policy A43 and to the inclusion of the 30 hectares of Garlick's Arch in this Plan. This site is new and was not included in the Regulation 18 Draft, and has not been consulted on previously and is therefore improperly included.

Even so it forms part of the Green Belt and is permanently protected by the NPPF, which is there to prevent the merging of settlements. It also contains around 5 hectares of ancient woodland, some of which dates back to the 16th century.

Furthermore any further industrial space required could easily be accommodated at Slyfield.

However, the traffic chaos that this proposal will generate is the reason for my next objection;

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to Policy A43a, the new on/off slip roads proposed to and from the A3 by the bridge on the A247 over the A3. These new junctions are ill conceived and will considerably increase traffic flows in the Burntcommon, Send and Clandon areas.

SEND CANNOT TAKE INCREASED TRAFFIC FLOWS

The A247 through Send would be gridlocked at rush hours, and at other times. At present there is a constant flow of traffic around the Burntcommon roundabout (by the Shell petrol station and Little Waitrose) all day and evening.

I also fear that those of us living in Boughton Hall Avenue, about 100 metres from this roundabout, will find access to and from the Avenue very difficult indeed. The junction with the B2215 is our only entry and exit point and there are at present 76 properties in this estate.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/904  Respondent: 8703937 / Alan Sussex  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A44

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to Policy A44, involving Winds Ridge and Send Hill. This proposal needs to be more in sympathy with existing housing and more realistic in its siting of travellers pitches.

Please ensure that this letter is passed on to the Government Planning Inspector.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/1522  Respondent: 8704417 / Philip Ashfield  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
My objections to Guildford Borough Council Proposed Local Plan (June 2016) and to the continued inclusion in the plan of the Former Wisley Airfield now known as Three Farm Meadows - Allocation A35 - for the phased development of a new settlement of up to 2100 dwellings.

I very strongly object to the draft local plan for many reasons - and I wonder if any of the Councillors have really considered this proposal, and many others in the neighbourhood - over 600 houses in Horsleys, 400 in Burnt Common, 2000 houses on Gosden Hill Farm (Burpham) plus a number of smaller sites in nearby villages. These add up to in excess of 5000 new dwellings in this neighbourhood.

As far as I am aware no Councillor or Planning Officer has ever been to or considered the enormous effect that this would have, not only on the residents in these areas but many other people from far and wide. I wonder if the Councillors or Planning Officers even know where these places are and, possibly as they do not live near the area affected, they feel that they are correct in putting these plans forward (NIM BY/SM).

If these building projects were carried out then there would be total traffic gridlock not only in the local area but on the M25 and A3 and, of course on every one of the smaller roads in Surrey and the surrounding Counties.

Amongst my other objections to the draft local plan, where no consideration has been given, are:

- There are not sufficient Transport links (railways, buses or roads)
- There are not sufficient Schools/Academies to educate possibly up to 10,000 children in the area. There are insufficient shopping and parking facilities
- The roads in the area cannot take any increase in traffic as this contribute to grave danger to all users (car drivers, pedestrians and cyclists, etc)
- The air pollution is already at a high level and any increase caused would be well in excess of the legal level.
- I was under the impression that the Councillors had previously stated in their Manifesto that "the Green belt is safe" It now appears that these words were totally meaningless and untrustworthy.
- Councillors and Planning Officials have no right nor lawful reason to turn prime Greenfield land into an enormous urban sprawl/slum stretching from Greater London to Guildford and probably further out.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/1879  Respondent: 8704417 / Philip Ashfield  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

My objections to Guildford Borough Council Proposed Local Plan (June 2016) and to the continued inclusion in the plan of the Former Wisley Airfield now known as Three Farm Meadows - Allocation A35 – for the phased development of a new settlement of up to 2100 dwellings.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: PSLPS16/1880  Respondent: 8704417 / Philip Ashfield  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I very strongly object to the draft local plan for many reasons – and I wonder if any of the Councillors have really considered this proposal, and many others in the neighbourhood –Over 600 houses in Horsleys, 400 in Burnt Common, 2000 houses on Gosden Hill Farm (Burpham) plus a number of smaller sites in nearby villages. These add up to in excess of 5000 new dwellings in this neighbourhood.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4071  Respondent: 8704417 / Philip Ashfield  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

There are not sufficient Schools/Academies to educate possibly up to 10,000 children in the area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4074  Respondent: 8704417 / Philip Ashfield  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
There are insufficient shopping and parking facilities

The roads in the area cannot take any increase in traffic as this contribute to grave danger to all users (car drivers, pedestrians and cyclists, etc)

The air pollution is already at a high level and any increase caused would be well in excess of the legal level.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/4070  Respondent: 8704417 / Philip Ashfield  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

If these building projects were carried out then there would be total traffic gridlock not only in the local area but on the M25 and A3 and, of course on every one of the smaller roads in Surrey and the surrounding Counties.

Amongst my other objections to the draft local plan, where no consideration has been given, are:

There are not sufficient Transport links (railways, buses or roads).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/4076  Respondent: 8704417 / Philip Ashfield  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I was under the impression that the Councillors had previously stated in their Manifesto that "the Green belt is safe". It now appears that these words were totally meaningless and untrustworthy.

Councillors and planning officials have no right nor lawful reason to turn prime Greenfield land into an enormous urban sprawl/slum stretching from Greater London to Guildford and probably further out.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Comment ID: PSLPP16/4069  
**Respondent:** 8704417 / Philip Ashfield  
**Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( )

is Sound? ( )

is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):**

As far as I am aware no Councillor or Planning Officer has ever ben to or considered the enormous effect that this would have, not only on the residents in these areas but many other people from far and wide. I wonder if the Councillors or Planning Officers even know where these places are and, possibly as they do not live near the area effected, they feel that they are correct in putting these plans forward (*NIMBYISM*).

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

---

Comment ID: PSLPS16/3575  
**Respondent:** 8705761 / John Stiff  
**Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A46

Do you consider this section of the document; complies with the Duty to Cooperate? ( )

is Sound? ( )

is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):**

The proposed development is located in the GREEN BELT outside any identified settlement area and represents inappropriate development which is by definition harmful to the GREEN BELT.

Accordingly to your planning department this proposed site is not in the village of NORMANDY? however the site is within 400-Slan THAMES BASIN Heath Special PROTECTION AREA. Why do we need an extra 1100 houses in Normandy anew 1500pupilsecondaTy school, where are all the pupils coming from. You will completely destroy our rural environment of village life, where will all the dogs go for walkies? If you take away our precious GREEN BELT land it will be completely outrageous. To consider doubling our village in a small area is an unsustainable pressure on all ready very busy roads.. In Westwood Lane we have a Horse and cart Railway bridge and Glaziers Lane a Railway bridge built in the 1800 both net fit for the 21st century propose

I strongly OBJECT to this proposal.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**
**Comment ID:** PSLPA16/3408  **Respondent:** 8706177 / david and beverley searle  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I wish to **OBJECT** to the proposed local development plan.

The plan does not site any required exceptional circumstance or other justification to alter the existing Green Belt boundaries.

The Horsleys have a rich & varied mix of established LOW housing density settlements, with a considerable number of historic buildings.

The proposed development would introduce an element of HIGH density development, which would alter the character & outlook of the villages.

No allowance appears to have been made for the impact of these developments on the existing infrastructure. The infrastructure is already "creaking at the seams" without increased development.

This plan in it's existing form is totally inadequate & includes far too many houses. It really should be reconsidered.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPP16/566  **Respondent:** 8706177 / david and beverley searle  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I write to complain about the latest version of the "local plan" for West Horsley

This plan would represent the largest change, over a short period, experienced by Horsley in the last 1000 years!! Our infrastructure would be incapable of coping with this.

The roads are already congested and public transport cannot take any more.

Other items of concern are:-

Schools
Shops
Medical center
Surface water
Main drainage
Policing
Public open spaces

Other items which would soon start to break down are

Electricity
Mains Water
Gas
Telephone systems (inc BroadBand)

All these matters will require urgent attention, and should be an integral part of any 'Plan'

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID:</th>
<th>PSLPA16/239</th>
<th>Respondent:</th>
<th>8706561 / Carolyn Pritchard</th>
<th>Agent:</th>
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<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I refer to the New Local Plan dated 6th June 2016.

Once again, I write on behalf of myself and others who feel VERY strongly about this.

My family have lived in the Horsleys for 4 generations and we have owned many houses over the years. The reason why we have made this area our home is simply because we enjoy living here, it offers green spaces and a friendly safe environment.

We cannot understand why GBC wise to completely change the nature of these villages. To even consider building 533 new homes is just ridiculous. To take us out of the Green Belt is unthinkable. To bring in Travellers Sites criminal.

The Horsleys cannot cope with this number of new homes........we do NOT have the infrastructure. Our roads, schools, Doctors, cannot cope now! Also consider more noise, lights, damage to the natural environment, flooding, drains etc .

This is on top of GBC'S favour of building 2,100 new homes at Wisley Airfield which is only 2 miles away!!!

I ask you to please consider the future of these villages and the mess that will be created if this number of new homes are built.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp172/1675  Respondent: 8706561 / Carolyn Pritchard  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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Once again I write to OBJECT strongly to this new development.

The reasons are always the same ie this area CANNOT COPE with such a mass expansion of new homes. The effect on the environment, lighting, our terrible poor quality roads, Doctors, countryside, drains and flooding, travel etc.

Even considering Traveller pitches and sheltered/care homes is unthinkable. If allowed then the 2000 new homes will never be sold!

I have lived here nearly 60 years, from a child, and I do not like what you are submitting. This is a lovely area and already over populated.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/2745  Respondent: 8706625 / Hilary Barker  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base
I OBJECT to the number of houses being proposed for Guildford in this Local Plan: The Housing number of 693 calculated by GL Hearn who represent councils wanting to build large numbers of houses and greedy developers, has been proven to be a gross miscalculation of our housing need and far too high. The SHMA calculations on how this number was reached have not been provided and we have been asking for two years. Nobody in the council can tell us and GBC are refusing to provide the details.

- In 2010 GBC fought for 322 which met the housing need then and it appears that nothing has changed.
- This number of 693 is exaggerated and massively over stated and contains errors.

Despite a great deal of new evidence being made available that would reduce the dwellings per annum, residents are having to use this draft figure which is not right as the “need” to utilise Green Belt for development is based on this figure and for no other reason.

- 693 new homes for Guildford is more than twice that of any other Surrey borough.
- Guildford will be increased by 25%
- Guildford needs no more than 500 new homes during the Plan period all of which can easily be accommodated on urban and brownfield land with good local services.

- If this many new homes are built around Guildford it will only attract more immigration into the borough as it is proven that immigration is largely responsible for the housing shortage.
- These new homes will be mostly “executive” homes selling for a high price and therefore this strategy will not dampen house prices.
- These houses will be snapped up by affluent families wanting to migrate out of London and commute to the City.
- Our train network is already over loaded
- Our roads are congested.
- Now we have Brexit and this may well change our forecast on immigration numbers again and numbers for the university in the years to come.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I OBJECT strongly to the development of 1100 and 50 houses and secondary school proposed for Normandy and Flexford.

- GBC should not be using Green belt land.
- The INFRASTRUCTURE is inadequate to cope with the extra housing – inadequate sewerage system, doctors surgery.
- The Aldershot Road into Guildford will not be able to cope with the extra traffic generated by 1150 homes = 2300 cars. Unclassified rural roads and two railway bridges are unsuitable for an increase in traffic.
- There is some doubt that there is a demand for a secondary school in this part of Guildford and the traffic generated would add to the congestion on the rural roads by a secondary school.
- This extra traffic will inevitably “rat run” through Wood Street Village which is already being eroded away by EXCESSIVE SPEEDING traffic.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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I OBJECT strongly to the development at KEENS LANE of 140 homes and a Care home.

This land is currently part of the Metropolitan Greenbelt

- Keens Lane is a narrow rural road – mostly single lane not suitable for extra cars generated by 140 new homes.
- This land is within the 400m buffer zone for the SPA, SSSI at Whitmoor Common.
- This land forms part of the wildlife corridor between Broad Street and Whitmoor Common.
- It will generate extra traffic exiting onto the A323 and A322 which are both at a standstill in rush hour traffic trying to get into Guildford.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I OBJECT strongly to the University’s planning application in this Local Plan to build 1800 homes on Blackwell Farm along with businesses, offices, supermarket, school and Traveller accommodation.

- Blackwell Farm site is located partly within the Surrey Hills AONB which the NPPF states “should be afforded the highest level of protection.”
- This is a major swathe of Green Belt land comprising 139 hectares of Green Belt land. Statistics show that 139 hectares is more land than was taken out of the Green Belt across the whole of England in the 12 months to March 2012.
- The Green Belt boundary was established 11 years ago when Manor Farm was taken out of the Green Belt and gifted to the University so that they could build student accommodation.

Blackwell Farm fulfils all 5 functions of the Green Belt: (NPPF para 80)

- To prevent urban sprawl from London.
- To check the unrestricted sprawl of large built up areas.
- To prevent neighbouring towns merging into one another.
- To assist in safeguarding the countryside from encroachment.
- To preserve the setting and special character of historic towns. (Guildford is an historic town)

NPPF para 79 states that:

“The Government attaches great importance to the Green Belt. The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of the Green belt are their openness and their permanence.”

NPPF 83 states that:

- “Once established, Green Belt boundaries should only be altered in “exceptional circumstances”
- “Inappropriate development is by definition harmful to the Green Belt and should not be approved except in very special circumstance”

The NPPF (section 9 para 83) states that “boundaries should be defensible and permanent and capable of enduring beyond the Plan period.

- Part of this area to be built on is registered as an AONB.

GBC would have to show “exceptional circumstances” in order to build on an AONB in the Green Belt.

- It would have a devastating impact on the AONB from an aesthetic and environmental perspective.

The panoramic views from the Hogs Back form an important part of Guildford’s landscape heritage – you can see the cathedral from here.

- It has an ancient woodland which the University promised to protect in 2003 when it was given Manor Farm along with the ancient monument and Hazel Farm.
- Blackwell Farm has many public footpaths and bridleways which offer extensive walking, horse riding and bicycling to local residents and visitors to Guildford.
- ENDANGERED SPECIES: The Hogs Back is the only steep, north-facing chalk ridge in the southeast and is home to some rare plant species and many protected animals and birds.
- There are a number of endangered species which inhabit the Hogs Back – skylarks, little owls, yellow hammers and curlews – all in decline.
- FARMING: Blackwell Farm is a working farm. It is good quality agricultural land. With the proposed increase in population in the South East there will be greater pressure on food resources so we need to protect our ability to provide food and crops for this country in the future years. Statistics show that 40% of food consumed in Britain is imported and this figure will be rising.
**FLOODING:** This land is formed of chalk and currently soaks up a significant amount of surface water. If it is developed and concreted over, this surface water run off would exacerbate existing flooding problems in Wood Street Village and Fairlands.

**INFRASTRUCTURE:** The A31 is already a congested road onto the A3 Guildford bound and an extra 4-5000 cars generated will bring it to a standstill.

- It would be controversial to build roads across an AONB and an exit road through to the Research Park / Tesco roundabout would add enormously to the traffic congestion already experienced at this junction – the ambulances would not be able to get through to the RSCH.

Thames water does not have sewerage capacity to cope with a development of this scale.

Once again this shows greed by our University who were given this land for safe keeping. They have already broken many promises made for Manor Farm in 2003. If this development goes ahead they are likely to make hundreds of millions of pounds on housing which will be worth 1bn – a lucrative business deal for them which is not going to benefit the residents of Guildford and the loss of some very beautiful AONB Green Belt land.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** PSLPS16/5716  **Respondent:** 8706625 / Hilary Barker  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A53

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

**I OBJECT** to this site being in the Local Plan:

- This site is in the Metropolitan Green Belt and should be returned to a private garden. Planning policy for traveller sites (PPTS) Policy E states that “Traveller sites are inappropriate development within the Green Belt and should not be approved except in very special circumstances.”
- The Traveller family who moved onto this site and applied for retrospective planning permission were granted a five year stay at appeal only until GBC provided them with a pitch in the area. As they must be top of the list for relocating, they should be allocated one of the 3 new pitches proposed for Cobbetts Close or Four Acres Stables or one of 17 new pitches at Hatchingtan - Burdenshott Road.

**SANGS**

**I OBJECT** strongly to GBC creating SANGS so that they can justify building developments within 5 km

- Russell Place Farm – Frog Grove Lane
- Broad Street Common and Backside Common
- Blackwell Farm
- Stringer’s Common
- Burpham Court Farm

**Definition of a SANG:** Suitable Alternative Natural Green Space.

- The role of a SANG is to divert visitors from visiting the Thames Basin Heaths Special Protection Area – SPA.
Worplesdon incorporates Whitmoor Common

- A SANG must provide a similar quality of experience as the SPA - be more attractive to visitors than the SPA.
- They should provide biodiversity, access, landscape character and wildlife.

GRA suggested in the consultation of the Issues and Options in 2013 that:

“A SANG needs to ensure that it can provide genuinely new opportunities for informal recreation in newly created areas of high potential wildlife value rather than simply a rebranding of areas already enjoyed by residents.

- SANGS are being created in Worplesdon in order to detract people away from Whitmoor Common SPA, SSSI, LNR. There is no proof that SANGS work. GBC will have to provide legal proof.
- They are also being created to allow developers to build extensively within a 5km radius of a SANG – this would allow for building in Normandy, Wood Street, Fairlands.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11499  Respondent: 8706625 / Hilary Barker  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

I OBJECT VERY STRONGLY to the strangle hold and seemingly the power that the University has over GBC. They must be relieved that the majority of Guildford residents are blissfully unaware of all the broken promises made by the University and the effect this is having on housing demand and housing shortage.

- The University has been expanding its numbers year by year – now 13,700 which makes up for 10% of the borough population (SHMA appendix C)
- Student growth now accounts for 50% of the recent growth of Guildford.
- We are now told that the University wants to expand to 17,000 students by 2017 – another 3000 full time students in the next 3 years.
- In 2003, in order to accommodate this growing rise in student numbers, GBC took Manor Farm (given to the University) out of the Green Belt specifically to allow the University to build a campus for their students and staff – 4,790 units.
- They have only built 1,665 units and we are still waiting for the other 3,125. The land is still available but is being squandered by concreting over large areas to create surface level car parks which should, at least, have student units built above.
- If the University was made to fulfil their 2003 commitments and house 60% of their students and staff on Manor Farm campus it would free up to 1,300 houses in Guildford and provide some much needed “social housing”.
- It would provide an income of 1.2 million for GBC as students /landlords are not obliged to pay council tax.
- By not building the student units on Manor Farm, the University is creating its own housing demand and this is reflecting on the Local Plan’s housing “need” numbers in the borough as it is being artificially raised.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to the number of extra Traveller Pitches allocated to Worplesdon Parish and the insetting of Green Belt in order to create these Traveller pitches.

It was said in the previous draft plan “We have sought to select sites carefully and in a way which does not over burden any single area of our borough and ensure that the right infrastructure is in place.”

Worplesdon Parish and other adjoining Parishes of Normandy and Ash in NW Guildford have for many years taken the larger share of Traveller and Showman’s sites and is now over-burdened.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

I am in favour of “affordable homes” being built BUT only for our own local families and key workers who already live in Guildford on a low income and cannot afford to get on the housing ladder – not those choosing to migrate from London.

By stating in the Plan that affordable homes will be provided “subject to viability” this creates an escape route for developers and it is financially more “viable” for them to build executive homes only. It should be taken out of the Local Plan.

There should be more plans to build affordable homes in the town centre for our key workers – hospital staff, teachers, firemen, police etc. They are the most important people and we should look after them.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
I OBJECT to the lack of forward planning by GBC as the Infrastructure delivery schedule is not developed enough to support even the 5 year programme.

This council has a very poor record of delivering infrastructure to support developments. GBC freely admitted in the previous draft plan that “infrastructure provision has not kept pace with housing development.” I feel this remains much the same.

- The current poor state of infrastructure must be remedied in advance of adding further strain by increasing populations.
- Road infrastructure is a very basic need. The road system around Guildford is already gridlocked at peak times and the amount of traffic is beyond the capacity of most feeder roads from the North, West and East of Guildford.
- Primary and Secondary school places will not keep up with demand.
- Doctor’s surgeries with more doctors and facilities need to be built and staffed.
- The Royal Surrey Hospital is already at capacity for the existing population.
- Sewerage system in parts of Guildford – particularly around the NW and Fairlands is not fit for purpose for the current population let alone more housing in the area.

- ROADS: There are no known plans to improve the already serious road congestion on the A322 and A323 – a crucial factor in the refusal of two previous applications. These roads along with the A320, A31 and A3 are all major problems as they all funnel towards the Dennis Roundabout. These roads cannot cope with the extra cars generated by 693 new homes.
- The road system around Guildford is already gridlocked at peak times and the amount of traffic is beyond the capacity of most feeder roads from the North, West and East of Guildford.
- SCHOOLS: primary schools are expanding to meet the current demand on places but won’t be able to offer places to new arrivals in the area. At 11 they will need to move on to Secondary Schools. Can SCC afford to build new schools and pay teacher’s salaries?
- DOCTOR’S SURGERIES are already over-subscribed. The developers may build new surgeries but can SCC afford to pay the doctors and nurses to staff them?
- THE SEWARAGE SYSTEM, in many areas are already at capacity and not fit for purpose for the current population let alone another 693 homes.
- WATER SUPPLY in the NW corner of Guildford is becoming a problem with falling water pressure - the bore holes on the Hogs Back are said to be under strain.
- FLOODING in Worplesdon continues to be a problem.
- ELECTRICITY SUPPLY is not consistent in Worplesdon and other villages in the NW of Guildford.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Russell Place Farm - Wood Street Village SANG

This site is not needed as a SANG as it is adjacent to 128 hectares of Common Land – Broad Street and Backside Commons offer the residents and visitors enough varied recreational space in the village – walkers, dog walkers, horse riding, bicycling and running.

Natural England’s report NECR136 para 3.58 dated 13th February 2014 indicates that there is no evidence to suggest provision of a SANG reduces the number of visitors to the SPA. Contrary to the NPPF para 118.

• This land is within the Metropolitan Green Belt so this would be “inappropriate” development.

There is already a public footpath 377 across this land providing for dog walking facilities.

• This is viable working farm land. Agricultural land should be protected for the future needs of a growing population in the SE.
• This expanse of farm land is a very attractive feature in Frog Grove Lane and the plans put forward will turn it into a contrived, sculptured space with unnatural footpaths creating an “urban” character compared to the “natural” character of the established Commons.

Broad Street Common and Backside Common SANG

Common Land is given to the people for their recreation and enjoyment of natural spaces and environments and are already publicly available land where residents have the right to walk over the commons via s193 of the Law of Property Act 1925 and the CROW Act (Countryside and Rights of Way) 2000.

Natural England’s report NECR136 para 3.58 dated 13th February 2014 indicates that there is no evidence to suggest provision of a SANG reduces the number of visitors to the SPA. Contrary to the NPPF para 118.

It is therefore inappropriate to designate the COMMONS as SANGS as it DOES NOT provide any new additional recreational space.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: PSLPP16/11498</th>
<th>Respondent: 8706625 / Hilary Barker</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
**I OBJECT** strongly to GBC’s plans to concrete over Green Belt land.

Guildford is made up of 89% Green Belt forming part of the Metropolitan Green Belt which was set up to:

NPPF paragraph 79 quotes “The Government attaches great importance to the Green Belt. The fundamental aim of the Green belt policy is to prevent urban sprawl by keeping land permanently open: the essential characteristics of the Green Belt are their openness and their permanence.

NPPF paragraph 80 The Green Belt serves 5 purposes:

- To check the unrestricted sprawl of large built up areas
- To prevent neighbouring towns merging into one another.
- To assist in safeguarding the countryside from encroachment.
- To preserve the setting and special character of historic towns.
- To assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

NPPF 83 states that:

- “Once established, Green Belt boundaries should only be altered in “exceptional circumstances”
- “Inappropriate development is by definition harmful to the Green Belt and should not be approved except in very special circumstances”

Can GBC demonstrate these “exceptional” or “special” circumstances?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPP16/11496  **Respondent:** 8706625 / Hilary Barker  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

Firstly **I OBJECT** to the enormous amount of paperwork involved in this second draft Local Plan – total overload and to make it worse we have only been given a mere 6 weeks to read it with no consultation period during the most busy period of the year. No doubt what you were hoping for…………..

It is therefore highly unlikely that you will get the amount of responses that Guildford deserves as we are all fed up having to write and re - write and then there are the so called “hard to reach groups” you have talked about in the past. As from my experience so far, the majority of residents do not even know what the Local Plan is and have certainly not read it so will not be making informed comments on the issues that may well affect them and their families in the future.

These “hard to reach groups” still exist and will likely not be responding:

- the young and busy working people.
- the elderly who live alone and have no support from family or neighbours.
- those with limited IT skills – not owning a computer for access to information.
- ethnic groups - those with limited English language skills.
We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/743  Respondent: 8706625 / Hilary Barker  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/635  Respondent: 8706625 / Hilary Barker  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
• adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPA16/6  **Respondent:** 8707553 / Stuart Farquharson  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. GBC want to double the size of the village but have made ZERO provision for infrastructure. Pure lunacy. We have a primary school that is 50 children over subscribed every year and growing. We have one bus service a day to Guildford. We have no public parking left at the railway station and a doctors surgery that cannot serve current residents. So where on earth does GBC expect the additional 1500 + residents to find said services…..There is NO infrastructure to support your ridiculous plan!!

6. There is no infrastructure to support the 500 proposed houses for Horsley. The roads are riddled with pot holes and we have very limited public transport. How on earth will the new residents get around.

The plan is a mess. Its sponsored by a political party who have completely ignored the wishes and views of the local community. The winners will be the developers and their share holders. The losers the natural habitat the villages.

Its an appalling mess.

Well done GBC!

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPA16/7  **Respondent:** 8707553 / Stuart Farquharson  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
4. GBC talk about keeping brownfield sites for offices - well I would suggest that by 2033 very few people will be working in an office as the trend of home working continues to grow

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

| Comment ID: PSLPP16/15  Respondent: 8707553 / Stuart Farquharson  Agent: |
| Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H2 |

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. You state that the purpose of the building more houses is to provide affordable housing - how on earth does GBC believe that allowing the Greenbelt to be developed on is going to suddenly lower land values here...have you all been smoking something funny? An average house in Horsley costs around £700K - An affordable house is deemed to be 80% of the total cost of the average house in that area currently making an affordable house in Horsley to be priced at well over half a million pounds - how many key workers can currently afford that cost???

Are GBC and the developers suddenly going to offset the costs to help people to get onto the property land...that would be a big fat NO!

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

| Comment ID: PSLPP16/16  Respondent: 8707553 / Stuart Farquharson  Agent: |
| Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2 |

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. The plan to develop greenbelt is disgusting. Its a sad and desperate attempt by the Conservative led Council to appease their Whitehall bosses who have failed to tackle immigration. Over population is leading to this requirement for more housing. The loss of natural habit will never be replaced. Offsetting new area of green for those lost is will never workout. How can you replace centuries old greenbelt with new greenbelt zones. The lack of understanding by our Councillors in that regard is deeply disturbing. Below are quotes from local Councillors at the recent plan meeting:

Cllr Goodwin (con) said he didn't know what all this fuss about airpollution was all about

Last night Angella Gunning said I don't see why ancient Woodland should be protected, after all they are old.
Its deeply disturbing that these people have such a lack of awareness of such key issues.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/26  Respondent: 8707553 / Stuart Farquharson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 2: Legal compliance

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

2. The local plan is a total fraud. GBC outsourced to a 3rd party company (which is not within the legality of plan) to estimate housing numbers required in each village. As a result not one resident can gain access to how these numbers where created due to them being commercially sensitive. Utter stupidity again. How can you expect residents to make an informed choice on what is right or wrong for the Borough and their villages when you hide behind this.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/24  Respondent: 8707553 / Stuart Farquharson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Let me begin but stating that the contempt with which GBC has approached this consultation is absolutely disgusting. The views and thoughts of many of the villages and towns impacted but this farce of a plan having been whole sale ignored. Point in case Wisley Airfield. Planning Permission denied but it still remains in the local plan…why? At the end of Public meeting when the Chair stated not aware that her microphone was still switched on referred to the Public as a Rabble….says it all.

So I object wholesale to the local plan…specifically the villages of Horsley

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/2713  Respondent: 8708289 / Frances King  Agent:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

**Strategic Housing Market Assessment (SHMA): I OBJECT to this evidence base:** The number of houses proposed by outside consultants, G L Hearn, of 13,860 or 693 per annum over the next 20 years, has not been properly scrutinised by Councillors as the methodology used to arrive at the figures has not been made available. If this document is to be part of the evidence base and the foundation for a raft of the policies in the proposed Local Plan all the background information on which the calculations were made must be put in the public domain.

An independent, highly qualified expert, Neil McDonald has indicated the housing number should be 510 per annum, as has Cllr David Reeves in his calculations. This is a reduction of almost 25% on the unsubstantiated figures presented to the residents by Guildford Borough Council and demands some detailed response which although demanded for sometime has been waved away by those responsible on the Council on the grounds that the information is 'commercially confidential' as 'intellectual property'.

It is interesting to note that G L Hearn on its website states "is increasing its work with the public sector providing a consultancy approach with a strong commercial aspect." One feels “strong commercial aspect” is the overriding aspect of the SHMA produced for Guildford Borough Council.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: PSLPA16/2714</th>
<th>Respondent: 8708289 / Frances King</th>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

**Sites in East and West Horsley: I OBJECT** to the inclusion of Sites A36-41. These sites should not be looked at individually but at the cumulative impact they will have on the two villages, but in particular West Horsley. Under the Plan the very rural West Horsley would have its housing stock increased by 35%, this is wholly disproportionate when set against the increases proposed for urban Guildford and Ash & Tongham. The infrastructure in the villages cannot support a further 593 houses, the local schools are already oversubscribed and medical centre is overstretched. The drainage already has difficulty coping with the roads regularly flooding and being impassable when there is heavy rainfall. It is noted in the site descriptions except A36 there is “surface water flood risk” and in the case of A39 the flood risk is “fluvial and surface water”. Building on open Green Belt agricultural will only exacerbate the problem. In the "Land Availability" survey it refers to the “Horsley flood hotspot” when discussing the sites referred to. There will no shop in West Horsley from October 2016, the parking at East Horsley, to be designated a "District Centre" is already full to capacity. As is the station car park at Horsley Station, whatever the hope is to encourage cycling and walking on a cold, wet winter morning and evening people will use their cars and 593 extra households would suggest at least that number of extra cars on roads.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Attached documents:

Comment ID: PSLPS16/5684  Respondent: 8708289 / Frances King  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Site A35 - Former Wisley Airfield: I OBJECT to the inclusion of the former Wisley Airfield as a site for 2,000 homes. This is totally inappropriate development that requires the land to be taken out of the Green Belt to even suggest that it should be built on. No exceptional circumstances have been given to justify such a move. Guildford Borough Council is being hypocritical in its inclusion in a Proposed Local Plan published the day before a planning meeting that gave very strong reasons, it being in the Green Belt and the traffic management next door to the already excessively busy Junction 10 of the M25 where the A3 joins that road for refusing an application to build 2,068 houses on the site. If there were no exceptional circumstances to justify planning permission the day after the Local Plan was published how can there be the day before! The information about the amount of brownfield land at the site is incorrect.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11227  Respondent: 8708289 / Frances King  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Green Belt: I OBJECT to the insetting of 14 villages from the Green Belt, the infilling proposed and the adjustment of the settlement boundaries in a number of other villages. This effectively gives a free for all to developers in those villages. The Green Belt was introduced to provide a lung round the London Metropolitan area. Guildford’s plan to put 8,086 new houses in that lung destroys its whole purpose. The claim that only 1.6% of the Green Belt in the borough is a manipulation of the figures as it ignores insetting, infilling and settlement boundary extensions. It merely tries to put a good light on a disreputable policy. The "exceptional circumstances” required to take this action have not been demonstrated in the proposed Plan, which ignores far more suitable brownfield sites in the urban part of the Borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Countryside (ie beyond the Green Belt): I OBJECT This appears to give stronger protection to an area beyond the Green Belt and outside the AONB than within those areas (the Green Belt and AONB); this is anomalous. It is noted, perhaps cynically, that this happens to include the wards of the Borough that the present leader and immediate past leader of the Council represent. Why should these be given extra protection when other much more rural parts of the Borough have their protection reduced.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
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<th>Comment ID: PSLPP16/11232</th>
<th>Respondent: 8708289 / Frances King</th>
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<tr>
<td><strong>Document:</strong></td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy P5</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

**Flood Risk and water source protection zones:** I OBJECT

The proposed Local Plan puts by far the majority of new housing on greenfield sites, this can only increase flood risk by concreting/tarmacing over land which at present acts, at least partially, as a catchment for excess rainwater. The better use of brownfield sites in already urban areas for housing with proper flood management would be more appropriate.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: PSLPP16/11233</th>
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<tr>
<td><strong>Document:</strong></td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

**Thames Basin Heath Special Protection Areas:** I OBJECT

The policy appears to be ineffective. There should be NO development within 400 metres and only VERY LIMITED development within 5km. Yet the proposed Local Plan ignores this with the inclusion of a large development at the former Wisley Airfield. There are also the proposed sites at Garlick’s Arch and the various sites in West Horsley. The provision of SANGs (Suitable Alternative Green Spaces) will not stop dog walkers, cyclists and general leisure users going to the protected heaths when those heaths are nearby to an increased population should the Plan be adopted.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Various Sites along the A3/A31 Corridor: I OBJECT not only to site A35 mentioned above but the various other sites that have been proposed along the A3/A31 corridor. These, apart from the brownfield site at Slyfield, are all on open agricultural land currently in the Green Belt. The destruction of swathes of Green Belt and open countryside when brownfield sites in the current urban envelope are available is wholly contrary to the NPPF guidelines. It will mean there is continuous built up land from Junction 10 of the M25 to the North East of Guildford to the junction of the A3/A31 to the South West at Blackwell Farm. There can be no justification of “exceptional circumstances” to cut into the Green Belt and countryside in this way.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** pslp171/2406  **Respondent:** 8708289 / Frances King  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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**Comment ID:** pslp171/2405  **Respondent:** 8708289 / Frances King  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Green Belt

I object to the claim that West Horsley and a further 13 villages are "now inset in the Green Belt" under Green Belt Policy P2 (4.3.13).

Guildford Borough Council merely proposes that this should happen. The villages remain in the Green Belt until a decision on the proposal by the Inspector. The wording in your document is incorrect.

I object to there being no changes are being proposed since the 2016 consultation to the insetting West Horsley and the further 13 villages listed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
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<tr>
<th>Comment ID: PSLPA16/3589</th>
<th>Respondent: 8708545 / Nigel Wicks</th>
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<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the proposed Infrastructure Schedule (Appendix C)

The Infrastructure Schedule sets out the key infrastructure requirements on which the delivery of the plan depends. For each of the Key Allocated Sites in the borough it identifies infrastructure projects that are required, except for Garlick’s Arch (A43) which is not mentioned. It is clear that the Plan takes no account of the infrastructure required for this site and is therefore not fit for purpose.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: PSLPA16/3590</th>
<th>Respondent: 8708545 / Nigel Wicks</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough. It is too high because of

- The critiques of the SHMA submitted by Councillor Reeve and the Guildford Residents’ Association. They provide compelling justification for materially reducing the proposed
- The National Planning Policy Framework allows the overall housing target to be reduced to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have ignored these factors

Moreover the Plan’s proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the borough. This is over double the previous figure of 322 used in previous plans. The SHMA report methodology is apparently based on commercially confidential modelling assumptions that are not publicly available for checking or review. For such an important public decision, this runs counter to all democratic principles of accountability and is totally unacceptable

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/6889  Respondent: 8708545 / Nigel Wicks  Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A25

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to Policy A25 - proposals for Gosden Hill Farm.

The Green Belt at this point serves the important function of separating West Clandon from the edge of urban Guildford. Development here will cause the two to coalesce defeating one of the objectives of the Green Belt. If this development proceeds there is a grave risk that the narrow strip of Green Belt remaining between Guildford and Clandon at this point will be too narrow and will come under further pressure for development.

It would represent an undesirable ribbon development along the A3. It will be highly visible from the A3 when approaching Guildford and will, in conjunction with A43a at Garlick’s Arch give the appearance of almost continuous development from Send through to Guildford.

The Plan puts forward no compelling evidence that exceptional circumstances exist to justify removing this site from the Green Belt.

I object to the proposal for a link road to bring traffic from the Gosden Hill development to the proposed 4 way junction at Burnt Common. This has the potential to generate large volumes of traffic (including commercial vehicles) on the A247 through West Clandon - a road which is already under traffic stress (see below).

The development will generate in the region of 6,000 vehicles which will pour on to the A3 which is stationary every day during rush hours. The linking of the A3100, B2215 and A247 would channel thousands of cars through the narrow, winding road through West Clandon, a road where large lorries mount the pavement virtually every day and through Send and Ripley which are also severely constrained.
If the Strategic Sites are developed, the north of Guildford will deliver 36%, 5,036 houses towards the total of around 14,000. The infrastructures of the existing villages and the A3 will be overwhelmed by the scale of development.

A new on-slip at Burpham would only be 1.8km from the on-slip at Burnt Common which is against Highway England’s requirement of 2km.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/6890  Respondent: 8708545 / Nigel Wicks  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The site was inserted in the draft plan at a late stage just before publication of the draft without proper consultation. The site is not a sustainable site being far from any infrastructure facilities and transport links. The bus service is infrequent and it is almost certain any future residents will rely almost entirely on cars for journeys. Similarly any employees at the employment areas will almost undoubtedly arrive and leave by car.

The Green Belt at this point serves the important function of separating West Clandon from Send. Building here will cause the two to coalesce defeating one of the objectives of the Green Belt.

I have seen no evidence that exceptional circumstances exist to justify removing this site from the Green Belt or that this important issue has been addressed. The Green Belt and Countryside study did not even consider this site.

The A247 running south past this site through the centre of West Clandon is already very heavily used whilst being unsuitable for designation as an A road. In places it is too narrow for two lorries to pass causing them to mount the pavement- often at speed. It has narrow bends with poor sight lines, an primary school and a hump-backed bridge concealing the entrance road to the station for southward traffic. In addition, there are no continuous footpaths which forces pedestrians to cross and re-cross the road. Development at Garlick’s Arch will only exacerbate the problem and make the road even more congested and unsafe for pedestrians.

Taken together with the development of the Gosden Hill site, the outcome would be a ribbon of development along the A3 in contrast to the current “soft” edge approach to Guildford.

There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).

I object to the inclusion of the land for new on/off ramps at Burnt Common (A43a)

The addition of north facing ramps to the A3 at Burnt Common would do great environmental damage to local communities. There is no significant requirement for local traffic to access the A3 to the north. The addition will draw in a huge amount of ‘through’ traffic.

The route from London/M25 to Woking or would now be through Burnt Common and Send. Equally traffic from the east of Guildford (Merrow etc) and the A25 will now go through West Clandon and Burnt Common. This will cause immense damage to those areas on small roads which cannot be improved.
This Plan does not address the needs of local communities or the Borough in this regard. There has again been no Section 18 consultation on this proposal.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPP16/15021  **Respondent:** 8708545 / Nigel Wicks  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the damage to the historic environment as a result of the scale of the proposed development (Policy D3).

I object to the local plan based on the impact it will have on the special countryside of the borough.

The proposed development at Garlick’s Arch (A43) will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPP16/15035  **Respondent:** 8708545 / Nigel Wicks  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy D4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to Policy D4 - Development in urban areas and inset villages

The policy should place much greater emphasis on residential development in the existing urban centres. In this way housing needs can be met without resorting to large developments in the Green Belt. There are urban areas in need of regeneration but these are ignored in favour of Green Belt development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
**Comment ID:** PSLPP16/15020  **Respondent:** 8708545 / Nigel Wicks  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

I object to the sustainable employment policy (Policy E1)

I object to the inclusion of a strategic employment site at Gosden Hill Farm. Employment sites should be concentrated on previously developed land in more sustainable locations with good transport links where the infrastructure can support development. Warehousing, distribution and industrial premises cause considerable commercial traffic, noise, pollution and general disruption. They are not good neighbours for schools and 2000 houses. Many of the jobs will be taken by people outside the area leading to additional congestion in Burpham and on the A3.

I object to the inclusion of a strategic employment site at Garlick’s Arch. It is in a non-sustainable location remote from any facilities of any kind and with poor public transport links. It is unlikely jobs there will be taken by local residents and it is likely all travel to and from work will be by car adding to local congestion. Employment sites should be concentrated on previously developed land in more sustainable location with good transport links where the infrastructure can support development.

The site is in any event subject to frequent flooding and unsuitable for development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** PSLPP16/15036  **Respondent:** 8708545 / Nigel Wicks  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E6

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

I object to Policy E6 - The leisure and visitor experience.

The policy should acknowledge that whilst in some areas new and enhanced leisure facilities are valuable (for example the new Opera House at West Horsley Place), much tourism depends on the undeveloped nature of Green Belt areas surrounding Guildford. Accordingly the policy should recognize that in many rural areas new and enhanced visitor facilities may be unnecessary and counterproductive, particularly away from existing buildings and development. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment. Heritage sites and the Green Belt are particularly vulnerable to harm.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: PSLPP16/15032  Respondent: 8708545 / Nigel Wicks  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E7

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to Policy E7 Guildford Town Centre

There should be a much greater focus on residential use of the town centre where many people would like to live and where the necessary amenities and infrastructure exist. There is an urgent need for a strategy to focus on brownfield redevelopment before considering development outside the existing urban area. The policy misses the opportunity to propose forward looking sustainable residential development plans in, for example the Walnut Tree Close area, where very significant numbers of new homes could be provided. Such town centre sites could meet much of the housing need over the plan period without harming the countryside.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15031  Respondent: 8708545 / Nigel Wicks  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to Policy H1 – Homes for all.

Numbers aside, the policy in the blue box states that the Council will encourage building over the plan period. It fails to set rules on important issues such as constraints and density, and is not sufficiently specific to provide a practical framework for planning decisions.

The housing mix is based on out-of-date, pre-Brexit projections and on assumptions set out in a flawed SHMA that has not been scrutinised or evaluated.

I support higher density development in the urban area, without resorting to dehumanising, high-rise buildings that developers commonly claim are necessary for financial viability. Much of Guildford town could usefully be regenerated with 4-5 storey blocks with landscaping and underground parking, as often seen on the Continent and, recently, in London.

Student accommodation should be provided by the University and the other higher education bodies for 100% of new students and more than 60% of existing students. This would free up ideal family accommodation in the urban area. I understand that other university cities insist on higher percentages than those proposed in the plan. It is not appropriate to release Green Belt land to house students who could be accommodated on the Surrey campus or other university sites. The plan should take account of the university's ability to house its own students and reduce the housing number accordingly.
Guildford borough has already a higher proportion of traveller sites than most comparable boroughs. Over-provision is inappropriate given other constraints.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15024  Respondent: 8708545 / Nigel Wicks  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object because of the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1)

Our villages are already suffering from severe congestion for much of the day, for example the Newark Road & Rose Lane junction in the centre of Ripley and the A247 through West Clandon. The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads. Many of the country lanes around the villages of Ripley, Send and Clandon are narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are already in a poor condition as a result of insufficient public funds for their maintenance and renewal.

I object to the development proposed in the local plan. It will result in more traffic using these narrow roads and a further deterioration in the road surfaces.

With some 5,000 houses being proposed close to the village of Ripley, the roads serving the village will become even more congested. Cycling has become an ever popular past time, particularly at weekends hundreds of cyclists past through the villages on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road accidents involving cyclists as a result of the development proposed under the local plan.

The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the road becoming ever more dangerous for pedestrians.

The Council has a statutory obligation to protect the public and the additional traffic flows will bring added accidents, noise, pollution and injury of the public. In the case of West Clandon the Street often only has a narrow footpath on one side of the road rendering it dangerous, especially when vehicles mount the pavements.

The borough’s infrastructure is already heavily strained. Yet the plan’s determination to build large housing estates across the Guildford countryside significantly increases the need for infrastructure investment without securing the means for its provision. Placing housing in the established urban areas would reduce the need for enhanced infrastructure as would a more realistic housing number.

The policy wording is silent about roads and traffic. The Council’s methodology for assessing traffic congestion - averaging it over periods of several hours, ignoring the effects of junctions and understating peak demand - hides the problem, which will worsen as development proceeds. The schemes referred to in this policy will not solve existing congestion and the local road network has not been given sufficient consideration. Some proposed development locations would require highway schemes that are unlikely ever to happen.
Adequate infrastructure provision is a pre-condition of sustainable development. But in this plan it is an afterthought buried away in Policy I1. By prioritizing green field over urban, brownfield regeneration, the plan creates insurmountable (and unnecessary) obstacles for itself. This plan, however, assumes infrastructure will be provided housebuilding without providing evidence that it is likely to materialize. It makes implementation critically dependent on providers outside the Council’s control and on the vagaries of Community Infrastructure Levy (CIL) income. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.

Despite the Garlick’s Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents’ in the locality will see their quality of life significantly deteriorate in many ways:

- Many of the utilities in the Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers. Without commitments to improve these services, there should be no development of the Garlick’s Arch site.
- Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are already at capacity and suffering from funding cuts or freezes. Any further development without funding will place further stress upon existing health services.
- Police services are seeing funding reduced. The development of the proposed 13,860 homes during the plan period will stretch the police services further and is unsustainable.
- There is no provision of the increased capacity of Guildford hospital.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15027  Respondent: 8708545 / Nigel Wicks  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object because of the congestion that development will cause to the trunk roads, A3/M25 (Policy I2)

Significant improvements to the road infrastructure are like to be many years away even if they ever happen. The draft plan, however, commits to building massive housing estates in the countryside before any of these road improvements are in place. This is inappropriate and will lead to massive traffic disruption during the construction phase and will add permanently to an already congested network (about 3,000 private cars from the 2,100 new homes at Wisley Airfield alone).

Road infrastructure represents a major constraint that should have been applied to the housing target at a much earlier stage in the plan process and not left as an unresolved difficulty in the draft plan.

There is no certainty that either the A3 or M25 in the borough will be improved to increase capacity and reduce congestion during the Plan period. Highways England has no plans to even examine improving the A3 before 2020. I have considerable concerns that development of the large residential sites identified at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), would take place before any improvements are made to the trunk road network. The A3 &
M25 are already at capacity during peak hours and any development prior to improvement of these roads will make the situations worse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPP16/15028  **Respondent:** 8708545 / Nigel Wicks  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

I object because of concerns about poor air quality (Policy I3)

Paragraph 4.6.27 of the Plan states that “Development must also mitigate its traffic impacts, including its environmental impacts and impacts on amenity and health.” The significant level of development being proposed, particularly in the north east of the borough, will lead to considerable further congestion, despite any attempts to mitigate this through travel plans. This will be particularly acute in built up residential areas and will only lead to greater levels of air pollution, which will have a detrimental effect on local residents and their health.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPP16/15018  **Respondent:** 8708545 / Nigel Wicks  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

I object to not protecting the Green Belt (Policy P2)

This policy does not sufficiently safeguard the Green Belt even though Green Belt constitutes 89% of the borough and should be the cornerstone of all local planning policy.

The Green Belt should be protected in perpetuity, but Policy P2 seeks to justify excessive development in supposedly protected areas. It is meretricious to argue, as the Council does, that the Plan would involve the loss of “only” 1.6% of the borough’s Green Belt. Leaving aside the reliability of that statistic, the NPPF does not set an “acceptable” percentage. The fact remains that the plan proposes that 65% of the housing plus industrial development be built on land to be taken out of the Green Belt.
Paragraph 4.3.16 states that the Council considers that exceptional circumstances exist to justify amendment of Green Belt boundaries. The exceptional circumstances are not identified. It is clear from national guidance that unmet housing need is not on its own an exceptional circumstance. Even to the extent that exceptional circumstances exist, these have to be balanced against the harm to the Green Belt in the specific sites proposed to be taken out of the Green Belt.

No evidence is put forward to suggest that this balancing exercise has been done. The Countryside Study does not meet the need to demonstrate the exceptional circumstances required to justify removal of areas from the Green Belt, nor carry out the balancing exercise needed to determine whether specific exceptional circumstances justified removal of specific areas of land from the Green Belt. Each of the identified Green Belt sites proposed to be removed from the Green Belt should be carefully assessed against any exceptional circumstances in deciding whether it should be removed from the Green Belt in the final plan. This exercise should bear in mind that housing need in itself is not an exceptional circumstance and nor is the Council’s growth aspiration. An important consideration is that more housing need could be met on urban sites than is currently planned.

To “inset” two-thirds of the borough’s rural villages on the grounds that they no longer contribute to the purposes of the Green Belt is implausible, given the borough’s location on the edge of Metropolitan London.

In addition I object to the proposals to remove from the Green Belt the so called ‘strategic sites’ of Wisley Airfield (A35), Gosden Hill Farm (A25) and Garlick’s Arch (A43) and all other strategic sites. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these sites and villages (as mere housing need does not constitute a ‘special circumstance’) to be taken from the Green Belt. Once taken from the green belt they will be lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached.

GBC’s Green Belt & Countryside Report does not address Garlick’s Arch and so provides no evidence base to support inclusion of this site. Nor was there adequate public consultation before that site was included in the proposals.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
materially since the Council received 20,000 objections to its first draft plan in 2014. There is scant evidence that the Council has given thorough consideration to the constraints, particularly the lack of infrastructure. Nor is evidence put forward that exceptional circumstances justify development on green field sites.

The housing needs assessment is flawed in various respects and overstates housing need. In addition, since it was produced, the Brexit decision has almost certainly reduced future housing need and rendered the previous assessment seriously out of date. As a result any assessment of Green Belt sites which took place to consider whether “exceptional circumstances” existed to outweigh the harm to the Green Belt was based on false premises and should consider constraints before determining the housing number.

Even if having properly applied constraints, specific Green Belt sites should not be included in the plan unless “exceptional circumstances” for development are proven in relation to that specific site, as stipulated repeatedly in the NPPF. There needs to be a specific balancing exercise conducted on each Green Belt site weighing the harm to the Green Belt against the special circumstances which are argued in favour of development at that particular site. There is no evidence this has been done.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15013  Respondent: 8708545 / Nigel Wicks  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to this Policy as the development proposed will not be sustainable (Policy S1).

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact on existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed.

Policy S1 is seriously deficient in making no mention of the Green Belt. The Green Belt is a long term Government policy enshrined in primary legislation to protect green areas in perpetuity.

Policy S1 should include a commitment to protect the Green Belt from inappropriate development and to uphold Green Belt boundaries and protections. This would set at least one clear boundary to planning decisions. Over 60 percent of the proposed housing would be in the Green Belt. The commitment to approve planning applications “wherever possible” and “without delay” is prejudicial. Countervailing references to sustainability are so vague that the National Policy Planning Framework (NPPF) presumption in favour of sustainable development becomes a presumption in favour of any development at all.

The strategic sites of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill Farm (A25) are in unsustainable locations. These sites are also unsuitable since they will not be supported by sustainable access transport. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. There are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater
consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided at much lower cost.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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Comment ID: PSLPP16/15011  Respondent: 8708545 / Nigel Wicks  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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I write to object to the Guildford Borough Proposed Submission Local Plan (June 2016). I set out below my objections to specific policies and matters within the Plan.

First, let me say that I believe that the scale of development envisaged in the Plan is not in the national interest. There is considerable agreement that economic development in the United Kingdom is unhealthily skewed towards the south east of the country. The proposals in the Plan would intensify such development. It is in the interests of the country at large that development in our region should be restricted so as to provide incentive to take place in other regions less favoured than ours. I therefore object to the scale of development envisaged in the Plan and ask for it to be materially reduced.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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Comment ID: PSLPP16/15016  Respondent: 8708545 / Nigel Wicks  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to the Borough Wide Strategy (Policy S2).

The borough wide strategy is poorly considered. It proposes 13,860 housing units being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from that of all the other Borough Councils in Surrey. No justification is given for this differentiation.

The housing number is based on pre-Brexit data for economic and population growth, including migration. This number needs to be revised downwards.

The critiques of the Strategic Housing Market Assessment (SHMA) submitted by Councillor Reeve and by the Guildford Residents’ Association provide compelling justification for materially reducing the proposed number.

As a result of the juxtaposition of Guilford with Woking, Guildford residents are effectively being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

The Plan in general and this policy in particular does not address the fact that Guildford exists as part of London's commuter belt. The Plan also ignores the fact that many of those working in the area live elsewhere. Accordingly in considering the housing number the Plan should take into account that in this part of London’s commuter belt, demand for housing is, in practical terms, unlimited.

It is unreasonable to embark on a radical transformation of the borough on the basis of this unclear housing target. Most of Guildford Borough is highly protected from development (89% Green Belt, 44% AONB and about 75% protected by SPA). This would be a major and irreversible change, arguably turning a largely rural borough into a mainly urban or suburban. The needed housing should be provided by concentrating development on urban brown field sites and by increasing the housing density of existing built up urban areas.

The scale of the housing number increases the onus for it to be seen to be sound. A substantially lower number, on the other hand, would remove the need to build on Green Belt or open countryside, and instantly meet the single biggest public objection to the plan as a whole.

The development of 13,860 homes in the Plan period with 65% in the Green Belt does not constitute sustainable development. It will have a permanently detrimental impact on the Borough in general and on West Clandon and surrounding area in particular. The developments at Garlick’s Arch and Gosden Hill Farm do not meet the needs of the local communities. The road infrastructure in and around West Clandon will be unable to cope with additional demand. The edge of urban Guildford will creep that much closer to West Clandon, thus negating the purposes of the Green Belt in the area which include safeguarding the countryside from encroachment, checking the unrestricted sprawl of large built up areas and preventing neighbouring towns merging into one another.

The strategy adopted in the Plan represents disproportionate development in the north east of the borough as a result of the allocation of Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill Farm (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Currently these three Wards represent only about 11% of the existing housing in the borough and are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. This would result in the coalescence and a merging of identities of the surrounding villages. In short, the Plan is unbalanced and does not reflect the current spread of housing across the borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp173/778  Respondent: 8708545 / Nigel Wicks  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Appendix C: Infrastructure Schedule
I object to the reliance of the Plan (Policies SRN 2, 3, 9 and 10) on the change of responsibility for the provision of funds for infrastructure, especially transport infrastructure, to developers and public agencies such as Highways England and Surrey County Council. In the former case developer funding provision will undermine the requirement to provide forty percent affordable housing and in the latter case the budgets of such public agencies, both as to their quantum and allocation, are totally outwith the control of the Local Authority.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/4258  
Respondent: 8708545 / Nigel Wicks  
Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A25

I object to Policy A25 Gosden Hill Farm with its new aspiration to build approximately 2,000 homes of which a minimum of 1,700 homes will be delivered within the plan period, for the reasons set out in the submission of West Clandon Parish Council.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/2573  
Respondent: 8708545 / Nigel Wicks  
Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy E1

I object to Policy E1 the Open Barn at Horsell with its new aspiration to build approximately 800 homes of which a minimum of 1,700 homes will be delivered within the plan period, for the reasons set out in the submission of West Clandon Parish Council.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to site Policy E1 Burnt Common, which has now become a ‘Strategic Employment Site’ for the reasons set out in the submission of West Clandon Parish Council. As a consequence of the change, the overall burden on West Clandon, in terms of traffic and congestion, of the proposed minimum (my italics) of 7000 sq m of industrial space is greater than the now deleted up-to (my italics) 7000 sq m from the neighbouring site A43 Garlick’s Arch. This is a net gain in traffic and congestion in this area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp171/2571  Respondent: 8708545 / Nigel Wicks  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the fact that in Policy S2 the reduction in numbers is mostly in the area of Normandy/Flexford. As a consequence the burden of development falls even more disproportionately on the East of the borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp17q/67  Respondent: 8708545 / Nigel Wicks  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Question 1: The evidence base and submission documents

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (No)

The population basis do not take account of the prospective decline in economic prospects as a result of BREXIT. The assumptions about student numbers appear to assume a large proportion of students will remain in the borough after graduation rather than move elsewhere, as is more likely.

More generally, I object for the relevant reasons in the submissions attached of the East and West Clandon Parish Councils.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents: West Clandon_Local_Plan_2017_Response.docx (35 KB)
Response East Clandon Parish Council to Local Plan Consultation 2017 14.7.17.pdfv2.pdf (577 KB)
**Comment ID:** pslp17q/460  **Respondent:** 8708545 / Nigel Wicks  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Question 1: The evidence base and submission documents

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the evidence base as it applies to Policy S2; because it fails to reflect the deterioration in national economic prospects as a result of the EU Referendum and thus overestimates the need for the provision of housing numbers; because it assumes that a high proportion of students will remain in the borough after graduation rather than is most likely moving elsewhere; and because it encourages development in the South East when it is declared government policy for development to be balanced throughout the country and especially in the northern English regions.

I object to the proposed changes to the plan and evidence produced or updated since 18 July 2016, for all the relevant reasons set out in the submissions of the East and West Clandon Parish Councils.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** pslp17q/461  **Respondent:** 8708545 / Nigel Wicks  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Question 2: Legal Compliance

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (No)

I object to the proposed changes to the plan on the basis that they are not legally compliant since they are in conflict with the framework stipulation in paragraph 87 of the NPPF which states

“As with previous Green Belt policy, inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances.” (Policy P2, P3, E5).

It is relevant here that, according to the Guildford Green Belt Group, 70% of new housing will be in countryside and 58% of this is on Green Belt (Gosden Hill, Wisley, Blackwell Farm).

The Plan does not provide evidence of the exceptional circumstances, which would justify this use of Green Belt land. Nor does the Plan justify the exclusion of further development in brown belt and urban areas sites. More such sites should be included to make the Plan legally compliant.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
**Comment ID:** PSLPS16/260  **Respondent:** 8708609 / Alistair Calder  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A38

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The Nature Reserve at Manor Farm is inaccessible and tucked away at the back of it. Few even know of it and is mostly used by dog walkers that live nearby. That is not a Nature Reserve.

It is a small and unattractive piece of land deliberately created by the landowner to defeat the lack of SANG between Ripley and Effingham Commons. I Object to its inclusion as SANG on the grounds that it is ineffective as a nature reserve, little used and with limited access.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** PSLPS16/876  **Respondent:** 8708897 / Richard Cunningham  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A46

Do you consider this section of the document; complies with the Duty to Cooperate? ( Yes ), is Sound? ( No ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

- **Statement of objection.**
  - Despite having concerns at the lack of scrutiny by GBC as to how the Objectively Assessed Need figure for the Local Plan has been derived, I acknowledge the need for and support some development throughout the borough.
  - However, **Object** to the large scale ‘strategic’ development proposed at Policy A46 which I consider to be inappropriate. Notwithstanding that I am a resident in Glaziers Lane who would be directly affected by the proposed development; I have tried to remain objective in the points of objection made below.

- **‘Developer led’ policy for site A46.**
  - Cllr Spooner, leader of GBC, stated during his visit to a residents meeting in Normandy on 3 May 16 that the previously proposed ‘safeguarded’ A46 site was to remain ‘red’ in the 2016 Local Plan.
  - This meant that the site was within the Green Belt, was a sensitive area contributing to the openness and permanence of the Green Belt and would therefore not be built upon. This apparently unless a developer proposed building a school on the site. So in other words, this has now become a ‘developer led’ site.
  - I contest that the building of a secondary school is an ‘exceptional circumstance’ enough to bring Normandy out of Green Belt status.
  - The Local Plan should not be 'developer led'.

- **No ‘early and meaningful engagement’ with the local community.**
There has been no ‘early and meaningful engagement’ with the residents in Normandy regarding the proposed development at A46. Its appearance in this Local Plan is the first that I have learnt about it. This runs contrary to NPPF 155 which states that this engagement is essential.

It is clear that GBC and the developer, Taylor Wimpey, have been in discussion about the site as far back as at least 2014. See attached Taylor Wimpey plan dated September 2014 obtained subsequent to the Local Plan’s publication through a Freedom of Information request. There has been no consultation with residents between 2014 and the issuing of the Local Plan.

The proposed development of 1100 homes on site A46 would ‘double’ the size of the village, thereby removing all of Normandy’s current characteristics of community and charm.

I chose to live in Normandy for its openness, rural peacefulness and access to the countryside. I am unconcerned about the lack of food shops or a pub within the village; I accept that facilities such as these thrive or die in a competitive market and with availability through the internet. Although these facilities used to exist in the village market forces have determined otherwise.

Rather than a large proposed development on a single site within an existing community, why does the Local Plan not propose to spread the need for development more equally across the whole borough? This would reduce the significant impact it will have on communities and share development within all parishes.

- **Need for a secondary school in Normandy**
  - There is no evidence within the Local Plan or supporting documents to suggest that a secondary school is required in Normandy.
  - Surrey County Council has not declared that there is a requirement for such a school in Normandy.
  - With no requirement for a school there is no requirement for 1100 homes.
  - If only 1FE of this new 7FE school is anticipated coming from Normandy (Appendix C - SED3) then the school could also be built elsewhere. This could be at Blackwell Farm which was recommended during the 2014 Local Plan process.
  - Local children from Normandy already travel by train from Wanborough to Guildford for secondary school.

- **Inadequate infrastructure to support proposed development**
  - General points:
    - There is no evidence that, given the existing national shortage of funding that exists for current infrastructure projects, any of the proposed infrastructure requirements identified in this Local Plan would be met.
    - The Local Plan should state quite categorically that without guaranteed funding for the entire infrastructure plan required to support a development of this scale, the development should be not go ahead.
  - There is no evidence within the Local Plan that the proposed changes to infrastructure would ameliorate a road system in Normandy that is at times already working to capacity (Appendix C - LRN 17, 18 and 19 refer).
  - Glaziers Lane is a busy rural ‘D’ class minor road (D60) with a recognised speeding issue. As well as local traffic, it takes traffic to and from the Hog’s Back via Wanborough Hill. Given the adjacency of housing to the road, there is little opportunity to change the width or direction of the carriageway. The footpath running up the Lane has to change sides in two places. This lane would therefore not contribute to safe, sustainable travel and access to the site given the likely increase in traffic.
  - The bridge over the railway in Glaziers Lane and tunnel under the railway in Westwood Lane are hazardous places at the best of times. The road over the ‘blind’ bridge in Glaziers Lane has an unnerving hump in the road to the south side and the tunnel is single file traffic with a narrow pedestrian walkway. With the increase in traffic that this proposed development would bring, no consideration seems to have been given to improving these bridges for the safety of road users and pedestrians, let alone ease of access to the site.
  - I consider that the proposed development would have a significant impact on the village resulting from commuter vehicle noise, pollution, and congestion and that this has not been recognised. Site traffic during development would exacerbate this situation.
  - **Other considerations.** I am also concerned that other infrastructure requirements would be looked over at the point of planning application because of a shortage of funding.
    - **Sewerage.** Rainwater run-off already causes significant disruption to residents with sewers backing up into properties and onto roadways. The main sewer pipe in Glaziers Lane is an
old six inch diameter pipe and would not be capable of handling the demands from any further development.

- **Flooding.** The site area, being on a clay based soil, has regularly become either flooded or susceptible to flooding for up to six months of the year. I am concerned that despite with the best intention of including a SuDS (Appendix C - FRR5) on site that this would not be effective enough for the whole site and that locally there would be areas of increased flooding.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents: [2516_101_A_Concept_Masterplan.pdf](2516_101_A_Concept_Masterplan.pdf) (5.6 MB)
1. The housing needs assessment is flawed in various respects and overstates housing need. In addition since it was produced, the referendum Brexit decision has almost certainly reduced future housing need and rendered the previous assessment seriously out of date. As a result any assessment of Green Belt sites which took place to consider whether “exceptional circumstances” existed to outweigh the harm to the Green Belt was based on false premises and should be reconsidered.

2. Having determined housing need the Council was entitled to consider constraints before determining the housing number. I believe that as well as being entitled to do this the Council was required to give proper consideration to constraints. The scarcity of sites outside the Green Belt as well as infrastructure (most notable roads) considerations all represented constraints which should have been taken into account in determining the final housing number. Accordingly in this regard our objection to the allocation of Green Belt sites is twofold. First I believe constraints should have been applied. Secondly I believe the Council did not properly consider constraints and that their decision making process was flawed and thus subject to being set aside by the Inspector.

3. Even if having properly applied constraints there is a need to develop in the Green Belt then specific Green Belt sites should not be included in the plan unless “exceptional circumstances” for development are proven in relation to that specific site, as stipulated repeatedly in the NPPF. The Green Belt should trump short-term considerations such as perceived housing need, as case law has established. There needs to be a specific balancing exercise conducted on each Green Belt site weighing the harm to the Green Belt against the very special circumstances which are argued in favour of development at that particular site. There is no evidence this has been done. Instead the council have appeared to say that having chosen a housing needs figure and decided it cannot be met without building on Green Belt then there is no need for any further consideration and any convenient Green Belt site can be allocated for building at will.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/1166  Respondent: 8709249 / Geoff Spink  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. APPENDIX D

I OBJECT to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)

- The “objectively assessed need” figure of 693 homes a year is too high.
- A professional review by NMSS has concluded that, even basing the calculations on a period of stronger economic and student growth, the housing need figure should be revised down to 510 homes a year and the method changed to consider student housing need separately due to the distorting effects.
- The current SHMA inflates the proposed housing figure due to
  - failure to correct for errors in the historical data for international migration flows,
  - issues with the way it considers students and affordability and
  - flaws in the method for estimating the number of homes needed to support job growth.
- It is unacceptable that demographic and economic model assumptions have been withheld and cannot be checked making the process unaccountable.
The Plan’s proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the borough, it is over double the previous figure of 322 used in previous plans. The SHMA report methodology is I believe inaccurate; it inflates the needs of the borough by distorted student numbers. However, it is based on commercially confidential modelling assumptions that cannot be checked or reviewed. There is no transparency to this evidence base and it is therefore impossible to assess its accuracy. This is not democratic and is not appropriate for consultation of the Plan.

The National Planning Policy Framework allows the overall housing target to be reduced to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPS16/2148  **Respondent:** 8709249 / Geoff Spink  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A25

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ( )

1. **POLICY A25 - Gosden Hill Farm**

I OBJECT to Policy A25 with proposals for Gosden Hill Farm.

The Green Belt at this point serves the important function of separating West Clandon from the edge of urban Guildford. Development here will cause the two to coalesce defeating one of the objectives of the Green Belt. If this development proceeds I believe the narrow strip of Green Belt remaining between Guildford and Clandon at this point will be too narrow and will come under further pressure.

It will represent an undesirable ribbon development along the A3. It will be highly visible from the A3 when approaching Guildford and will, in conjunction with A43a at Garlick’s Arch give the appearance of almost continuous development from Send through to Guildford.

The Plan does not put forward any evidence that exceptional circumstances exist to justify removing this site from the Green Belt.

The development will overburden the local road network and increase congestion on the A3 and A247 through the centre of West Clandon. This is already very heavily used whilst being unsuitable for designation as an A road. In places it is too narrow for two lorries to pass causing them to mount the pavement.

Note the following accident data:

2010 –2014 from Crashmap data

- Clandon Cross Roads Area to Bulls Head - 17 incidents
- Bulls Heads Head to Bennett Way - 8 incidents
- Bennett Way to Highcotts Lane - 15 incidents
- Tithebarn Lane to Portsmouth Road Birch Close - 8 incidents
2015

- 21 Oct 2015 – A247 near shell garage - Three vehicles collided causing delays
  Surrey Fire and Rescue deployed.

2016

- 15 April 2016 12 year old boy injured in The Street – A247 closed in both directions
- 28 April 2016 A3 West Clandon London bound between A247 Tythebarns Lane (Burntcommon and M25J10 (Wisley Interchange) congestion on A3 to A3100 Clay Lane Burpham
- 30 June 2016 Motorcyclists with injuries airlifted to hospital Send Marsh Road

Attempts have been made over many years to reduce traffic, traffic speeds and accident risks through West Clandon, however little has been achieved as the road cannot be widened and SCC is reluctant to impose further speed limits as congestion is already very high.

I object most strongly to the proposal for a link road to bring traffic from the Gosden Hill development to the proposed 4 way junction at Burnt Common. This has the potential to generate large volumes of traffic (including commercial vehicles) on the A247 through West Clandon - a road which is already under traffic stress (see below).

The land in Gosden Hill does exactly what the Greenbelt was designed to achieve. It provides a green buffer between the Guildford Urban Area and West Clandon, gives Burpham a defined green boundary and breathing space and it hides Guildford town from visitors until they pass the off-slip to Burpham.

No exceptional circumstances have been demonstrated for building on this site and therefore it does not comply with paragraphs 87-89 of the NPPF. It stops the sprawl of Guildford town, assists in safeguarding the countryside from encroachment and assists in urban regeneration by encouraging the recycling of derelict and other urban land. All of these are requirements of the NPPF.

The scale of Gosden Hill is out of proportion to West Clandon. It would have four times the amount of housing plus shops, offices/factories, GP surgery, schools. Development on this scale would blight a historic village with a history going back to the doomsday book and beyond.

Gosden Hill is the most obvious location for the north end of an A3 tunnel. It has rising ground and is situated just before the urban area. If it is built on, it will be very difficult to construct a tunnel.

The development will generate in the region of 6,000 vehicles which will pour on to the A3 which is stationary every day during rush hours. The linking of the A3100, B2215 and A247 would channel thousands of cars through the narrow, winding road through West Clandon, a road where large lorries mount the pavement virtually every day and through Send and Ripley which are also severely constrained.

The volume of traffic will greatly increase air pollution which is particularly critical given the proposal to build two schools.

Currently, a two way junction at the site would require vehicles wanting to go north on the A3 to go through Burpham which is grid-locked every day.

Burpham’s sewers are at capacity. Sewage would have to be pumped to Slyfield for processing, a project of enormous cost.

There is inadequate fresh water in Guildford and current supplies could not meet the needs of a development of this size.

Electricity supply is also inadequate and would require a big infrastructure development.

The railway station was rejected by Guildford Borough Council in 1984 because it feared Gosden Hill would become a dormitory estate for London.
The wording of the Local Plan with regard to Gosden Hill is so loose that the developer could virtually do whatever it wants.

The remaining agricultural land between Gosden Hill and West Clandon is so small that it is highly likely to be uneconomic and therefore a prime candidate for further development which would roll the Guildford Urban Area over West Clandon towards East Clandon and Wisley.

If the Strategic Sites are developed, the north of Guildford will deliver 36%, 5,036 houses towards the total of around 14,000. The infrastructures of the existing villages and the A3 will be overwhelmed by the scale of development.

A new on-slip at Burpham would only be 1.8km from the on-slip at Burnt Common which is against Highway England’s requirement of 2km.

Development of the A3 at best will not start until after 2020 and the building of a tunnel, which is only an “aspiration” in the Local Plan, is likely to be many years after. In the meantime given that developers build houses to provide cash-flow for infrastructure, Gosden Hill will have a crippling effect on villages like West Clandon and the A3.

Gosden Hill already has surface water problems. Merrow Stream crosses the site. No hydrological survey has been carried out to assess the implications. Electricity pylons run through the centre of Gosden Hill which have health and safety issues.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPS16/2149  **Respondent:** 8709249 / Geoff Spink  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ()**

1. **POLICY A43 AND A43a – Garlick’s Arch**

I OBJECT to Policy A43 and A43a on Garlick’s Arch.

The site was only inserted in the draft plan at a late stage just before publication of the consultation draft which is a shabby way for the Council to proceed. The site is not a sustainable site being far from any infrastructure facilities and transport links. The bus service is infrequent and it is almost certain any future residents will rely almost entirely on cars for journeys. Similarly any employees at the employment areas will almost undoubtedly arrive and leave by car.

The site is susceptible to flooding and will not make a suitable site.

The Green Belt at this point serves the important function of separating West Clandon from Send. Building here will cause the two to coalesce defeating one of the objectives of the Green Belt.

I have seen no evidence that exceptional circumstances exist to justify removing this site from the Green Belt or that this important issue has been addressed. The Green Belt and Countryside study did not even consider this site.

It is understood the Council's eyes may have been turned by the possibility of receiving for free the land which might be used for new A3 slip roads in return for allowing this development, thus justifying it as some form of enabling development. However the slip road land if needed could be safeguarded in the plan and acquired by compulsory purchase...
when required. Lack of current funding for the slip road is not a justification for allowing the development of this site. If the slip road is genuinely needed then government funding will be available for it. (One of the reasons for turning down the so called enabling development proposal intended to fund the rebuilding of the Howard of Effingham School was that the redevelopment of the school was not essential. As and when it became essential Government funding would become available. Accordingly enabling development was not necessary. The same principle applies here.)

The A247 running south past this site through the centre of West Clandon is already very heavily used whilst being unsuitable for designation as an A road. In places it is too narrow for two lorries to pass causing them to mount the pavement- often at speed. It has narrow bends with poor sight lines, an infants school and a hump-backed bridge concealing the entrance road to the station for southward traffic. In addition, there are no continuous footpaths which forces pedestrians to cross and re-cross the road. Development at Garlick’s Arch will only exacerbate the problem and make the road even more congested and unsafe for pedestrians.

The development will cause harm to the ancient woodland on and by the site.

Taken together with the Gosden Hill site, there will be a ribbon of development along the A3 in contrast to the current “soft” edge approach to Guildford.

Garlick’s Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8). There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).

The Plan states the preference is to making the best use of previously developed land. Yet at the 11th hour a perfectly acceptable brown field site at Burnt Common, capable of accommodating approximately 100 houses, was removed from the Plan and replaced with the Garlick’s Arch site. There was no proper consultation in relation to the inclusion of this site. Why was a brownfield site removed and replaced with a Greenfield site? There is no evidence that Section 18 of the Planning and Compulsory Purchase Act 2004, which requires local planning authorities to produce a Statement of Community Involvement, has been complied with for this site. This only came to light for local residents following a Council meeting on 11th May 2016.

Moreover, Guildford Borough Council’s own Green Belt & Countryside Report does not address Garlick’s Arch at all, so there is no evidence base to support the inclusion of this site.

National Planning Policy promotes sustainable developments, with sustainable transport. With ever reducing bus services in the area and no train station within reasonable walking distance it is impossible for any development on this site to offer a sustainable transport solution. Development on this site is wholly inappropriate (Policy I3).

The stream, which runs through the site, is identified as having a high risk of flooding by the Environment Agency. There are other sites that do not flood that can be developed and therefore this site should be removed from the Plan (Policy P4).

This site is bordered by Ancient Woodland and within it a number of trees are protected by Tree Preservation Orders (Policy D3).

The site has an abundance of wildlife, some of which are protected. It is home to many types of owls and bats, with the woods having cuckoos and woodpeckers. In addition there are regular sightings of badgers, deer and red kites. The development of the site will result in the loss of habitat. No wildlife report has been conducted on the site. (Policy I4)

It is clear that with this site being added at the 11th hours no infrastructure planning has been undertaken. The Infrastructure Schedule makes no provision for any infrastructure improvements for this site. How will the local services such as schools and doctors cope, many of which are already at capacity? (Policy I1)

Furthermore, several electricity pylon runs through the site, which will have the potential to be a health hazard for any residents.

I OBJECT to the inclusion of the land for new on/off ramps at Burnt Common (A43a)
The addition of north facing ramps to the A3 at Burnt Common would be a disaster for local communities. There is no requirement for local traffic to access the A3 to the north, but the addition will draw in a huge amount of 'through' traffic.

The route from London/M25 to Woking or would now be through Burnt Common and Send. Equally traffic from the east of Guildford (Merrow etc) and the A25 will now go through West Clandon and Burnt Common. This will cause immense damage to those areas on small roads which cannot be improved.

This Plan does not address the needs of local communities or the Borough in this regard. There has again been no Section 18 consultation on this.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
1. **POLICY D3**

I OBJECT to Policy D3 - Historic environment

I object to this policy as it is very weak and I do not think it is clear enough in its support for the conservation of the historic environment. It provides for development which will “enhance” heritage assets which I fear is a developer’s charter as it leaves plenty of room for abuse.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** PSLPP16/4509  **Respondent:** 8709249 / Geoff Spink  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy D4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. **POLICY D4**

I OBJECT to Policy D4 - Development in urban areas and inset villages

The policy should place much greater emphasis on residential development in the existing urban centres. In this way housing needs can be met without resorting to large developments in the Green Belt. There are urban areas in need of regeneration but these are ignored in favour of Green Belt development.

The policy should not be applied to the villages which should remain in the Green Belt. Unrestricted application of this policy to the villages intended to be inset will change their characters radically and for the worse. The development it encourages will increase traffic and congestion disproportionately.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** PSLPP16/4498  **Respondent:** 8709249 / Geoff Spink  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
1. **POLICY E1**

I OBJECT to the sustainable employment policy (Policy E1)

I object to the inclusion of a strategic employment site at Gosden Hill Farm. Employment sites should be concentrated on previously developed land in more sustainable locations with good transport links where the infrastructure can support development. Warehousing, distribution and industrial premises cause considerable commercial traffic, noise, pollution and general disruption. They are not good neighbours for schools and 2000 houses. Many of the jobs will be taken by people outside the area leading to additional congestion in Burpham and on the A3.

I object to the inclusion of a strategic employment site at Garlick’s Arch. It is in a non-sustainable location remote from any facilities of any kind and with poor public transport links. It is unlikely jobs will be taken by local residents and it is likely all travel to and from work will be by car adding to local congestion. Employment sites should be concentrated on previously developed land in more sustainable location with good transport links where the infrastructure can support development.

The site is in any event subject to frequent flooding and unsuitable for development.

If developed, the new employment site at Garlick’s Arch, Send Marsh/Burnt Common (A43), would be treated as a Strategic Employment Site.

The proposed development of up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8) at Garlick’s Arch (A43) is in the scheme of industrial development relatively small. Just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m. The Garlick’s Arch site which is in the Green Belt should not be developed as a Strategic Employment Site when there is a suitable alternative brownfield site very close by, which is far more sustainable.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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There is no need for the new employment floorspace to be located at Garlick’s Arch or Gosden Hill Farm, when near to these sites at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/4500  Respondent: 8709249 / Geoff Spink  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. POLICY E5

I OBJECT to the loss of rural employment (Policy E5)

Policy E5 supports the retention and development of local services and community facilities in our inset and identified villages. Yet the development at Garlick’s Arch (A43) would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises. The Plan does not promote rural employment; rather it will result in the loss of existing local rural businesses.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/4511  Respondent: 8709249 / Geoff Spink  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E6

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. POLICY E6

I OBJECT to Policy E6 - The leisure and visitor experience.

The policy should acknowledge that whilst in some areas new and enhanced leisure facilities are valuable (for example the new Opera House at West Horsley Place Towers), much tourism depends on the undeveloped nature of Green Belt areas surrounding Guildford. Accordingly the policy should recognize that in many rural areas new and enhanced visitor facilities may be unnecessary and counterproductive, particularly away from existing buildings and development. For
example the attraction of Newlands Corner is its undeveloped nature. Significant development of visitor facilities there is likely to diminish rather than increase its attractions. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment. Heritage sites and the Green Belt are particularly vulnerable to harm.

Tourism and visitors do not depend on new visitor “attractions” and could actually be damaged by them, as compellingly argued in the current debate over Newlands Corner. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment/“Disneyfication”. Heritage sites and the Green Belt are particularly vulnerable to harm.

Guildford has many “leisure and visitor attractions” already. The case for creating more is not made and no examples are given. Instead, the plan’s explicit priorities should be:

1. To protect the borough’s prime leisure and tourism asset, its countryside, from inappropriate development. This is all the more valuable because of its accessibility from London, the rest of Britain and the Continent, in that order. Rural residents are its custodians and require no Council interference. Economically, the most valuable forms of tourism, such as walking and cycling, require no new development. In the overcrowded South-East of England, lack of development is a leisure and tourism asset, not a liability.

2. To help make Guildford’s river landscape less off-putting and support town-break packages for high-value tourists. To achieve this, the policy needs to define what leverage, if any, Council planners have to influence normal tourism market mechanisms.

3. To help private providers market local tourism. This need not involve extra spending. The Council could, for instance, help co-ordinate ready-made, local tourism packages under a distinctive brand at an all-in price. An “English town break” (including B&B accommodation, a walking tour of Guildford, a pub lunch in the Surrey Hills, a visit to Wisley Gardens and a National Trust property and a Southwest Trains travelcard for a day out in London) would be highly attractive to many European visitors who currently by-pass Guildford to go to Bath, Oxford or Cambridge instead.

4. To rule out the redevelopment of scarce rural hotel sites (e.g. Thatchers, East Horsley, earmarked for 40 new houses under Site A37 of the plan yet just a short walk from the new opera house).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
residential development plans in, for example the Walnut Tree Close area, where very significant numbers of new homes could be provided. Such town centre sites could meet much of the housing need over the plan period without harming the countryside.

There is an urgent need for a strategy to focus on brownfield redevelopment before considering development outside the existing urban area.

The policy does not address any of the major issues raised by the Council’s own Town Centre Master Plan, the Guildford Vision Group’s proposal for new river and rail crossings or plans for the redevelopment of Guildford Station, all of which are already the subject of public discussion.

The policy also fails to provide guidance on design requirements, as required by the NPPF.

The policy and surrounding text concentrates too much on shopping without regard to its nature which risks a proliferation of dull high-street chain stores. The policy should seek to enhance Guildford’s character and encourage a wider variety of small shops including locally owned businesses and shops of use to consumers. (For example there is no butcher in Guildford.)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4505  Respondent: 8709249 / Geoff Spink  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. POLICY H1

I OBJECT to Policy H1 – Homes for all. Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan period. It fails to set rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions.

The housing mix is based on out-of-date, pre-Brexit projections and on assumptions set out in a flawed SHMA that has not been scrutinised or evaluated.

I support higher density development in the urban area, without resorting to dehumanising, high-rise buildings that developers commonly claim are necessary for financial viability. Much of Guildford town could usefully be regenerated with 4-5 storey blocks with landscaping and underground parking, as often seen on the Continent and, recently, in London.

Student accommodation should provided for 100% of new students and more than 60% of existing students, which would free up ideal family accommodation in the urban area. Other university cities (e.g. Oxford) insist on higher percentages than those proposed in the plan. In my view, the Council’s timidity is a case of “regulatory capture” by Surrey University, which has failed to use its existing planning permissions (dating from 2004) to accommodate 3,000 students or to improve the efficient development of its campus (e.g. by building on its extensive and under-used surface car parks). If all students are accommodated in this way, 2,000 homes would be freed up in town and there would be no need to build on the Hog’s Back.
It is not appropriate to release Green Belt land to house students who could be accommodated on the Surrey campus or other university sites. The plan should take account of the university's ability to house its own students and reduce the housing number accordingly.

Guildford borough has already a higher proportion of traveller sites than most comparable boroughs. Over-provision is inappropriate given other constraints.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/4506  Respondent: 8709249 / Geoff Spink  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. POLICY H2

I OBJECT to this policy on affordable homes (Policy H2) on the grounds of feasibility and that it should be more firm and explicit on unviability in paragraph 4.2.40.

In particular a scheme is only unviable if the value of developing the land (including some allowance for development risk and a normal level of profit) falls below the sale value of the land for alternative non-premium uses such as agriculture. The price paid for the land is not relevant. The possibility of avoiding the affordable housing obligation through use of unviability arguments only serves to inflate land values. It will become clear that developments are unviable when developers start selling land for alternative non-development uses.

It should be noted in the plan that because of Guildford's relative popularity as a place to live combined with its location close to others towns and within the London Commuter belt no amount of building will meet demand. Similarly no amount of affordable housing will ever meet demand.

In addition the definition of an ‘affordable home’ is 80% of market value. With even a 2 bedroom flat in Guildford now having a market value of +£360,000 the discounted price is still not going to be affordable to anyone on a normal income.

And at what point will ‘affordable homes’ be able to go onto the market at full market price?

As we have seen with council houses it is not long before the discounted property is sold at full market value with the original owner simply pocketing the profit.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/4510  Respondent: 8709249 / Geoff Spink  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H3
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. POLICY H3

I OBJECT to Policy H3 – Rural Exception Homes as this Trojan horse policy. It says that homes can be built anywhere near a settlement of any form (including agricultural land and the AONB). These homes are meant for people with a village connection, but they could be for anyone on the Guildford borough housing list. To make the housing viable, or to improve the “mix” this can include “market” housing (i.e. normal commercial development which in Guildford usually means large executive homes). This policy means building anywhere, and ignoring all historic planning restrictions.

The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove “exceptional circumstances.”

The wording of the policy is far too wide and drives a coach and horses though all other aspects of planning policy. As drafted the planning authority could be obliged to grant permission for inappropriate and unsuitable developments.

The wording provides no ability to balance the desirability of the development against other considerations including harm to the Green Belt or the AONB. (If the housing would meet identified need and adjoins a settlement under this policy wording permission would have to be granted even in the most sensitive AONB location, even if more suitable locations were available.) The policy should include the need for a balancing exercise including consideration whether more suitable locations exist.

The policy wording should not allow market housing. The ability to include market housing is likely to inflate land values, leading to a self-perpetuating need to include market housing. It may lead to spurious developer led proposals which will be difficult to resist.

The policy wording should define small, either in land size or number of units. I am concerned that if small is left undefined the policy could be used to justify significant developments. In the context of the plan a development of 150 homes might be argued as small. (If Wisley at 2,500 homes is a big development then 500 homes might be a medium development and 150 could be small.)

The policy wording should be restricted to adjoining sites or define the concept of being "closely related". In particular I believe adding the concept of safe and easy walking distance extends the potential radius within which sites will be argued to be “closely related” Many people would regard a mile or so as an easy walking distance. (School children are expected to walk further than that before being eligible for free school travel.)

The wording of the policy itself does not require the local connection requirement for tenants to be secured in perpetuity - only the affordability must be secured in perpetuity. (For example housing could be built for retired Cabinet Ministers under this policy so long as the first tenant was required to have a local connection.) The introduction to the policy mentions this point, but it is not part of the policy itself and may carry little weight at appeal.

The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove “exceptional circumstances.” The size and location of sites should be better defined and it should be clear market housing cannot be included.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
1. POLICY I1

I OBJECT, due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1)

Our villages are already suffering from severe congestion for much of the day, for example the Newark Road & Rose Lane junction in the centre of Ripley and the A247 through West Clandon. The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.

Furthermore, many of the country lanes around the villages of Ripley, Send and Clandon are narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition.

I OBJECT to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces.

Many of the affected villages, such as West Clandon, already suffer from traffic congestion. Further development around these villages will only result in more traffic and more parking problems.

With some 5,000 houses being proposed close to the village of Ripley, the roads serving the village will become even more congested. Cycling has become an ever popular past time, particularly at weekends hundreds of cyclists pass through the villages on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road accidents involving cyclists as a result of the development proposed under the local plan.

The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the road becoming ever more dangerous for pedestrians.

The council has a statutory obligation to protect the public and the additional traffic flows will bring added accidents, noise, pollution and injury of the public. In the case of West Clandon the Street often only has a narrow footpath on one side of the road making it very dangerous, especially when vehicles mount the pavements.

This policy as it is inappropriate and inadequate and fails to respond to the challenges raised by the proposed significant Green belt developments. The borough’s infrastructure is already heavily strained. However the plan’s determination to build large housing estates across the Guildford countryside significantly increases the need for infrastructure investment without securing the means for its provision. Placing housing in the established urban areas would reduce the need for enhanced infrastructure as would a more realistic housing number.

The policy wording says nothing about roads and traffic. The Council’s methodology for assessing traffic congestion - averaging it over periods of several hours and ignoring the effects of junctions - simply hides the problem, which will get worse as development proceeds. The schemes referred to in this policy will not solve existing congestion and the local road network has not been given sufficient consideration. Some proposed development locations would require highway schemes that are unlikely ever to happen.

Adequate infrastructure provision is a pre-condition of sustainable development. But in this plan it is an afterthought buried away in Policy I1. By prioritizing greenfield over urban, brownfield regeneration, the plan creates insurmountable
(and unnecessary) obstacles for itself. Common sense suggests a local plan should first assess the borough’s infrastructure capacity for sustainable development, and then tailor development accordingly. This plan, however, assumes infrastructure will follow on the heels of housebuilding as if by magic. It makes implementation critically dependent on providers outside the Council’s control and on the vagaries of CIL income. Instead of recognizing this as a key constraint, the plan is based on hope. It is also highly likely that developers faced with the imposition of large infrastructure requirements will go to court to invoke the NPPF provision that prevents authorities from imposing conditions that make a development non-viable.

Policy I1 requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.

Despite the Garlick’s Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents’ in the locality will see their quality of life significantly deteriorate in many ways.

Many of the utilities in the Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers. No plans to improve these services should mean no development of the Garlick’s Arch site.

Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are already at capacity and suffering from funding cuts or freezes. Any further development without funding will place further stress upon existing health services.

Police services are seeing funding reduced. The development of the proposed 13,860 homes during the plan period will stretch the police services further and is unsustainable.

There is no provision of the increased capacity of Guildford hospital, where is this assessed and remedied?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<thead>
<tr>
<th>Comment ID: PSLPP16/4503</th>
<th>Respondent: 8709249 / Geoff Spink</th>
<th>Agent:</th>
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<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy I2</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. POLICY I2

I OBJECT due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2)

I object to this policy as it is too vague and optimistic. Significant improvements to the road infrastructure are like to be many years away even if they ever happen. The draft plan, however, commits to building massive housing estates in the countryside before any of these road improvements are in place. This is inappropriate and will lead to massive traffic disruption during the construction phase and will add permanently to an already congested network (about 3,000 private cars from the 2,100 new homes at Wisley Airfield alone).
Road infrastructure represents a major constraint that should have been applied to the housing target at a much earlier stage in the plan process and not left as an unresolved difficulty in the draft plan.

There is no certainty that either the A3 or M25 in the borough will be improved to increase capacity and reduce congestion during the Plan period. Highways England has no plans to even examine improving the A3 before 2020. I have considerable concerns that development of the large residential sites identified at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), will take place before any improvements are made to the trunk road network. The A3 & M25 are already at capacity during peak hours and any development prior to improvement of these roads will only make the situations worse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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1. POLICY I3

I OBJECT to poor air quality concerns (Policy I3)

Paragraph 4.6.27 of the Plan states that “Development must also mitigate its traffic impacts, including its environmental impacts and impacts on amenity and health.” The significant level of development being proposed, particularly in the north east of the borough will lead to considerable further congestion, despite any attempts to mitigate this through travel plans. This will be particularly acute in built up residential areas and will only lead to greater levels of air pollution, which will have a detrimental effect on local residents and their health and can result in early death.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
1. **POLICY P2**

I OBJECT to not protecting the Green Belt (Policy P2)

This policy does not sufficiently safeguard the Green Belt even though Green Belt constitutes 89% of the borough and should be the cornerstone of all local planning policy. The Green Belt is not the Council’s to give away and once it is gone it is gone forever. Sacrificing areas of the Green Belt to a developer influenced growth agenda is a betrayal of future generations and does not constitute sustainable development.

The Green Belt should be protected in perpetuity, but Policy P2 seeks to justify excessive development in supposedly protected areas. This is in breach of party manifesto commitments and contrary to previous responses to public consultation. It is disreputable to argue, as the Council does, that the Plan would involve the loss of “only” 1.6% of the borough’s Green Belt. Leaving aside the reliability of that statistic, the NPPF does not set an “acceptable” percentage. The fact remains that the plan proposes that 65% of the housing plus industrial development be built on land to be taken out of the Green Belt

Paragraph 4.3.16 is seriously deficient in simply stating that the Council considers that exceptional circumstances exist to justify amendment of Green Belt boundaries. The exceptional circumstances are not identified. It is clear from national guidance that unmet housing need is not on its own an exceptional circumstance. Even to the extent that exceptional circumstances exist, these have to be balanced against the harm to the Green Belt in the specific sites proposed to be taken out of the Green Belt. This balancing exercise appears not to have been done.

The Countryside Study which the Council may argue fulfilled the need to demonstrate the exceptional circumstances required to justify removal of areas from the Green Belt was a simplistic tick box exercise. Within limits it may have answered certain questions about different attributes of different areas of Green Belt but it did not carry out the balancing exercise needed to determine whether specific exceptional circumstances justified removal of specific areas of land from the Green Belt. I believe that each of the identified Green Belt sites proposed to be removed from the Green Belt should be carefully assessed against the harm to the Green Belt in the specific sites proposed to be taken out of the Green Belt. This balancing exercise appears not to have been done.

The Countryside Study which the Council may argue fulfilled the need to demonstrate the exceptional circumstances required to justify removal of areas from the Green Belt was a simplistic tick box exercise. Within limits it may have answered certain questions about different attributes of different areas of Green Belt but it did not carry out the balancing exercise needed to determine whether specific exceptional circumstances justified removal of specific areas of land from the Green Belt. I believe that each of the identified Green Belt sites proposed to be removed from the Green Belt should be carefully assessed against any exceptional circumstances in deciding whether it should be removed from the Green Belt in the final plan. This exercise should bear in mind that housing need in itself is not an exceptional circumstance and nor is the Council’s growth aspiration. An important consideration is that more housing need could be met on urban sites than is currently planned. The Plan has fallen into the developers’ hands and developers prefer building on undeveloped land rather than brown field sites.

I note that the Summer 2016 edition of "About Guildford" (published by the Council) on page 5 states that "... the Plan rejects any schemes that would have a detrimental impact on the Green Belt." This is demonstrably untrue and I consider this to be a deliberate untruth which compromises the consultation process. I would ask that this untruth be corrected and the consultation period restarted after the correction has been given the same distribution as the original statement. (I assume the document was delivered to most houses in the Borough.) I reserve the right to argue before the inspector that the consultation process was flawed and ineffective because of this.

I object to the “insetting” of 14 villages from the Green Belt. Contrary to assertions made in the Plan process many of these villages do contribute to the openness of the Green Belt and there is no need to inset them.

I also object to the wholesale extensions to the settlement boundaries in many villages to allow for infilling and that infilling is also proposed outside the settlement boundaries of 11 further villages. Many Guildford villages are linear. It is all too easy to square off boundaries by including countryside bounded on only one or two sides by existing development, claiming it contributes nothing to the “openness” of the Green Belt, a term which neither the plan nor the NPPF defines. The NPPF’s other 4 tests of Green Belt status, including the prevention of urban sprawl, are ignored. Effectively, this policy makes all villages within the Green Belt vulnerable to large blocks of new development and seems almost calculated to secure the rejection of the plan as a whole.

To “inset” two-thirds of the borough’s rural villages on the grounds that they no longer contribute to the purposes of the Green Belt is extreme and inherently implausible, given the borough’s location on the edge of Metropolitan London. I cannot see how such extensive areas fail to contribute to the purposes of the Green Belt under the NPPF, but this could quickly be the case if the proposed “insetting” and boundary extensions go ahead.
This policy is wildly disproportionate in terms of any foreseeable development need and has caused tidal waves of opposition from residents. It flies in the face of NPPF paragraph 17’s aim of “empowering local people to shape their surroundings” and other NPPF provisions.

Paragraph 4.3.17 states that “the general extent of the Green Belt has been retained.” I believe this should be deleted as an untruth.

In addition I OBJECT to the proposals to remove from the Green Belt the so called ‘strategic sites’ of Wisley Airfield (A35), Gosden Hill Farm (A25) and Garlick’s Arch (A43) and all other strategic sites. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these sites and villages (as mere housing need does not constitute a ‘special circumstance’) to be taken from the Green Belt. Once taken from the green belt they will be lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached.

GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site.

Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/4512   Respondent: 8709249 / Geoff Spink   Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. SITES - POLICIES A1 TO A57

I OBJECT to all strategic sites proposed in the draft Plan to be built in the Green Belt.

1. I object to the identification and allocation of sites in this plan without regard to Green Belt, infrastructure or other constraints. The plan says that “allocating these sites does not grant planning permission for development.” However, each of the sites will be removed from the Green Belt and will be available in principle for development and non-Green Belt uses. The inclusion of these sites without detailed site by site justification shows contempt for the thousands of detailed comments the Council have received about individual sites ever since the Issues and Options consultation in 2013. The plan has hardly changed since the Council received 20,000 objections to its first draft plan in 2014. The Inspector considering the plan may conclude that the consultation has not been properly conducted.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
1. POLICY P4

I OBJECT to development in areas which are at risk of flooding (Policy P4)

National Planning Policy states that Local Plans should take account of climate change over the longer term, including factors such as flood risk. It goes on to say that new development should be planned to avoid increased vulnerability to the range of impacts arising from climate change.

The Plan states that in accordance with national planning practice guidance, the Level 1 SFRA has been used to guide development towards areas at the lowest risk of flooding and identify areas unsuitable for development. However, the document concludes that land outside of the area of flood risk is not capable of accommodating all of the borough’s identified development needs. A Level 2 SFRA has therefore also been produced and will help the Council apply the exceptions test (as described in the NPPG) as necessary to development proposals in areas at risk of flooding.

The site at Garlick’s Arch (A43) is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. Knowing the area well I am aware that this site often floods during the winter months and the flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
It seems to me that the plan is draconian in approach, whilst failing to absorb the previous genuine concerns of local residents regarding infrastructure and traffic problems. Furthermore, the plan seems to assume the annexation of Green Belt, contrary to Governmental stipulations

1. POLICY S1

I OBJECT to this Policy as the development proposed will not be sustainable (Policy S1)

The NPPF states that the presumption in favour of sustainable development “should be seen as a golden thread running through both plan-making and decision-taking.” As the first policy in the Plan, Policy S1 ought to set a clear framework. Instead, no definition of “sustainable development” is given. The policy also fails to set out any principles for applying sustainable development in practice to local planning decisions, which often have serious long-term impacts.

The policy states that it aims “to secure development that secures the economic, social and environmental conditions in the area”. This fails to recognize that economic growth, social justice and environmental protection often conflict. The policy does not say how each element is to be weighted or conflicts resolved. As a practical guide to the planning decision to be taken in the Plan period it is seriously deficient. The policy is likely to be used by developers to justify inappropriate developments on economic grounds. Under this policy, virtually any development will qualify as “sustainable”, in breach of the NPPF’s most important guideline.

Policy S1 is also seriously deficient in making no mention of the Green Belt. The Green Belt is a long term Government policy enshrined in primary legislation to protect green areas in perpetuity. The Green Belt is a living example of sustainable development in practice and is one of the most important factors affecting sustainable development in the area covered by the Plan and should be acknowledged in this policy. Policy S1 should include a commitment to protect the Green Belt from inappropriate development and to uphold Green Belt boundaries and protections. This would set at least one clear boundary to planning decisions. The Plan and the Council have treated the Green Belt as a developable land bank rather than as a constraint to development.

The commitment to approve planning applications “wherever possible” and “without delay” reveals the pro-development bias of the plan. Countervailing references to sustainability are so vague that the NPPF presumption in favour of sustainable development becomes a presumption in favour of any development at all.

This policy also ignores, as if they are inconvenient constraints, most of the 12 Core Planning Principles set out in NPPF paragraph 17.

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill Farm (A25) are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are also unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick’s Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
1. POLICY S2

I OBJECT to the Borough Wide Strategy (Policy S2)

The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

The housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.

The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guilford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

The assumptions and calculations in the SHMA are widely regarded as flawed and even before Brexit, produced an inflated housing needs number. The figure of 13,860 new homes is completely unsubstantiated. It has not been scrutinised by Councillors despite repeated requests for debate. The assumptions and calculations underlying the model are hidden, protected by a claim to intellectual property by a commercial sub-contractor used in preparing the SHMA. I have serious doubts about the objectivity of the SHMA because it has been produced by consultants whose website openly proclaims their pro-development agenda leading to reasonable suspicion that the figures are inflated. Guildford’s OAN is not transparent but has been taken on trust by the authors of the plan. Given that almost every element of the plan is predicated on this OAN, the plan as a whole cannot be considered “sound”.

The status of the 13,860 figure is ambiguous. The Council has said that the housing number and the OAN are identical because the OAN is “deliverable” and is by definition objective and cannot be contradicted. The OAN is only deliverable because of the Council’s cavalier approach to the Green Belt in contravention of the NPPF, ministerial statements and local and national Conservative Party manifesto commitments. The plan also states that infrastructure or other constraints may in due course affect deliverability. It is also unlikely that the number of houses can be built at the rate proposed. In recent years, housing starts have on average been less than half the proposed rate. This is not because developers do not have the land or cannot get planning permission. Constraints in the supply chain and maintaining profit levels have been more important.

The plan cannot be considered “deliverable”. In addition, the number of homes proposed, plus existing planning permissions, plus expected “windfall” sites, exceeds the total of 13,860. So how many homes (taking account of these adjustments) do the Council want built? The plan does not say. Without this figure it is hard to see how anything else can be planned. This undermines the validity of the whole consultation. It is unreasonable to ask the public to approve a “plan” that fails to propose a target number that takes all the standard constraints and adjustments realistically into account, leaving the Council to set one without further consultation. Even if the OAN is not flawed, it is at best only a baseline figure and should not be passed off as a policy proposal.

It is unreasonable to embark on a radical transformation of the borough on the basis of an unclear housing target. Most of Guildford Borough is highly protected from development (89% Green Belt, 44% AONB and about 75% protected by SPA). Whether or not increasing the number of dwellings by up to a quarter is desirable, it would be a major and irreversible change, arguably turning a largely rural borough into a mainly urban or suburban one like Woking. The scale of the housing number increases the onus for it to be seen to be sound. A substantially lower number, on the other hand, would remove the need to build on Green Belt or open countryside, and instantly meet the single biggest public objection to the plan as a whole.

The Plan in general and this policy in particular does not address the point that Guildford exists as part of London’s commuter belt. Any increase in supply of housing in Guildford, particularly if the increase is proportionately greater than elsewhere in the commuter belt, will simply result in a shift of population into the area. It will not reduce prices or increase availability except imperceptibly. The Plan also ignores the point that many of those working in the area live elsewhere. Accordingly in considering the housing number the Plan should take into account that in this part of London’s commuter belt, demand for housing is, in practical terms, unlimited.

This policy does not take proper accounts of the constraints to development which exist, principally posed by the Green Belt and by infrastructure limitations. I believe the Council is under a duty to properly consider applying these constraints. It is clear the Council has failed to do this. This approach differs from all the other boroughs in Surrey. The Plan appears to have deliberately been manipulated towards a growth agenda without disclosing why this is being done. The housing that is needed should be concentrated on urban brown field sites and through increasing the housing density of existing built up urban areas.

The development of 13,860 homes in the Plan period with 65% in the Green Belt does not constitute sustainable development. It will have a permanently detrimental impact on the Borough in general and on West Clandon and surrounding area in particular. The developments at Garlick’s Arch and Gosden Hill Farm do not meet the needs of the local communities. The road infrastructure in and around West Clandon will be unable to cope with additional demand. The edge of urban Guildford will creep that much closer to West Clandon, thus negating the purposes of the Green Belt in the area which include safeguarding the countryside from encroachment, checking the unrestricted sprawl of large built up areas and preventing neighbouring towns merging into one another.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill Farm (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.
The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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<th>Comment ID: SQLP16/810</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016</td>
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1. **Questions posed by Guildford Borough Council as part of its consultation.**

**Questions from GBC**

24.A. **Question 1: The evidence base and submission documents**

The Proposed Submission Local Plan: strategy and sites is based on up-to-date evidence. The evidence base documents contributing to the preparation of the plan are listed in Appendix D and can be found on our website (links open in a new window).

Do you agree that the evidence used for the Proposed Submission Local Plan Strategy and Sites is adequate, up-to-date and relevant?

**ANSWER**

I do not agree that the evidence used for the Proposed Submission Local Plan Strategy and Sites is adequate, up-to-date and relevant.

The fundamental driving forces for much of the development proposed in the Plan (particularly that on Green Belt land) are based on:

1. An excessive ambition to expand the local economy which is neither warranted nor wanted by the local population. Guildford is already one of the highest ‘value creation’ areas in the country and has one of the lowest unemployment rates. There is no evidence that massive and accelerated expansion is required.

1. SHMA figures which are neither transparent nor justifiable, especially in view of previous figures set. Independent assessments of the SHMA (eg from Guildford Residents’ Association and David Reeve) show it is set far too high and so cannot be said to be adequate, up to date or relevant.

In addition the recent vote to leave the EU and the impact this will have on the economy and migration have not been taken into account.

The Plan should be re-assessed and the methodology for arriving at housing need figures should be fully transparent.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/811  Respondent: 8709249 / Geoff Spink  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 2: Legal compliance

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

24.B. Question 2: Legal Compliance

Do you consider the Proposed Submission Local Plan: strategy and sites as a whole is legally compliant? Please provide the following information being as precise as possible:

- why you consider it is or is not legally compliant and
- what change(s) (if any) you consider necessary to make it legally compliant, explaining why this is the case.

ANSWER

I do not consider the Proposed Submission Local Plan: strategy and sites as a whole to be legally compliant because it mainly ignores the consultation process for the 2014 draft Plan it is claimed to be based on.

That consultation process was absolutely clear by some +20,000 responses that that Plan was flawed and no development should be carried out on Green Belt land.

Instead this 2016 draft Plan actually increases the number of dwellings being built on the Green Belt, in direct contradiction to the consultation process, yet is stated to be a Regulation 19 proposal.

As a result I do not see how the 2016 draft Plan can be Legally Compliant.

The 2016 draft Plan should be re-assessed and should take into account the views of the majority of responses from the consultation process for the 2014 draft Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/812  Respondent: 8709249 / Geoff Spink  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
24.C. Question 3: Soundness

Do you consider the Proposed Submission Local Plan: strategy and sites as a whole to be sound? Please provide the following information being as precise as possible:

• why you consider it is or is not sound and
• what change(s) (if any) you consider necessary to make it sound, explaining why this is the case.

ANSWER

I do not consider the Proposed Submission Local Plan: strategy and sites as a whole to be sound, because, but not limited to, the following reasons:

1. "Only sites that propose sustainable solutions have been included in the Plan and the Plan rejects any schemes that would have a detrimental effect on the green belt." Summer 2016 edition of "About Guildford" (published by the Council) on page 5. This is demonstrably untrue and appears designed to bias the consultation process.
2. The housing OAN figure has been calculated by a process which is not transparent. It has not been properly examined by Councillors before being adopted.
3. The OAN has been adopted as the housing number without the application of any constraints to take account of Guildford's circumstances, including in particular the Green Belt, AONB and road infrastructure. National policy permits such constraints to be applied and it is inappropriate not to consider the need to do this.
4. The draft Plan does not accord with the NPPF policies on protecting the Green Belt.

Exceptional circumstances need to be shown to justify removing areas from the Green Belt and this has not been done. The housing need number is not justification in itself according to published ministerial statements. Having properly calculated an OAN, constraints should be applied to it to reflect the Green Belt, AONB and infrastructure. Each proposed Green Belt site then needs to be justified on its own merits. The benefits of the proposed development need to be identified together with the harm to the Green Belt. Only if there are exceptional circumstances and following a proper balancing exercise demonstrating that these exceptional circumstances outweigh the harm to the Green Belt can the proposal proceed. The draft Plan does not demonstrate that this has been done. The housing number has been used as a blanket justification for all Green Belt sites which amount to 65% of the proposed housing number.

1. Whatever the justification for the assumptions made in calculating the OAN, those assumptions are now almost certainly incorrect following the referendum.
2. The housing number is at least twice the achieved rate of building in the Borough over the last few years. There is no evidence in the Plan to show that this rate is achievable and sustainable.
3. Much of the infrastructure required to support the level of development proposed is outside the Council’s control. The Infrastructure Plan is long on possibilities and aspirations and very short on commitments. The infrastructure requirements placed on developers are supposed to be in place before development commences. This is utterly unrealistic and indicates a lack of knowledge of developer’s business models which depend on positive cash flow. It seems very clear that at best, infrastructure provision will seriously lag development and leave higher levels of congestion than now. This will reduce the quality of life for residents through congestion and disruption.
4. The 40-45% requirement for affordable homes together with infrastructure such as railway stations, park and ride facilities, schools and roads is highly likely to be challenged on a site by site basis by developers using the NPPF provision that Councils cannot impose conditions which make development non-viable.

1. GBC has not included details of its Town Centre Master Plan and urban development proposals in time for and as a part of the Guildford Local Plan consultation
2. GBC has failed to provide an Infrastructure Report in time for and as a part of the Guildford Local Plan consultation
3. GBC has proposed an OAN of 693 houses per annum in the GL Hearn West Surrey Strategic Housing Market Assessment (SHMA) which many, including independent assessors, consider unsound

4. Highways England will not start to consider what it intends to do as regards the A3 in the vicinity of Guildford until 2018

5. Network Rail have not made available for the public consultation any plans for a new railway station at Merrow with an adjacent Park & Ride for 1,000 cars

6. The GBC proposals for Gosden Hill Farm do not appear to be in coordination with the Neighbourhood Plan for Burpham

7. The draft Local Plan will cause further linear development along the A3 between Burpham and West Clandon PC and encroachment onto open Green Belt countryside in clear conflict with the National Planning Policy Framework

8. The proposal for Garlick’s Arch was added to the draft Local Plan without any prior consultation under Regulation 18.

9. The Land Availability Assessment (LAA) indicates a range of planning difficulties for Gosden Hill Farm and Burpham which have to be met by the developer involved. These include Electricity Grid supply problems and foul sewage and surface water issues that suggest the development proposed cannot easily be implemented both technically and financially.

10. No adequate explanation is given as to how the aspirational proposal for a tunnel will be used to overcome traffic issues relating to the quality of life and amenity of Burpham, West Clandon, Send and Ripley citizens

11. In common with many others I do not believe the housing figure has been properly calculated and I believe it overstates housing need. The Council has prevented councilors or others from properly considering the SHMA by refusing to make public the basis on which it was drawn up.

12. The housing figure, when properly recalculated, should be subject to constraints to reflect Guildford's circumstances, including in particular the Green Belt and road infrastructure. National policy permits such constraints to be applied and it is inappropriate not to consider the need to do this.

13. Even once a housing number has been calculated it cannot be used to justify taking land out of the Green Belt on a wholesale basis.

14. Cast iron commitment should be included in the plan that development can only commence when required infrastructure improvements have been secured.

15. The status of the text which accompanies each policy box is not clear. If the accompanying text does not have the force of policy a number of the policies (i.e. the text in blue) are so vague and general that they commit the Council to very little.

The draft Plan should be re-assessed with housing on brownfield sites made a priority over commercial development and Greenfield sites and each of the above points addressed.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

**Comment ID:** SQLP16/813  **Respondent:** 8709249 / Geoff Spink  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 4: Duty to cooperate

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ()**
24.D. Question 4: Duty to cooperate

Do you consider the Proposed Submission Local Plan: strategy and sites as a whole has complied with the Duty to cooperate? Please provide the following information being as precise as possible:

- why you consider it has or has not complied with the Duty to cooperate and
- what change(s) (if any) you consider necessary to make it comply with the duty to cooperate, explaining why this is the case.

**ANSWER**

I do not consider the Proposed Submission Local Plan: strategy and sites as a whole has complied with the Duty to cooperate.

This 2016 draft of the Local Plan clearly demonstrates Guildford Borough Council’s refusal to co-operate with the wishes and requirements of the vast majority of the residents in its Borough.

The Council has failed to co-operate with the results of the consultation process for the 2014 draft Plan which was meant to inform and guide this 2016 draft Plan.

Despite campaigning on a clear statement ‘Conservatives Say Green Belt To Stay’, the ruling party on GBC is now intent on pushing through a Plan which will devastate Green Belt land and extend the Guildford Urban Area to further merge into surrounding rural villages.

This is not cooperation by any definition.

In addition the Council has failed to cooperate in providing any transparency to the housing need figures commissioned by the Council from GL Hearn.

The 2016 draft Local Plan should be reassessed with a reviewed and transparent SHMA and revised to reflect the views of the residents of the Borough, who pay for Guildford Borough Council to act in their interests, and not those of developers and central government.

I trust that the objections made above are fully taken into consideration and that the 2016 draft Local Plan is amended accordingly.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** pslp172/4359  **Respondent:** 8709249 / Geoff Spink  **Agent:**

**Document:**  Proposed Submission Local Plan: strategy and sites 2017 / Policy A25

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
1. I object to the changed policy A25 Gosden Hill for the development of 1700 homes which is still far too much.
2. There is no need for housing on this site because the local plan housing target is incorrect and inflated and ignores constraints.
3. Gosden Hill is located entirely within the Green Belt. No exceptional circumstances have been demonstrated for building on this site and therefore development here does not meet paragraphs 87-89 of the NPPF. Furthermore, Gosden Hill performs all five functions of green belt,
4. The site has no provision for foul or surface water sewerage and adjoining sewerage is at capacity
5. The Green Belt at this point serves the important function of separating West Clandon from the edge of urban Guildford. Development here will cause the two to coalesce defeating one of the objectives of the Green Belt. If this development proceeds I believe the narrow strip of Green Belt remaining between Guildford and Clandon at this point will be too narrow and will come under further pressure. It will represent an undesirable ribbon development along the A3. It will be highly visible from the A3 when approaching Guildford and will, in conjunction with A43a at Garlick's Arch give the appearance of almost continuous development from Send through to Guildford.
6. The development of this site cannot be sustainable and will cause massive congestion onto surrounding roads. The development will generate in the region of 6,000 vehicles which will exit straight on to the A3 which is stationary every day during rush hours. The linking of the A3100, B2215 and A247 would channel thousands of cars through the narrow, winding road through West Clandon.
7. I object to the proposal for a link road to bring traffic from the Gosden Hill development to the proposed 4 way junction at Burnt Common. This has the potential to generate large volumes of traffic (including commercial vehicles) on the A247 through Send and West Clandon - a road which is already under traffic stress (see below).
8. The volume of traffic will greatly increase air pollution which is particularly critical given the proposal to build two schools.
9. A new on-slip at Burpham would only be 1.8km from the on-slip at Burnt Common which is against Highway England’s requirement of 2km.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/4360  Respondent: 8709249 / Geoff Spink  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to the changed policy A43 Garlick’s Arch for 400 homes and 6 travelling show people pitches
2. It ignores all the thousands of previous objections made by local people
3. There is no proven demand for travelling show people plots in this location
4. There is no need for putting houses on this site because the local plan housing target is incorrect and inflated and ignores constraints.
5. The allocation of 28.9 ha is an excessive land grab into the Green Belt. If we take a normal density of 30 homes per ha and it is at the end of the day proven that there is a need for 400 homes in this location the land requirement is 13 ha not 28.9 ha which is more than double. This replicates a similar over land grab at Burnt Common where the factor is 7 times the land required.
6. This confirms the worrying impression that GBC have a pre-determined policy of building on the Green Belt at every opportunity. The arithmetic does not stack up. One would have thought that they would as custodians of the green Belt be intent on conserving it rather than exploiting it.
7. The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

8. Garlick’s Arch (A43) is in an unsustainable location. It does not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. The site is unsuitable due to lack of access to sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be dependent on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

9. The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

10. I object to the proposal to remove Garlick’s Arch from the Green Belt. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for this land to be taken from the Green Belt. Once taken the green belt is lost forever. There is a real danger that the loss of this Green Belt will result in urban sprawl and the neighbouring villages merging into one another. The significant development in West Clandon, Send and Ripley will result in the character of these villages being lost and the countryside encroached.

11. I object to the development at Garlick’s Arch because of flood risk. The site at Garlick’s Arch is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. Knowing the area well I am aware that this site often floods during the winter months and the flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.

12. I object to the loss of rural employment on the site. The development at Garlick’s Arch would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises.

13. I object to the potential loss of Ancient Woodland on the site. The proposed development at Garlick’s Arch will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees that existed in the year 1600.

14. I object due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1). Our villages are already suffering from severe congestion for much of the day, for example the Newark Road and Rose Lane junction in the centre of Ripley and the A247 through West Clandon. The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.

15. Furthermore, many of the country lanes around the villages of West Clandon, East Clandon, Ripley, and Send are narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition. I object to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces.

16. Many of the affected villages, such as West Clandon, East Clandon, Send and Ripley, already suffer from parking problems. Further development around these villages will only result in more traffic and more parking problems.

17. With some 5000 houses being proposed close to the villages of West Clandon, East Clandon, Send and Ripley, the roads serving the village will become even more congested. Cycling has become a popular past time, particularly at weekends hundreds of cyclists past through the village on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road accidents involving cyclists as a result of the development proposed under the local plan.

18. The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the roads becoming ever more dangerous for pedestrians.

19. I object to the lack of proper infrastructure planning for sites (Policy I1). Policy I1 requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.
20. Despite the Garlick’s Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents’ in the locality will see their quality of life significantly deteriorate in many ways.

21. Many of the utilities in the West Clandon, East Clandon, Burpham, Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers. No plans to improve these services should mean no development of the Garlick’s Arch site.

22. Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are already at capacity and suffering from funding cuts or freezes. Any further development without funding will place further stress upon existing health services.

23. I object due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2). There is no certainty that either the A3 or M25 in the borough will be improved to increase capacity and reduce congestion during the Plan period. Highways England has no plans to even examine improving the A3 before 2020. I have considerable concerns that development of the large residential sites identified at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), will take place before any improvements are made to the trunk road network. The A3 & M25 are already at capacity during peak hours and any development prior to improvement of these roads will only make the situations worse.

24. I object to poor air quality concerns (Policy I3). Paragraph 4.6.27 of the Plan states that “Development must also mitigate its traffic impacts, including its environmental impacts and impacts on amenity and health.” The significant level of development being proposed, particularly in the north east of the borough will lead to considerable further congestion, despite any attempts to mitigate this through travel plans. This will be particularly acute in built up residential areas and will only lead to greater levels of air pollution, which will have a detrimental effect on local residents and their health.

25. I object to the inclusion of the land at Garlick’s Arch, Send Marsh/Burnt Common and Ripley (A43). Garlick’s Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8). There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).

26. It is clear that with this site being added at the eleventh hour and no infrastructure planning has been undertaken. The Infrastructure Schedule makes no provision for any infrastructure improvements for this site. How will the local services such as schools and doctors cope, many of which are already at capacity? (Policy I1)

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** pslp172/4361  **Respondent:** 8709249 / Geoff Spink  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy A58

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ()**

1. I object to Policy A 58 at Burnt Common and to the proposed inclusion of Burnt Common as an Industrial Strategic Employment Site
2. This previous allocation for B1c, B2 and B8 development was removed from the 2014 draft due to all the objections made previously.
3. The word “minimum” is a change from the previous “maximum” in the 2016 plan and since that time there has been a decline in demand for industrial land. This change alone is unacceptable since even if there was a need to
build 7,000 sq m at Burnt Common this development would only require 1.4 ha at a standard plot ratio density of 50% not 9.26 ha. There is no justification for zoning an additional 7.86 ha in the Green Belt.

4. There is in fact no justification for building any more industrial development in the borough particularly at Burnt Common. The current industrial pipeline of granted consents of 38,357sqm in B1c, B2 or B8 use class space is double the 19,000 sq m said to be needed by Aecom who justify the need for new space on top of the existing pipeline by a completely unsubstantiated suggestion that “there is the possibility that some pipeline developments may not come forward at all, or be developed in different quantities by use class than has been consented.”

5. There is no need to build industrial or warehouse development in the middle of the Green Belt when Slyfield and Guildford still have empty sites and industrial units.

6. The 2017 Employment Land Need Assessment shows a reduction in demand to 3.9 hectares for industrial land for the whole borough not a huge over allocation of 9.26 hectares at Send in the Green Belt.

7. The Employment Land Needs Assessment update 2017 (ELNA) states “that the pipeline for employment floorspace defined by planning permissions yet to be implemented and prior approvals suggests the potential for an additional 33,607sqm of B use class floorspace to come forward. This figure comprises a net loss of 4,750sqm of B1a use class floorspace and a net gain of 38,357sqm in B1c, B2 or B8 use class space.”

8. 38,357 sq m of B1c, B2 or B8 use class is quite sufficient supply for the plan period and is in fact more space than the 3.9 ha of industrial land that is said to be needed for the plan period by Aecom. Since if you were to develop 3.9 ha at a plot ratio of 50% it would provide new industrial development of 19,000 sq m approximately half of current planning permissions granted. This does not justify the need for new development of industrial space on the Green Belt in such areas as Burnt Common.

9. The reality of demand for industrial space is that it is both nationally and locally in decline and this is evidenced by old existing permissions that have not been taken up and developed. The ELNA alludes incorrectly to the poor quality of existing space being a “constraint” on supply and fails to acknowledge that this assertion cannot apply to potential newly developed space e.g. the undeveloped pipeline of 38,357sqm.

10. The impact on small surrounding roads will create traffic gridlock.

11. It will join up existing villages and defeat the purpose of the Green Belt.

12. The ongoing poor quality of the updated research undertaken by Aecom in the Employment Land Needs Assessment 2017 does not support industrial development on land in the Green Belt at Burnt Common.

13. The Aecom research is generally superficial and lacks sufficient detail and analysis between B1c, B2 and B8 use classes and no reliable individual analysis has been undertaken of the widely different supply and demand dynamics of light industrial, general industrial and warehousing and distribution floor space.

14. The potential inclusion of a waste management facility mentioned at paragraph 4.4.23a lacks enough detail for proper consultation and is completely inappropriate.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/2786  Respondent: 8709249 / Geoff Spink  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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The Plan now states: “the presumption in favour of sustainable development will not automatically apply to policies relating to sites protected under the Birds and Habitats Directives and/or designated as Sites of Special Scientific Interest (SSSIs), land designated as Green Belt, Local Green Space, the Surrey Hills Area of Outstanding Natural Beauty, designated heritage assets and locations identified as at risk of flooding.”

Gosden Hill and Blackwell Farm (both currently in the green belt) are called “urban extensions” surely a euphemism for urban sprawl? Garlick’s Arch and Burnt Common developments take land from the green belt to extend Ripley/Send. One of the important specific purposes of the green belt is to prevent urban sprawl.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp17q/520  Respondent: 8709249 / Geoff Spink  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Question 4: Duty to cooperate

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The NPPF states para 155: “Early and meaningful engagement and collaboration with neighbourhoods, local organisations and businesses is essential. A wide section of the community should be proactively engaged, so that Local Plans, as far as possible, reflect a collective vision and a set of agreed priorities for the sustainable development of the area, including those contained in any neighbourhood plans that have been made.”

The changes in this latest version of the Guildford Local Plan show little or no willingness of Guildford Borough Council to reflect a collective vision. Despite the many thousands of responses to previous versions of the Plan which overwhelmingly rejected building on Green Belt land this latest version has as much, if not more, building on the Green Belt and increased problems of infrastructure and traffic which will bring increased noise and air pollution and danger to residents.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/4316  Respondent: 8709601 / Robert Fletcher  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I live in West Horsley and I am writing with my objections to the Guildford Borough Proposed Submission Local Plan.

**Permanent loss of greenbelt never to be retrieved for our progeny**

The current green belt and surrounding policies have worked well in preserving the nature of this area. The proposed changes will turn the Horsleys into a residential area getting on for half the urban area of Guildford - by comparing the area enclosed by the proposed green belt boundary. Horsley and particularly West Horsley with it's open spaces along East Lane has a very different character from the urban spoke that runs through Ewell, Epsom, Leatherhead and out through Fetcham and the Bookhams towards Horsley. Horsley is the first place along this spur that is properly surrounded by countryside with a village and not suburban feel. This is wholly down to the restriction previous authorities have placed on development. The Horsleys serve the Surrey hills immediately to the south, an area of outstanding natural beauty. This is significant generator of tourist trade for the village. The change in character will have a huge impact. For example, we have a Camping and Caravan Club site in Horsley. Part of the proposal is to build a large area of housing to the north and east of Waterloo farm where the camp site is located. Can you imagine the change in the approach road to the site, from a drive between open fields consummate with the rural feel of the area, to a drive through a housing estate. The council have failed to demonstrate the exceptional circumstances necessary to remove the proposed sites in Horsley from the Green Belt.

Sadly the focus of the plan appears to be on green field sites as cheaper option for developers over the many brown field opportunities in the borough.

**An unsustainable growth in the population of the Horsleys**

The proposed plan, is grossly disproportionate both in the proportion of Guildford's housing allocation landing on the Horsley area, and in the size of increase in housing numbers in West Horsley (35% in West Horsley). To the residents this looks like a piece of exploitative opportunism on the part of developers and councillors - many sites already being under option.

I am very concerned about the infrastructure in the area and it's ability to cope with the population we have now.

**Inadequate Junior Schools Provision**

The schools have no capacity left to accommodate more children and the Raleigh Primary School has not enough real estate to take on more pupils without having to build on the school field which is valuable for physical recreation, an increasingly important part of the curriculum to encourage healthy lives.

**Inadequate Senior Schools Provision**

We already have had the nightmare of parents being told places are not available in local senior schools and the prospect of having to take their children many miles to school - bad for the children, the community and the local transport systems. A jump in population will make this situation unmanageable.

**Inadequate Roads and Parking**

The roads in the area are already busy and often in a poor state of repair. The area around the junctions between Nightingale Avenue, East Lane and Ockham Road are seriously congested in the morning as children are being dropped at both the Raleigh and Glensk Schools. The proportionate increase in cars and traffic in the village would be unsustainable and completely out of character with the current rural nature of the village. Many of the residents would catch the train to work. Horsley station car park is already full on week days and would need expansion to support the new commuters.

Medical facilities too are stretched currently and could not cope with the extra population. The car park is often full and people use the few extra spaces available at the village hall. More people would again dictate the provision of extra facilities.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:
### Flood Risk and Inadequate Drainage and Sewerage

There have been drainage problems in the area around Waterloo Farm leading to localised flooding and backed up drains - about 5 years ago we had sewage across our back garden where the water level in the system had risen above that of some of the drain covers - notably one on our property. This had backed up from the main sewer. These sewers could not cope with any further development in the area.

The area around and to the rear of Waterloo Farm is also low lying and always floods in periods of heavy or sustained rainfall. Evidence of the wetness of the area can be seen by the thriving willow trees behind Waterloo Farm. This makes this area most unsuitable for housing.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

### Inadequate Infrastructure Planning

I was astounded to discover that the Borough's Infrastructure Delivery Plan failed to address these issues at all, let alone adequately. No planning gain seems to have been outlined in the proposal.

The proposed local plan for the Horsleys is a travesty when set against the criteria of the National Planning Policy Framework (NPPF) that new residential development must respect the character and density of housing in the area and be limited in quantity by the availability of infrastructure and local facilities.

Sadly, the drive behind the plan appears to be to maximise the financial opportunity for developers in the area over addressing the needs and well-being of council tax paying residents.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
Land bounded by Aldershot/Guildford Railway, Glaziers Lane, A323 & Westwood Lane.

I supported and commented in detail to the 2013 Local Plan -Ref my letter 26-11-13.

When the 2014 proposed plan was issued all had changed and suddenly Green Belt Land had become safeguarded. I opposed these significant proposed changes. -Ref my Letter 18-9-14.

Now we are presented with the proposed Draft Local Plan 2016. Having considered in detail the impact this will have on our rural area of Normandy/Plextord I am strongly opposed to this Plan on the following points.

1 - Green Belt Land
The Borough conveniently refers this area as "safeguarded" but fails to demonstrate "exceptional circumstances" to transfer this area from Green Belt Land. For our rural area of Normandy this must stay as Green Belt land.

2 - National Planning Policy Framework (NPPF)
This provides local residents an opportunity to be involved with the proposed redevelopment of their home environment. No involvement was available to residents until this plan was released. For me this appears to be Developer (ie Taylor Wimpey) led with proposals to build Schools, Care Homes, Shops etc in order to get Planning Permission for large scale profitable development!

3 - School
This is "Chicken & Egg" - build the houses you will need a new secondary school! However there seems no justification for a new school as the two nearest secondary schools Ash Manor and Kings College Guildford are under subscribed. Kings College have stated that if there were Increased needs they would be prepared to expand!

4 - Infrastructure
The Village is already heavily congested with through traffic due to the density of transport along the A31 Hogs Back and A 323 Aldershot to Guildford commuter flow. Development of the scale proposed will completely grid-lock the Village especially with school collections! The railway bridges in Westwood Lane and Glaziers Lane would make road redevelopment hugely expensive.

5 - Thames Basin Heath Special Protection Area (TBHSPA)
The A46 site is with in the zone of protection and if developed would Impact seriously on the five key threats to the Area.

6 - Scale of Proposed Development
I accept that more affordable housing is urgently needed and I supported the 2013 Proposed Local Plan to achieve this objective. local Plan 2014 was targeted principally to the West of Guildford with 53% of new housing for the next 10 years in this area which for me was unacceptable. Now with 2016 Local plan it will totally change a pleasant rural Village Into an unacceptable urban congestion!
1000 plus properties in a highly congested area subjected to flooding is not right for this rural area. The Proposal includes retail properties includes retail properties, again I suspect the Developers suggestion. We have had shops in the village when we first moved to Normandy 55 years ago but they could not survive against the Supermarket's range and sadly I expect the same would happen again!

I was very surprised the Borough proposing to mix Traveller Pitches within Residential housing. With two different cultures there is potential for conflict!

7 - Environmental Issues

The urban spread West of Guildford and East of Aldershot is destroying much of our important rural habitat and in turn much of our native wildlife*. We must protect the valuable areas that remain.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/2223  Respondent: 8711489 / Malcolm Wych  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The SHMA as the mathematical model it is based on, from my perspective, house. The only certain thing about the assessment is that it is flawed, its pie in the sky waffle.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/4352  Respondent: 8711489 / Malcolm Wych  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The Wisley Site - Possible site for future expansion but who would trust the company for the project? Basis is an off shore tax haven that’s enough to convince me they have little or no interest in surrey's well being. Their sole objective will be to get the maximum cash return from the project. Money is their motivation – not concerns with developing a site that is – keeping its location eg. opposite the royal horticultural garden at Wisley.
Finally does the site have the necessary infrastructure to support further development. The simple answer to that is NO, it does not, so why produce a plan that will only jeopardise what we need to hang on to.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9425  Respondent: 8711489 / Malcolm Wych  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I have tabled my comments and objections previously but believe I now need to do so again.

The Horsley Village proposed removal from the Green Belt is cited as being due to exceptional circumstances. I see no justification for this and do not believe the case is proven. These villages should remain in the Green Belt

Extension to bowanes in settlement area. I see no sound reasons supporting the proposed changes. I believe they are being driven by the councils personal need to provide space for additional development. The basis for such moves are unproven and suspect.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/1072  Respondent: 8711489 / Malcolm Wych  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

What I find suspect or flawed in all the documentation is the way the provision of additional amenities in relationship to the plan are apparently regarded by the planners as "Givens". For example new cycle paths, primary schools, roads, Doctors surgeries are shown as part of the infrastructure in support of additional housing. However in reality there is little evidence that Surreys budget can support things as they currently are-let alone provide additional support for an enlarged population. As one small example I have lived in East Horsley since 1990 and during that time the paths and service roads at Station Parade, Ockham Road South have never been resurfaced or upgraded. A small example maybe but if the Council cannot attend to a small issue like that how can it expect to fund an enlarged population and infrastructure as outlined in the plan.

As such I worry that the plan represents a "Civil Service" style response to a Government dictate to provide more homes-at whatever the cost to the Green Belt,Local environment or Village communities.
I'm worried.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** PSLPA16/1199  **Respondent:** 8711841 / Rosmarie Roberts-Kunz  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT ESPECIALLY TO 6 POLICIES: A36, A37, A38, A39, A40 & A41:

- Amount of new housing far exceeds local need.
- Housing density excessive when compared with existing development.
- It would transform the Horsleys into a sizable town, something for which no case is made.
- Collective impact of these 6 sites on a small part of the borough not considered. Should not be treated as isolated, separate sites.
- Total amount of building involved disproportionate with the amount of planned development elsewhere the borough, especially less sensitive urban areas not protected by Green Belt.
- Sites unsustainable, since key infrastructure is lacking and no adequate provision is made to increase it – e.g. poor wastewater capacity, lack of schools, absence of traffic management plan, flooding.
- No account taken of additional impact of Wisley Airfield site on Horsleys.
- Extension of settlement boundaries too permissive. The Horsleys are characterised by streets with development along only one side of the road. Policies allow too many adjacent green fields to be developed by squaring off boundaries and claiming they don’t contribute to Green Belt “openness”.
- Green Belt gap with neighbouring settlements hugely narrowed, especially if Wisley Airfield is built on.
- Policies will harm compliance with NPPF 81 – e.g. by making cycling (including Prudential cycle races) too dangerous, ruining the rural setting of Waterloo Farm campsite, destroying the ambience of Grange Park Opera’s new “Theatre in the Woods”.
- Policy A40 especially unviable because of high water table and poor drainage, leading to regular winter flooding.
- Safe access and egress at Site A40 unachievable, owing to flooding, high speed limits, poor sight lines, narrow access to existing properties, inadequate pavements for elderly and schoolchildren, increasing use by recreational cyclists etc

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** PSLPS16/2199  **Respondent:** 8711841 / Rosmarie Roberts-Kunz  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Page 1816 of 3335
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT ALSO TO POLICY A35 (WISLEY AIRFIELD):

- Should not be in the plan for all the reasons the Planning Committee rejected the identical recent proposal by Wisley Investment Properties.
- Irregularity of including this policy in the plan 24 hours before this planning application was rejected (like extending the time allowed for the developers to present their application).
- Unacceptable Conservative Party links between the developers and the Council.
- No Green Belt “exceptional circumstances” presented.
- Not a brownfield site as stated – only 15% of it.
- Proposed SCC waste site ignored.
- Loss of farming land.
- Too near RHS Wisley and Thames Basin Heath SPA.
- SANG would harm on SPA.
- Unacceptable increase in air pollution.
- No existing public transport and stations miles away.
- No proper traffic data.
- Housing density far too great.
- Over 2,000 houses will swamp and destroy Ockham conservation area, with impact on listed buildings.
- Access confined to inadequate narrow lanes.
- Water table and surface water flooding not considered either for site itself or for downstream areas on River Mole.
- Major impact on neighbouring villages, especially Horsleys.
- No assessment made of collective impact on area of this and 6 Horsley sites.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4734  Respondent: 8711841 / Rosmarie Roberts-Kunz  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT TO POLICY D1 (BETTER PLACES):

- Poor monitoring.
- No force given to vernacular or historic design guidelines.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Attached documents:

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<th>Comment ID: PSLPP16/4735</th>
<th>Respondent: 8711841 / Rosmarie Roberts-Kunz</th>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<tr>
<td>I OBJECT TO POLICY D2 (SUSTAINABLE DESIGN ETC):</td>
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<tr>
<td>• Targets unachievable if Green Belt is covered with amount of housing as proposed, causing traffic chaos, infrastructure failure and unacceptable levels of pollution.</td>
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<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
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<td>I OBJECT TO POLICY D3 (HISTORIC ENVIRONMENT):</td>
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<td>• Supports overdevelopment: you can’t “enhance” history. Doesn’t ban private interests from trying to make aggressive profits from privatising, commercialising and Disneyfying public historic assets.</td>
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<tr>
<td>• Doesn’t ban development near historic assets.</td>
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<td>• Ignores NPPF 126, 131, 132, 133.</td>
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<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy D4</td>
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</table>
I OBJECT TO POLICY D4 (DEVELOPMENT IN URBAN AREAS AND INSET VILLAGES)

- No commitment to expand social housing or accommodation for people who can’t afford so-called affordable homes.
- Not enough new homes in urban areas, despite demand and need for urban regeneration and protection of Green Belt.
- Objectives for inset villages cancelled out by plans for excessive housing growth there.
- Too much emphasis on traditional shops, when a lot of this sector is in terminal decline.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4726  Respondent: 8711841 / Rosmarie Roberts-Kunz  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E1

I OBJECT TO POLICY E1 (EMPLOYMENT):

- Poor evidence base.
- Too much encouragement to low added-value employment that’s needed elsewhere in the country.
- Fails to concentrate general business activity in urban areas or business parks that have the infrastructure.
- Fails to differentiate this from appropriate rural business.
- Too much encouragement of warehousing, for which Guildford is too congested.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4727  Respondent: 8711841 / Rosmarie Roberts-Kunz  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E3
I OBJECT TO POLICY E3 (EMPLOYMENT CAPACITY AND FLOORSPACE):

- Puts unnecessary obstacles in the way of using brownfield land into useful residential housing, contrary to government policy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4728   Respondent: 8711841 / Rosmarie Roberts-Kunz   Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT TO POLICY E4 (SURREY RESEARCH PARK):

- Subordinates public planning policy to the University of Surrey’s private, commercial enterprises (not its public academic purpose).
- No cost/benefit analysis of harm to Green Belt involved in extending research park.
- Waters down research purpose of park, turning into a general business park.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4729   Respondent: 8711841 / Rosmarie Roberts-Kunz   Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT TO POLICY E5 (RURAL ECONOMY):

- Incompatible with high housing numbers proposed for rural areas elsewhere in the plan.
- Insetting and settlement boundary extension would endanger appropriate rural activities listed that depend on maintaining rural areas’ character.
- Town-centre uses for rural areas contradict government’s localism policy and need to consult and protect village environments.
- Established commitments to high speed rural broadband and mobile coverage watered down despite 2014 consultation responses.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/4730  Respondent: 8711841 / Rosmarie Roberts-Kunz  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E6

Do you consider this section of the document: complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT TO POLICY E6 (LEISURE AND VISITOR EXPERIENCE):

- Danger of overdevelopment: success doesn’t depend on building “attractions” which can harm heritage and rural settings. No case made for creating new ones.
- No policy of opposing reduction in rural hotel capacity.
- No definition of what added value interventions by Council can make to normal visitor market mechanisms.
- No policy of supporting Guildford countryside as its prime leisure and visitor asset, whose value rises as London gets bigger and busier.
- No vision of what the ideal visitor experience of the borough actually is and how to support its various elements.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/4731  Respondent: 8711841 / Rosmarie Roberts-Kunz  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E7

Do you consider this section of the document: complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT TO POLICY E7 (TOWN CENTRE):

- No statement in policy wording of value of Guildford’s rural setting and views.
- No consideration of Town Centre Master Plan, GVG proposals or plans to redevelop the station.
- Far too little new housing in town. Development pushed into countryside, ruining the latter and harming urban regeneration.
- No brownfield register.
- Too much big retail, despite online shopping revolution and decline of traditional high streets internationally. Futile to try to turn Guildford into Woking or Kingston.
- No measures to support small, niche retailers in town, e.g. through business rates.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<th>Comment ID:</th>
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I OBJECT TO POLICY E8 (DISTRICT CENTRES):
- Too much scope to expand rural retail centres in order to justify major housing expansion across the countryside, despite lack of existing demand. This will spoil the character of villages while further harming Guildford's role as a retail hub.
- No measures to support existing rural shops and services, e.g. through business rates.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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I OBJECT TO POLICY E9 (LOCAL CENTRES):
- No need for retail development “adjacent” to rural centres for same reason as Policy E8.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy H1</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT TO POLICY H1 (HOMES FOR ALL) as follows:

- Policy doesn’t set any constraints on building.
- Housing mix based on pre-Brexit growth and demographic assumptions and unreliable SHMA that wasn’t put out to formal public consultation and wasn’t scrutinised by Councillors.
- Fails to compel University of Surrey to use its thousands of planning permissions and existing space, such as car parks, for student accommodation.
- Lets University off the hook of accommodating all its students, so as to free up houses for the most needy in town.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H2</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT TO POLICY H2 (AFFORDABLE HOMES):

- Using the official definition of Affordable is a joke. Affordable homes round here are not affordable! Pushing for these homes just means pushing for more development.
- The viability clause lets developers off the hook of providing even these (non-) affordable homes. Too open to manipulation.
- Contradicts government policy to develop less advantaged regions of the UK. People don’t have to live and work in Guildford but should be encouraged to move to cheaper, less congested areas.
- This policy won’t affect market forces or house prices. Guildford is too small and too near London to influence these, however many homes it builds.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<th>Comment ID: PSLPP16/4721</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H3</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT TO POLICY H3 (RURAL EXCEPTION HOMES):

- It loosens the criteria by allowing “market housing” and development that changes the housing mix. Developers would be able to override NPPF “exceptional circumstances” and other restrictions to build large houses in the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<th>Comment ID: PSLPP16/4738</th>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT TO POLICY I1 (INFRASTRUCTURE & DELIVERY)

- Infrastructure is considered here as an afterthought, rather than a pre-condition of development. Should be a key issue for the rest of the plan.
- Plan for excessive housebuilding in countryside not supported by any funding or provision for infrastructure.
- Plan’s heavy focus on building on greenfield sites inefficient and unnecessary: cheap for developers but much more expensive for the public who have to fund the infrastructure.
- Draft CIL scale discourages use of brownfield land first.
- No plan for organic increase in existing traffic congestion, let alone once thousands of houses are built across the countryside. Local roads hardly considered. Green Belt being eroded before road widening/improvement plans are certain, encouraging opportunistic over-development of greenfield sites.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<th>Comment ID: PSLPP16/4739</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID2</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I OBJECT TO POLICY I2 (SUPPORTING DTP’S ROAD STRATEGY):

- Policy doesn’t allow for catastrophic increase in traffic resulting from spreading new housing estates across the borough.
- Plan is out of sync with DTP’s strategy: houses would be built and Green Belt destroyed before plans for A3 etc are implemented.
- Many of the road plans are too optimistic anyway, especially post-Brexit, and very likely will never happen.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

I OBJECT TO POLICY I3 (SUSTAINABLE TRANSPORT):

- Just a list of generic measures, not related to real life or the particularities of Guildford.
- Fails to treat sustainability as a constraint. Policy assumes excessive levels of development proposed in the plan can be supported by sustainable development.
- Unrealistic belief most people can be persuaded out of their cars to walk or cycle. Many large groups can’t or won’t do this – commuters in a hurry, the elderly, children, people who are unwell or unfit, people carrying heavy shopping or other goods. In other words, most residents!
- Town’s eye view of transport. Ignores scarcity of existing rural public transport and commercial unviability of increasing it. Ignores terrible state of Surrey’s roads, potholes, flooding etc. Ignores extra stress to be created by huge new housing estates in countryside.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT TO POLICY I4 (GREEN & BLUE INFRASTRUCTURE):

- A toothless policy completely cancelled out by plan for huge developments across the countryside. No mention of opportunity costs of loss of Green Belt services and amenities (e.g. farming).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4722  Respondent: 8711841 / Rosmarie Roberts-Kunz  Agent: PSLPP16/4722

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I STRONGLY OBJECT TO POLICY P2 (GREEN BELT) on the following grounds:

- No declaration of support for protecting the Guildford Green Belt, contrary to NPPF and government statements.
- No evaluation of value of local Green Belt as a public and private asset: it’s just treated as potential building land with a few inconvenient restrictions.
- Impact of Green Belt development on local agriculture ignored.
- Impact on rural leisure and tourism ignored.
- Impact on flood control ignored.
- Impact on carbon sink and knock-on effects for air pollution and climate change ignored.
- Impact on biodiversity ignored.
- Impact on natural heritage ignored.
- Impact on water catchment ignored.
- Impact on room for public space amenities (parks, cemeteries, waste facilities etc) ignored.
- Impact on rural business (e.g. mineral mining, film making) ignored.
- Impact on natural landmarks and views ignored.
- Harm to public health and wellbeing (physical, psychological) ignored.
- Allows excessive levels of development in breach of views expressed in last consultation and Conservative Party manifesto commitments at the last local elections.
- Has allowed ruling Councillors to argue that there is an acceptable percentage of Green Belt that should be sacrificed to development, when no such rule exists in the NPPF.
- Ignores alternative approaches, such as fair burden-sharing under which settlements would undertake to accommodate new development in proportion to their size.
- Disproportionate amount of development (most of it, in fact) to be in Green Belt. Too few new homes in urban areas where most people (especially the young and less privileged) want to live. This will act against much needed urban regeneration.
“Insetting” of most villages disproportionate and unjustified in terms of their contribution under the NPPF to the purposes of the Green Belt. Based on flawed Green Belt and Countryside Study. Idea that most Guildford villages do not contribute to “openness” is subjective.

- Major settlement extensions allow indiscriminate housebuilding, as irregularly shaped villages are squared off to enclose green fields.
- Overall harm to Guildford Green Belt unjustified by any objective development need post-Brexit.
- Ignores most of NPPF 17 stipulations.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** PSLPP16/4742  **Respondent:** 8711841 / Rosmarie Roberts-Kunz  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

**SITES**

I OBJECT TO ALL POLICIES INVOLVING BUILDING IN THE GREEN BELT:

- No “exceptional circumstances” are shown and numbers, numbers are excessive and the clearly expressed views of residents in previous consultations are ignored.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** PSLPP16/4723  **Respondent:** 8711841 / Rosmarie Roberts-Kunz  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT TO POLICY P3 (COUNTRYSIDE BEYOND THE GREEN BELT):

- Gives Ash and Tongham more protection than rest of borough, including existing Green Belt. But they don’t contribute to preventing London sprawl.
- Special treatment of ward represented by current Council Leader and his predecessor. Politically biased.
- A minor extension of Green Belt in one place does not justify its major destruction elsewhere (the inset villages).
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPP16/4724  **Respondent:** 8711841 / Rosmarie Roberts-Kunz  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT TO POLICY P4 (FLOOD RISK AND WATER PROTECTION):

- Unreasonably limits development of urban, brownfield, hardstanding sites, pushing development unnecessarily into the countryside.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPP16/4725  **Respondent:** 8711841 / Rosmarie Roberts-Kunz  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT TO POLICY P5 (THAMES BASIN HEATH S.P.A.):

- Compensation mechanism too feeble to provide protection.
- Cynical encouragement of SANG to justify nearby development in protected areas. Does not extend protection or amount of green space, and can damage them (e.g. dog and cat attacks on wildlife).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPP16/4717  **Respondent:** 8711841 / Rosmarie Roberts-Kunz  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT TO POLICY S1 (GREEN SPACE NEEDS):

- Compromises on location and extent of protection (green spaces).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I OBJECT TO POLICY S1 (SUSTAINABLE DEVELOPMENT) for the following reasons:

- No definition given, no reference to its importance in the NPPF, no guidelines for applying it to planning.
- No statement of how economic, social and environmental impacts should be balanced.
- No mention of Green Belt, Guildford’s greatest legacy by far to Sustainable Development. No commitment to protecting it.
- No reference to most of the NPPF Core Planning Principles.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

| Comment ID: PSLPP16/4718 | Respondent: 8711841 / Rosmarie Roberts-Kunz | Agent: |
| Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2 |

I OBJECT TO POLICY S2 (BOROUGH-WIDE STRATEGY) as follows:

- Numbers based on growth and demographic data now invalidated by Brexit.
- No justification given for 13,860 housing figure. Figure based on a secret formula used by consultants and never seen by anyone on the Council or by the public. Council has failed to seek its disclosure.
- 13,860 figure confuses the OAN with a housing target. No definite housing target given, leaving too much scope for the Council to make one up. I can’t understand how we’re being consulted when we don’t know how many houses the Council want to build, taking all the contraints into account.
- Figures based on a Housing Market Area that ignores 2 neighbouring districts (Rushmoor and Mole Valley) and is much too small, since most people commute or travel far outside the Area to shop or study. This distorts the figures: no reason why Guildford needs to build nearly twice as many large housing estates as the rest of Surrey put together, or half of all sites over 100 units.
- High numbers involved would transform character of the borough from mainly rural/Green Belt to urban, creating a corridor of development out of London as per Woking or Croydon.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

| Comment ID: pslp17q/405 | Respondent: 8711841 / Rosmarie Roberts-Kunz | Agent: |
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (No)

I call on the Inspector to send Guildford Council back to the drawing-board with this plan. It is a shoddy effort that takes almost no account of the 32,000 comments (mostly objections) in the last public consultation, or the 20,000 almost identical comments in the consultation before that (on the Issues and Options paper).

Reasons for declaring the draft unsound are too numerous to list, but I wish to highlight the following 6 items:

1. The council have gone to huge lengths to conceal the consultant’s formula apparently used to calculate the OAN, which cannot therefore be scrutinised. They have failed to differentiate between the OAN (which is supposed to be objective evidential data) and their housing number policy target. They have made no effort to address flaws in the SHMA revealed by independent studies well known to residents, which suggest a target more in the order of 4,000 than over 12,000. They have not taken seriously the implications of applying constraints which, by greatly reducing the housing target, would answer many other objections, for instance by preserving the Green Belt. They are also being ambiguous about how development will be phased and how constraints will be applied, suggesting a plan full of moving targets that cannot be properly monitored or evaluated for performance or against government policy over the plan period.

2. The council have deleted a passage in Policy H1 on housing density, leaving it up to developers. This removes a key planning element and makes it impossible for Guildford to comply with Government policy on efficient land use.

3. Policy P1 and E5 reduced protections against development in the AONB, contrary to the declared policy of central and local government.

4. Despite some 52,000 objections in the previous 2 rounds of public consultations, the council is persisting in trying to direct most new development onto the Green Belt, contrary to declared government policy including the NPPF. Whether one agrees with this attempt or not, it needs to be argued through in any plan worthy of the name – for instance, in Policies P2, P3, E5 or the Sites appendices. The council, however, do not say why 70% of new homes need to be on green fields, or 58% in the Green Belt, when common sense suggests most people would like to live in urban or suburban areas where close to employment and other facilities. The plan doesn’t say either why three of the biggest developments need to be in the Green Belt: Wisley “airfield” (which is actually good farmland), Blackwell Farm and Gosden Hill Farm. The NPPF states that the Green Belt can be developed only in “exceptional circumstances”, but the plan does not mention these. The council do not say why most of the borough’s rural villages need to be “inset” from (i.e. kicked out of) the Green Belt against their expressed will. No justification, weak or strong, is advanced for such drastic action. The numerous proposals in the plan for infilling and extending settlement boundaries seem designed merely to support or facilitate an a priori decision to promote maximum development in the countryside and to minimise development in the urban areas. Instead of balancing public and private interests, this plan fails the public by capitulating to developers’ understandable greed for green-field sites that are cheap to build on. A sound plan would need to balance this by a full appraisal of urban brownfield sites available, many of which the council already own but seem strangely reluctant to release for housing.

5. In Policies E1 and E2, the council has similarly taken the caved in to a perceived business demand for retail and commercial space in the town centre. This is probably not what business (such as the Local Enterprise Partnership) actually want, but may seem a soft-option route to easy growth. With 89% of the borough Green Belt, however, there are obvious objections to devoting scarce urban space to uses of low employment value such as warehousing or drying activities such as town-centre shopping, especially if this means even less new urban residential development. The plan does not say why these areas cannot be developed for low-cost housing that would regenerate the town centre, or for high-value, less space-wasting businesses that are more consistent with Guildford’s well-educated workforce. It also fails to make an assessment of the impact on traffic or existing high-street shops. Instead, it plonks commercial development in cut-off, unsuitable locations, such as Burnt Common, with no balancing arguments about how the consequent damage to the Green Belt can be justified. Policy D1 reveals that the council has failed to address in any serious manner the vast discrepancy between its ambitious development targets and Guildford’s infrastructure deficiencies, which are already a serious constraint
on day-to-day life in the borough. Lack of infrastructure was brought forcefully to their attention in previous public consultations. In their public rhetoric, they have recently acknowledged that this is a major problem. But this is not reflected in the latest version of the plan, which continues to rely on vague hopes that the gap might be narrowed through the CIL mechanism or by willing “infrastructure providers”. The council is either being cynical (thinking they can fob the government off with promises of development they know they cannot deliver) or else incompetent (in thinking that so much infrastructure will simply materialise out of nowhere once development is underway). To meet the soundness test, on the other hand, the plan must recognise the reality of Guildford as a congested, exceptionally constrained borough in London’s shadow, and plan only as much economic and housing growth as can predictably be supported in infrastructure terms.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/106  Respondent: 8712449 / Marie & Ken Scotland  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Key facts

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The Plan seems to be concerned almost exclusively with the well-being of the economy of the borough, the enhancement of the lives of the more deprived sections of its existing community, and the care of new-comers. All of these are concerns which can be supported, but the Plan seems to have neglected the well-being of the majority of its existing residents, which may be described as not deprived.

2.22 This paragraph has been deleted. Its first sentence was "Pressure on existing infrastructure and additional stress caused by planned growth must be addressed if we are to maintain and enhance the borough's prosperity and quality of life."

This deleted sentence summarises one of the main concerns of many existing residents, and its deletion should call into question the validity of the document's arguments.

It should be made clear that the increase in housing, economic activity, infrastructure etc. will result is a reduction in the quality of life of its existing residents: if this is not considered to be true, then the Plan should demonstrate that adequate measures will be taken to ensure that that is not the case.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/108  Respondent: 8712449 / Marie & Ken Scotland  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy ID1
4.6 Infrastructure Policies.

Policy ID1 (p.122) states that "Infrastructure necessary to support new development will be provided and available when first needed".

Garlick Arch (Site 43) is identified as an area for the introduction of some 400 homes, and a new interchange with the A3 trunk road is proposed (Site 43a). Both of these are likely to give rise to significant extra traffic on the A247, which runs through West Clandon village. There is already some congestion at peak times in the village, as well as numerous accidents due to the narrowness and poor driver visibility in parts of the village. There is no scope for road widening or of line-of-sight visibility in these places, so these proposed developments appear to be in violation of the Plan's policies.

I hope these reservations will be properly taken into account,

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Furthermore, it is beyond comprehension that the development of the Wisley Airfield site to include 2000 houses, has been included again after having been overwhelmingly rejected so recently.

What is the point of having public consultation when its findings are completely ignored?

I sincerely trust that the plan as it exists will be rejected.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
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<tr>
<th>Comment ID: PSLPP16/163</th>
<th>Respondent: 8713889 / Joyce Campbell</th>
<th>Agent:</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The villages within the Guildford Borough are already choked with traffic, the roads are in a parlous state, drains are frequently blocked leading to flooding after even a short shower, schools are over-subscribed and medical services are already over-stretched. The arrival of 500 - 600 more families will place an intolerable burden on the local infrastructure and amenities. Even the increased Council Tax income from all these new homes is unlikely to be adequate to cover the additional demand.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/163  Respondent: 8713889 / Joyce Campbell  Agent:

As a resident of East Horsley for nearly 30 years, I am horrified at the latest attempts to build more than 500 houses in the Horsleys and to further erode the existing Green Belt.

The introduction of Green Belt land in the 1950’s was to stop the spread of urban sprawl. It is particularly important in the South East to prevent the Greater London conurbation from spreading further into the surrounding countryside. A look at a map will show that further urbanisation would soon join it to areas such as Guildford and Woking and Redhill and Reigate to the south. There must be plenty of brownfield sites which could be developed. Even though this might be more costly at the outset, in the long term it would have many advantages.

The M25 should be allowed to be a natural barrier between the built-up areas and the countryside. For those people who live in busy towns, the opportunity to get out into the countryside for recreation and relaxation is vital to their health and well-being, although I understand that air quality around Junction 10 of the motorway is comparable with that in Central London.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3989  Respondent: 8713921 / Jenny Bywater  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the alteration of the green belt boundary in Shalford. Shalford is a village with a wonderful open ambience. The land behind the Village Hall contributes to the open character of the village and should be preserved. Also the elevation of the land is 32 feet above King's road which would make any housing development unsightly and out of keeping with neighbouring properties and tower over the village community facilities. Access to this land is via Chinthurst Lane, which is already a heavily congested country lane.

The boundary has been its current place for a long time and there is no valid reason for change. Guildford Borough Council should support the expressed views of the local residents and protect the fields from development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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I support this policy of retaining this land for allotment use only

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID:</th>
<th>PSLPP16/955</th>
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<th>8714145 / Catlin Pearl</th>
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I strongly object to further plans to destroy our Green Belt. We had 700 residents sign a petition against this only last year. Apart from destroying this English village how can you possibly consider Chinthurst Lane as as access? It is already an extension of Shalford Station Car park and a thorough danger as it is narrowing daily due to overuse by railway users, making passing other vehicles impossible to pass each other.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/839  Respondent: 8714305 / Dereca and John Trevail  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

GUILDFORD PROPOSED LOCAL PLAN 6/6/2016
FIELDS BEHIND SHALFORD VILLAGE HALL

As a resident of Shalford and a member of Shalford LTC I wish to make known my objections to the current version of the local plan which removes the fields behind the Village Hall and Tennis Club from the Green Belt and puts them in the Shalford settlement boundary.

Although these fields have been classified as “open spaces” there is no explanation or confirmation to say that this would give them the same degree of protection as the Green Belt from housing development.

Any Construction on these fields which are 25ft above the village hall would tower over the tennis courts and bowling green and totally destroy the Green lung of the village.

The considerable traffic from a development would have to exit on Chinthurst lane not only adding to the traffic chaos and pollution but increasing the potential for an accident.

We believe that any construction in this field would exacerbate the current flooding that the tennis courts and the village hall suffers in heavy rain.

By implementing a small adjustment back to the 2003 boundary GBC could protect these fields and ensure they remain open spaces.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/3377  Respondent: 8714433 / Paul and Liz Reynolds  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Shalford (south)
I live adjacent to Shalford Village Hall on the Common and I am writing to strongly object to the above new version of the Guildford Local Plan. I have written to the Council before but feel I need to make my feelings clear again by objecting to this proposed extension of the village settlement boundary to include the fields behind Shalford Village Hall.

If this land in question is incorporated into the new village settlement boundary, it will lose its green belt and area of great landscape value (AGLV) status. This would be a huge mistake as the land would then be open to other further development in the future. Due to the height of the land, which is 32 feet above the Kings Road, any development would be clearly seen and tower over the village community facilities and the surrounding area, detracting from the village feeling of space and open character we have at present. These boundaries have been in place for a long time and there is no valid reason for them to change. We cannot allow the development of 20 houses on these fields with access via Chinthurst Lane. This would create a disastrous traffic situation where we already have considerable congestion and overcrowded village roads. A further 20 houses on this site would potentially mean a further 40 cars (minimum) using the access road on a daily basis, together with visiting cars. This traffic would be in addition to the already heavily congested country lane we have at present. The lower end of Chinthurst Lane, leading off from Kings Road, is an impossible drive with the continuous parked cars on one side. Further housing development behind Shalford Village Hall would reduce this road to a standstill. Widening the lane, which I understand has also been proposed, would only further degrade our village from retaining its rural character.

I also object to the fact that the infrastructure has not been properly assessed and is inadequate to deal with current housing levels. The local roads in the area, the schools and local amenities will not be able to cope. Development of this site will surely lead to further areas of beauty being scarred forever.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Over 700 residents signed a petition objecting to the proposed settlement boundary change last year. This issue has united the local community with widespread support across local clubs and other organisations.

This land is in the Green Belt and in an Area of Great Landscape Value, both of which designations are meant to be permanent. If the boundary is changed, the protection afforded by the Green Belt and AGLV will be lost, the consequence of which is likely to be a planning application for housing.

As a resident of Shalford for 34 years, I strongly object to the repositioning proposal and to any planning application for housing on this piece of land, which would create a precedent for further development on other Green Belt and AGLV land.

I am horrified that the removal of the protection of Green Belt land is even being considered. This designation is intended to be a permanent protection for our beautiful countryside for our enjoyment and that of future generations.

This land contributes to the open character of the village and provides an attractive setting for the village’s community facilities. Any development on this land would be clearly visible from the road and significantly impact upon the open character of the village and green nature of the locality.

At 32 feet above King’s Road, the land behind the Village Hall is one of the highest elevations in the area and any housing development built on it would tower over the village community facilities and the surrounding area.

Any development would also impact on the local infrastructure which is already limited, including poor vehicle access, inadequate provision of schools and doctors’ surgery; the latter is already stretched to its limits.

Of particular concern is vehicle access to the site, which would be via Chinthurst Lane, which is not able to take any more traffic, being already highly congested, especially during rush hours when it is used as a “rat run” by drivers trying to avoid the traffic jams on the A281 from Bramley/Horsham and the A248 from Chilworth/Wonersh/Shamley Green/Cranleigh. Chinthurst Lane is a narrow, winding country lane; it is single carriageway along most of its length with hardly any pavements. It is unsuitable for the amount of traffic it already has, let alone any additional. It also has to be borne in mind that because of the increased congestion in Chinthurst Lane that would result from additional housing, it is inevitable that Summersbury Drive and Poplar Road would also become “rat runs”. This would be dangerous as they are narrow, residential roads.

Because of the Green Belt and AGLV status of the land and inadequate infrastructure for additional homes and traffic, I am appalled that this proposal is even being considered.

Please leave Shalford’s settlement boundary where it is.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/3399  Respondent: 8715073 / Virginia Cox  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Shalford (north)

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Objection to Guildford Borough Council’s proposal to (1) move the green belt boundary to include the fields behind Shalford Village Hall, (2) extend the village settlement boundary to include these fields, making it easier to develop

Once again I am writing to **object** in the strongest possible terms to Guildford Borough Council’s proposal to significantly reposition the Shalford settlement boundary which will result in the inclusion of land at the rear of the Village Hall.

If Guildford Borough Council support the expressed views of the local residents to protect the fields from development, they should retain them within the current green belt boundary and keep them outside the village settlement boundary. The boundaries have been there for a long time so there is no valid reason for change.

Over 700 residents signed a petition objecting to the proposed settlement boundary change last year. This issue has united the local community with widespread support across local clubs and other organisations.

This land is in the Green Belt and in an Area of Great Landscape Value, both of which designations are meant to be permanent. If the boundary is changed, the protection afforded by the Green Belt and AGLV will be lost, the consequence of which is likely to be a planning application for housing.

As a resident of Shalford for 34 years, I strongly object to the repositioning proposal and to any planning application for housing on this piece of land, which would create a precedent for further development on other Green Belt and AGLV land.

I am horrified that the removal of the protection of Green Belt land is even being considered. This designation is intended to be a permanent protection for our beautiful countryside for our enjoyment and that of future generations.

This land contributes to the open character of the village and provides an attractive setting for the village’s community facilities. Any development on this land would be clearly visible from the road and significantly impact upon the open character of the village and green nature of the locality.

At 32 feet above King’s Road, the land behind the Village Hall is one of the highest elevations in the area and any housing development built on it would tower over the village community facilities and the surrounding area.

Any development would also impact on the local infrastructure which is already limited, including poor vehicle access, inadequate provision of schools and doctors’ surgery; the latter is already stretched to its limits.

Of particular concern is vehicle access to the site, which would be via Chinthurst Lane, which is not able to take any more traffic, being already highly congested, especially during rush hours when it is used as a “rat run” by drivers trying to avoid the traffic jams on the A281 from Bramley/Horsham and the A248 from Chilworth/Wonersh/Shamley Green/Cranleigh. Chinthurst Lane is a narrow, winding country lane; it is single carriageway along most of its length with hardly any pavements. It is unsuitable for the amount of traffic it already has, let alone any additional. It also has to be borne in mind that because of the increased congestion in Chinthurst Lane that would result from additional housing, it is inevitable that Summersbury Drive and Poplar Road would also become “rat runs”. This would be dangerous as they are narrow, residential roads.

Because of the Green Belt and AGLV status of the land and inadequate infrastructure for additional homes and traffic, I am appalled that this proposal is even being considered.

Please leave Shalford’s settlement boundary as it is.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the 2016 Draft Local Plan as it has had no regard to schools required, additional medical or hospital facilities which would make a plan sustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<tr>
<th>Comment ID: PSLPA16/2169</th>
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<tr>
<td>Agent:</td>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base</td>
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</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the methodology of drawing up the plan. Guildford Borough employs consultants who allegedly have planning expertise but have done so without taking account of Surrey County Council highway planners' views, or the costs involved in improving the infrastructure, currently outside their financial capability.

The methodology is also flawed as this plan has been formulated without regard to village Neighborhood plans. Surely, logic would suggest planning is best formed by a bottom up approach, not top down.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: PSLPA16/3502</th>
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<td>Agent:</td>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
1. I consider removal of Horsleys from Green Belt both immoral & possibly illegal.

2. No provision has been made for new wider roads to carry extra traffic.

3. No plans for extra schools, doctors surgeries

4. Parking is already difficult—where are the plans/ideas for possibly 500-1000 more spaces

5. The young cannot afford housing now—what plans for affordable NON EXPANDABLE houses

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/4329  Respondent: 8715777 / John Sansom  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to new sites (Garlicks Arch) being introduced as an afterthought when it was not even considered in the previous plan. A slip road on the A3 at Burnt Common has been added to the Draft Local Plan without Highways England consent.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/9159  Respondent: 8715777 / John Sansom  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to 2016 Draft Local Guildford Plan

I object to a totally unrealistic number of houses for the country lanes to absorb.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/9535  Respondent: 8715777 / John Sansom  Agent:
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<td>I object to the removal of villages from the Green Belt.</td>
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<td>I object to raising the annual number of houses built per year. With no rational reason given, one must assume these are developers' numbers for financial gain and not for social need.</td>
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<td>I object to the disproportionate distribution of houses across Guildford Borough, by far, the North East has taken an unsustainable number, in an area where country lanes are narrow and volume of traffic now using through routes makes roads gridlocked at rush hour.</td>
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<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
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The Car Parks of both Horsley and Effingham Junction stations are already full to capacity and will not be able to cope with any additional housing (other than minor infilling) in either East or West Horsley or Ockham villages. This also applies to the Medical Centre in East Horsley which is also presently oversubscribed.

Finally the three roads which enter East Horsley (the B2039; the road from the A3 to Effingham Station; and the road from Cobham to East Horsley are minor roads or lanes and the increased level of traffic, (including large commercial lorries) from any significant additional house building will lead to unacceptable congestion in a rural environment. The deterioration in the air quality alone from the additional traffic should be a good enough reason not to proceed with the level of proposed housing in the Local Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2607  Respondent: 8717697 / Michael Henderson  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

• The Local Plan Policy central theme is that “we will continue to protect the Metropolitan Green Belt (MGC)” and yet there are several instances in the Plan which completely flout this statement. A detailed study of the plans show that nearly 9,000 new homes (65% of the proposed developments) are to be built on land currently within the MGC which destroys the central tenet of the Local Plan. This is a deceitful statement and brings no credit to the authors of the GBC Local Plan.

• I have lived in East Horsley for 44 years and can see no good reason why as a Rural location it’s Green Belt status should not be preserved. I object strongly to the proposal that East Horsley should be “inset from the Green Belt “ as it clearly both in the past and currently makes an important and continuing contribution to the openness of the Green Belt. Driving down the B2039 lane from the A3 (or for that matter from the A3 to Effingham or the road into East Horsley from Cobham) it is clear you are driving through farmland and countryside before entering the rural village of East Horsley.

I also object strongly (which I have done in a separate detailed letter to GBC) regarding the proposal to remove Wisley Airfield from the Green Belt in order to build further houses which is certainly not a good enough reason to warrant the description of “exceptional circumstances “.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2606  Respondent: 8717697 / Michael Henderson  Agent:
I am writing to register my serious OBJECTIONS to various aspects of the proposed GBC Local Plan published recently.

The proposed scale of House building of 13,860 new homes over a twenty year period represents a 25% increase in the housing stock of GBC which is indefensible and is totally unacceptable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
13) I object to the fact that infrastructure planning for sites has not been properly addressed. There is a huge infrastructure deficit, no public funding available and developments will not fund the shortfall. Central government will not bail out Surrey County Council or Guildford Borough Council. Sites which will rely on the private car must be excluded from the local plan. Unrealistic transport plans put forward by developers need to be scrutinised thoroughly and exposed for the misleading documents that they are. Surrey County Council has told me that they do not have sufficient resources to critique these applications/policies properly and this is totally unacceptable.

[...]

18) I object to the fact that there is no tolerance planned at all for accidents, roadworks etc on the SRN which already impact local roads often resulting in gridlock. I am mindful that recent guidance from the Parliamentary Select Committee on Transport published on 30th June 2016 condemning the use of hard shoulders for permanent running [see http://www.parliament.uk/business/committees/committees-a-z/commons-select/transport-committee/news-parliament-2015/all-lane-running-report-published-16-17/]. For the avoidance of doubt, hard shoulder running is a large part of the planned increased capacity on the M25 southwest quadrant – the costs of adding capacity without using the hard shoulder option is not funded and is unlikely to be properly funded in the near term particularly following the result of the recent Referendum.

[...]

32) I object to the proposed Strategic SANG allocation at Long Reach, West Horsley as it “supports” the development of close to 1000 additional homes.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/4142  Respondent: 8717921 / Helen Jefferies  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

- I object to the housing number of 693 houses per year from the West Surrey SHMA is far too. The calculation are not transparent and no one in the council appears to care [or have the intellect to realise that errors could and probably do exist]. There are AT LEAST three independent reports which are highly critical of the SHMA including those commissioned by the GRA, CPRE and the one done by Councillor Reeve. The West Surrey SHMA is completely unfit for purpose and as a core document in the draft local plan brings the soundness and legality of the plan completely into doubt. I have no confidence in the SHMA. I object to its inclusion in the evidence base.

- I object to the use of inferior, inadequate and subjective documents in the evidence
• In particular I object to the LAA, which is inconsistent in the extreme and incomplete, citing for example land considered for schools which has not been considered for housing despite being brownfield, in excess of 50ha and close to the [eg site at Newmarsh Farm East Horsley – clearly brownfield due to lack of enforcement]. It is also highly subjective and open to challenge.

• I object to the Borough Infrastructure Delivery Plan, which is incomplete, lacking in detail, not properly costed eg £5-£10 million or even worse £100-£250 million and relies on funding that is not allocated by central government and is more of a wish list than anything

• I object to the use of the Green Belt and Countryside Study in all its volumes and Why is it that some sites are excluded because they weren’t identified in the Green Belt and Countryside Study despite numerous volumes and addenda? Why is it that some sites may impact the TBHSPA when they are outside the 5km zone are excluded (nothing to do with the size of site) and some sites are inside and indeed outside the zone but included? (again not to do with the size of site). It just appears to be inconsistent and subjective – quite possibly a desk based study which has not been verified or cross-checked. This is unacceptable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Ash and Tongham</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

• I strongly object to the proposal for new greenbelt in Ash and Tongham (this is not the Guildford Green Belt it is the Metropolitan Green Belt and you cannot get further from London in the borough than Ash and The only exceptional circumstance for this proposal is that the leader of the Council and other members of the Council’s Executive live there.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Ripley</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to the insetting of Ripley

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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I object to all sites in West Horsley for over 5 homes. There is insufficient infrastructure planned. It is impossible to deliver sustainable housing sites of this size in the countryside.

I object to the insetting of West Horsley

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/7709  Respondent: 8717921 / Helen Jefferies  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ) is Sound? ( ) is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

• I object to the fact that the impact of poor air quality on the Special Protection Area is not properly taken into account. There is no evidence that the impact of nitrogen and acid deposition on the heathland and the consequent degradation of the heathland has been taken into Please see the attached document by Baker Consultants specifically in response to the planning application almost identical to policy A35 which is relevant for ALL SITES WHICH ARE CLOSE TO THE SPA.

• I object to the allocation Three Farms Meadows– allocation A35.I object to the proposed removal of this site from the green belt when no exceptional, very special or special circumstances I object due to
  1. Unsustainable nature of site reliant on private cars and undeliverable public transport [in terms of unrealistic journey times/fabricated modelling which do not stand up to scrutiny]
  2. Unrealistic assumptions that people will even walk from one end of the development to the other to go to the doctor, school, shop etc.
  3. Unsustainable due to poor air quality impact on both housing and the SPA
  4. Impact on views to and from the Surrey Hills AONB
  5. The urban nature of the proposal – five storey buildings are out of keeping in the countryside [and some would argue are not even acceptable in Guildford town centre]
  6. Road, sewerage, fresh water, gas and electric capacity does not exist
  7. Funding for infrastructure from Central government does not exist;
  8. There is already a huge infrastructure deficit in terms of This is not properly taken into account.
  9. Impact on nitrogen deposition on the TBHSPA is not neutral and this allocation is therefore open to legal challenge
  10. No consideration has been taken of the current and future plans of the RHS These should take priority over allocation A35. Roads definitely cannot accommodate an additional 500,000 visitors to the RHS and 5,000 residents of site A35. [this is without taking into consideration the huge number of houses planned in the Horsleys, Send and Ripley].
  11. Robust objections to the planning application almost identical to this allocation were made by numerous statutory bodies including neighbouring Local authorities
  12. Insufficient consideration has been taken of the historic houses in Ockham and Ripley and the Chatley Heath Semaphore Tower

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents: Baker Consultants review of ecology documentation.pdf (1.0 MB)
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<td>- I object to the allocation of Thatchers’ Hotel, EH – allocation A36</td>
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<td>- I object to the allocation of Bell &amp; Colville, WH – allocation A37</td>
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Comment ID: PSLPS16/7711  Respondent: 8717921 / Helen Jefferies  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the allocation at Garlick’s Arch – allocation A43 due to the loss of ancient woodland; the impact on all local infrastructure of another 400 houses; the site is too close to the A3 and will have poor air There appears to be no joined up thinking on the various on/off junctions on the A3 – my understanding is that the SRN is meant to be for THROUGH TRAFFIC not local traffic. Numerous junctions will slow progress for all users and increase accidents due to more lane changes.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17064  Respondent: 8717921 / Helen Jefferies  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

• I object to the fact that insufficient consideration has been given to the harm caused by over- development to the Special Protection Area, the Sites of Special Scientific Interest and the borough’s Conservation Area and heritage assets. There appears to be no notice taken of the NPPF which specifically does NOT call for the presumption in favour of sustainable development to be engaged where the Birds Directive is engaged. This covers a huge proportion of the borough.

• I object to the disproportionate size of sites relative to the historic rural villages they will

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17070  Respondent: 8717921 / Helen Jefferies  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
- I object to the lack of consideration for the protection of heritage. There appears to be no concept of understanding that the number of HGVs used during major construction either of infrastructure or housing has a huge negative impact on listed buildings due to shaking foundations for example, increase in pollution [and impact on brickwork/mortar etc].

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17068  Respondent: 8717921 / Helen Jefferies  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the lack of consideration of parking issues in local villages caused by larger population

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17069  Respondent: 8717921 / Helen Jefferies  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

- I object due to the unsuitability of our local roads for heavy vehicles and more traffic including many years of construction traffic
- I object due to the fact that local healthcare facilities will be overwhelmed by large numbers of additional residents – it is already difficult to get an appointment at the GP and the RSCH is failing to meet waiting times for outpatients’
- I object due to the impact of large numbers of additional residents on local policing facilities which will be further Surrey Police are currently unable to cope with dealing with local residents’ concerns [eg breach of law on PROWs on allocation A35] citing lack of resources.
- I object to the impact of large numbers of new residents on school places which has not been properly For example, Send Primary School (in the process of being rebuilt) is being rebuilt with no spare capacity. The proposed redevelopment of the Raleigh School in Horsley [not even in the local plan] is only for redevelopment not for enlargement. Schools planned for Three Farms Meadows will not be operational for the first 500 houses of development. Where will those children go to school? There is no capacity. When the school is built at TFM children will have to be bussed in from elsewhere as it’s not possible to walk… adding to congestion on local
roads and the Strategic Road Network. Does one hand know what the other one is doing because it certainly does not look like it to me?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/17062  Respondent: 8717921 / Helen Jefferies  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

- There is no mandate from the electorate to build on the Green Belt – to the contrary the Conservatives who were elected in Guildford without exception stood on a protect the Green Belt I object to the fact that election manifesto promises to protect the Green Belt have not been upheld. Councillors have no mandate from the electorate to justify development of the greenbelt.

- It is clear from the census that building the majority of new housing on the greenbelt will generate almost double the amount of cars than building housing in the urban area. This is unsustainable and I object to greenbelt housing on air quality Residents of GBC will not be prepared to pay the fines for breaches of air quality limits due to the inability and unwillingness of the Council to take the impact of poor air quality on humans and the SPA seriously.

- I object to the draft plan which proposes over 70% of new housing on the This will ruin the countryside for ever impacting both current and future residents.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/17071  Respondent: 8717921 / Helen Jefferies  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
- I object to the fact that modern building techniques appear to have been ignored such that there is almost no housing proposed for the town centre “due to flood risk”. In many other parts of the country this risk has been completely

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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<th>Comment ID: PSLPP16/17059</th>
<th>Respondent: 8717921 / Helen Jefferies</th>
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- I object to the fact that insufficient consideration has been made for the constraints in this borough, be they infrastructure in nature, AONB, THBSPA, Green Belt, water supply
- I object due to the inadequate protection of the environment in terms of wildlife, SNCIs, SPA; in terms of air pollution and noise and light

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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<th>Comment ID: PSLPP16/17067</th>
<th>Respondent: 8717921 / Helen Jefferies</th>
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- I object to the fact that this proposed plan does not meet the needs of local communities
- I object to the fact that insufficient truly affordable housing is being proposed. There is no evidence that any calculations at all have been done; no sensitivity analysis on interest rates; costs of running cars
- I object to the impact of further congestion on local village roads and

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

- I object to the disproportionate (in terms of population density) allocation of housing to the north east of the borough in the wards of Clandon and Horsley and Lovelace in
- I object to the overdevelopment of sites, particularly the large sites, the density of housing proposed for site allocation A35 is higher than in most London Boroughs – this proposal is urban in nature and completely out of keeping with its surroundings
- I object to the fact that many of the allocated sites are being planned in unsustainable locations
- I object to the fact that the plan implies modal shift to cycling and walking which in the rural areas is completely unrealistic due to lack of proper cycle lanes on local roads (and the space to provide them)
- I object to the fact that the plan implies modal shift to cycling and walking which in the rural areas is completely unrealistic due to lack of proper pedestrian footpaths on local roads and the requisite street lighting to ensure the safety of Much of the borough is RURAL IN NATURE and residents specifically do not want to live in well-lit areas more akin to urban living.
- I object to the insetting of villages from the This is not necessary. There is plenty of suitable land in the urban area which needs to be regenerated rather than left to degrade further.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17066  Respondent: 8717921 / Helen Jefferies  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

10. I object to the fact that air quality concerns have not been taken seriously – air quality in many parts of the borough is in excess of the EU permitted levels. Additional traffic with exacerbate this situation impacting the health of all current and future residents.

[...]

17. I object to the impact of excessive development on the already congested Strategic Road Network particularly on the A3 and M25

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: SQLP16/388  Respondent: 8717921 / Helen Jefferies  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (No)

Much of the evidence base is unsound being either incomplete, inaccurate, subjective, inconsistent or in many cases all of the above. The SHMA and LAA are particularly poor pieces of work.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/1887  Respondent: 8717921 / Helen Jefferies  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

• A concise summary should have been provided

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/389  Respondent: 8717921 / Helen Jefferies  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 2: Legal compliance

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (No)
I do not believe that the plan is legally compliant and more likely it is morally bankrupt - for example there is no indication that Policy S1 has been limited by the Birds Directive.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/390  Respondent: 8717921 / Helen Jefferies  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (No)

Insufficient consideration has been given to the significant number of responses and depth of feeling of existing residents of this Borough

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/391  Respondent: 8717921 / Helen Jefferies  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 4: Duty to cooperate

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (No)

Significant objections were made by both Elmbridge Borough Councils and Woking Borough Council to the recently rejected planning application which is almost identical to proposed development of policy A35 - I cannot understand how the continued inclusion of this policy evidences that the Duty to cooperate has been carried out.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/392  Respondent: 8717921 / Helen Jefferies  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (Yes)

Yes I wish to participate in the examination particulary with regard to policy A35. P2 and P5, I1 and A36-41 inclusive

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/393  Respondent: 8717921 / Helen Jefferies  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 7: Any other comments?

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (Yes)

I will outline the remainder of my comments in a letter

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/3957  Respondent: 8717921 / Helen Jefferies  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I require conformation that all of these comments together with all my previous comments are passed to the Inspector. I reserve my right to appear at the inquiry and present my evidence.

I continue to object to the inclusion of policy A35, Three Farms Meadows in the draft Local Plan for many reasons including:
1. It is the least sustainable strategic site identified in both this version and in previous versions of the plan because of the constraints on the site and the physical location.
2. It is further from railway stations than any other identified strategic site.
3. It is adjacent to the most congested stretch of strategic road network in the county and close to one the most congested junction in the country (J10)

4. Local roads are at capacity particularly when the SRN is not free-flowing (accidents, diversions, roadworks etc)

5. Any public transport provision such as bus services to/from Guildford will have to negotiate the over-crowded SRN and will therefore be unreliable and subject to frequent delays.

6. Any public transport (bus services) provision to Horsley will impact the safety of the local road network as the lanes are not wide enough to accommodate PSVs, particularly as sustainable methods of travel such as cycling and walking are being promoted at the same time. This is totally unrealistic and unsafe.

7. It is adjacent to the most popular visitor attraction in the south-east, the RHS at Wisley where visitor numbers will increase by 500,000/annum.
   o The associated traffic increase from the RHS has not been taken into account.
   o The regular events at the RHS which attract 1000’s more visitors several times a year and the resultant traffic has not been taken into account

8. There is insufficient employment available onsite so that almost all residents will have to travel to work. It is unrealistic and unsafe to assume people will walk/cycle on narrow unlit local roads on a regular basis.

9. The identified mitigation to address the impact of increased traffic will not address the commuters travelling to Woking rail station

10. It remains unclear when/if the Ockham DVOR/DME will be decommissioned as the timetable has already slipped. This constrains the site significantly in terms of building heights etc.

11. The changed “Opportunities” listed in this policy reinforce why this site is totally inappropriate talking of “good urban design”

12. Opportunity (3) should be common to all sites and is not unique to this site

13. I object to the increased area of the site as this now abuts another heritage asset, Upton Farm negatively impacting the setting of this building.

14. I object to the fact that the increased area, being on the south of the site facing the Surrey Hills AONB will increase the negative impact of the views from the AONB.

15. I object to the change of site boundaries as these are not identified correctly on the plan (Appendix H p16)

16. I object to the removal of additional 3.1 ha from the green belt without any justification

17. I object to the change in green belt boundary to the eastern end of the site as this now encloses an area of high archaeological impact

18. I object to para 21 which “limits” development in flood zone 2 and 3. Development should be excluded in flood zone 2 and 3

19. I object to para 22 as this does not reflect the impact of the buildings on the surrounding area.

20. I object to the fact that the council has failed to remove this site from the local plan despite receiving 1000’s of objection from local residents and statutory consultees.

21. I object to the proposed Submission Local Plan because the significant modifications made to the plan mean that this should not be a Regulation 19 consultation. A regulation 19 consultation needs to be on the totality of the plan rather than the proposed changes.
22. I object to the fact that there has been no clear explanation why the council think it is appropriate to have a regulation consultation when the changes are major.

23. I object to the fact that there is no clear justification for the removal of one strategic site over site A35.

24. I object to the inclusion of A35 as it will not contribute to the 5-year housing projection due to constraints notably in the provision of sewerage capacity.

25. I object to the extension of the plan period by 1 year as it has not been identified as a major change.

26. I object to the fact that the Council have not explained why the Plan is unsound within the original time frame.

27. I object to the Council wasting tax payers and residents’ time and money not following due process and indeed ignoring previous representations.

28. I object to the inclusion of a 10% buffer in the housing number over the plan period. This is unnecessary.

29. I object to the evidence base especially the West Surrey SHMA and the Guildford addendum 2017 which is not transparent and has been challenged by other experts including NMSS.

30. I object to the transport evidence base including the SHAR 2016 Highways assessment report which has been criticised by Mouchel for using out of date modelling software and is therefore unreliable.

31. I object to the fact that the Council appear to have directed the transport assessment to use prescribed vehicle movements from this site with no justification.

32. I object to the housing number and particularly the fact that the Council have not, as required used any constraints such as green belt, infrastructure, air quality, AONB, TBHSPA etc. I believe that the housing number is unsound and open to legal challenge.

33. I object to the apparent disregard for the impact of in-combination development on the TBHSPA, particularly the damage caused by nitrogen deposition and high pollution levels.

34. I object to policy S2 where it states “the figures set out in the Annual Housing Target table sum to a total of 12,426” yet the figures in the table add up to 9,810 – what is the significance of the missing 2,616? This is one of a number of glaring examples of why the plan is not sound.

35. I object to the quantity of space allocated for retail in the town centre. This could be much better used for residential development. I particularly object to the reliance on the Carter Jonas study update 2017 which includes “demand” for retail space from companies already in administration.

36. I object to the plan period being inconsistent. This is an example (of which there are many) of extremely sloppy work which gives me no confidence in the content. For example, the foreword mentions an end date of 2034 whereas the introduction 1.2 and 1.3 refer to 2033. Spatial vision uses 2033. What is the plan period? This is very unclear.

37. Para 2.10a underestimates the pressure already suffered by local residents on a daily basis as a result of insufficient infrastructure particularly in the provision of health services, e.g. doctors and hospital appointments. Additional growth in the quantum proposed is unsustainable in that it fails to recognised the needs of current residents and is focussed only on the needs of future residents.

38. Para 2.13 I reject the statement that most local roads in villages have “at least one footway and usually two “.

39. I reject the assumption in para 2.15 that increased road infrastructure capacity – it may improve theoretical capacity but actually worsens performance.
40. I object to the new green belt provision in Ash and Tongham to prevent the merger with Ash Green and I do not understand why this locality should be treated any differently from any other location for example the merger of Ripley and Ockham as a result of policy A35.

41. I object to the fact that the spatial vision makes no mention of protecting the TBHSPA

42. I reject the comment in the spatial strategy that the RIS will provide congestion relief for the A3 in Guildford as my understanding is that these schemes have been dropped.

43. I do not accept para 3.2 where there is a disconnect in the period of the Council’s Corporate Plan and the Submission plan –

44. I object to Para 4.1.11 which should clearly identify the version of the LAA and not just refer to “the latest”.

45. I object strongly to the deletion of para 4.2.8 on housing density. There must be an efficient use of land in keeping with the local area. It is notable than the development planned for the town centre is at a lower density than that at site A35 for example and this is totally unacceptable.

46. I object to the wording of 4.2.18 which is unenforceable. Throughout the plan the word “Expect” needs to be replaced by “require”

47. Likewise, I object to the use of the word “resist” in 4.2.24 – it should be replaced by “refused” in this para and throughout the plan.

48. I object to the wording of policy H2 specifically “we will also seek” and “we will seek”. This should be replaced by the use of the verb “require” in this para and throughout the document.

49. Policy H2 para 4 needs to include that any funds paid in lieu of affordable housing should be ringfenced and the wording further tightened by replacement of “expect” by “will enable”

50. I object to policy H3 para b “the local community”. Rural exception sites should only be allowed where the identified need is truly local defined as within the parish.

51. I object to policy P2 and the inclusion of Ripley in the list of villages to allow insetting.

52. Policy P2 refers to the Metropolitan green belt yet goes on to create additional green belt in the west of the borough furthest from the metropolitan area. There is no justification whatsoever for new green belt land in Ash.

53. There is no evidence that cross-boundary options beyond the green belt have been considered as a viable option instead of moving the green belt boundaries within the borough.

54. I object to the removal in para 4.3.18 of “where it would not have a greater impact on the openness.” and the replacement by “subject to the impact”. This is completely in contravention of the purposes of the green belt.

55. I strongly object to policy P5 TBHSPA as no regard whatsoever is paid to the impact of air pollution on the integrity of the heathland and the resultant loss in habitat from nitrogen deposition. It is inconceivable that the level of development proposed in this plan will result in anything other than thousands more vehicles on the roads due to the unsustainable locations of for example policy A35. Additional traffic equals more pollution and more nitrogen deposition. There is no evidence at all of any in-combination impact from planned developments in adjacent boroughs and no regard to the recent Wealden case for example.

56. I also reject that the SAMM mitigation through the use of wardens will have any impact on cat predation.

57. I object to the statistics in para 4.3.55. Any survey work done on the visitor numbers is unlikely to have covered the time when commercial dog walkers from South London who appear in droves throughout the week.
58. I object to para 4.3.57 – there is no evidence that SANG provided adjacent to the SPA will provide any mitigation at all. Faced with the choice of walking in a manmade environment or on the SPA, the majority of people would choose the natural environment.

59. I object to para 10 of policy E1. Where is the “new industrial employment land on the west side of the former Wisley airfield”? there is no “new” employed land listed under policy A35. This is confusing and needs to be clarified.

60. I do not understand why previously developed sites in the green belt have not been included for development. Specifically, HMP Send where the prisoners have been told that they might be moving and indeed the site is understood to have been valued by Savills amongst others. There is no justification for adjustment of green belt boundaries until all other options have been exhausted. Doubtless there are other examples.

61. I object to para 4.4.36 with regard to the extension of the Surrey Research Park. There is no justification for this when there are a number of surface car parks within the Research Park which should be used in preference. The density of buildings in the Research Park needs to be prioritised over an extension in area.

62. I object to the wording of para 5 in policy E5 – “marketing of the site for its current use for a minimum of 12 prior to submission of a planning application”. This is another example of extremely poor and careless drafting. DO you mean 12 days, months, years….

63. I object to policy D1. Firstly, the deletion of the word “must” in para 2. This means that the policy will be unenforceable (see earlier comments). The word “must” has to be retained.

64. I object to the deletion of the wording in para 2 of policy D1 which must remain in full and I also object to the deletion of para 4.5.8.

65. I agree with the insertion of para 4.5.8a regarding the need for an efficient broadband connection but would add that the needs of current residents should take precedence. The state of broadband provision in parts of the borough (e.g. Ockham) is frankly dire.

66. I support the inclusion of policy D4.

67. In Guildford borough, it is widely accepted that there is an infrastructure deficit particularly in roads and the provision of health services. The needs of current residents are not taken into account in policy ID1. All infrastructure should be in place before development of strategic sites takes place to ensure that the developer pays so as not to jeopardise the needs of current residents.

68. There is insufficient weight given to the problem of air pollution in the borough. I object strongly to the fact that the Council does not take the health of its residents sufficiently seriously to have a policy to ensure the improvement of air quality in the life of the plan.

69. I object to the wording of policy ID3 para 11 which makes no sense at all. What do you mean by “the provision of additional public off-street parking in Guildford town centre will be supported when it facilitates the interception of trips that would otherwise derive through the Guildford gyratory”.

70. I object to the continued assumption that Guildford needs more retail. The ELNA fails to understand the shortcomings in the Carter Jonas retail study update 2017 which refers to retail requirement from companies already in administration and also fails to recognise the increasing use of internet shopping over the bricks and mortar experience. This is lamentable as the land allocated for retail could be put to much better use as residential.

71. I object to the inclusion of policy A58 – there is no justification for an increase in additional industrial floorspace at this location or indeed particularly as there are a number of vacant industrial sites at o Slyfield.

72. The AECOM work to support the ELNA is a poor piece of work riddled with unsupported assumptions.
73. I continue to object to the inclusion of the following policies:
o A36-A41 inclusive in the Horsleys, A43 at Garlick’s Arch, A42 Clockbarn, and A58. There is no evidence that anyone has considered the cumulative impact of these developments together with the development at A35. The infrastructure proposed is totally inadequate and, as these stand at the borough boundary will have a huge impact on residents throughout the borough and further afield, particularly those who use the A3.

74. I object to the fact that there is no evidence that land owned by the council in the town centre is being used for residential development.

75. I object to the fact that the land required at Garlick’s Arch is said to be almost 29ha where only 13ha is required at 30dph.

76. Similarly, I object to the excess requirement for land at A53 where the normal plot ratio of 50% appears to have been ignored resulting in an excess use of green belt land of over 7.5ha.

77. I object to the housing number of 693/annum as no constraints have been applied – the GL Hearn methodology has compounded past errors in international migration forecasts and the whole SHMA needs to be re-visited and corrected as a matter of urgency.

78. I object to the continued use of the Green Belt and Countryside study as part of the evidence base. It is a subjective and inconsistent document that pays no regard to the impact of the current proposals on the setting of the AONB for example.

79. The transport evidence provided shows an increase in congestion as a result of the planned developments. Insufficient modelling has been done to satisfy me that any of the strategic sites can move forward on this basis. The consequences are severe to residents of Guildford and those much further afield.

80. I object to the fact that there is no proposed location for a bus station in the town centre. This means it is impossible to model journey times from, for example A35 with any degree of reliability. Furthermore, the modelling capacity at SCC does not use “real world” situations for example the junctions do not allow for traffic stopped at red traffic lights and assume all time all direction running which is clearly a fallacy. This perhaps makes it easier to understand why the today’s congestion is so dire.

81. There is no evidence that noise and light pollution and the impact on both humans and wildlife has been adequately taken into account.

82. I object to the fact that policy S2 makes no distinction between previously developed land in the Green Belt. It is clear that the use of a site with no above ground building e.g. A35 has a far greater impact than the use of a site such as Send Prison.

83. I object to the fact that greenbelt sites are allocated to improve flexibility in the delivery of the plan. It is clear that the green belt should only be seen as a last resort, after all other opportunities have been fully explored.

84. I object to the use of a film on the GBC website promoting a biased view from those interviewed who would in the real world have been excluded due to conflicts of interest. This is unfortunately completed expected behaviour from a council that continues to promote opaque policy and one which has little respect from many residents.

85. I object to the fact that the prosed housing allocation at Slyfield of 1000 homes results in no increase in vehicles. This is a patently false assumption and leads me to question the soundness of the transport evidence base.

86. I object to the variation in the assessment of sites which is extremely inconsistent. In some cases the TBHSPA appears to be a concern whereas in others it isn’t. The same applies to a number of elements including impact of conservations areas, SNCIs, views in and out etc.

I consider for the reasons listed above and numerous other reasons that this plan is unsound and not fit for purpose. It is very worrying that the council does not appear to have either the resources or the intellect to get the basics right.

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Answer (if comment is on questions 1-7 of the questionnaire): ()

Sites A36-41 (East and West Horsley). This is a back-door way to create a mega-village – essentially, a soulless new dormitory town. The Horsleys feel victimised by this plan, which has been masterminded by Council leaders representing Ash and Tongham at the other end of the borough, where (in a flagrant case of political double standards) the Green Belt is actually being extended under Policy P3.15

Whatever their merits as development sites, the 6 Horsley sites should not be considered individually but for their cumulative impact on the contiguous villages of East and West Horsley, the green belt is meant to stop villages from conjoining.

Under the plan, rural West Horsley will take 35% of new homes, urban Ash and Tongham 16% and Guildford urban area only 11%. The total number of homes in West Horsley will increase by 35%, which is disproportionate when measured against the overall increase in housing across the borough and particularly in Guildford town.

These sites will put unsustainable strain on local facilities and infrastructure, including public transport, parking, schooling, medical facilities, sewage, surface drainage and shops.

By surrounding Waterloo Farm campsite with 120 new houses, Policy A40 on land to the North of West Horsley will make this rural tourism amenity unviable. This may accord with developers’ plans, since the site would then be vulnerable to infilling with yet more housing

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<td>Proposed Submission Local Plan: strategy and sites 2016 / Introduction</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( No )

Answer (if comment is on questions 1-7 of the questionnaire): ()
The Plan is already out of date, with Britain leaving the EU many European laws that currently apply to this Draft will come under scrutiny these issues should be considered within the draft, and GBC should decide now which European laws they will uphold until the next plan.

With the possible return of many European citizens to Europe and possible recession projected housing numbers and growth should also be reconsidered.

How can GBC say you are producing a map for the areas you want to 'protect' i.e. the Green Belt and Surrey Hills and then take huge swathes of Guildford out of the Green belt by insetting, other sites, and the potential damage to Surrey Hills. The green belt belongs to the whole Metropolitan area, GBC are supposed to be the care takers of it.

The increased population from new housing is not sustainable when according to Gov figures 45% of Guildford borough commute and the current train (incl. car park) and roads infrastructure is already severely overcrowded.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

### Comment ID: PSLPS16/5759   Respondent: 8721857 / Andrea Lightfoot   Agent:
**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The re-inclusion in the plan of Site A35 Three Farms Meadow, alias the former Wisley airfield, Ockham following a huge public outcry, and after Guildford Planning Committee have unanimously rejected a recent planning application for precisely this development on 14 separate grounds has deceived many residents into thinking that it has been defeated. This is not an NPPF “presumption in favour of sustainable development” but a predetermined bias in favour of specific applicants, who had already been given many additional months to refine their application before it was rejected.

Policy A35 should be removed from the plan for all the reasons the development was rejected by the Planning Committee.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

### Comment ID: PSLPP16/11640   Respondent: 8721857 / Andrea Lightfoot   Agent:
**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy D1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
No reference to vernacular or historic design guidelines, even in Conservation Areas. Most of the borough, especially the rural areas, has vernacular design guidelines that are available to give suggestions as to appropriate design. These should have strong planning force.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11641  Respondent: 8721857 / Andrea Lightfoot  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Sustainability should be the main ambition, conditioning the whole local plan and running through it, as claimed in the NPPF, “like a golden thread”. It should be set out clearly in Policy S1.

Your plan wants to build towns in the Green Belt that are environmentally unsustainable. Bringing increased car use and unacceptable traffic congestion, overstretched social infrastructure, and more greenhouse gas emissions, noise and light pollution. It’s counter-intuitive and contradictory.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11642  Respondent: 8721857 / Andrea Lightfoot  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The policy should commit the Council firmly to protecting and preserving our heritage assets from development. Instead, the specific policy pledge to “support development” that might “enhance” heritage assets leaves wide scope for abuse in the form of destructive commercialisation.

This policy needs to be much stronger, and do much more to protect and preserve our historic assets.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
### Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D4

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ()**

The plan envisages that 40% of homes built will be “affordable”, but this does not provide any accommodation for low-paid workers, for example, those on the minimum wage, who cannot afford to buy so-called “affordable” homes or pay an “affordable” rent. There is a need for some expansion in social housing, especially in urban areas, where there is a greater concentration of low-paid workers such as those employed in the retail etc.

The number of homes planned in the urban area is too low. There is a need for regeneration in many urban areas, but this is ignored in favour building homes on green-field sites instead. This will not address urban housing needs. It is also unsustainable, since building outside the town does disproportionate harm to road traffic, air quality and overstretched infrastructure.

All the stated policy aims for “inset” villages will be negated by the excessive weight of new housing development proposed which would radically change their character forever.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

### Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E5

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ()**

Villages need protecting in terms of both design and scale. Many farms are being taken over by light industrial units that can be inappropriate for the area this needs to be clearly defined.

Some rural economy dependd on maintaining the rural character of our villages which would be endangered by the wholesale “insetting”, boundary expansion and house building proposed in other parts of the plan.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

### Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E6

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ()**

Villages need protecting in terms of both design and scale. Many farms are being taken over by light industrial units that can be inappropriate for the area this needs to be clearly defined.

Some rural economy dependd on maintaining the rural character of our villages which would be endangered by the wholesale “insetting”, boundary expansion and house building proposed in other parts of the plan.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
Tourism and visitors do not always depend on new visitor “attractions”, ie. Newlands Corner. In this policy, the presumption in favour of development may damage Heritage sites and the Green Belt.

Guildford has many “leisure and visitor attractions” already. Need examples.

The priority should be to protect the borough’s prime leisure and tourism asset, its countryside, from inappropriate development. This is all the more valuable because of its accessibility from London.

Don’t ruin our National Attractions ie RHS Wisley with a huge neighbouring development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11637  Respondent: 8721857 / Andrea Lightfoot  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E7

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The policy “vision” refers to protecting the Guildford’s “unique setting” (including, surely, its surrounding Green Belt and countryside views) but this is not carried over into the formal policy wording in the blue box.

There should be much more residential use of the town centre where most people, especially the young and less well-off, want to live and where the necessary amenities and infrastructure exist. The policy misses the opportunity to propose a visionary regeneration plan for the River Wey/Walnut Tree Close area, where there is arguably enough brownfield land for 4,000 new homes, meeting near all the borough’s housing need over the plan period without harming the countryside.

There is an urgent need for a brownfield register and to focus on brownfield redevelopment before considering development outside the existing urban area. CIL strategy must promote brownfield redevelopment

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11638  Respondent: 8721857 / Andrea Lightfoot  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E8
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

To the proposal that sites on the edge of District Centres should be considered for retail developments allowing retail hubs to be vastly expanded in order to smooth the way for vast new housing estates outside in the countryside.

The Council should not be preparing the way for new supermarkets in the Green Belt, supermarkets are closing due to deliveries. Rural retail capacity should be left to local demand.

The policy proposes not a single measure to support existing rural shops and services that are the lifeblood of village communities, e.g. using business rates and other levers at the Council’s disposal.

NPPF 59: “Local planning authorities should consider... the overall scale, density, massing, height, landscape, layout, materials and access of new development in relation to neighbouring buildings and the local area more generally.”

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11626  Respondent: 8721857 / Andrea Lightfoot  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The policy in the blue box says is that the Council will encourage building over the plan period. We need rules, context and we need a proper framework.

The housing mix is based on out-of-date, pre-EU exit projections and on assumptions set out in a flawed SHMA that has not been scrutinised.

Higher density development in the urban area would be an improvement, not high rise ruining the views but sensitive regeneration with 3-4 storey blocks with landscaping and underground parking.

How can Guildford trust GL Hearn “We act for many of the leading developers.” “Focused on maximising returns from real estate assets.” and part of Capita Real Estate, when it is not in there interest to act for GBC.

Student accommodation should provided for all of new students and more than 60% of existing students by the Uni, freeing ideal family accommodation in the urban area. Other university cities insist on higher percentages than those proposed in the plan. Surrey University, has failed to use its existing planning permissions (dating from 2004) to accommodate 3,000 students or to improve the efficient development of its campus (e.g. by building on its extensive and under-used surface car parks).

If all students were accommodated in this way, 2,000 homes would be freed up in town and there would be no need to build on the Hog’s Back.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11627  Respondent: 8721857 / Andrea Lightfoot  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The viability clause (4.2.40) means that in practice the policy would not work. Private financial viability has no place in a public policy and should be removed. Loosing countryside for no local benefit.

Building more homes in Guildford cannot increase real affordability given the London market and the average price of houses in the borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11628  Respondent: 8721857 / Andrea Lightfoot  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

It implies that homes can be built anywhere near a settlement of any form (including agricultural land, Green Belt and the AONB). These homes are meant for people with a village connection, but they could be for anyone on the Guildford borough housing list and they are not in perpetuity because of right to buy.

The blue-box policy wording needs to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove “exceptional circumstances.”

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11644  Respondent: 8721857 / Andrea Lightfoot  Agent:
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<thead>
<tr>
<th>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1</th>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<td>Infrastructure investment that no-one is prepared to pay for.</td>
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<td>The current draft CIL scale also encourages development on greenfield sites rather than brownfield.</td>
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<td>The policy wording says nothing about roads and traffic. The schemes referred to in this policy will not solve existing congestion and the local road network has not been given sufficient consideration.</td>
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<td>Adequate infrastructure provision must be a pre-condition of sustainable development, this is key.</td>
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<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<tr>
<td>Decisions by Highways England on improving the strategic road network (the M25 and A3) are still years away especially with EU uncertainties. Nothing should be considered before these are completed.</td>
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<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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The sustainability of the settlements which the Council want built across the countryside depends on a general shift from private car use to walking, cycling and public transport, this will not happen everyone will still drive, especially at the proposed Wisley Airfield site where they would be isolated. The proposed sites are often miles away from the nearest railway station, the station car parks are all full. Bus services even in the largest villages are almost non-existent. Many roads flood badly and have no footpaths.

The vast majority of the borough’s residents are not able to cycle.

Park-and-rides are part of the transport mix but are too slow for commuters. For an adult couple going shopping it is still cheaper/easier to park in town.

The addition of two new stations appears good but will slow down train journeys, which are already packed and what’s the point when we are told the Waterloo lines have no extra time slots for extra trains, we are not cattle.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11649  Respondent: 8721857 / Andrea Lightfoot  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The plan to build on large areas of countryside and to inset villages will cancel out any benefits from extending the principle of enhancing biodiversity beyond Biodiversity Opportunity Areas.

There is no mention of the impact of the plan on food production, or monitoring the loss of agricultural land, or biodiversity of gardens that will be built on if gardens are inset.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11630  Respondent: 8721857 / Andrea Lightfoot  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
This policy weakens existing protections

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11631  Respondent: 8721857 / Andrea Lightfoot  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

This policy states “the general extent of the Green Belt has been retained.” The plan has not done this, at this rate it will be nearly gone in just over 100 years, possibly during the lifetimes of our grand children.

The Metropolitan Green Belt forms 89% of the borough. It is precious beyond the short-term demands of the present Government’s policy or a 15-year local plan. It is a legacy to future generations – an asset and amenity that belongs as much to all Londoners as GBC, have you done your duty to cooperate with all of them, I believe their Mayor has banned building in the Green belt in the London area.


These assets should be protected in perpetuity, but Policy P2 seeks to justify excessive development in supposedly protected areas. This is contrary to previous responses to public consultations.

Loss of 7% when insetting, infilling and settlement boundary extensions are included, unacceptable.

Instead say no to land-banking urban sites as a financial speculation.

I strongly object to “insetting” of 14 villages from the Green Belt, and at “infilling” 12 of the borough’s Green Belt villages. I am deeply disturbed that settlement boundaries are to be hugely extended in many villages and that infilling is also proposed outside the settlement boundaries of 11 further villages.

I strongly Object to Wisley Airfield site being included, it is not a brownfield site and it completely ignores the SPA influence and the councillors own decision to object to it. Very strange.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11650  Respondent: 8721857 / Andrea Lightfoot  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire):()

To the identification and allocation of sites in this plan without regard to Green Belt, infrastructure or other constraints. The plan says that “allocating these sites does not grant planning permission for development, however, it does identify the principle of development and uses.” This ignores the tens of thousands of detailed comments the Council have received about individual sites ever since the Issues and Options consultation in 2013. This amounts to a war of attrition by the Council in conjunction with developers, since many busy residents are sick and tired of repeating the same comments to deaf ears.

The plan has hardly changed since the Council received 20,000 objections to its first draft plan in 2014, commenting is a waste of time.

All Green Belt sites should be removed from the plan until “exceptional circumstances” for development are proven, as stipulated repeatedly in the NPPF. The Green Belt should always be above short-term considerations such as perceived housing need, as the law has established.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11653  Respondent: 8721857 / Andrea Lightfoot  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire):()

The Green Belt is not for swopping. Areas in the West are having new green belt while other areas in the East are having their Green Belt removed, the reason why land nearer to London is more ecologically valuable as Green Belt is as a Green ‘lung’, the further away from the Urban area the less efficient it is in its purpose to curb pollution.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11632  Respondent: 8721857 / Andrea Lightfoot  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire):()
Urban development on existing hardstanding would not create additional flood risk, especially where there is scope for improved flood resistance measures to be included in the design. Sites such as the Arriva bus depot, on the River Wey bank, are potential high-value brownfield sites that would not be available for housing if this policy is implemented. It is not the footprint of existing buildings that should limit future development, but the extent of existing hardstanding. Tarmac and concrete do not act as functional floodplain, and some land with hard standing close to the river, within the town centre and within easy walking distance of the railway station, provides an excellent opportunity for real urban regeneration that could protect the surrounding countryside.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11633  Respondent: 8721857 / Andrea Lightfoot  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The policy must ensure that it is not using land which is adjacent to the Special Protection Areas.

The mitigation (cash compensation) offered for development in the special protection area is so small as to be meaningless.

SANG (Suitable Alternative Natural Greenspace) is not beneficial since the sites identified or targeted are already green space. This is just using agricultural or wooded land as recreation land in order to justify building on other green spaces nearby. There is no actual increase in open space or environmental protection; instead, it is a ploy designed to permit building on otherwise protected areas. SANG – in part used to prevent dogs and cats attacking nesting birds. Car parking actually reduces the green space.

Strongly Object to Car Parking on Effingham Common, due to having its own protected species.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11624  Respondent: 8721857 / Andrea Lightfoot  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
No definition of sustainable development. The policy also needs to set out any principles for applying sustainable development in practice for local planning decisions, which could have serious long-term impacts.

No environmental protection.

It doesn’t reflect issues of transport and infrastructure in the rural areas, where scale and density are unsustainable.

It does not say how each element is to be weighted or conflicts resolved.

Where is the Green Belt in the Policy - to protect the green areas in perpetuity, stopping urban sprawl and villages converging. Commit to Green Belt boundaries and protections. It is what is so great about our borough.

“Wherever possible” and “without delay” is not the sort of language to be used in a serious planning document like this, it is too open to be used by any half decent developers lawyer.

Where are the 12 Core Planning Principles set out in NPPF?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/11625  Respondent: 8721857 / Andrea Lightfoot  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The number is based on in EU projections for economic and population growth, including migration. These now need to be revised downwards, due to our exit. The area is artificial, and so are the housing numbers artificially high.

It is not clear why Waverley is included in the SHMA and not say Mole Valley. Guildford borough is unique and should be treated as such. These concerns have been raised since 2014 but the Council have failed to seek good data.

No public consultation on the SHMA and no scrutiny. The method has not been disclosed therefore one one knows whether the numbers are completely fabricated. This is not a good basis for our Local Plan.

University Student housing should not be counted in the SHMA.

Most of Guildford borough is meant to be protected from development (89% Green Belt, 44% AONB and about 75% protected by SPA). This would be a major and irreversible change, a largely rural borough into a suburban one like Woking, if residents wanted to live in Woking we would, its cheaper and has lower house prices. A substantially lower housing number would remove the need to build on Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
**Comment ID:** PSLPP16/9068  **Respondent:** 8723809 / Sally Blake  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy D1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to POLICY D1 - Making better places

- There is no reference to vernacular or historic design guidelines, even in Conservation Areas. Most of the borough, especially the rural areas, has vernacular design guidelines that are available to give suggestions as to appropriate design. These should have mandatory planning force.
- The monitoring of this policy is inappropriate. Why should this policy result in a reduction of the number of appeals for poor design?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPP16/9069  **Respondent:** 8723809 / Sally Blake  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy D2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to POLICY D2 - Sustainable design, construction and energy

- Targets unachievable if Green Belt covered with amount of housing as proposed, causing traffic chaos, infrastructure failure and unacceptable levels of pollution.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPP16/9070  **Respondent:** 8723809 / Sally Blake  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to POLICY D3 - Historic environment

- Supports overdevelopment: you can’t “enhance” history. Doesn’t ban private interests from trying to make aggressive profits from privatising and commercialising public historic assets.
- Doesn’t ban development near historic assets.
- Development close to historical assets is harmful and should be expressly prohibited. Fails to meet the requirements of NPPF 126, 131, 132, 133.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/9071  Respondent: 8723809 / Sally Blake  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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I object to POLICY D4 - Development in urban areas and inset villages

- No commitment to expand social housing or accommodation for people who can’t afford so-called affordable homes.
- Not enough new homes in urban areas, despite demand and need for urban regeneration and protection of Green Belt.
- Objectives for inset villages cancelled out by plans for excessive housing growth there.
- Too much emphasis on traditional shops, when a lot of this sector is in terminal decline.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/9059  Respondent: 8723809 / Sally Blake  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to POLICY E1 - Meeting employment needs

- The evidence base is unreliable;
- There is unclear differentiation between B class uses;
- Only high value-added business uses, contributing to a modern “knowledge economy”, are desirable, not low-grade, low-employment warehousing which is also land hungry;
- Industrial and commercial businesses must be concentrated in the urban area or existing business parks (e.g. Slyfield) not in the rural environment which the infrastructure is unable to support
- The rural environment must support micro- or high-tech businesses, agricultural industries, and tourism, and these sectors must not be damaged by general industrial development which is inappropriate.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9060  Respondent: 8723809 / Sally Blake  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to POLICY E2 - Location for new employment floorspace

- It would be more sensible to confine all new office and research and development (use Class B1a and B1b) floor space to Guildford town centre.
- I oppose the policy of expanding the Research Park onto Blackwell Farm. No exceptional circumstances, as defined under the NPPF, have been advanced to justify incursion into this permanent and high-quality area of Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9061  Respondent: 8723809 / Sally Blake  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to POLICY E3 - Maintaining employment capacity and improving employment floorspace

- Puts unnecessary obstacles in the way of using brownfield land into useful residential housing, contrary to government policy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9062  Respondent: 8723809 / Sally Blake  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to POLICY E4 - Surrey Research Park

- Subordinates public planning policy to the University of Surrey’s private, commercial enterprises (not its public academic purpose).
- No cost/benefit analysis of harm to Green Belt involved in extending research park.
- Waters down research purpose of park, turning into a general business park.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9063  Respondent: 8723809 / Sally Blake  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to POLICY E5 - Rural economy

- Incompatible with high housing numbers proposed for rural areas elsewhere in the plan.
- Insetting and settlement boundary extension endanger appropriate rural activities listed that depend on maintaining rural areas’ character.
- Town-centre uses for rural areas contradict government’s localism policy and need to consult and protect village environments.
- Established commitments to high-speed rural broadband and mobile coverage watered down despite 2014 consultation responses.
I object to POLICY E6 - The leisure and visitor experience

- Danger of overdevelopment: success doesn’t depend on building “attractions” which can harm heritage and rural settings. No case made for creating new ones.
- No policy of opposing reduction in rural hotel capacity.
- No definition of what added value interventions by Council can make to normal visitor market mechanisms.
- No policy of supporting Guildford countryside as its prime leisure and visitor asset, whose value rises as London gets bigger and busier.
- No vision of what the ideal visitor experience of the borough actually is and how to support its various elements.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

I object to POLICY E7 Guildford Town Centre

- No statement in policy wording of value of Guildford’s rural setting and views.
- No consideration of Town Centre Master Plan, GVG proposals or station redevelopment plans.
- Proportion of new housing in town far too small. Development pushed into countryside, ruining the latter and harming urban regeneration.
- No brownfield register.
- Too much big retail, despite online shopping revolution and decline of traditional high streets internationally. Futile to try to turn Guildford into Woking or Kingston.
- No measures to support small, niche retailers in town, e.g. through business rates.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9066  Respondent: 8723809 / Sally Blake  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E8

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to POLICY E8 - District centres

- Too much scope to expand rural retail centres to justify major housing expansion across the countryside, despite lack of demand. Will spoil character of villages while harming Guildford’s role as a retail hub.
- No measures to support existing rural shops and services, e.g. through business rates.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9067  Respondent: 8723809 / Sally Blake  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E9

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to POLICY E9 - Local centres

- No need for retail development “adjacent” to rural centres for same reason as Policy E8.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9051  Respondent: 8723809 / Sally Blake  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1
I object to POLICY H1 – Homes for all

- The policy doesn’t set any constraints on building.
- Housing mix based on growth and demographic assumptions and unreliable SHMA that weren’t put out to formal public consultation and wasn’t scrutinised by Councillors.
- I support higher density development in the urban area.
- Fails to compel University of Surrey to use its thousands of planning permissions and existing space, such as car parks, for student accommodation.
- Lets University off the hook of accommodating all its students, so as to free up houses for the most needy in town.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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I object to POLICY H2 – Affordable homes

- Using the official definition of Affordable is not appropriate. ‘Affordable homes’ in this area are not affordable!
- Pushing for these homes just means pushing for more development.
- The viability clause lets developers off the hook of providing even these (non-) affordable homes. It is too open to manipulation.
- Contradicts government policy to develop less advantaged regions of the UK. People don’t have to live and work in Guildford but should be encouraged to move to cheaper, less congested areas.
- This policy won’t affect market forces or house prices. Guildford is too small and too near London to influence these, however many homes it builds.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to POLICY H3 – Rural Exception Homes

- It loosens the criteria by allowing “market housing” and development that changes the housing mix. Developers would be able to override NPPF “exceptional circumstances” and other restrictions to build large houses in the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9072  Respondent: 8723809 / Sally Blake  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to POLICY I4 Green and blue infrastructure

- Infrastructure considered here as an afterthought, rather than pre-condition of development. Should be a key issue for the rest of the plan.
- Excessive housebuilding in countryside not supported by any funding or provision for infrastructure.
- Heavy focus on building on greenfield sites inefficient and unnecessary: cheap for developers but much more expensive for the public who have to fund the infrastructure.
- Draft CIL scale discourages use of brownfield land first.
- No plan for organic increase in existing traffic congestion, let alone once thousands of houses are built across the countryside. Local roads hardly considered. Green Belt being eroded before road widening/improvement plans certain, encouraging over-development of greenfield sites.
- All Green Belt sites should be removed from the plan until “exceptional circumstances” for development are proven, as stipulated repeatedly in the NPPF. The Green Belt should trump short-term considerations such as perceived housing need, as case law has established.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9054  Respondent: 8723809 / Sally Blake  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

**I object to POLICY P1 – Surrey Hills Area of Outstanding Natural Beauty**

- This policy weakens existing protection when it should strengthen it. It is dependent on the Surrey Hills Management Plan. The latter welcomes housing development. Even major (undefined) development in the AONB would be permitted if exceptional (undefined) circumstances could be demonstrated.
- The wording in paragraph 4.3.9, Policy P1, and the bullet points in the first paragraph of Policy box P1, could be interpreted to allow spectacular viewpoints and features in the AONB to be commercialised with visitor centres, shops and man-made additions for play areas. These would contravene the 1949 National Parks and Access to the Countryside Act 1949, which established the AONB "for the primary purpose to conserve the natural beauty of the landscape." (paragraph 4.3.1)

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

**Comment ID:** PSLPP16/9055  **Respondent:** 8723809 / Sally Blake  **Agent:**  

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

**I object to POLICY P2 – Green Belt**

- No declaration of support for protecting the Guildford Green Belt, contrary to NPPF and government statements.
- No evaluation of value of local Green Belt as a public and private asset: it’s just treated as potential building land with a few inconvenient restrictions.
- Impact of Green Belt development on local agriculture ignored.
- Impact on rural leisure and tourism ignored.
- Impact on flood control ignored.
- Impact on carbon sink and knock-on effects for air pollution and climate change ignored.
- Impact on biodiversity ignored.
- Impact on natural heritage ignored.
- Impact on water catchment ignored.
- Impact on room for public space amenities (parks, cemeteries, waste facilities etc) ignored.
- Impact on rural business (e.g. mineral mining, film making) ignored.
- Impact on natural landmarks and views ignored.
- Harm to public health and wellbeing (physical, psychological) ignored.
- Allows excessive levels of development in breach of views expressed in last consultation and Conservative Party manifesto commitments at the last local elections.
- Has allowed ruling Councillors to argue that there is an acceptable percentage of Green Belt that should be sacrificed to development, when no such rule exists in the NPPF.
• Ignores alternative approaches, such as fair burden-sharing under which settlements would undertake to accommodate new development in proportion to their size.
• Disproportionate amount of development (most of it, in fact) to be in Green Belt. Too few new homes in urban areas where most people (especially the young and less privileged) want to live. This will act against much needed urban regeneration.
• “Insetting” of most villages disproportionate and unjustified in terms of their contribution under the NPPF to the purposes of the Green Belt. Based on flawed Green Belt and Countryside Study. Idea that most Guildford villages do not contribute to “openness” is subjective.
• Major settlement extensions allow indiscriminate housebuilding, as irregularly shaped villages are squared off to enclose green fields.
• Overall harm to Guildford Green Belt unjustified by any objective development need post-Brexit.
• Ignores most of NPPF 17 stipulations.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to POLICY P4 – Flood risk and water source protection zones

• Inappropriately limits development of urban, brownfield, hardstanding sites, pushing development unnecessarily into the countryside.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9058  Respondent: 8723809 / Sally Blake  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to POLICY P5 - Thames Basin Heath Special Protection Areas

• Compensation mechanism too feeble to provide protection.
• Cynical encouragement of SANG to justify nearby development in protected areas. Does not extend protection or amount of green space, and can damage them (e.g. dog and cat attacks on wildlife).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9049  Respondent: 8723809 / Sally Blake  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to POLICY S1 – Presumption in favour of sustainable development

• No definition of sustainable development given, no reference to its importance in the NPPF, no guidelines for applying it to planning.
• No mention of Green Belt, Guildford’s greatest legacy by far to Sustainable Development. No commitment to protecting it.
• No statement of how economic, social and environmental impacts should be balanced.
• No reference to most of the NPPF Core Planning Principles.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
I object to POLICY S2 – Borough Wide Strategy

- No justification given for 13,860 housing need figure. Figure based on a secret formula used by consultants and never seen by anyone on the Council or by the public. Council has failed to seek its disclosure.
- 13,860 figure confuses the OAN with a housing target. No definite housing target given, leaving too much scope for the Council to make one up. I can’t understand how we’re being consulted when we don’t know how many houses the Council want to build, taking all the constraints into account.
- Figures based on a Housing Market Area that ignores 2 neighbouring districts (Rushmoor and Mole Valley) and is much too small, since most people commute or travel far outside the Area to shop or study. This distorts the figures: no reason why Guildford needs to build nearly twice as many large housing estates as the rest of Surrey put together, or half of all sites over 100 units.
- High numbers involved would transform the character of the borough from mainly rural/Green Belt to urban, creating a corridor of development out of London as per Woking or Croydon.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I wish to object to the draft local plan, on the grounds that Guildford council have failed to disclose how they arrived at the number of 13,860 new homes.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<td>The extra pollution, which will be created</td>
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<td>Guildford cannot cope with the existing traffic without having any more.</td>
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<td>The intention to increase the size of village boundaries, thereby allowing developers to propose even more sites</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The Green Belt should be protected at all costs

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/968  Respondent: 8726529 / Eric Palmer  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. APPENDIX C

I OBJECT to the proposed Infrastructure Schedule (Appendix C)

The Infrastructure Schedule sets out the key infrastructure requirements on which the delivery of the plan depends. For each of the Key Allocated Sites in the borough it identifies infrastructure projects that are required, except for Garlick’s Arch (A43) which is not mentioned. It is clear that the Plan takes no account of the infrastructure required for this site and is therefore not fit for purpose.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/1044  Respondent: 8726529 / Eric Palmer  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I OBJECT to the proposed Infrastructure Schedule (Appendix C)

The Infrastructure Schedule sets out the key infrastructure requirements on which the delivery of the plan depends. For each of the Key Allocated Sites in the borough it identifies infrastructure projects that are required, except for Garlick’s Arch (A43) which is not mentioned. It is clear that the Plan takes no account of the infrastructure required for this site and is therefore not fit for purpose.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/969  Respondent: 8726529 / Eric Palmer  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. APPENDIX D

I OBJECT to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)

° The “objectively assessed need” figure of 693 homes a year is too high.

° A professional review by NMSS has concluded that, even basing the calculations on a period of stronger economic and student growth, the housing need figure should be revised down to 510 homes a year and the method changed to consider student housing need separately due to the distorting effects.

° The current SHMA inflates the proposed housing figure due to

° failure to correct for errors in the historical data for international migration flows,
° issues with the way it considers students and affordability and
° flaws in the method for estimating the number of homes needed to support job growth.

° It is unacceptable that demographic and economic model assumptions have been withheld and cannot be checked making the process unaccountable.

The Plan’s proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the borough, it is over double the previous figure of 322 used in previous plans. The SHMA report methodology is I believe inaccurate; it inflates the needs of the borough by distorted student numbers. However, it is based on commercially confidential modelling assumptions that cannot be checked or reviewed. There is no transparency to this evidence base and it is therefore impossible to assess its accuracy. This is not democratic and is not appropriate for consultation of the Plan.

The National Planning Policy Framework allows the overall housing target to be reduced to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/1473  Respondent: 8726529 / Eric Palmer  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Introduction

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

SITES - POLICIES A1 TO A57

I OBJECT to all strategic sites proposed in the draft Plan to be built in the Green Belt.

1. I object to the identification and allocation of sites in this plan without regard to Green Belt, infrastructure or other constraints. The plan says that “allocating these sites does not grant planning permission for development.” However, each of the sites will be removed from the Green Belt and will be available in principle for development and non-Green Belt uses. The inclusion of these sites without detailed site by site justification shows contempt for the thousands of detailed comments the Council have received about individual sites ever since the Issues and Options consultation in 2013. The plan has hardly changed since the Council received 20,000 objections to its first draft plan in 2014. The Inspector considering the plan may conclude that the consultation has not been properly conducted.

2. The housing needs assessment is flawed in various respects and overstates housing need. In addition since it was produced, the referendum Brexit decision has almost certainly reduced future housing need and rendered the previous assessment seriously out of date. As a result any assessment of Green Belt sites which took place to consider whether “exceptional circumstances” existed to outweigh the harm to the Green Belt was based on false premises and should be reconsidered.

3. Having determined housing need the Council was entitled to consider constraints before determining the housing number. I believe that as ill as being entitled to do this the Council was required to give proper consideration to constraints. The scarcity of sites outside the Green Belt as ill as infrastructure (most notable roads) considerations all represented constraints which should have been taken into account in determining the final housing number. Accordingly in this regard our objection to the allocation of Green Belt sites is twofold. First I believe constraints should have been applied. Secondly I believe the Council did not properly consider constraints and that their decision making process was flawed and thus subject to being set aside by the Inspector.

4. Even if having properly applied constraints there is a need to develop in the Green Belt then specific Green Belt sites should not be included in the plan unless “exceptional circumstances” for development are proven in relation to that specific site, as stipulated repeatedly in the NPPF. The Green Belt should trump short-term considerations such as perceived housing need, as case law has established. There needs to be a specific balancing exercise conducted on each Green Belt site weighing the harm to the Green Belt against the very special circumstances which are argued in favour of development at that particular site. There is no evidence this has been done. Instead the council have appeared to say that having chosen a housing needs figure and decided it cannot be met without building on Green Belt then there is no need for any further consideration and any convenient Green Belt site can be allocated for building at will.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
1. **POLICY A25 - Gosden Hill Farm**

I OBJECT to Policy A25 with proposals for Gosden Hill Farm.

The Green Belt at this point serves the important function of separating West Clandon from the edge of urban Guildford. Development here will cause the two to coalesce defeating one of the objectives of the Green Belt. If this development proceeds I believe the narrow strip of Green Belt remaining between Guildford and Clandon at this point will be too narrow and will come under further pressure.

It will represent an undesirable ribbon development along the A3. It will be highly visible from the A3 when approaching Guildford and will, in conjunction with A43a at Garlick's Arch give the appearance of almost continuous development from Send through to Guildford.

The Plan does not put forward any evidence that exceptional circumstances exist to justify removing this site from the Green Belt.

The development will overburden the local road network and increase congestion on the A3 and A247 through the centre of West Clandon. This is already very heavily used whilst being unsuitable for designation as an A road. In places it is too narrow for two lorries to pass causing them to mount the pavement.

Note the following accident data:

2010 –2014 from Crashmap data

- Clandon Cross Roads Area to Bulls Head - 17 incidents
- Bulls Heads Head to Bennett Way - 8 incidents
- Bennett Way to Highcotts Lane - 15 incidents
- Tithebarn Lane to Portsmouth Road Birch Close - 8 incidents

2015

- 21 Oct 2015 – A247 near shell garage - Three vehicles collided causing delays
  
  Surrey Fire and Rescue deployed.

2016
Attempts have been made over many years to reduce traffic, traffic speeds and accident risks through West Clandon, however little has been achieved as the road cannot be widened and SCC is reluctant to impose further speed limits as congestion is already very high.

I object most strongly to the proposal for a link road to bring traffic from the Gosden Hill development to the proposed 4 way junction at Burnt Common. This has the potential to generate large volumes of traffic (including commercial vehicles) on the A247 through West Clandon - a road which is already under traffic stress (see below).

The land in Gosden Hill does exactly what the Greenbelt was designed to achieve. It provides a green buffer between the Guildford Urban Area and West Clandon, gives Burpham a defined green boundary and breathing space and it hides Guildford town from visitors until they pass the off-slip to Burpham.

No exceptional circumstances have been demonstrated for building on this site and therefore it does not comply with paragraphs 87-89 of the NPPF. It stops the sprawl of Guildford town, assists in safeguarding the countryside from encroachment and assists in urban regeneration by encouraging the recycling of derelict and other urban land. All of these are requirements of the NPPF.

The scale of Gosden Hill is out of proportion to West Clandon. It would have four times the amount of housing plus shops, offices/factories, GP surgery, schools. Development on this scale would blight a historic village with a history going back to the doomsday book and beyond.

Gosden Hill is the most obvious location for the north end of an A3 tunnel. It has rising ground and is situated just before the urban area. If it is built on, it will be very difficult to construct a tunnel.

The development will generate in the region of 6,000 vehicles which will pour on to the A3 which is stationary every day during rush hours. The linking of the A3100, B2215 and A247 would channel thousands of cars through the narrow, winding road through West Clandon, a road where large lorries mount the pavement virtually every day and through Send and Ripley which are also severely constrained.

The volume of traffic will greatly increase air pollution which is particularly critical given the proposal to build two schools.

Currently, a two way junction at the site would require vehicles wanting to go north on the A3 to go through Burpham which is grid-locked every day.

Burpham’s sewers are at capacity. Sewage would have to be pumped to Slyfield for processing, a project of enormous cost. There is inadequate fresh water in Guildford and current supplies could not meet the needs of a development of this size. Electricity supply is also inadequate and would require a big infrastructure development.

The railway station was rejected by Guildford Borough Council in 1984 because it feared Gosden Hill would become a dormitory estate for London.

The wording of the Local Plan with regard to Gosden Hill is so loose that the developer could virtually do whatever it wants.

The remaining agricultural land between Gosden Hill and West Clandon is so small that it is highly likely to be uneconomic and therefore a prime candidate for further development which would roll the Guildford Urban Area over West Clandon towards East Clandon and Wisley.
If the Strategic Sites are developed, the north of Guildford will deliver 36%, 5,036 houses towards the total of around 14,000. The infrastructures of the existing villages and the A3 will be overwhelmed by the scale of development.

A new on-slip at Burpham would only be 1.8km from the on-slip at Burnt Common which is against Highway England’s requirement of 2km.

Development of the A3 at best will not start until after 2020 and the building of a tunnel, which is only an “aspiration” in the Local Plan, is likely to be many years after. In the meantime given that developers build houses to provide cash-flow for infrastructure, Gosden Hill will have a crippling effect on villages like West Clandon and the A3.

Gosden Hill already has surface water problems. Merrow Stream crosses the site. No hydrological survey has been carried out to assess the implications. Electricity pylons run through the centre of Gosden Hill which have health and safety issues.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/1570  Respondent: 8726529 / Eric Palmer  Agent:  

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A25

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Gosden Hill development being in the Local Plan. The land in Gosden Hill does exactly what the Greenbelt was designed to achieve. It provides a green buffer between the Guildford Urban Area and West Clandon, gives Burpham a defined green boundary and breathing space and it hides Guildford town from visitors until they pass the off-slip to Burpham.

No exceptional circumstances have been demonstrated for building on this site and therefore it does not comply with paragraphs 87-89 of the NPPF. It stops the sprawl of Guildford town, assists in safeguarding the countryside from encroachment and assists in urban regeneration by encouraging the recycling of derelict and other urban land. All requirements of the NPPF.

The scale of Gosden Hill is out of proportion to West Clandon. It would have four times the amount of housing plus shops, offices/factories, GP surgery, schools. Development on this scale would blight a historic village with a history going back to the doomsday book and beyond.

Gosden Hill is the most obvious location for the north end of an A3 tunnel. It has rising ground and is situated just before the urban area. If it is built on, it will be very difficult to construct a tunnel.

The development will generate in the region of 6,000 vehicles which will pour on to the A3 which is stationary every day during rush hours. The linking of the A3100, B2215 and A247 would channel thousands of cars through the narrow, winding road through West Clandon, a road where large lorries mount the pavement virtually every day and through Send and Ripley which are also severely constrained.

The volume of traffic will greatly increase air pollution which is particularly critical given the proposal to build two schools.

Currently, a two way junction at the site would require vehicles wanting to go north on the A3 to go through Burpham which is grid-locked every day.
Burpham’s sewers are at capacity. Sewage would have to be pumped to Slyfield for processing, a project of enormous cost. There is inadequate fresh water in Guildford and current supplies could not meet the needs of a development of this size. Electricity supply is also inadequate and would require a big infrastructure development.

The railway station was rejected by Guildford Borough Council in 1984 because it feared Gosden Hill would become a dormitory estate for London.

The wording of the Local Plan with regard to Gosden Hill is so loose that the developer could virtually do whatever it wants.

The remaining agricultural land between Gosden Hill and West Clandon is so small that it is highly likely to be uneconomic and therefore a prime candidate for further development which would roll the Guildford Urban Area over West Clandon towards East Clandon and Wisley.

If the Strategic Sites are developed, the north of Guildford will deliver 36%, 5,036 houses towards the total of around 14,000. The infrastructures of the existing villages and the A3 will be overwhelmed by the scale of development.

A new on-slip at Burpham would only be 1.8km from the on-slip at Burnt Common which is against Highway England’s requirement of 2km.

Development of the A3 at best will not start until after 2020 and the building of a tunnel, which is only an “aspiration” in the Local Plan is likely to be many years after. In the meantime given that developers build houses to provide cash-flow for infrastructure, Gosden Hill will have a crippling effect on villages like West Clandon and the A3.

Gosden Hill already has surface water problems. Merrow Stream crosses the site. No hydrological survey has been carried out to assess the implications. Electricity pylons run through the centre of Gosden Hill which have health and safety issues.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/1571  Respondent: 8726529 / Eric Palmer  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the inclusion of the land at Garlick’s Arch, Send Marsh/Burnt Common and Ripley (A43)

Garlick’s Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8). There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).

The Plan states the preference is to making the best use of previously developed land. Yet at the 11th hour a perfectly acceptable brown field site at Burnt Common, capable of accommodating approximately 100 houses, was removed from the Plan and replaced with the Garlick’s Arch site. There was no proper consultation in relation to the inclusion of this site. Why was a brownfield site removed and replaced a Greenfield site? There is no evidence that Section 18 of the Planning
and Compulsory Purchase Act 2004, which requires local planning authorities to produce a Statement of Community Involvement, has been complied with for this site. This only came to light for local residents following a Council meeting on 11th May 2016.

Moreover, Guildford Borough Council’s own Green Belt & Countryside Report does not address Garlick’s Arch at all, so there is no evidence base to support the inclusion of this site.

National Planning Policy promotes sustainable developments, with sustainable transport. With ever reducing bus services in the area and no train station within reasonable walking distance it is impossible for any development on this site to offer a sustainable transport solution. Development on this site is wholly inappropriate (Policy I3).

The stream, which runs through the site, is identified as having a high risk of flooding by the Environment Agency. There are other sites that do not flood that can be developed and therefore this site should be removed from the Plan (Policy P4).

This site is bordered by Ancient Woodland and within it a number of trees are protected by Tree Preservation Orders (Policy D3).

The site has an abundance of wildlife, some of which are protected. It is home to many types of owls and bats, with the woods having cuckoos and woodpeckers. In addition there are regular sightings of badgers, deer and red kites. The development of the site will result in the loss of habitat. No wildlife report has been conducted on the site. (Policy I4)

Furthermore, several electricity pylon runs through the site, which will have the potential to be a health hazard for any residents.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/1475  Respondent: 8726529 / Eric Palmer  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. POLICY A43 AND A43a – Garlick’s Arch

I OBJECT to Policy A43 and A43a on Garlick’s Arch.

The site was only inserted in the draft plan at a late stage just before publication of the consultation draft which is a shabby way for the Council to proceed. The site is not a sustainable site being far from any infrastructure facilities and transport links. The bus service is infrequent and it is almost certain any future residents will rely almost entirely on cars for journeys. Similarly any employees at the employment areas will almost undoubtedly arrive and leave by car.

The site is susceptible to flooding and will not make a suitable site.
The Green Belt at this point serves the important function of separating West Clandon from Send. Building here will cause the two to coalesce defeating one of the objectives of the Green Belt.

I have seen no evidence that exceptional circumstances exist to justify removing this site from the Green Belt or that this important issue has been addressed. The Green Belt and Countryside study did not even consider this site.

It is understood the Council’s eyes may have been turned by the possibility of receiving for free the land which might be used for new A3 slip roads in return for allowing this development, thus justifying it as some form of enabling development. However the slip road land if needed could be safeguarded in the plan and acquired by compulsory purchase when required. Lack of current funding for the slip road is not a justification for allowing the development of this site. If the slip road is genuinely needed then government funding will be available for it. (One of the reasons for turning down the so called enabling development proposal intended to fund the rebuilding of the Howard of Effingham School was that the redevelopment of the school was not essential. As and when it became essential Government funding would become available. Accordingly enabling development was not necessary. The same principle applies here.)

The A247 running south past this site through the centre of West Clandon is already very heavily used whilst being unsuitable for designation as an A road. In places it is too narrow for two lorries to pass causing them to mount the pavement- often at speed. It has narrow bends with poor sight lines, an infants school and a hump-backed bridge concealing the entrance road to the station for southward traffic. In addition, there are no continuous footpaths which forces pedestrians to cross and re-cross the road. Development at Garlick’s Arch will only exacerbate the problem and make the road even more congested and unsafe for pedestrians.

The development will cause harm to the ancient woodland on and by the site.

Taken together with the Gosden Hill site, there will be a ribbon of development along the A3 in contrast to the current “soft” edge approach to Guildford.

Garlick’s Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8). There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).

The Plan states the preference is to making the best use of previously developed land. Yet at the 11th hour a perfectly acceptable brown field site at Burnt Common, capable of accommodating approximately 100 houses, was removed from the Plan and replaced with the Garlick’s Arch site. There was no proper consultation in relation to the inclusion of this site. Why was a brownfield site removed and replaced with a Greenfield site? There is no evidence that Section 18 of the Planning and Compulsory Purchase Act 2004, which requires local planning authorities to produce a Statement of Community Involvement, has been complied with for this site. This only came to light for local residents following a Council meeting on 11th May 2016.

Moreover, Guildford Borough Council’s own Green Belt & Countryside Report does not address Garlick’s Arch at all, so there is no evidence base to support the inclusion of this site.

National Planning Policy promotes sustainable developments, with sustainable transport. With ever reducing bus services in the area and no train station within reasonable walking distance it is impossible for any development on this site to offer a sustainable transport solution. Development on this site is wholly inappropriate (Policy I3).

The stream, which runs through the site, is identified as having a high risk of flooding by the Environment Agency. There are other sites that do not flood that can be developed and therefore this site should be removed from the Plan (Policy P4).

This site is bordered by Ancient Woodland and within it a number of trees are protected by Tree Preservation Orders (Policy D3).

The site has an abundance of wildlife, some of which are protected. It is home to many types of owls and bats, with the woods having cuckoos and woodpeckers. In addition there are regular sightings of badgers, deer and red kites. The development of the site will result in the loss of habitat. No wildlife report has been conducted on the site. (Policy I4)
It is clear that with this site being added at the 11th hour, no infrastructure planning has been undertaken. The Infrastructure Schedule makes no provision for any infrastructure improvements for this site. How will the local services such as schools and doctors cope, many of which are already at capacity? (Policy I1)

Furthermore, several electricity pylons run through the site, which will have the potential to be a health hazard for any residents.

I OBJECT to the inclusion of the land for new on/off ramps at Burnt Common (A43a)

The addition north facing ramps to the A3 at Burnt Common would be a disaster for local communities. There is no requirement for local traffic to access the A3 to the north, but the addition will draw in a huge amount of ‘through’ traffic.

The route from London/M25 to Woking would now be through Burnt Common and Send. Equally traffic from the east of Guildford (Merrow etc) and the A25 will now go through West Clandon and Burnt Common. This will cause immense damage to those areas on small roads which cannot be improved.

This Plan does not address the needs of local communities or the Borough in this regard. There has again been no Section 18 consultation on this.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/1573  Respondent: 8726529 / Eric Palmer  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the inclusion of the land for new on/off ramps at Burnt Common (A43a)

The addition north facing ramps to the A3 at Burnt Common would be a disaster for local communities. There is no requirement for local traffic to access the A3 to the north, but the addition will draw in a huge amount of ‘through’ traffic.

The route from London/M25 to Woking would now be through Burnt Common and Send. Equally traffic from the east of Guildford (Merrow etc) and the A25 will now go through West Clandon and Burnt Common. This will cause immense damage to those areas on small roads which cannot be improved.

This Plan does not address the needs of local communities or the Borough in this regard. There has again been no Section 18 consultation on this.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3229  Respondent: 8726529 / Eric Palmer  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. POLICY D3

I OBJECT to the damage to the historic environment as a result of the scale of the proposed development (Policy D3)

I OBJECT to the local plan based on the impact it will have on the special countryside of the borough.

The proposed development at Garlick’s Arch (A43) will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3236  Respondent: 8726529 / Eric Palmer  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. POLICY D3

I OBJECT to Policy D3 - Historic environment

I object to this policy as it is very weak and I do not think it is clear enough in its support for the conservation of the historic environment. It provides for development which will “enhance” heritage assets which I fear is a developer’s charter as it leaves plenty of room for abuse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3501  Respondent: 8726529 / Eric Palmer  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I OBJECT to the damage to the historic environment as a result of the scale of the proposed development (Policy D3).

I OBJECT to the local plan based on the impact it will have on the special countryside of the borough.

The proposed development at Garlick’s Arch (A43) will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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1. **POLICY D4**

I OBJECT to Policy D4 - Development in urban areas and inset villages

The policy should place much greater emphasis on residential development in the existing urban centres. In this way housing needs can be met without resorting to large developments in the Green Belt. There are urban areas in need of regeneration but these are ignored in favour of Green Belt development.

The policy should not be applied to the villages which should remain in the Green Belt. Unrestricted application of this policy to the villages intended to be inset will change their characters radically and for the worse. The development it encourages will increase traffic and congestion disproportionately.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/3226  Respondent: 8726529 / Eric Palmer  Agent:  

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I OBJECT to the sustainable employment policy (Policy E1)

I object to the inclusion of a strategic employment site at Gosden Hill Farm. Employment sites should be concentrated on previously developed land in more sustainable locations with good transport links where the infrastructure can support development. Warehousing, distribution and industrial premises cause considerable commercial traffic, noise, pollution and general disruption. They are not good neighbours for schools and 2000 houses. Many of the jobs will be taken by people outside the area leading to additional congestion in Burpham and on the A3.

I object to the inclusion of a strategic employment site at Garlick’s Arch. It is in a non-sustainable location remote from any facilities of any kind and with poor public transport links. It is unlikely jobs there will be taken by local residents and it is likely all travel to and from work will be by car adding to local congestion. Employment sites should be concentrated on previously developed land in more sustainable location with good transport links where the infrastructure can support development.

The site is in any event subject to frequent flooding and unsuitable for development.

If developed, the new employment site at Garlick’s Arch, Send Marsh/Burnt Common (A43), would be treated as a Strategic Employment Site.

The proposed development of up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8) at Garlick’s Arch (A43) is in the scheme of industrial development relatively small. Just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m. The Garlick’s Arch site which is in the Green Belt should not be developed as a Strategic Employment Site when there is a suitable alternative brownfield site very close by, which is far more sustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3498  Respondent: 8726529 / Eric Palmer  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the sustainable employment policy (Policy E1)

If developed, the new employment site at Garlick’s Arch, Send Marsh/Burnt Common (A43), would be treated as a Strategic Employment Site.

The proposed development of up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8) at Garlick’s Arch (A43) is in the scheme of industrial development relatively small. Just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m. The Garlick’s Arch site which is in the Green Belt should not be developed as a Strategic Employment Site when there is a suitable alternative brownfield site very close by, which is far more sustainable.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E2</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. POLICY E2

I OBJECT to the location for new employment floorspace (Policy E2)

I object to this policy. It would be more sensible to confine new office and research and development floor space to the urban Guildford area. I also oppose the policy of expanding the Research Park onto Blackwell Farm. No exceptional circumstances, as defined under the NPPF, have been advanced to justify incursion into this permanent and high-quality area of Green Belt.

Proposals for new industrial, warehousing and storage (use Class B1c, B2 and B8) floorspace will be directed to the Industrial Strategic Employment Sites.

There is no need for the new employment floorspace to be located at Garlick’s Arch or Gosden Hill Farm, when near to these sites at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I OBJECT to the location for new employment floorspace at Garlick’s Arch – Site A43 (Policy E2)

Proposals for new industrial, warehousing and storage (use Class B1c, B2 and B8) floorspace will be directed to the Industrial Strategic Employment Sites.

There is no need for the new employment floorspace to be located at Garlick’s Arch, when just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID:  PSLPP16/3228  Respondent:  8726529 / Eric Palmer  Agent:  

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )

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1. POLICY E5

I OBJECT to the loss of rural employment (Policy E5)

Policy E5 supports the retention and development of local services and community facilities in our inset and identified villages. Yet the development at Garlick’s Arch (A43) would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises. The Plan does not promote rural employment; rather it will result in the loss of existing local rural businesses.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID:  PSLPP16/3500  Respondent:  8726529 / Eric Palmer  Agent:  

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )
I OBJECT to the loss of rural employment (Policy E5)

Policy E5 supports the retention and development of local services and community facilities in our inset and identified villages. Yet the development at Garlick’s Arch (A43) would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises. The Plan does not promote rural employment; rather it will result in the loss of existing local rural businesses.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3239  Respondent: 8726529 / Eric Palmer  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E6

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. POLICY E6

I OBJECT to Policy E6 - The leisure and visitor experience.

The policy should acknowledge that whilst in some areas new and enhanced leisure facilities are valuable (for example the new Opera House at West Horsley Place Towers), much tourism depends on the undeveloped nature of Green Belt areas surrounding Guildford. Accordingly the policy should recognize that in many rural areas new and enhanced visitor facilities may be unnecessary and counterproductive, particularly away from existing buildings and development. For example the attraction of Newlands Corner is its undeveloped nature. Significant development of visitor facilities there is likely to diminish rather than increase its attractions. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment. Heritage sites and the Green Belt are particularly vulnerable to harm.

Tourism and visitors do not depend on new visitor “attractions” and could actually be damaged by them, as compellingly argued in the current debate over Newlands Corner. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment/“Disneyfication”. Heritage sites and the Green Belt are particularly vulnerable to harm.

Guildford has many “leisure and visitor attractions” already. The case for creating more is not made and no examples are given. Instead, the plan’s explicit priorities should be:

1. To protect the borough’s prime leisure and tourism asset, its countryside, from inappropriate development. This is all the more valuable because of its accessibility from London, the rest of Britain and the Continent, in that order. Rural residents are its custodians and require no Council interference. Economically, the most valuable forms of tourism, such as walking and cycling, require no new development. In the overcrowded South-East of England, lack of development is a leisure and tourism asset, not a liability.
2. To help make Guildford’s river landscape less off-putting and support town-break packages for high-value tourists. To achieve this, the policy needs to define what leverage, if any, Council planners have to influence normal tourism market mechanisms.
3. To help private providers market local tourism. This need not involve extra spending. The Council could, for instance, help co-ordinate ready-made, local tourism packages under a distinctive brand at an all-in price. An “English town break” (including B&B accommodation, a walking tour of Guildford, a pub lunch in the Surrey
Hills, a visit to Wisley Gardens and a National Trust property and a Southwest Trains travelcard for a day out in London) would be highly attractive to many European visitors who currently by-pass Guildford to go to Bath, Oxford or Cambridge instead.

4. To rule out the redevelopment of scarce rural hotel sites (e.g. Thatchers, East Horsley, earmarked for 40 new houses under Site A37 of the plan yet just a short walk from the new opera house).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3512  Respondent: 8726529 / Eric Palmer  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E6

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY E6 - The leisure and visitor experience

I OBJECT. Tourism and visitors do not depend on new visitor “attractions” and could actually be damaged by them, as compellingly argued in the current debate over Newlands Corner. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment/“Disneyfication”. Heritage sites and the Green Belt are particularly vulnerable to harm.

Guildford has many “leisure and visitor attractions” already. The case for creating more is not made and no examples are given. Instead, the plan’s explicit priorities should be:

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3. To help private providers market local tourism. This need not involve extra spending. The Council could, for instance, help co-ordinate ready-made, local tourism packages under a distinctive brand at an all-in price. An “English town break” (including B&B accommodation, a walking tour of Guildford, a pub lunch in the Surrey Hills, a visit to Wisley Gardens and a National Trust property and a SouthWest Trains travelcard for a day out in London) would be highly attractive to many European visitors who currently by-pass Guildford to go to Bath, Oxford or Cambridge instead.

4. To rule out the redevelopment of scarce rural hotel sites (e.g. Thatchers, East Horsley, earmarked for 40 new houses under Site A37 of the plan yet just a short walk from the new opera house).

I trust that the objections made above are fully taken into consideration and that the Plan is amended accordingly.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
1. **POLICY E7**

I OBJECT to Policy E7 Guildford Town Centre

The policy “vision” describes protecting the Guildford’s unique setting and historical character and sets out some of the ways this will be done. However none of this is included in the formal Policy wording in the blue box. I suspect the Vision wording is effectively of little or any force. These principles should be included in the formal policy.

There should be a much greater focus on residential use of the town centre where many people would like to live and where the necessary amenities and infrastructure exist. The policy misses the opportunity to propose forward looking sustainable residential development plans in, for example the Walnut Tree Close area, where very significant numbers of new homes could be provided. Such town centre sites could meet much of the housing need over the plan period without harming the countryside.

There is an urgent need for a strategy to focus on brownfield redevelopment before considering development outside the existing urban area.

The policy does not address any of the major issues raised by the Council’s own Town Centre Master Plan, the Guildford Vision Group’s proposal for new river and rail crossings or plans for the redevelopment of Guildford Station, all of which are already the subject of public discussion.

The policy also fails to provide guidance on design requirements, as required by the NPPF.

The policy and surrounding text concentrates too much on shopping without regard to its nature which risks a proliferation of dull high-street chain stores. The policy should seek to enhance Guildford’s character and encourage a wider variety of small shops including locally owned businesses and shops of use to consumers. (For example there is no butcher in Guildford.)

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
1. **POLICY H1**

I OBJECT to Policy H1 – Homes for all. Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan period. It fails to set rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions.

The housing mix is based on out-of-date, pre-Brexit projections and on assumptions set out in a flawed SHMA that has not been scrutinised or evaluated.

I support higher density development in the urban area, without resorting to dehumanising, high-rise buildings that developers commonly claim are necessary for financial viability. Much of Guildford town could usefully be regenerated with 4-5 storey blocks with landscaping and underground parking, as often seen on the Continent and, recently, in London.

Student accommodation should provided for 100% of new students and more than 60% of existing students, which would free up ideal family accommodation in the urban area. Other university cities (e.g. Oxford) insist on higher percentages than those proposed in the plan. In my view, the Council’s timidity is a case of “regulatory capture” by Surrey University, which has failed to use its existing planning permissions (dating from 2004) to accommodate 3,000 students or to improve the efficient development of its campus (e.g. by building on its extensive and under-used surface car parks). If all students I support in this way, 2,000 homes would be freed up in town and there would be no need to build on the Hog’s Back.

It is not appropriate to release Green Belt land to house students who could be accommodated on the Surrey campus or other university sites. The plan should take account of the university's ability to house its own students and reduce the housing number accordingly.

Guildford borough has already a higher proportion of traveller sites than most comparable boroughs. Over-provision is inappropriate given other constraints.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
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<th>Comment ID: PSLPP16/3505</th>
<th>Respondent: 8726529 / Eric Palmer</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1</td>
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</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT (POLICY H1 – Homes for all) Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan period. It fails to set rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions.

The housing mix is based on out-of-date, pre-Brexit projections and on assumptions set out in a flawed SHMA that has not been scrutinised or evaluated.

I support higher density development in the urban area, without resorting to dehumanising, high-rise buildings that developers commonly claim are necessary for financial viability. Much of Guildford town could usefully be regenerated with 4-5 storey blocks with landscaping and underground parking, as often seen on the Continent and, recently, in London.
Student accommodation should be provided for 100% of new students and more than 60% of existing students, which would free up ideal family accommodation in the urban area. Other university cities (e.g. Oxford) insist on higher percentages than those proposed in the plan. In my view, the Council’s timidity is a case of “regulatory capture” by Surrey University, which has failed to use its existing planning permissions (dating from 2004) to accommodate 3,000 students or to improve the efficient development of its campus (e.g. by building on its extensive and under-used surface car parks). If all students were accommodated in this way, 2,000 homes would be freed up in town and there would be no need to build on the Hog’s Back.

Guildford borough has already a higher proportion of traveller sites than most comparable boroughs. Over-provision is inappropriate given other constraints.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
1. POLICY H3

I OBJECT to Policy H3 – Rural Exception Homes as this Trojan horse policy. It says that homes can be built anywhere near a settlement of any form (including agricultural land and the AONB). These homes are meant for people with a village connection, but they could be for anyone on the Guildford borough housing list. To make the housing viable, or to improve the “mix” this can include “market” housing (i.e. normal commercial development which in Guildford usually means large executive homes). This policy means building anywhere, and ignoring all historic planning restrictions.

The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove “exceptional circumstances.”

The wording of the policy is far too wide and drives a coach and horses though all other aspects of planning policy. As drafted the planning authority could be obliged to grant permission for inappropriate and unsuitable developments.

The wording provides no ability to balance the desirability of the development against other considerations including harm to the Green Belt or the AONB. (If the housing would meet identified need and adjoins a settlement under this policy wording permission would have to be granted even in the most sensitive AONB location, even if more suitable locations Ire available.) The policy should include the need for a balancing exercise including consideration whether more suitable locations exist.

The policy wording should not allow market housing. The ability to include market housing is likely to inflate land values, leading to a self-perpetuating need to include market housing. It may lead to spurious developer led proposals which will be difficult to resist.

The policy wording should define small, either in land size or number of units. I am concerned that if small is left undefined the policy could be used to justify significant developments. In the context of the plan a development of 150 homes might be argued as small. (If Wisley at 2,500 homes is a big development then 500 homes might be a medium development and 150 could be small.)

The policy wording should be restricted to adjoining sites or define the concept of being "closely related". In particular I believe adding the concept of safe and easy walking distance extends the potential radius within which sites will be argued to be “closely related” Many people would regard a mile or so as an easy walking distance. (School children are expected to walk further than that before being eligible for free school travel.)

The wording of the policy itself does not require the local connection requirement for tenants to be secured in perpetuity - only the affordability must be secured in perpetuity. (For example housing could be built for retired Cabinet Ministers under this policy so long as the first tenant was required to have a local connection.) The introduction to the policy mentions this point, but it is not part of the policy itself and may carry little weight at appeal.

The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove “exceptional circumstances.” The size and location of sites should be better defined and it should be clear market housing cannot be included.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
POLICY H3 – Rural Exception Homes

I OBJECT  This is a Trojan horse policy. It says that homes can be built anywhere near a settlement of any form (including agricultural land and the AONB). These homes are meant for people with a village connection, but they could be for anyone on the Guildford borough housing list. To make the housing viable, or to improve the “mix” this can include “market” housing (i.e. normal commercial development which in Guildford usually means large executive homes). This policy means building anywhere, and ignoring all historic planning restrictions.

The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove “exceptional circumstances.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.

Furthermore, many of the country lanes around the villages of Ripley, Send and Clandon are narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition.

I OBJECT to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces.

Many of the affected villages, such as West Clandon, already suffer from traffic congestion. Further development around these villages will only result in more traffic and more parking problems.

With some 5,000 houses being proposed close to the village of Ripley, the roads serving the village will become even more congested. Cycling has become an ever popular past time, particularly at weekends hundreds of cyclists past through the villages on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road accidents involving cyclists as a result of the development proposed under the local plan.

The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the road becoming ever more dangerous for pedestrians.

The council has a statutory obligation to protect the public and the additional traffic flows will bring added accidents, noise, pollution and injury of the public. In the case of West Clandon the Street often only has a narrow footpath on one side of the road making it very dangerous, especially when vehicles mount the pavements.

This policy as it is inappropriate and inadequate and fails to respond to the challenges raised by the proposed significant Green belt developments. The borough’s infrastructure is already heavily strained. However the plan’s determination to build large housing estates across the Guildford countryside significantly increases the need for infrastructure investment without securing the means for its provision. Placing housing in the established urban areas would reduce the need for enhanced infrastructure as would a more realistic housing number.

The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the road becoming ever more dangerous for pedestrians.

The policy wording says nothing about roads and traffic. The Council’s methodology for assessing traffic congestion - averaging it over periods of several hours and ignoring the effects of junctions - simply hides the problem, which will get worse as development proceeds. The schemes referred to in this policy will not solve existing congestion and the local road network has not been given sufficient consideration. Some proposed development locations would require highway schemes that are unlikely ever to happen.

Adequate infrastructure provision is a pre-condition of sustainable development. But in this plan it is an afterthought buried away in Policy I1. By prioritizing greenfield over urban, brownfield regeneration, the plan creates insurmountable (and unnecessary) obstacles for itself. Common sense suggests a local plan should first assess the borough’s infrastructure capacity for sustainable development, and then tailor development accordingly. This plan, however, assumes infrastructure will follow on the heels of housebuilding as if by magic. It makes implementation critically dependent on providers outside the Council’s control and on the vagaries of CIL income. Instead of recognizing this as a key constraint, the plan is based on hope. It is also highly likely that developers faced with the imposition of large infrastructure requirements will go to court to invoke the NPPF provision that prevents authorities from imposing conditions that make a development non-viable.

Policy I1 requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.

Despite the Garlick’s Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents’ in the locality will see their quality of life significantly deteriorate in many ways.

Many of the utilities in the Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers. No plans to improve these services should mean no development of the Garlick’s Arch site.
Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are already at capacity and suffering from funding cuts or freezes. Any further development without funding will place further stress upon existing health services.

Police services are seeing funding reduced. The development of the proposed 13,860 homes during the plan period will stretch the police services further and is unsustainable.

There is no provision of the increased capacity of Guildford hospital, where is this assessed and remedied?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3502  Respondent: 8726529 / Eric Palmer  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT, due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1)

Our villages are already suffering from severe congestion for much of the day, for example the Newark Road & Rose Lane junction in the centre of Ripley. The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.

Furthermore, many of the country lanes around the villages of Ripley, Send and Clandon are narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition.

I OBJECT to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces.

Many of the affected villages, such as West Clandon, already suffer from traffic congestion. Further development around these villages will only result in more traffic and more parking problems.

With some 5000 houses being proposed close to the village of Ripley, the roads serving the village will become even more congested. Cycling has become an ever popular past time, particularly at weekends hundreds of cyclists past through the villages on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road accidents involving cyclists as a result of the development proposed under the local plan.

The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the road becoming ever more dangerous for pedestrians.

The council has a statutory obligation to protect the public and the additional traffic flows will bring added pollution and risk to injury of the public. In the case of West Clandon the Street often only has a narrow footpath on one side of the road making it very dangerous, especially when vehicles mount the pavements.

1. I OBJECT to the lack of proper infrastructure planning for sites (Policy I1)
Policy I1 requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.

Despite the Garlick’s Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents’ in the locality will see their quality of life significantly deteriorate in many ways.

Many of the utilities in the Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers. No plans to improve these services should mean no development of the Garlick’s Arch site.

Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are already at capacity and suffering from funding cuts or freezes. Any further development without funding will place further stress upon existing health services.

Police services are seeing funding reduced. The development of the proposed 13,860 homes during the plan period will stretch the police services further and is unsustainable.

There is no provision of the increased capacity of Guildford hospital, where is this assessed and remedied?

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/3231  **Respondent:** 8726529 / Eric Palmer  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy ID2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. **POLICY I2**

I OBJECT due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2)

I object to this policy as it is too vague and optimistic. Significant improvements to the road infrastructure are like to be many years away even if they ever happen. The draft plan, however, commits to building massive housing estates in the countryside before any of these road improvements are in place. This is inappropriate and will lead to massive traffic disruption during the construction phase and will add permanently to an already congested network (about 3,000 private cars from the 2,100 new homes at Wisley Airfield alone).

Road infrastructure represents a major constraint that should have been applied to the housing target at a much earlier stage in the plan process and not left as an unresolved difficulty in the draft plan.

There is no certainty that either the A3 or M25 in the borough will be improved to increase capacity and reduce congestion during the Plan period. Highways England has no plans to even examine improving the A3 before 2020. I have considerable concerns that development of the large residential sites identified at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), will take place before any improvements are made to the trunk road network. The A3 & M25 are already at capacity during peak hours and any development prior to improvement of these roads will only make the situations worse.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPP16/3503  **Respondent:** 8726529 / Eric Palmer  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy ID2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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I OBJECT due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2)

There is no certainty that either the A3 or M25 in the borough will be improved to increase capacity and reduce congestion during the Plan period. Highways England has no plans to even examine improving the A3 before 2020. I have considerable concerns that development of the large residential sites identified at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), will take place before any improvements are made to the trunk road network. The A3 & M25 are already at capacity during peak hours and any development prior to improvement of these roads will only make the situations worse.

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPP16/3232  **Respondent:** 8726529 / Eric Palmer  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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1. **POLICY I3**

I OBJECT to poor air quality concerns (Policy I3)

Paragraph 4.6.27 of the Plan states that “Development must also mitigate its traffic impacts, including its environmental impacts and impacts on amenity and health.” The significant level of development being proposed, particularly in the north east of the borough will lead to considerable further congestion, despite any attempts to mitigate this through travel plans. This will be particularly acute in built up residential areas and will only lead to greater levels of air pollution, which will have a detrimental effect on local residents and their health and can result in early death.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

1. POLICY P2

I OBJECT to not protecting the Green Belt (Policy P2)

This policy does not sufficiently safeguard the Green Belt even though Green Belt constitutes 89% of the borough and should be the cornerstone of all local planning policy. The Green Belt is not the Council’s to give away and once it is gone it is gone forever. Sacrificing areas of the Green Belt to a developer influenced growth agenda is a betrayal of future generations and does not constitute sustainable development.

The Green Belt should be protected in perpetuity, but Policy P2 seeks to justify excessive development in supposedly protected areas. This is in breach of party manifesto commitments and contrary to previous responses to public consultation. It is disreputable to argue, as the Council does, that the Plan would involve the loss of “only” 1.6% of the
bureau’s Green Belt. Leaving aside the reliability of that statistic, the NPPF does not set an “acceptable” percentage. The fact remains that the plan proposes that 65% of the housing plus industrial development be built on land to be taken out of the Green Belt.

Paragraph 4.3.16 is seriously deficient in simply stating that the Council considers that exceptional circumstances exist to justify amendment of Green Belt boundaries. The exceptional circumstances are not identified. It is clear from national guidance that unmet housing need is not on its own an exceptional circumstance. Even to the extent that exceptional circumstances exist, these have to be balanced against the harm to the Green Belt in the specific sites proposed to be taken out of the Green Belt. This balancing exercise appears not to have been done.

The Countryside Study which the Council may argue fulfilled the need to demonstrate the exceptional circumstances required to justify removal of areas from the Green Belt was a simplistic tick box exercise. Within limits it may have answered certain questions about different attributes of different areas of Green Belt but it did not carry out the balancing exercise needed to determine whether specific exceptional circumstances justified removal of specific areas of land from the Green Belt. I believe that each of the identified Green Belt site proposed to be removed from the Green Belt should be carefully assessed against any exceptional circumstances in deciding whether it should be removed from the Green Belt in the final plan. This exercise should bear in mind that housing need in itself is not an exceptional circumstance and nor is the Council’s growth aspiration. An important consideration is that more housing need could be met on urban sites than is currently planned. The Plan has fallen into the developers’ hands and developers prefer building on undeveloped land rather than brown field sites.

I note that the Summer 2016 edition of “About Guildford” (published by the Council) on page 5 states that “... the Plan rejects any schemes that would have a detrimental impact on the Green Belt.” This is demonstrably untrue and I consider this to be a deliberate untruth which compromises the consultation process. I would ask that this untruth be corrected and the consultation period restarted after the correction has been given the same distribution as the original statement. (I assume the document was delivered to most houses in the Borough.) I reserve the right to argue before the inspector that the consultation process was flawed and ineffective because of this.

I object to the “insetting” of 14 villages from the Green Belt. Contrary to assertions made in the Plan process many of these villages do contribute to the openness of the Green Belt and there is no need to inset them.

I also object to the wholesale extensions to the settlement boundaries in many villages to allow for infilling and that infilling is also proposed outside the settlement boundaries of 11 further villages. Many Guildford villages are linear. It is all too easy to square off boundaries by including countryside bounded on only one or two sides by existing development, claiming it contributes nothing to the “openness” of the Green Belt, a term which neither the plan nor the NPPF defines. The NPPF’s other 4 tests of Green Belt status, including the prevention of urban sprawl, are ignored. Effectively, this policy makes all villages within the Green Belt vulnerable to large blocks of new development and seems almost calculated to secure the rejection of the plan as a whole.

To “inset” two-thirds of the borough’s rural villages on the grounds that they no longer contribute to the purposes of the Green Belt is extreme and inherently implausible, given the borough’s location on the edge of Metropolitan London. I cannot see how such extensive areas fail to contribute to the purposes of the Green Belt under the NPPF, but this could quickly be the case if the proposed “insetting” and boundary extensions go ahead.

This policy is wildly disproportionate in terms of any foreseeable development need and has caused tidal waves of opposition from residents. It flies in the face of NPPF paragraph 17’s aim of “empowering local people to shape their surroundings” and other NPPF provisions.

Paragraph 4.3.17 states that “the general extent of the Green Belt has been retained.” I believe this should be deleted as an untruth.

In addition I OBJECT to the proposals to remove from the Green Belt the so called ‘strategic sites’ of Wisley Airfield (A35), Gosden Hill Farm (A25) and Garlick’s Arch (A43) and all other strategic sites. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these sites and villages (as mere housing need does not constitute a ‘special circumstance’) to be taken from the Green Belt. Once taken from the green belt they will be lost forever.
There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached.

GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site.

Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/3495  Respondent: 8726529 / Eric Palmer  Agent:  

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2  

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )  

Answer (if comment is on questions 1-7 of the questionnaire): ()  

I OBJECT to not protecting the Green Belt (Policy P2)  

I OBJECT to the proposals to remove the villages of Ripley, Send and Clandon from the Green Belt, together with sites of Wisley Airfield (A35) and Garlick’s Arch (A43). National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these villages (as mere housing need does not constitute a ‘special circumstance’ and the land to be taken from the Green Belt. Once taken the green belt is lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached. GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site.

Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/3225  Respondent: 8726529 / Eric Palmer  Agent:  

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4  

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
1. **POLICY P4**

I OBJECT to development in areas which are at risk of flooding (Policy P4)

National Planning Policy states that Local Plans should take account of climate change over the longer term, including factors such as flood risk. It goes on to say that new development should be planned to avoid increased vulnerability to the range of impacts arising from climate change.

The Plan states that in accordance with national planning practice guidance, the Level 1 SFRA has been used to guide development towards areas at the lowest risk of flooding and identify areas unsuitable for development. However, the document concludes that land outside of the area of flood risk is not capable of accommodating all of the borough’s identified development needs. A Level 2 SFRA has therefore also been produced and will help the Council apply the exceptions test (as described in the NPPG) as necessary to development proposals in areas at risk of flooding.

The site at Garlick’s Arch (A43) is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. Knowing the area well I am aware that this site often floods during the winter months and the flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Answer (if comment is on questions 1-7 of the questionnaire): ()

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The Plan states that in accordance with national planning practice guidance, the Level 1 SFRA has been used to guide development towards areas at the lowest risk of flooding and identify areas unsuitable for development. However, the document concludes that land outside of the area of flood risk is not capable of accommodating all of the borough’s identified development needs. A Level 2 SFRA has therefore also been produced and will help the Council apply the exceptions test (as described in the NPPG) as necessary to development proposals in areas at risk of flooding.
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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I have lived in the borough for 46 years and have become increasingly alarmed at the constant erosion of rural amenities and increasing pressure on local services and traffic. I am aghast at the proposed plan which will only exacerbate further these issues.

I object in the strongest possible terms to the Guildford Borough Proposed Submission Local Plan (June 2016). This Plan is unsustainable, unworkable and, in many provisions, unnecessary. I set out below my objection to specific policies and matters within the Plan.

1. **POLICY S1**

I OBJECT to this Policy as the development proposed will not be sustainable (Policy S1)

The NPPF states that the presumption in favour of sustainable development “should be seen as a golden thread running through both plan-making and decision-taking.” As the first policy in the Plan, Policy S1 ought to set a clear framework. Instead, no definition of “sustainable development” is given. The policy also fails to set out any principles for applying sustainable development in practice to local planning decisions, which often have serious long-term impacts.

The policy states that it aims “to secure development that secures the economic, social and environmental conditions in the area”. This fails to recognize that economic growth, social justice and environmental protection often conflict. The policy does not say how each element is to be weighted or conflicts resolved. As a practical guide to the planning decision to be taken in the Plan period it is seriously deficient. The policy is likely to be used by developers to justify inappropriate developments on economic grounds. Under this policy, virtually any development will qualify as “sustainable”, in breach of the NPPF’s most important guideline.

Policy S1 is also seriously deficient in making no mention of the Green Belt. The Green Belt is a long term Government policy enshrined in primary legislation to protect green areas in perpetuity. The Green Belt is a living example of sustainable development in practice and is one of the most important factors affecting sustainable development in the area covered by the Plan and should be acknowledged in this policy. Policy S1 should include a commitment to protect the Green Belt from inappropriate development and to uphold Green Belt boundaries and protections. This would set at least one clear boundary to planning decisions. The Plan and the Council have treated the Green Belt as a developable land bank rather than as a constraint to development.
The commitment to approve planning applications “wherever possible” and “without delay” reveals the pro-development bias of the plan. Countervailing references to sustainability are so vague that the NPPF presumption in favour of sustainable development becomes a presumption in favour of any development at all.

This policy also ignores, as if they are inconvenient constraints, most of the 12 Core Planning Principles set out in NPPF paragraph 17.

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact on existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill Farm (A25) are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are also unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick’s Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3493  Respondent: 8726529 / Eric Palmer  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I have lived in the Guildford area for 46 years and am devastated by the latest proposals in the Guildford Borough Councils Local Plan. The Council appears to have no regard for the wishes of the local residents and just ploughs ahead with its own agenda to make Guildford into an economic growth area which is not wanted by the local population. People who choose to live in this area want to be surrounded by green belt countryside and do not and do not wanted it covered in housing estates.

Objections to Guildford Borough Proposed Submission Local Plan (June 2016)

I OBJECT in the strongest possible terms to the Guildford Borough Proposed Submission Local Plan (June 2016). This Plan is unsustainable, unworkable and, in many provisions, unnecessary.

I set out below my objection to specific policies and matters within the Plan.
1. I OBJECT to the Local Plan as the development proposed will not be sustainable (Policy S1)

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact on existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are just unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick’s Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3223  Respondent: 8726529 / Eric Palmer  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. POLICY S2

I OBJECT to the Borough Wide Strategy (Policy S2)

The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It
is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guilford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

The assumptions and calculations in the SHMA are widely regarded as flawed and even before Brexit, produced an inflated housing needs number. The figure of 13,860 new homes is completely unsubstantiated. It has not been scrutinized by Councillors despite repeated requests for debate. The assumptions and calculations underlying the model are hidden, protected by a claim to intellectual property by a commercial sub-contractor used in preparing the SHMA. I have serious doubts about the objectivity of the SHMA because it has been produced by consultants whose website openly proclaims their pro-development agenda leading to reasonable suspicion that the figures are inflated. Guildford’s OAN is not transparent but has been taken on trust by the authors of the plan. Given that almost every element of the plan is predicated on this OAN, the plan as a whole cannot be considered “sound”.

The status of the 13,860 figure is ambiguous. The Council has said that the housing number and the OAN are identical because the OAN is “deliverable” and is by definition objective and cannot be contradicted. The OAN is only deliverable because of the Council’s cavalier approach to the Green Belt in contravention of the NPPF, ministerial statements and local and national Conservative Party manifesto commitments. The plan also states that infrastructure or other constraints may in due course affect deliverability. It is also unlikely that the number of houses can be built at the rate proposed. In recent years, housing starts have on average been less than half the proposed rate. This is not because developers do not have the land or cannot get planning permission. Constraints in the supply chain and maintaining profit levels have been more important.

The plan cannot be considered “deliverable”. In addition, the number of homes proposed, plus existing planning permissions, plus expected “windfall” sites, exceeds the total of 13,860. So how many homes (taking account of these adjustments) do the Council want built? The plan does not say. Without this figure it is hard to see how anything else can be planned. This undermines the validity of the whole consultation. It is unreasonable to ask the public to approve a “plan” that fails to propose a target number that takes all the standard constraints and adjustments realistically into account, leaving the Council to set one without further consultation. Even if the OAN is not flawed, it is at best only a baseline figure and should not be passed off as a policy proposal.

It is unreasonable to embark on a radical transformation of the borough on the basis of an unclear housing target. Most of Guildford Borough is highly protected from development (89% Green Belt, 44% AONB and about 75% protected by SPA). Whether or not increasing the number of dwellings by up to a quarter is desirable, it would be a major and irreversible change, arguably turning a largely rural borough into a mainly urban or suburban one like Woking. The scale of the housing number increases the onus for it to be seen to be sound. A substantially lower number, on the other hand, would remove the need to build on Green Belt or open countryside, and instantly meet the single biggest public objection to the plan as a whole.

The Plan in general and this policy in particular does not address the point that Guildford exists as part of London’s commuter belt. Any increase in supply of housing in Guildford, particularly if the increase is proportionately greater than elsewhere in the commuter belt, will simply result in a shift of population into the area. It will not reduce prices or increase availability except imperceptibly. The Plan also ignores the point that many of those working in the area live elsewhere. Accordingly in considering the housing number the Plan should take into account that in this part of London’s commuter belt, demand for housing is, in practical terms, unlimited.

This policy does not take proper accounts of the constraints to development which exist, principally posed by the Green Belt and by infrastructure limitations. I believe the Council is under a duty to properly consider applying these constraints. It is clear the Council has failed to do this. This approach differs from all the other boroughs in Surrey. The Plan appears
to have deliberately been manipulated towards a growth agenda without disclosing why this is being done. The housing that is needed should be concentrated on urban brown field sites and through increasing the housing density of existing built up urban areas.

The development of 13,860 homes in the Plan period with 65% in the Green Belt does not constitute sustainable development. It will have a permanently detrimental impact on the Borough in general and on West Clandon and surrounding area in particular. The developments at Garlick’s Arch and Gosden Hill Farm do not meet the needs of the local communities. The road infrastructure in and around West Clandon will be unable to cope with additional demand. The edge of urban Guildford will creep that much closer to West Clandon, thus negating the purposes of the Green Belt in the area which include safeguarding the countryside from encroachment, checking the unrestricted sprawl of large built up areas and preventing neighboring towns merging into one another.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill Farm (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3494  Respondent: 8726529 / Eric Palmer  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the Borough Wide Strategy (Policy S2)

1. The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.
2. The Housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.
3. The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any commonsense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in
the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guilford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/675  Respondent: 8726529 / Eric Palmer  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. Questions posed by Guildford Borough Council as part of its consultation.

Questions from GBC

24.A. Question 1: The evidence base and submission documents

The Proposed Submission Local Plan: strategy and sites is based on up-to-date evidence. The evidence base documents contributing to the preparation of the plan are listed in Appendix D and can be found on our website (links open in a new window).

Do you agree that the evidence used for the Proposed Submission Local Plan Strategy and Sites is adequate, up-to-date and relevant?

ANSWER
I do not agree that the evidence used for the Proposed Submission Local Plan Strategy and Sites is adequate, up-to-date and relevant.

The fundamental driving forces for much of the development proposed in the Plan (particularly that on Green Belt land) are based on:

1. An excessive ambition to expand the local economy which is neither warranted nor wanted by the local population. Guildford is already one of the highest ‘value creation’ areas in the country and has one of the lowest unemployment rates. There is no evidence that massive and accelerated expansion is required.

1. SHMA figures which are neither transparent nor justifiable, especially in view of previous figures set. Independent assessments of the SHMA (eg from Guildford Residents’ Association and David Reeve) show it is set far too high and so cannot be said to be adequate, up to date or relevant.

In addition the recent vote to leave the EU and the impact this will have on the economy and migration have not been taken into account.

The Plan should be re-assessed and the methodology for arriving at housing need figures should be fully transparent.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/689  Respondent: 8726529 / Eric Palmer  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)

The Plan’s proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the borough, it is over double the previous figure of 322 used in previous plans. The SHMA report methodology is I believe inaccurate; it inflates the needs of the borough by distorted student numbers. However, it is based on commercially confidential modelling assumptions that cannot be checked or reviewed. There is no transparency to this evidence base and it is therefore impossible to assess its accuracy. This is not democratic and is not appropriate for consultation of the Plan.

The National Planning Policy Framework allows the overall housing target to be reduced to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/676  Respondent: 8726529 / Eric Palmer  Agent:
Do you consider the Proposed Submission Local Plan: strategy and sites as a whole to be legally compliant because it mainly ignores the consultation process for the 2014 draft Plan it is claimed to be based on.

That consultation process was absolutely clear by some +20,000 responses that that Plan was flawed and no development should be carried out on Green Belt land.

Instead this 2016 draft Plan actually increases the number of dwellings being built on the Green Belt, in direct contradiction to the consultation process, yet is stated to be a Regulation 19 proposal.

As a result I do not see how the 2016 draft Plan can be Legally Compliant.

The 2016 draft Plan should be re-assessed and should take into account the views of the majority of responses from the consultation process for the 2014 draft Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
ANSWER

I do not consider the Proposed Submission Local Plan: strategy and sites as a whole to be sound, because, but not limited to, the following reasons:

1. GBC has not included details of its Town Centre Master Plan and urban development proposals in time for and as a part of the Guildford Local Plan consultation
2. GBC has failed to provide an Infrastructure Report in time for and as a part of the Guildford Local Plan consultation
3. GBC has proposed an OAN of 693 houses per annum in the GL Hearn West Surrey Strategic Housing Market Assessment (SHMA) which many, including independent assessors, consider unsound
4. Highways England will not start to consider what it intends to do as regards the A3 in the vicinity of Guildford until 2018
5. Network Rail have not made available for the public consultation any plans for a new railway station at Merrow with an adjacent Park & Ride for 1,000 cars
6. The GBC proposals for Gosden Hill Farm do not appear to be in coordination with the Neighbourhood Plan for Burpham
7. The draft Local Plan will cause further linear development along the A3 between Burpham and West Clandon PC and encroachment onto open Green Belt countryside in clear conflict with the National Planning Policy Framework
8. The proposal for Garlick’s Arch was added to the draft Local Plan without any prior consultation under Regulation 18.
9. The Land Availability Assessment (LAA) indicates a range of planning difficulties for Gosden Hill Farm and Burpham which have to be met by the developer involved. These include Electricity Grid supply problems and foul sewage and surface water issues that suggest the development proposed cannot easily be implemented both technically and financially.
10. No adequate explanation is given as to how the aspirational proposal for a tunnel will be used to overcome traffic issues relating to the quality of life and amenity of Burpham, West Clandon, Send and Ripley citizens
11. In common with many others I do not believe the housing figure has been properly calculated and I believe it overstates housing need. The Council has prevented councilors or others from properly considering the SHMA by refusing to make public the basis on which it was drawn up.
12. The housing figure, when properly recalculated, should be subject to constraints to reflect Guildford's circumstances, including in particular the Green Belt and road infrastructure. National policy permits such constraints to be applied and it is inappropriate not to consider the need to do this.
13. I do not believe the draft plan accords with the NPPF policies on protecting the Green Belt.
14. Exceptional circumstances need to be shown to justify removing areas from the Green Belt and this has not been done. The housing need number is not itself a very special circumstance justifying an indiscriminate removal of sites from the Green Belt. Having properly calculated a housing needs number, constraints should be applied to it to reflect the Green Belt and AONB. Each proposed Green Belt site then needs to be considered on its own merits. The benefits of the proposed development need to be identified together with the harm to the Green Belt. Only if there are exceptional circumstances, and following a proper balancing exercise demonstrating that these exceptional circumstances outweigh the harm to the Green Belt, can the proposal proceed. The draft plan does not demonstrate that this has been done. Even once a housing number has been calculated it cannot be used to justify taking land out of the Green Belt on a wholesale basis.
15. Cast iron commitment should be included in the plan that development can only commence when required infrastructure improvements have been secured.
16. The status of the text which accompanies each policy box is not clear. If the accompanying text does not have the force of policy a number of the policies (i.e. the text in blue) are so vague and general that they commit the Council to very little.

The draft Plan should be re-assessed with housing on brownfield sites made a priority over commercial development and Greenfield sites and each of the above points addressed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
### Question 4: Duty to cooperate

Do you consider the Proposed Submission Local Plan: strategy and sites **as a whole** has complied with the Duty to cooperate? Please provide the following information being as precise as possible:

- why you consider it has or has not complied with the Duty to cooperate and
- what change(s) (if any) you consider necessary to make it comply with the duty to cooperate, explaining why this is the case.

#### ANSWER

I do not consider the Proposed Submission Local Plan: strategy and sites **as a whole** has complied with the Duty to cooperate.

This 2016 draft of the Local Plan clearly demonstrates Guildford Borough Council’s refusal to co-operate with the wishes and requirements of the vast majority of the residents in its Borough.

The Council has failed to co-operate with the results of the consultation process for the 2014 draft Plan which was meant to inform and guide this 2016 draft Plan.

Despite campaigning on a clear statement ‘Conservatives Say Green Belt To Stay’, the ruling party on GBC is now intent on pushing through a Plan which will devastate Green Belt land and extend the Guildford Urban Area to further merge into surrounding rural villages.

This is not cooperation by any definition.

In addition the Council has failed to cooperate in providing any transparency to the housing need figures commissioned by the Council from GL Hearn.

The 2016 draft Local Plan should be reassessed with a reviewed and transparent SHMA and revised to reflect the views of the residents of the Borough, who pay for Guildford Borough Council to act in their interests, and not those of developers and central government.

I trust that the objections made above are fully taken into consideration and that the 2016 draft Local Plan is amended accordingly.

Please acknowledge receipt of my comments.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
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<th>Comment ID: pslp172/1284</th>
<th>Respondent: 8726529 / Eric Palmer</th>
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<td>Ref: A43 - The building of 400 homes at Garlicks Arch along with travellers show plots which will exacerbate further the traffic issues.</td>
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<td>Ref: A58 - The planned Industrial development will again overload the A247 through Clandon and roads around Send.</td>
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Answer (if comment is on questions 1-7 of the questionnaire): ()

In summary my objections are very much directed to the inadequacy of the Plan to support new housing with the necessary infrastructure and especially relating to the road network which already creaks with the existing amount of traffic. In places the Greenbelt is being sacrificed for homes that will most probably be proven unaffordable which in turn will change the developers plans and promises made to finance new infrastructure.

I propose that as a minimum the planned development at Garlicks Arch be withdrawn and that a detailed road traffic relief plan be undertaken and committed to before any development at all is agreed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** pslp171/1710  **Respondent:** 8726689 / David Shaw  **Agent:**

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Contrary to national trends, too much potential development land within the town centre is being allocated for retail or commercial development rather than housing. High added value businesses are welcome in the borough, but much of the employment land is designated for retail or low added value employment floorspace, which only exacerbates current issues such as lack of low cost housing and heavy traffic. Sites such as the Burnt Common Triangle, currently in the Green Belt, are inappropriate for heavy industry,

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** pslp171/1706  **Respondent:** 8726689 / David Shaw  **Agent:**

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
The paragraphs relating to density in Policy H1 have been deleted. To ensure developments make optimal use of space there must be a policy to cover minimum and maximum densities. Without a policy to cover density, there is a risk that developers will use land inefficiently, putting additional pressure on the countryside and un-developed land. This deletion is inappropriate.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/1712  Respondent:  8726689 / David Shaw  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

There is concern about the inability of current infrastructure to meet current and future needs. The policy recognises that the “Infrastructure provider” will maintain infrastructure in most cases, and developers can only offer a contribution via Community Infrastructure Levy. Until the current infrastructure can meet existing needs adequately, further development should be very targeted to meet only absolute essentials.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/1708  Respondent:  8726689 / David Shaw  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The policy relating to AONB weakens the protections offered, and (unlike previously) does not have restrictions on non-major development. This is a move in the wrong direction. Previously all proposals were considered against the 5 key tests – now development in the AONB seems to be more acceptable. This is weaker, not stronger, and is contrary to huge responses from the public in previous consultations and the weight of protection given to AONB in the NPPF.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/1709  Respondent:  8726689 / David Shaw  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P2
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<td>Exceptional circumstances must be demonstrated in order to develop Greenbelt yet despite the weight of public opinion against weakening of this policy, 70% of new housing development will be in the countryside, of which, 58% will be in Greenbelt. By definition, this is not an exception and no attempt is made to demonstrate exceptional circumstances, in line with the requirements of the NPPF. Insetting villages is of concern since restrictions within the settlement boundary raises concerns over loss of character. The Rural Economic Strategy covered in 4.51a, promoting affordable homes everywhere in the countryside including the AONB as a main aim, is a mechanism for promoting overdevelopment in our countryside. It has not been subject to full public consultation and is based on data, which is not up-to-date. Three major strategic sites – Blackwell Farm, Wisley Airfield and Gosden Hill Farm – are in the Green Belt. Previous consultations show that, in line with the NPPF, the public would prefer to use brownfield land in the urban area first.</td>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
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<td>The housing target proposed, of 12,426 is based on assumptions that have not been made public and includes flaws that have not been corrected in the modified SHMA (verified by professional analyst Neil MacDonald of NMSS who concluded that an annual housing figure of 400 per year would meet Guildford's overall need). The phased approach (more homes built towards the end of the plan period) is appropriate in order to permit necessary infrastructure but open-ended targets where an unknown figure is held back until after the plan period is not a reduction but a postponement and does not allow for optimal planning or transparency.</td>
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<td>Comment ID: PSLPP16/930</td>
<td>Respondent: 8726721 / Rosemary Mitchell</td>
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<td>This area must be protected at all costs.</td>
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<th>Comment ID: PSLPP16/931</th>
<th>Respondent: 8726721 / Rosemary Mitchell</th>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<td>The greenbelt must be protected at all costs and I totally oppose any rearrangement of the greenbelt and removal of small towns and villages from it. It has been reasonably successful at stopping the uncontrolled sprawl of our towns and cities but this will not continue if we keep taking land out of it. The time has come to call a complete halt to any change in the green areas around our urban areas.</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I fail to see how building on Send MARSH (the clue is in the name) can be a sensible idea in terms of future flood risk to properties unless you build all properties on high stilts and give every property a boat!

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I do not know enough about the law to judge whether or not the document is legal. I object to the principle of a presumption in favour of development rather than a presumption in favour of the needs of the environment and local people.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
When assessing the need for development in the local rural areas I want to know how the council proposes to determine whether there is true local need. Under the last local plan the only housing development allowed in the villages was supposed to be for people within the parish. The recent social housing development in new road Gomshall has been mostly filled with people from outside the parish. How does the proposed local plan address this and what assurances have we that self interest on the part of planning officials will not take precedence.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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If East & West Horsley are taken out of the Green Belt then I believe it would be much easier for developers to build new homes which would very quickly destroy the quality of living in Horsley. The existing infrastructure in Horsley cannot cope with the existing number of residents so any increase in housing would again be detrimental to the community.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Comment ID: PSLPA16/4042  Respondent: 8727105 / Emma Pernet  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Comment ID: PSLPP16/16760  Respondent: 8727105 / Emma Pernet  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I strongly object to any plans to build on existing green belt land. As far as I am aware you need to demonstrate exceptional circumstances to build on the Green Belt. No exceptional circumstances have been submitted and in my opinion the views of a large number of people who objected previously have been ignored.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/511  Respondent: 8727425 / Chris Payne  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to the building on the Green Belt at Send at Garlick’s Arch and Send Hill because it is not justified by any special circumstances and the fact that Green Belt is meant to be permanent and not continually eroded. I have cycled to work from Ripley to Camberley for over 25 years and in this time the volume of traffic has increased massively. If we are serious about the environment and wish to encourage more people to give up the car then we must resist further development and erosion of the green belt. Our road system simply cannot cope.

2. I object to the exaggerated “housing need” figure of 13,860 which is far too high and results in the completely unnecessary development of the Green Belt. The way students, economic need and affordability are calculated inflates the housing need. No assessment is presented which projects the pull factor this scale of development will have to people already living in London. Living to so close to one of the largest cities in the world Guildford will just act as London overspill - what % of this figure is overspill - 80%?

3. I object to all proposals to build on the Green Belt at Send and elsewhere in the borough because all the actual development that is really needed for locals not London overspill can be accommodated in Guildford’s urban brownfield areas much closer to existing transport hubs.

4. I object to the proposed new interchange onto the A3 at Burnt Common because it would be disastrous for Send and the (A247) would be gridlocked all day. As a Cyclist using this road every day I am seriously concerned about pollution and safety on this road. It will just become a major cut through to/from Woking with traffic from the clockwise M25 using this instead of the M25 J11. Old Woking is grid locked as it is - no account of the development by Woking Borough Council in and around this area is considered which has already increased congestion i.e. the massive development at Willow Reach (nr Woking Football Ground).

5. I object to the development at Garlick’s Arch because the site has a particular conservation sensitivity since it is covered in ancient woodland. Trees which existed in the 16th century would be endangered. The site is also subject to flooding. It also proved a natural barrier from the A3 reducing pollution and traffic noise. So very few sites of ancient woodland remain and this should be preserved at all costs.

6. I object to the proposed massive development at of 2,000 houses at Wisley Airfield, 2,000 houses at Gosden Hill and 1,850 houses at Blackwell Farm because it will destroy large areas of Green Belt and agricultural land and the local infrastructure requirements have not been properly considered and are inadequate to deal with proposed housing levels. Roads, doctors and schools will be unable to cope.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/6236  Respondent: 8727457 / Nuala Crampin  Agent:
Hogs Back development

I strongly disagree with this proposed development as it is violating green belt and an A.O.N.B. and will remove from the environment of the town one of its major attractions in the form of its rural character. Furthermore the local infrastructure, especially of roads and water drainage is insufficient to support the development. If implemented it will increase the water-logging problems on Broad Street Common, Pound Lane and the area of Wood Street Village, and exacerbate the already acute traffic congestion on that side of Guildford.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Land South and East of Ash and Tongham

If this development is allowed it will again destroy an area of rural peace and contribute to even more traffic congestion on the already overburdened A323 and through Wood Street Village.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Land South of Normandy and North of Flexford

This proposed development will completely destroy the semi-rural character of Normandy; again there is not the road infrastructure to support it and the A323 and Wood Street Village will be adversely affected.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/6239  Respondent: 8727457 / Nuala Crampin  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A52

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

A52 and A53 Four Acres, Aldershot Road and Land to the rear of Roundabout White Hart Lane

The North-West area of Guildford has more than its fair share of Traveller sites and indeed the borough has more than comparable boroughs so further provision is not appropriate.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12874  Respondent: 8727457 / Nuala Crampin  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy D2 Sustainability

The provision of 8000 homes with the associated increase in traffic is not sustainable; the infrastructure does not exist and the desirable character of the area will be destroyed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12875  Respondent: 8727457 / Nuala Crampin  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E6
Policy E6 The Leisure and Visitor Experience

This will be greatly detracted from by destroying the green belt areas around the town and the A.O.N.B. of the Hogs Back.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12876  Respondent: 8727457 / Nuala Crampin  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy 11 Infrastructure and Delivery

There is a lack of strategic overall planning of infrastructure, in particular roads, water drainage and sewerage, and a dependence on developers' schemes to mitigate the adverse effects of their plans, which they present in order to obtain planning permission.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12878  Respondent: 8727457 / Nuala Crampin  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Policy P2 Green Belt

The boundaries of the green belt should not be changed as the reason for the creation of the green belt was to prevent sprawling development which is what this draft plan will give rise to.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12877  Respondent: 8727457 / Nuala Crampin  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy P5 Thames Basin Heaths Special Protection Area

The creation of S.A.N.G. by the council is a deceptive scheme to enable them to comply with regulations to justify development; in many cases the areas allocated to this use are areas of green space already, e.g. the proposed S.A.N.G. in Frog Grove Lane, and offer no improvement to the environment or biodiversity.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12873  Respondent: 8727457 / Nuala Crampin  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The whole plan is based on the premise that growth and expansion of business and population is a desirable objective for Guildford; I strongly disagree with this as if it is achieved it will change the character of the borough from that of a busy market town to that of city. Residents of Guildford have chosen to live in the former, not the latter. I therefore do not accept the excessive figure for the estimated housing need.

The plan proposed puts too much emphasis on expanding retail capacity within the town at the expense of allocating town sites to housing development. The need for retail premises is in decline due to online shopping, and housing development should be built at high density on town sites in order to preserve the green belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
In conclusion I do not see the borough council to be acting in the best interests of their electorate in the draft plan as they will be destroying the environment and character of the area in which we have chosen to live. Indeed much of what is proposed seems to be in the best interests of property developers, and there seems to be little regard for the views of residents expressed in the previous consultation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/2336  Respondent: 8728161 / Judy Kennedy  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Appx C Guildford's SHMA and the ONA on which the housing development of the Local Plan is based. Evidence revealed in the document which has been published by David Reeve July 2016 would appear to undermine GBC's housing development plan and the plans to increase the population of Normandy by over 175%.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the release of Site A46 from the Green Belt and the proposed development in Normandy for the following reasons:

Road/highway infrastructure. There has been no demonstrable evidence of any forward planning to increase and develop the highway accessibility which would be required for a housing development of 1100 new homes/traveller sites/secondary school. At least 1500 additional cars using minor local roads would be a conservative estimate. Unless there is an immediate plan to widen the A31/A3/A323 and build a bridge/tunnel to relieve the Ash railway crossing, any proposals for this housing development are ill-thought out, foolhardy and unplanned.

Secondary school provision under 'exceptional circumstances' for development. In-depth research and studies show that the two secondary schools in the Normandy catchment area: King's College and Ash Manor are approximately 40% under subscribed and likely to continue to be so. I object that one of the main premises for the proposed development is based on flawed statistics for additional secondary school places, when the existing schools are struggling to fill pupil numbers.

Travellers' sites proposed within the development. I object that Normandy is once again required to provide further sites for travellers. Normandy has its quota of these sites and it is time for a fairer distribution within the Borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9709  Respondent: 8728161 / Judy Kennedy  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy P2 Green Belt. I object to the misuse of Policy P2: Green Belt and the apparent justification of 'exceptional circumstances' for the removal of Normandy from this policy. GBC's Local Plan appears to be re-writing the green belt policy and choosing to ignore vital historical and contemporary concepts of the green belt. Professional planners ignore it at their, and our, peril. The UK is a small, over-crowded land mass with an ever-growing population. The retention of open spaces, wildlife habitats and, most importantly, clear air is not a 'nimby' whim but of survival necessity for rural and urban populations.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9710  Respondent: 8728161 / Judy Kennedy  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

S2 Unfair concentration of housing development and overturning of Green Belt sites to the west of Guildford. Once again, it seems that the villages to the west of Guildford are the target of GBC's development plans and I object to an apparent uneven policy of distribution within the Borough.

Lord Onslow's proposal to develop1000 new homes, a new school and sports facilities on Clandon Golf Course, Merrow is an excellent and practicable idea and it is curious that it is absent from the overall draft Plan. The site is well served by a good road system, with excellent access to the A3/A25/M25 thus avoiding the need to circumnavigate the congested roads of central Guildford. The schools on that side of Guildford (St. Peter's, George Abbot, Howard of Effingham) are popular and would benefit from an additional secondary school in the area. It's a win/win idea for Lord Onslow's proposal.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/1891  Respondent: 8728545 / Power Race Graphics (Darren West)  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Guildford Borough Council’s draft Local Plan proposals to build 1,800 houses, an industrial park and a highway on the slopes of the Hog’s Back at Blackwell Farm, which will:

- Destroy view from the Hog’s Back ridge – a nationally designated Area of Outstanding Natural Beauty
- Remove 72 hectares of scenic farmland and additional ancient woodland from the green belt
- Increase tailbacks on the A31 and traffic congestion
- Result in rat running through local roads
- Add to Guildford’s pollution

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/904  Respondent: 8728577 / Peter Williams  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the proposed local plan for the following reasons:

1. Green Belt and the Countryside (Policy P2) and Surrey Hills Area of Outstanding Natural Beauty (AONB) (Policy P1)
   1. Policy P2 states that the Metropolitan Green Belt will continue to be protected against inappropriate development. I object to the village’s removal from the Green Belt by insetting and extending the 2003 Local Plan Settlement Area boundaries.
   2. No exceptional circumstances are made for the new boundaries.
   3. The Green Belt study and Countryside Study is flawed. Wet Horsley’s defined settlement boundaries (2003 Plan) do not need to be extended.
   4. The parish has a rich and varied mix of low density housing and a good number of historic buildings. It sits on the north side or the North Downs (partly within the Surrey Hills AONB) and is a magnet for visitors, particularly walkers and cyclists, throughout the year.
   5. The key evidence document (Guildford Borough Economic Strategy 2013-2031) makes no case for the large increase in housing in West and East Horsley, nor for that matter, in the neighbouring villages.
   6. The proposed new economic development sites are proposed for the opposite side of the borough. Any increase in housing should be close to them.

2. Presumption in favour of sustainable development (Policy 1), Borough-Wide Strategy (Policy S2), Homes for all and affordable homes (policy H1, H2)
   1. Policy S2 calls for 13,800 new houses to be built during the plan period of 2013-2033. This number is excessive and unsustainable in the villages surrounding Guildford, particularly in West Horsley.
   2. Substantial expansion of the village is not sustainable. There is a single small shop, no post office, and a very restricted bus service. This is inadequate for the proposed increase in housing.
   3. The density of development proposed is much higher than the current level and will be out of character with the varied mix of type and layout in the village.
   4. There is already a deficiency in the local infrastructure; there is a lack of schools and shops; drainage is overloaded; parking is in short supply and the station car park in East Horsley is often full.
   5. The need for the proposed number of homes to be constructed during the first 5 years is completely unproven. The West Horsley Parish Council and Surrey Community Action Housing Survey: May 2014 identified a need for some 20 additional affordable homes to cater for young people and local elderly people who wished to remain in the village by down-sizing to smaller homes.

3. Sustainable Transport for new development (Policy i3)
   1. The practicalities of delivering secure travel plans have not been properly considered. The elderly, disabled, or those with small children, are best served by developments in towns and close to extensive amenities, including health care. The Policy states that developers ‘will be expected’ to propose and secure travel plans; this is a far cry from ‘be required to deliver’.
   2. Access to essential facilities (this is not mentioned in the written policies, although there are vague references in the infrastructure policies section)
      3. The green grocer may retire this year leaving the village with no shop. Plus parking outside the shop is, in any case, very limited.
      4. Parking is very limited in East Horsley where most residents go to use the library and the shops. The proposed increase in population will make movement through, and parking in, the village much more difficult.
4. Schools (schools are mentioned in the definition under Policy I1)

1. There is already a shortage of state primary school places in the village. The Raleigh School has been oversubscribed for several years.
2. Secondary school places at the Howard of Effingham School amongst others are limited and necessitate a significant bus or car journey to attend.
3. The private schools of Glenesk and Cranmore are busy and generate significant traffic from other parts of the county for parents to deliver and collect their children. There is heavy traffic on the A246 and Ockahm Road North as a result at the start and end of each day.

5. Medical facilities (Infrastructure Delivery Plan refers to a possible extension of Kingston Avenue Medical Centre)

1. The doctors’ surgery is already busy and it is difficult get appointments now. An increase in patients will adversely affect the level of service.
2. A major extension of the Royal Surrey Hospital will be needed to deal with the increase of population (which is in excess of the Government ONS forecasts).

6. Roads and transport infrastructure (mentioned in the definitions of Policy I1)

1. There are frequent trains to London and Guildford, but the station car park is normally full on weekdays. There is no scope of extension of the car park.
2. The large increase in population planned will overload the station and the roads serving it.
3. Because of the village’s location and the distant location of jobs and amenities, most households have at least 2 cars. The proposed housing will increase traffic on the already inadequate roads, prolonging journey times, increasing local air and noise pollution, and increasing risk of traffic accidents.
4. The road surfaces and drainage are already in a very poor state of repair and will deteriorate even more rapidly.

7. Waste water infrastructure (mentioned in Reasoned Justification under Policy I1)

1. Sewage is known to overflow in the Ockham Road and Green Lane areas
2. Guildford Council has been advised by Thames Water that drainage network is unlikely to be able to cope with the increased demand of the proposed population increase. The foul water drainage system connecting West Horsley to the treatment works north of Ripley will require upgrading, for which Thames Water advises 2-3 years lead-in subsequent to any planning permission.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/2146  Respondent: 8728577 / Peter Williams  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )
I object to the proposed local plan for the following reasons:

1. The reduction in the number of new homes in the Green Belt is not enough. There is still a very large number of new dwellings proposed for construction in the Green Belt.

2. It is proposed that the area to the east of the borough takes an even higher number of dwelling in the Green Belt.

3. Many other councils have chosen not to constrain overall housing growth to protect the Green Belt, yet Guilford has not. Although the objectively assessed housing target has been reduced since the 2016 plan to 12,466 dwellings by 2034, this still represent a 25% growth for Guilford.

4. Nothing has changed since last year’s consultation to address the sustainability aspects of the West Horsley development sites, as is required by national policy requirements. No matter how much people are encouraged to travel on foot or by cycling, each new home will need at least one car to give access to Horsley station, shops, medical centre, library, etc.; this is easily demonstrable.

5. More apartments are needed in Guildford, not more retail space. The rise of on-line shopping and the reduction in physical shopping is clearly documented and many authoritative reports support that view that the trend will continue.

6. No changes have been made to the proposal to inset both East and West Horsley from the Green Belt. Policy P2 states that the Metropolitan Green Belt will continue to be protected against inappropriate development. I object to the village’s removal from the Green Belt by insetting and extending the 2003 Local Plan Settlement Area boundaries.

7. The overload of local social and physical infrastructure is not addressed. Increased demand for access to medical facilities, schools, station parking, roads, and particularly disposal of waste water remain at large.

I trust that you will take my views into consideration and I would be happy to discuss the matter further with you.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Wood Street Village Association

Wood Street Village Association was established in 1990 to represent the Village of Wood Street, and represents the people of Wood Street Village, as defined by the Parish Boundaries, some 1612 people and 550 homes.

WSVA Summary View

WSVA remain deeply disappointed by the process and output on this local plan. Any project which works without targets (in this case housing numbers) for so long can be suspect. In this case since the housing number (693 per year) has only recently been produced, has not been scrutinised, is not open to examination, and is so much higher than the existing 322 per year, we believe this a significant flaw in the plan.

WSVA recognise the need for a Guildford Local Plan, beyond the legal requirements for one. This is seen as good practice and WSVA support that need.

WSVA also see a need for Social Housing, however we do not believe this plan takes proper account of all the evidence to correctly enable this housing to be available in the right place. We see far too many houses built on Greenbelt (nearly 8000), and far too few in the town (2000) where available land appears to be allocated at too low density, and to allow a retail expansion of close to 40%, which is against almost all market trend information.

We see much of our resident feedback from the regulation 18 consultation completely ignored., we therefore conclude, that the regulation 18 consultation feedback has largely been given lip service only. Despite the major rewrite, many policies are still loosely worded, and the greenbelt protection asked for and which was paramount in many responses, has been completely ignored.

Over 1100 people said in the regulation 18 responses, no building on the greenbelt, against just 6 saying yes, “saving the greenbelt” was a major election manifesto promise, yet the number of houses on the Greenbelt proposed is now even higher than original local plan proposal consultation of 2014.

We remain deeply sceptical that the council planning office is representing its residents views in this local plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents: 20160716 Local Plan Consultation (Reg 19) response By WSVA Final.pdf (1.1 MB)
Mixed use 1,800 homes, 6 Traveller pitches, employment, Local Centre, school etc.

Object

This area is Greenbelt. Despite suspect evident, Greenbelt Study evidence, it does meet all purposes of the Greenbelt and should be rejected on this basis alone.

As a result of a recent study (June 2016) by Land Management Services Ltd, we now know that most of Blackwell Farm and the land in its vicinity is of a landscape and scenic quality, character and condition that should merit inclusion within a revised AONB boundary.

The landscape is critical to the setting of the Hog’s Back ridge and in the conservation of rural views to the north of equal, if not greater importance, than land to the west of Down Place, which has been included in the boundary proposed by the Surrey Hills AONB Board.

Two fields at the very eastern edge of the Blackwell Farm/Manor Farm site did not meet the AONB criteria. However, these were acknowledged to be important in providing the setting to Guildford and an important transitional landscape.

The boundary put forward by Surrey Hills AONB Board between Misley Copse and Down Place and between Down Place and the current AONB boundary does not follow any defined landscape features (such as a ridge line, woodland edges, or prominent field boundary) or reflect a decline in landscape and scenic quality or changes in landscape character that might justify exclusion.

The proposed AONB boundary should be reviewed at this location and realigned according to the recommendations made by Land Management Services Ltd – As per their report entitled “Hogs Back Natural Beauty Evaluation” dated June 2016, as attached.

Failure to realign the boundary according to Land Management Services Ltd’s recommendations could enable opportunities for development which would result in significant harm to the setting of the existing AONB and the loss of landscape which is of a character and quality which merits inclusion within a revised AONB boundary.

Lack of infrastructure and increased surface water run-off would affect Wood Street Village (particularly Pound Lane/Baird Drive) and Fairlands.

A development in this location would have a significant negative effect on the wonderful biodiversity of the region. We note that dormouse and insect monitors for study were placed around 2014 (date not recorded) and within 2 weeks of being placed in hedgerows and on field boarders, the hedges and grass areas were cut. We are therefore not surprised if there are studies showing poor bio diversity.

The proposed accesses from the A31 and Gill Avenue would be inadequate to support such a development. Indeed access onto the A31 would be in the AONB. In addition there would be an adverse impact on the following: Ancient Woodland, Strawberry Grove, Dean Bottom, Manor Copse and a strip of Ancient woodland at Wildfield Copse. The Infrastructure Study para 3.10 states there is insufficient waste water infrastructure for this site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPS16/7616</th>
<th>Respondent: 8728865 / Neville Bryan</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A29</td>
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</table>
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Object

The level of development in Ash would significantly increase traffic on the highway network through Wood Street. The Strategic Highway Assessment Report carried out by Surrey County Council, on behalf of GBC concludes that the Aldershot Road (A323) would experience increased traffic congestion and have a level of service indicator which would be at least unstable or where there would be no spare capacity.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/7617  Respondent: 8728865 / Neville Bryan  Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A46

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Object

A development of this size is inappropriate for Normandy. Westwood Lane and Glaziers Lane, which are unclassified rural roads, as well as the two railway bridges, are unsuitable for an increase in traffic from such a development. The draft Local Plan indicates that local highway environmental improvements (these are not specified) would mitigate the transport impact from this development...

However, the Strategic Highway Assessment Report carried out by Surrey County Council, on behalf of GBC concludes that the Aldershot Road (A323) would experience increased traffic congestion and have a level of service indicator which would be at least unstable or where there would be no spare capacity. This implies that far more traffic mitigation would be required.

The sewerage system is already running at capacity and could not cope with the proposed development. We are not convinced that there is a demand for a secondary school in this part of Guildford

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/7618  Respondent: 8728865 / Neville Bryan  Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A52
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Object

DCLG changes to NPPF / NPPG regards the applications and management of traveller applications needs to be applied. This is a small site which meets all criteria of the Greenbelt

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/4367  Respondent: 8728865 / Neville Bryan  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A53

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Object

This is greenbelt, meeting all purposes of the greenbelt.

DCLG changes to NPPF / NPPG regards the applications and management of traveller applications needs to be applied.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/7619  Respondent: 8728865 / Neville Bryan  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A53

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Object

DCLG changes to NPPF / NPPG regards the applications and management of traveller applications needs to be applied. This is a small site which meets all criteria of the Greenbelt

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16889  Respondent: 8728865 / Neville Bryan  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Object

While we support the emphasis on views, natural features, local distinctiveness, and layout of surrounding buildings, there need to be some good design criteria for Guildford and its setting, which should have mandatory planning enforcement.

The monitoring of this policy is inadequate, and should result in more sympathetic and better designed buildings.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9457  Respondent: 8728865 / Neville Bryan  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Object

I do not see how 8000 houses built on the greenbelt meets the definition of sustainable. There will be 16000 additional cars (2 per house is the norm), increased pollution and a biodiversity reduction.

The council is also currently reluctant to do emissions testing due to cost. Air quality testing is something which should be required in planning to protect our environment from overdevelopment and should have a clear policy statement and develop is required by law to meet emissions standards.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Comment ID: PSLPP16/16890  Respondent: 8728865 / Neville Bryan  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Object

Sustainability should be a key aim and therefore defined in Policy S1.
We do not see how 8000 houses plus required infrastructure on the Greenbelt, together with the 16000 cars (2 per house is the norm) is in anyway sustainable.
The council is currently reluctant to do emissions testing due to costs. We see this as something required in planning to protect our environment from overdevelopment and should have a clear policy statement.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/9458  Respondent: 8728865 / Neville Bryan  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Object

Wording is woolly and ineffective. It needs to be stronger, and much more prominent.
I would add that any development close to historical assets is harmful and should be expressly prohibited. This policy fails to meet the requirements of NPPF paragraphs 126 and 131-133.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Object

The policy is weak and fails to get to the core issue of protecting our history and heritage against over development. The policy should protect and preserve our heritage assets and new development be sympathetic with it.

Wording need to be stronger, and much more prominent.

We would add that any development close to historical assets is harmful and should be expressly prohibited. This policy fails to meet the requirements of NPPF paragraphs 126 and 131-133.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Object

We strongly object to both the change of and insetting of the Wood Street Village boundaries. We also ask you re recheck the Wood Street Village Map as common land is we believe incorrectly drafted in the local plan diagrams.

We believe increased insetting for all the villages should not be necessary as it removes protection from over development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Attached documents:

Comment ID: PSLPP16/16893  Respondent: 8728865 / Neville Bryan  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

No comment

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9459  Respondent: 8728865 / Neville Bryan  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Object

I do not support the policy of expanding the Research Park onto Blackwell Farm which is high quality Greenbelt and which has recently been identified as of sufficient quality to be included in the Surrey Hills AONB review (see the Land Management Services independent report commissioned by Worplesdon, Compton and Wanborough PC’s - June 2016 in PolicyA26).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16895  Respondent: 8728865 / Neville Bryan  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E3
**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ()**

**Object**

This policy appears to conflict with government policy on using Brownfield land for housing. We would like see brownfield released for housing, especially in Guildford town area.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/9460  **Respondent:** 8728865 / Neville Bryan  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E4

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ()**

**Object**

I find this policy very strange, when there is none on other business parks or (and of much greater concern due to history) the University.

I do not support the policy of expanding the Research Park onto Blackwell Farm which is high quality Greenbelt and which has recently been identified as of sufficient quality to be included in the Surrey Hills AONB review (see the Land Management Services independent report commissioned by Worplesdon, Compton and Wanborough PC’s - June 2016)

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/16896  **Respondent:** 8728865 / Neville Bryan  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E4

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ()**
We find this policy very strange to be included, when one on the University is not (and was removed from the 2003 plan in the 2007 review by the secretary of state. If inclusion of this type of policy is sound then we would expect the reintroduction of a policy on the university area of Manor Park (next door).

We do not support the policy of expanding the Research Park onto Blackwell Farm which is high quality Greenbelt and which has recently been identified as of sufficient quality to be included in the Surrey Hills AONB review (see the Land Management Services independent report commissioned by Worplesdon, Compton and Wanborough PC’s - June 2016)

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy E5</td>
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<tr>
<td><strong>Object</strong></td>
<td>This policy should only apply to small-scale development in rural areas i.e. less than 100 sq m which is in keeping with and the permanence and amenity of the green belt. The policy needs to protect villages from overdevelopment and include good design, especially in light of insetting proposals.</td>
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<td><strong>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</strong></td>
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<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy E6</td>
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<td><strong>Object</strong></td>
<td>The main attraction for the Guildford area is the Surrey Hills AONB. Rather than focus on more attractions (agree some is needed particularly the Museum, Guildford Art Collection, History, Castle etc), there needs to be much more focus on making the most of the Surrey Hills AONB by protecting it from over development.</td>
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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/9462  Respondent: 8728865 / Neville Bryan  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E7

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Object

One of the biggest issues with the local plan is the failure of a strong and far sighted plan for the town. Where is the urban housing development?

Only 2000 houses on brownfield in the town of Guildford are not sufficient, especially when other policies promote retail and industry within the town.

Where are the people going to live to support retail? There are sites available, for example, various sites in Woodbridge Meadows (relocating post office would be a major boost for example), Walnut Tree Close (including the area around the station) and North Street.

I really do not understand the focus on retail and the 40% growth in what is widely now regarded as a contracting business sector, while denying land for housing we also observe:--

1. Retail is contracting. The British Retail Consortium forecast that by 2020 up to one third of those now employed in traditional retail could lose their job.
2. Online sales are still growing. Recently it was announced that 13% of total retail sales now made over the internet.
3. This does not meet the stated objective of attracting highly paid jobs to the area – the majority of jobs in retail are low paid, with zero hours contracts and usually a pay rate based on the minimum wage.

We need the plans for retail to be converted into plans for building sustainable houses.

Especially social houses (i.e. council led).

I expect this plan to change to deliver a much higher density of house building and much more brownfield land allocated away from retail. Good design is essential.

I do like the idea of developing and promoting the river area as a key attraction.

CIL strategy must promote brownfield redevelopment.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Wrong and misguided policy which flies in the face of national and global trends.

Where is the urban housing development? Only 2000 odd houses in the town of Guildford is not sufficient, especially when other policies promote retail and industry within the town. Where are the people going to live? There are sites available, for example, various sites in Woodbridge Meadows (relocating post office would be a major boost for example), Walnut Tree Close (including the area around the station) and North Street.

We do not understand the focus on retail and the 40% growth in a dying sector. While denying land for housing we also observe:

1. Retail is contracting. The British Retail Consortium forecast that by 2020 up to one third of those now employed in traditional retail could lose their job.
2. Online sales are still growing. Recently it was announced that 13% of total retail sales now made over the internet.
3. This does not meet the stated objective of attracting highly paid jobs to the area – the majority of jobs in retail are low paid, with zero hours contracts and usually a pay rate based on the minimum wage.

We need the plans for retail to be converted into plans for building sustainable houses.

Especially social houses (i.e. council led).

CIL strategy must promote brownfield redevelopment.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
No comment

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16901  Respondent: 8728865 / Neville Bryan  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E9

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

No comment

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9463  Respondent: 8728865 / Neville Bryan  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Object

There has been wholesale mismanagement of the University since the 2003 local plan, with a complete failure to enforce the policies agreed at that time. Specifically related to building for student accommodation. Many of these issues detailed in my last submission (and others), but have not been addressed. I have summarised again under policy S2.

Failure to build the accommodation is a very poor thing for Guildford, and should put the University at the top of the bad developer list.

I support high density development in the urban area, but this plan does not deliver it.

Guildford borough has already a higher proportion of traveller sites than most comparable boroughs and this should be taken into account when evaluating need for travellers. This policy needs to be in line with the Traveller Guidelines issues and included in the NPPF in August 2015.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Attached documents:

Comment ID: PSLPP16/16902  Respondent: 8728865 / Neville Bryan  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Object

The University of Surrey students are steadily taking over Guildford – a town with a population of around 70,000 inhabitants. There are now 14,000 students with only 5,500 campus accommodation places. There are at least 1,500 HMO’s in Guildford occupied by students and that number is growing. Student accommodation should be provided by the University of Surrey for 85% of all its full time students overall, with 100% of new students and more than 60% of existing students accommodated. Active promotion of this policy would allow 1000 houses to be released from HMO occupancy and find their way back to the local communities, for family housing in the urban area.

We support high density development in the urban area.

Guildford borough has already a higher proportion of traveller sites than most comparable boroughs and this should be taken into account when evaluating need for travellers. This policy needs to be in line with the Traveller Guidelines issues and included in the NPPF in August 2015.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/18568  Respondent: 8728865 / Neville Bryan  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
In 2002, when the University was pushing to take Manor Farm out of green belt, it argued that students wanted to live in student halls and that not having enough on-campus accommodation meant that it was losing students to Kingston. It also stated the following:

“The provision of on-campus accommodation for over 60% of students is a benefit of very substantial significance. On-campus accommodation is cheaper than renting in the private sector and students are closer to the University’s facilities. Other benefits include a subsequent reduction in housing demand in Guildford, further enhanced by the release of University land at Hazel Farm for general housing provision.” - University of Surrey, Manor Park Non Technical Summary (para 19/20), November 2002. The University now promotes the opposite argument suggesting that students prefer to live in town. Pressure for housing in the town suits the University's case to develop its land holding on the green belt.

A phased plan would only affect future intakes. I.e those currently studying for their GCSEs. Future candidates would be applying to Guildford in the knowledge that this was a "campus university" in the true sense of the word.

It would be possible for the University to encourage students to live on campus by making the accommodation cheaper or by including accommodation costs within the student fees. Exceptions could be made for students who were married with families or who wished to live with their parents or who had other good reason for living in town.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Strongly Object

This policy will be a disaster for Guildford residents. This wording looks like a developer’s charter. A local community nightmare, which appears to allow development outside the settlement boundaries - even in Green Belt. This policy introduces a loop hole to allow housing be built anywhere with no restriction, other than an obscure link to the easy to manipulate housing list.

Wording needs to make clear, as part of the policy that the overriding requirements of the NPPF, especially NPPF 87, 88 and 89, will apply in the administration of this policy so that it will only apply in exceptional circumstances.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9466  Respondent: 8728865 / Neville Bryan  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Strongly Object

Existing infrastructure is highly constrained, with particular concern to roads, water supply and sewerage.

This again looks like a wish list rather than a plan. The stated infrastructure first cannot be implemented on this policy. Many of the key schemes like the tunnel are aspirational rather than practical. Existing roads are jammed – try going through Guildford at 8.30 am. We need one co-ordinated transport strategy, but this is piecemeal based on developments which may never happen.

If 14,000 houses are built as this document suggests this policy will not support the 28,000 additional cars on the road. This is implies a serious constraint which needs to be applied in Policy S2.

CIL strategy as drafted also encourages development on green field sites rather than brownfield.

SANG strategy is flawed. I see no practical way the Thames Basin will be protected by sites like Russell Place Farm as proposed. We also believe the Russell Place Farm SANG already an application before this consultation has been predetermined. It seems GBC approach to SANGS is as a method of building houses on the Greenbelt rather than adding them as a valued community asset.

The Hockford Sewage works have been omitted in error. Without this being seriously upgraded, the whole of the west of Guildford will not be able to get rid of sewerage.

Policy I2: Supporting the Department for Transport’s “Road Investment Strategy"
Object

What happened to integration? This should be part of policy I1.

The A3 tunnel is not funded.

Infrastructure funding and support is needed before housing and employment growth are factored in.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/16905  Respondent: 8728865 / Neville Bryan  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy I1: Infrastructure and delivery

Strongly Object

Existing infrastructure is highly constrained, with particular concern to roads, water supply and sewerage.

We doubt this policy, led as it is by developer contributions (mainly from Greenfield sites requiring significant infrastructure of all types) is deliverable. Many of the key schemes like the tunnel are aspirational rather than practical.

Existing roads are jammed – try going through Guildford at 8.30 am. **We need one co-ordinated transport strategy**, but this is piecemeal based on developments which may never happen. If 14,000 houses are built as this document suggests this policy will not support the 28,000 additional cars on the road.

**A strong policy here is not possible and this should be used as a major constraint on building on the greenbelt.**

CIL strategy as drafted also encourages development on green field sites rather than brownfield.

SANG strategy is flawed. We see no practical way the Thames Basin will be protected by sites like Russell Place Farm as proposed. We also believe the Russell Place Farm SANG already an application before this consultation has been predetermined. It seems GBC approach to SANGS is as a method of building houses on the Greenbelt rather than adding them as a valued community asset.

We note the wording at the end of the Policy which indicates that the council is more interested in meeting its legal responsibilities than actually protecting wildlife. GBC is failing to take account of existing biodiversity at sites selected for SANG provision.

Paragraph 3.6 of the Infrastructure Study is incorrect. The Hockford Sewage works have been omitted in error.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: PSLPP16/16906  Respondent: 8728865 / Neville Bryan  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Object

Needs to be integrated with Policy I1 and isn’t.

The A3 tunnel is not funded.

Infrastructure funding and support is needed before housing and employment growth are factored in.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9467  Respondent: 8728865 / Neville Bryan  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Object

Policy needs expanding, and to have more solutions.

While I support the concept but fail to see how it can be applied for new out of town Greenbelt sites. We are in the surrey HILLS it isn’t flat and cycling is not practical in many cases.

Bus travel is being scaled down by Surrey CC, and private investment will only be on profitable routes. No bus hub is yet clear to link busses and trains.

The further from the town centre, the less sustainable and more car dependant the development will be.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16907  Respondent: 8728865 / Neville Bryan  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Object

We support the concept but fail to see how it can be applied for new out of town Greenbelt sites.

We are in the surrey HILLS it isn’t flat and cycling is not practical in many cases.

Bus travel is being scaled down by Surrey CC, and private investment will only be on profitable routes. No bus hub is yet clear to link busses and trains.

The further from the town centre, the less sustainable and more car dependant the development will be.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/16908  Respondent: 8728865 / Neville Bryan  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID4

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Object

Policy has no teeth and appears to contradict much of the rest of this plan.

We welcome the intention to extend the principle beyond Biodiversity opportunity areas; however the current plan to build on large areas of countryside and to inset villages will have the opposite effect. That includes the flawed approach of making farmland into SANGS. There is no mention of the impact of the plan on food production, or monitoring the loss of agricultural land.

The inset map for Wood Street Village is incorrect as it does not show the common land on Oak Hill.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/9468  Respondent: 8728865 / Neville Bryan  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Object.

We like the concept of the policy, but the wording leave us to believe this will weaken the AONB protection. Terms such as “considered” and “expected” are not strong enough in prohibiting development proposals that do not conserve and enhance the AONB, and it is likely that developers will be able to use this loose wording to their advantage.

The AONB Policy in the Draft Plan 2014 provided greater protection to the AONB, and I would like to see the following sentences reinserted:

“The national significance the AONB will be afforded the highest level of protection and only proposals which can be sensitively amalgamated into the area and which complement and enhance the character of the AONB will be considered”

“Proposals within the AGLV which would have a negative impact upon views into and out of the AONB and which do not respect the setting, will not be acceptable”

In accordance with the most up to date Minerals and Waste Plan, safeguarding of applicable land within the AONB and/or AGLV may be necessary and deemed appropriate

I would also like to see a clause which gives protection to the candidate areas for AONB status in the forthcoming Surrey Hills AONB Boundary Review. All land that has been assessed as meeting the latest Natural England criteria for AONBs should be subject to the same level of protection as an AONB, not just land that has been designated AGLV.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>PSLPP16/16909</th>
<th>Respondent:</th>
<th>8728865 / Neville Bryan</th>
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<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy P1</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Object.

We like the concept of the policy, but the wording leave us to believe this will weaken the AONB protection. Terms such as “considered” and “expected” are not strong enough in prohibiting development proposals that do not conserve and enhance the AONB, and it is likely that developers will be able to use this loose wording to their advantage.

We are also concerned that the AONB criteria listed in the policy are not the most important ones in determining whether a planning application should be approved. Aside from the one outlined in the first bullet point (which relates to the AONB setting) none of these criteria is concerned with the key characteristics of AONB, i.e landscape character, scenic beauty,
important views, tranquillity etc. Whether or not a development supports the rural economy or provides public access is of far less national importance than preserving the quality of the landscape itself.

The AONB Policy in the Draft Plan 2014 provided greater protection to the AONB, and we would like to see the following sentences reinserted:

“The national significance the AONB will be afforded the highest level of protection and only proposals which can be sensitively amalgamated into the area and which complement and enhance the character of the AONB will be considered”

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In accordance with the most up to date Minerals and Waste Plan, safeguarding of applicable land within the AONB and/or AGLV may be necessary and deemed appropriate

We would also like to see a clause which gives protection to the candidate areas for AONB status in the forthcoming Surrey Hills AONB Boundary Review. We consider that all land that has been assessed as meeting the latest Natural England criteria for AONBs should be subject to the same level of protection as an AONB, not just land that has been designated AGLV.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9469  Respondent: 8728865 / Neville Bryan  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Object

Greenbelt is not just for us but also for future generations. It is not the Council’s to give away. When it gone it is gone forever. This policy wording is too weak.

I strongly object o building on the greenbelt without local resident support.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16894  Respondent: 8728865 / Neville Bryan  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Object

We strongly object to both the change of and insetting of the Wood Street Village boundaries. We also ask you re recheck the Wood Street Village Map as common land is we believe incorrectly drafted in the local plan diagrams.

We believe increased insetting for all the villages should not be necessary as it removes protection from over development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16910  Respondent: 8728865 / Neville Bryan  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Object

We need our greenbelt protected by much stronger wording, as it is under threat from developers. This policy wording is much weaker than previous plans and versions, and it now appears that it is dependent on the Surrey Hills Management Plan which we note welcomes housing development.

Greenbelt needs much more substantial protection. Even major (undefined) development in the AONB would be permitted if exceptional (undefined) circumstances could be demonstrated.

Greenbelt is not just for us but also for future generations. It is not the Council’s to give away. When it gone it is gone forever.

Any policy on the Green Belt should start with a fair assessment of its value. The Green Belt is not just empty space but is an inhabited, working environment that safeguards a certain stock of natural capital. It is a National Asset and should be protected in perpetuity. However Policy P2 appears to try to justify excessive development in supposedly protected areas. This is contrary to previous wishes expressed in responses to the regulation 18 public consultation.

This policy is also based on a flawed Green Belt and Countryside Study. Errors reported in the last consultation have not been addressed. The Greenbelt sensitivity study which accompanies the Greenbelt reports is also deeply flawed. Nowhere are the errors more apparent than with area H2, as this area has been recently assessed as high grade greenbelt fitting the criteria for the AONB expansion (see the Land Management Services report June 2016), yet the sensitivity study only rated it as Amber – too convenient as the University and GBC both wish to develop it.

Policy P2 states that “the general extent of the Green Belt has been retained.” This is a misrepresentation as over 6% of the borough Greenbelt is being given away.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: PSLPP16/9470</th>
<th>Respondent: 8728865 / Neville Bryan</th>
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<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy P3</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Object

Why are GBC removing Greenbelt in most of the borough while adding it back in Ash?

Exceptional circumstances have not been demonstrated anywhere to remove or add Greenbelt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<tr>
<th>Comment ID: PSLPP16/16911</th>
<th>Respondent: 8728865 / Neville Bryan</th>
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<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy P3</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Object

Not clear why we are removing Greenbelt in most of the borough while adding it back in Ash. Exceptional circumstances have not been demonstrated anywhere to remove or add Greenbelt. We hope it’s purely co-incidental that the current and immediate past leadership of Guildford Council and a significant number of the Executive reside in the area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/16912</th>
<th>Respondent: 8728865 / Neville Bryan</th>
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<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy P4</td>
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Page 1969 of 3335
Object

There are aspects of this policy which are acceptable; it is sensible to protect groundwater source protection zones. We note the maps used in some cases (example around the Clay Lane Link Road project) were inaccurate, missing as they did a key water course.

However, urban development on previously developed concreted areas does not create increased flood risk, especially where there is the capacity for improved flood resistance measures to be included in the design. E.g. Walnut Tree Close and Woodbridge Meadows.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16913  Respondent: 8728865 / Neville Bryan  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Object

There are aspects of this policy which are acceptable; it is sensible to protect groundwater source protection zones. We note the maps used in some cases (example around the Clay Lane Link Road project) were inaccurate, missing as they did a key water course.

However, urban development on previously developed concreted areas does not create increased flood risk, especially where there is the capacity for improved flood resistance measures to be included in the design. E.g. Walnut Tree Close and Woodbridge Meadows.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9471  Respondent: 8728865 / Neville Bryan  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P5
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Object

This looks like an exercise in creating SANGs to justify using agricultural or wooded land as recreation land in order to justify building on other green spaces. There is no actual increase in environmental protection, and actually a reduction in Biodiversity.

This policy is weak and pointless. The Waddenze judgement must be applied. As per paragraph 21 of Planning Circular 06/2005.

SANG (Suitable Alternative Natural Greenspace) is not beneficial as the sites identified or targeted are already greenspace. Site designation shows how little logic applied (for example 900 Houses in Ash cannot be mitigated by a SANG in Wood Street Village).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9472  Respondent: 8728865 / Neville Bryan  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Object

The building of 14000 houses and allowing excessive employment growth in an already overcrowded part of the Surrey is by definition unsustainable.

This wording is based on the National Planning Policy Framework (NPPF) however the policy fails to recognise that development in rural areas, with inadequate transport and other poor infrastructure, cannot cope with the proposed scale of development.

This should represent an absolute constraint on development and housing and that constraint should be reflected in policy S2.

There is no account of the impact of the University of Surrey past and present.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9473  Respondent: 8728865 / Neville Bryan  Agent:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The Local Area Definition

Guildford Area only defined as Waverley and Woking as well as Guildford – Guildford entwined will be hit by other implications from Rushmoor and the further to the west. Much of this passes through Guildford in the rush hours. These concerns have been raised since 2014 but the Council has failed to seek better market data.

The OAN / SHMA Process is flawed

The Local Plan evidence base should be open to scrutiny. How can we scrutinise the OAN on 693, when the assumptions and calculations underlying the result are hidden. The Council propose we should trust them, as the contractors’ model is used by a large number of other local authorities.

Widespread usage in no circumstances mean it is right for Guildford, and Guildford itself has some rather special circumstances, being that it is dominated by the University of Surrey. The Office of National Statistics acknowledge this, yet no mention is made of the implications of the massive and temporary resident student population on the long term population forecasts underlying the model.

Brexit has made the large immigration assumptions used in the SHMA rather suspect too.

For reasons I do not understand Guildford Borough Council failed to scrutinize the SHMA, and recently altered the petitioning rules in March 2016 to avoid a full public petition on the matter going into debate.

The hidden model belongs to consultants G L Hearn, whose website openly proclaim their pro-development agenda, leading me to the reasonable suspicion that the figures are not right.

This lack of debate and closed process, undermines the validity of the whole consultation. It is unreasonable to ask us, the public to approve a “plan” that fails to propose a target number that takes all the standard constraints and adjustments realistically into account, leaving the Council to set one without further consultation. Even if the OAN were not flawed, it is at best only a baseline figure and should not be passed off as a policy proposal.

Outside Analysis

Guildford Resident Association commissioned a critique of the housing number “A Review of the West Surrey SHMA as it relates to the Objectively Assessed Housing Needs of Guildford” by Neil McDonald dated June 2016. This suggests the target should be 510 per year (before constraints) rather than the 693 which appears to be set and applied.

The Campaign for Rural England has also done a critique exercise they will be submitting, which we believe leads to a similar conclusion on numbers

Constraints should be applied

Constraints are fully justified and need to be applied in accordance with para 166 of the NPPF.

- The borough has major traffic and access problems,
- The town is gridlocked in rush hours
- The A3 is gridlocked in rush hours
- Minor roads are overloaded
• Most of Guildford borough is highly protected from development (89% Green Belt, 44% AONB and about 75% protected by SPA).

Guildford residents cannot take such a large increase in housing target on trust but that is what we are being asked to do. As the number is not explained it is difficult to argue with.

**SHMA is Pre Brexit**

Even the 510 would be substantially low if Brexit implies a limit on international migration, as international migration is driving the majority of the population rise.

**The University Impact**

The University has approximately 14000 FTE students, half of whom live off-campus. This means that around 7000 students live in the town centre, occupying homes that could be made available for University staff and other key workers.

The housing need has to be completely rethought in light of the student impact. There is no policy for students and I feel - as outlined below - this is a serious omission, with nearly 1 in 5 of the Guildford Town population being a student.

Let’s begin with the history, and previous promised. The University has been woeful in meeting its promises made in 2003 to build one student accommodation place for each extra full time place. I specifically refer to the University of Surrey’s agreement to build 4790 student residences, and 300 staff residences to support its expansion in the Manor Park Development Brief (MPDB) in 2003. To date only around 1665 residences and 30 staff houses have been built, while the University has expanded by 5850 full time students (SHMA Appendix C).

Over the same period it has expanded by around 6000 students, placing a huge burden on infrastructure, and forcing the population out of the town as the student move in.

In the same 2003 Local Plan – the University committed to 60% of full time students on site. It currently admits to 54%, but with 11523 (under and post graduate) full time students (SHMA appendix C) and only 5100 accommodation units (SHMA Appendix C) this is calculated 44% on site. The current University Estates Plan of 2009 states clearly the University only plans for 42%. This is a direct breech of that 2003 agreement. We note the slight fall after 2011 is more likely to do with the introduction of student grants, than a plan reduction by the University as stated in SHMA Appendix C.

Increase Students on Site. We note that other councils such as Oxford which have a similar scale University challenge have solved this creatively, by seeking agreements for student numbers between 80 and 85% on site. OBC motivate the University colleges by effectively blocking any development until this is agreed and adhered to.

I therefore believe that the proposal of 60% of students is wholly insufficient. Guildford needs a policy to ensure that the University accommodates 85% per cent of its students on its existing campuses. This policy would quickly free up 1000+ houses currently denied to the residents due to the advantages of high returns offered in renting to Students by privet landlords. These properties would be in the town centre, close to the University and railway station, where they are sustainable and needed. An easy win.

If this were to happen a natural result would be fewer traffic movements, and fewer problems with students parking in residential areas. Students living on campus are less likely to bring cars. (In parts of Ashenden there are four cars per student house) NB In 2003, the University promised that Manor Park would be a “world-class car-free campus”.

Under a 2004 Section 106 agreement (Section 15), Hazel Farm will be released by the University to provide housing for Guildford once 2,500 units have been built on Manor Park. Whilst the site cannot be used for family housing (because of its proximity to Whitmore Common SPA), Natural England would allow the site to be used as a care home. This usage would seem appropriate given the ageing population often cited as being a reason for population growth, and it would help towards Guildford’s housing supply numbers.

This is all good. Also

Seven out of the top-10-ranking US universities accommodate more than 86% of students on campus - Harvard has 98%.
Oxford City Council’s Local Plan includes a policy which limits the number of students in the private housing market to 6,000 out of a student population expected to reach 40,000 in the near future.

The University has ample space on its Manor Park and Stag Hill campuses to provide this accommodation.

Student preference is an argument that the University has used in order not to build its student housing, however the majority of students attending Oxford University are not given the option to live in shared accommodation in town, and this does not prevent them wanting to go there.

Many students actively want to live on campus and want the security of knowing that they have a roof over their heads for three years. The student halls are filled every year. A number of students, for example in Onslow Village, would have preferred to remain on campus, but say they were unable to do so.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/3753  Respondent: 8728865 / Neville Bryan  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Object - Mixed use 1,800 homes (1500 in plan period), 6 Traveller pitches, employment, Local Centre, school etc.

All original objections remain - Additional comments.

(Allocation 9) Adding a secondary school will exaggerate the already unacceptable traffic situation. The RGB technical note produced for Compton and Worpleson parish councils dated June 2017. Highlighted this and access to this site is along existing congested roads. The 20% uplift on the A3 in 2011 was never addressed, and this will have a similar impact on the A31, and feed roads. This will exaggerate the already unacceptable traffic situation.

Also noted, is that the two areas proposed are through points

- Southern access is through a protected AONB per policy
- Eastern Access is through/next to Ancient Woodland

(Infrastructure 3 ) Control of through traffic (turning the new estate in to a run like Park Barn and Wood Street already are) will be unenforceable.

Surface water run of will be uncontrollable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/1899  Respondent: 8728865 / Neville Bryan  Agent:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Object - All original objections remain. In addition

The amended definition does not provide for enforcement or corrections for the previous under provision of student accommodation by the University of Surrey.

Housing targets should include the students, however due to restricted land supply, future expansion (and previous under build to 2003 commitment) should 85% be accommodated on the University campus. We are recommending at a minimum, 4500 student accommodation places to meet the 2003 plan proposals (not provided), plus 1 student place for each additional FTE student attending the University of Surrey.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/1900  Respondent: 8728865 / Neville Bryan  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Strongly Object

I do not believe the maths support developer funding the infrastructure and the affordable housing requirements via any method, including CIL. Indeed it is doubtful they would add up to a significant part of either infrastructure OR affordable housing costs required. On this point alone the proposed plan fails.

Since the previous plan, Guildford has been identified as the 4th most congested town in England.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/1902  Respondent: 8728865 / Neville Bryan  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Object - All original objections remain

The amended policy wording still appears to weaken the AONB protection. We maintain the requirement of this policy is to fully consider the AONB build policy against the 5 key tests.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/1903  Respondent: 8728865 / Neville Bryan  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Object - All original objections remain

Wording amendments are not specific. We need to manage implications of changes and building on flooding. Specifically we mention site A26 (Blackwell Farm), as the runoff water courses have been identified as affecting Wood Street Village, Fairlands, etc... as well as environmentally protected areas (covered by GBC and SCC policy), such as the Thames Heath Basin SPA, Whitmoor Common, and wetlands downstream in the river Wey. These are covered in the Flooding Assessment produced by JBA, and submitted by Worplesdon Parish Council as part of the evidence base. Link attached. http://s3.spanglefish.com/s/428/documents/other/2017s5991-worplesdon-parish-council-sw-fra-v4-july-2017.pdf

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/1906  Respondent: 8728865 / Neville Bryan  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Object - All original objections remain

A modified target of 12426 houses still does not reflect local need or conditions. Conversely changing the target based on a SHMA document which remains unexplained adds to the accusation that the number is made up, rather than calculated based on a clear set of assumptions. Guildford is a town of 70000 residents, and we have a University of 14000 students. Under any definition that is a monopoly. The affect this has had on the town, and housing is dramatic. Guildford residents association (GRA) have employed a professional analyst (Neil MacDonald), and I would defer to his report and conclusions, on numbers and lack of transparency. https://www.guildfordresidents.co.uk/app/download/30614509/Review+of+GL+Hearn%27s+Guildford+Addendum+to+the+West+Surrey+SHMA.pdf

We should NOT be taking unfulfilled housing needs form Woking and Waverly. We have no space for our own.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<thead>
<tr>
<th>Comment ID: PSLPP16/17890</th>
<th>Respondent: 8729025 / Richard Clark</th>
<th>Agent:</th>
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<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1</td>
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</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Infrastructure

There are any number of infrastructure pinch points, consideration of which appear to be an after thought with very little in the way of upfront commitment to solving the capacity issues ahead of building extra homes. Road, rail, schools, sewage, waste disposal, GPs, emergency services, to name but a few, all need scaling up or scaling out first, well ahead of considering building significant numbers of new homes. Solving these issues afterwards is not good enough, many are overstretched already.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: PSLPP16/17889</th>
<th>Respondent: 8729025 / Richard Clark</th>
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<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
In response to your Draft local plan, requiring responses by 18/07/2016, I must strongly object to the proposed development on Blackwell Farm.

Greenbelt should be a last resort

There are plenty of brownfield sites that can be developed to provide a proportionate quantity of extra housing capacity, if strategically planned for the long term. Building on greenfield sites should be a last resort only when all brownfield sites are exhausted.

Building on greenfield sites because there are insufficient brownfield sites available as a tactical short term option is not a good enough reason to take greenfield.

Any perceived lack of immediately available brownfield sites is due to a historic lack of strategic planning and a continued lack of long term strategic planning. What is being proposed is an excessive tactical build to make up for these short comings.

The plan needs to fit the land becoming available, not the land fitting the available plan. Reduce the target numbers of new home to only what can be built without taking green field.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: pslp172/1214</th>
<th>Respondent: 8729025 / Richard Clark</th>
<th>Agent:</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26</td>
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<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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</table>

We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPS16/6892</th>
<th>Respondent: 8729089 / Andrew and Fiona Groenewald</th>
<th>Agent:</th>
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<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35</td>
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**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ()**

<table>
<thead>
<tr>
<th>Question</th>
<th>Reason</th>
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<tbody>
<tr>
<td>1)</td>
<td>I object to the draft Local Plan for the following key reasons:</td>
</tr>
<tr>
<td>2)</td>
<td>I object to the planning process and its implications.</td>
</tr>
<tr>
<td>3)</td>
<td>I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).</td>
</tr>
<tr>
<td>4)</td>
<td>I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans.</td>
</tr>
<tr>
<td>5)</td>
<td>I object to the threat the Local Plan poses to the historic rural village of Ockham and the blight on properties there. The plan calls for a village of 159 residences (with narrow lanes, no streetlights, very few pavements and many listed houses) to be subsumed into a 2,000+ dwelling development, with urban-style buildings up to five storeys high and a population density higher than most London boroughs.</td>
</tr>
<tr>
<td>6)</td>
<td>I object to the detrimental impact on transport, local roads and road safety. I specifically object to:</td>
</tr>
<tr>
<td>a.</td>
<td>The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars</td>
</tr>
<tr>
<td>b.</td>
<td>The increased volume of car traffic. A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads</td>
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<tr>
<td>c.</td>
<td>The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements</td>
</tr>
<tr>
<td>d.</td>
<td>The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them)</td>
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<td>e.</td>
<td>The increase in the already severe congestion on the Strategic Road Network of the A3 and M25. A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest</td>
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<tr>
<td>f.</td>
<td>The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity</td>
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<td>7)</td>
<td>I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).</td>
</tr>
</tbody>
</table>
8) I object to the fact that air quality concerns have not been taken seriously – air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.

9) I object to the fact that the proposed plan does not meet the needs and desires of local communities, as evidenced through the Ockham Parish Plan. The top two responses as to why local residents enjoy life in Ockham are (1) access to the countryside and clean air and (2) the peace and quiet afforded by wide open spaces. Over 90% wish to see both the historic features of the village maintained and the village’s green spaces, including the FWA/TFM, protected.

10) I object to the continued inclusion of a site (the former Wisley Airfield, - now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC’s Planning Committee.

After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd’s (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter.

Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Following the Issues and Options Consultation, Save Hogs Back, alongside other residents and campaign groups, presented its concerns regarding inconsistencies and obvious flaws in the Study to the Guildford Borough Council (GBC) Scrutiny Committee.

Save Hogs Back produced a paper (dated March 2014, titled: “Commentary on Guildford Borough Green Belt and Countryside Study” to put down in writing concerns that had been tabled at a round table discussion with the Pegasus consultant as part of the scrutiny process.

Following the Scrutiny Committee meeting, Pegasus was asked to revisit parts of the study and as a result adjusted scores for different land parcels. A large number of concerns were not addressed - in particular why a large site such as that at Blackwell Farm was not considered as a single land parcel. Whilst we still have strong reservations about the Study and the methodology applied by Pegasus, revised scores would have meant that site H1 would have dropped out as a potential development area. However, if the study had considered H1 and H2 as a whole, then both of these would drop out.

This paper sets out again some the reservations that Save Hogs Back has with the GBCS methodology and application of this methodology.

It also sets out further information about how Blackwell Farm meets each Green Belt purpose.

The GBCS study

The GBCS prepared by Pegasus Planning Group (Pegasus) on behalf of GBC contains significant flaws in its methodology and in the application of this methodology. These flaws mean that sites H1 and H2 (collectively “the land at Blackwell Farm, Hogs Back”) should not have been identified as potential development areas (PDAs).

Furthermore, the GBCS does not then consider other factors that would influence whether land should be taken out of Green Belt:

- The GBCS suggests that it follows best practice as outlined in the South West Regional Assembly (SWRA) Strategic Green Belt Review. The SWRA review recommends the “consideration of landscape character and environmental capacity to absorb development” when identifying areas where boundaries might be reviewed. We have been told by GBC that the Landscape Character Assessment 2007 hasn’t been considered within the Pegasus Study.
- The Environmental Capacity Analysis, which does form part of the study, is incomplete, contains errors and hasn’t been used in formulating recommendations for PDAs.
- The study has not taken into account the results of the 2003 boundary review, which resulted in the release of land at Manor Park and a decision which the University described would “reaffirm rather than undermine the permanence of Green Belt around Guildford”.

The conclusions of the study for H1 and H2 contain further errors and do not take account of GBC’s current policy towards Areas of Outstanding Natural Beauty (AONB) or the ability to create a revised boundary within the land parcel as defined in the NPPF.

It is hoped that GBC considers the issues raised in this paper, amends the findings of the GBCS study accordingly and removes land parcels H1 and H2 as PDAs from the local planning process.

Commentary of approach adopted in the GBCS

1. Pegasus described in Volume I of its report how its methodology for carrying out the GBCS had “emerged from best practice identified within previous Green Belt studies, with particular reference to the recommendations of the review by SWRA [South West Regional Assembly].”
2. It also recognised that “the methodology used within the Coventry Study most closely follows the recommendations of the SWRA Review in terms of the clarity of the report and the stages undertaken within the assessment.”
3. The methodology adopted by Pegasus has not followed best practice as set out in the SWRA report or adopted the rigour of the Coventry study. In particular:
• The SWRA report describes how the starting point for review is “to determine the relative importance of the five criteria [five Green Belt purposes] and identify a ranking of criteria...”. This stage of the analysis isn’t included in the GBCS report, which instead assumes that each of the four purposes of Green Belt it considers in the analysis are equally important to Guildford

• Pegasus has not created clear criteria for how scoring was assessed against each of the purposes of Green Belt, despite it recognising how “Fundamental to a sound methodology that provides robust, defendable [sic] conclusions about Green Belt release, is the clear and transparent identification of information used, and the scoring methods and thresholds applied to each stage of the assessment. These need to be objective where possible and consistently applied to each area under assessment to allow for direct comparisons of each area at each stage of the review.”

• The GBCS approach isn’t “able to make judgements on strength of purpose for Green Belt” as described in the SWRA report. The GBCS simply gives a 1 or a 0 against each purpose of Green Belt, but does not consider how effective a plot of land might be relative to another within each category.

• There appear to be anomalies in the methodology adopted by Pegasus - eg its interpretation of Purpose 2 (to prevent neighbouring towns merging into one another) and Purpose 3 (to assist in the safeguarding the countryside from encroachment), as well as its very narrow interpretation of Purpose 4 (to preserve the setting and special character of historic towns). These anomalies result in land being incorrectly assessed for its ability to fulfil the purposes of Green Belt. The approach adopted seems difficult to defend.

• There appear to be inconsistencies in the application of this methodology when looking at the analysis of land parcels across the borough.

1. The GBCS approach does not recognise that, whilst an area of land may fulfil just a single purpose of Green Belt, there may still be strong arguments for it to remain as Green Belt (an issue that is picked up in other reviews). For example, an area next to a town may solely have the purpose to prevent urban sprawl (to check the unrestricted sprawl of large built-up areas - NPPF Purpose 1); whereas, the purpose of Green Belt designation for a remote area in the countryside may be solely to retain the open character of that land (ie to assist in safeguarding the countryside from encroachment - NPPF Purpose 3). The SWRA states that “areas of Green Belt might only fulfil a single purpose and yet have no capacity to accommodate development, that is without undermining the very purpose of Green Belt itself.”

2. The GBCS study has ranked a plot of land based on how many purposes of Green Belt it achieves (regardless of how well the land actually meets each purpose and how important that purpose is considered to be).

3. It is interesting to contrast the approach taken by Pegasus with the one taken by Cambridge (cited as a robust example in the SWRA report). The Cambridge review considers that the overriding purpose of Green Belt for the city is to preserve its historic setting, which includes its existing settlement pattern. It then appraises the extent to which each land parcel achieves this purpose in more detail.

4. Further concern about the criteria for scoring each Green Belt purpose is discussed later in this report, when the scoring for the two land parcels H1 and H2 is re-assessed.

5. The SWRA report states that “weighting the purposes for the Green Belts so as to achieve a cumulative ranking does provide a rational basis for identifying areas where boundaries might be reviewed. However, this analysis should be considered in combination with the consideration of landscape character and environmental capacity to absorb development.” This simply has not been done.

**Appraisal of Blackwell Farm**

The initial appraisal of land parcels H1 and H2 scored only 1 against a possible 4 when assessed by Pegasus against the 4 purposes of Green Belt it considered.

An independent appraisal of H1 and H2, based on the methodology used by Leeds City Council, demonstrates that an area comprising of H1 and H2 combined contributes to each of the 4 Green Belt purposes (ref. Rob Burch, 2013)

It should also be noted that the nature of the land at Blackwell Farm means that it scores strongly against each of the Green Belt purposes - although the Pegasus methodology wasn’t able to take this into account.

A subsequent appraisal by Pegasus, scored H1 and H2 with a score of 3 and 2 against the purposes of Green Belt respectively.
It would seem reasonable to consider the entire land area in terms of its ability to meet the purposes of Green Belt. Applying the same rules adopted by Pegasus for this combined site would demonstrate it met all four purposes.

Green Belt Review (culminating 2003)
The appraisal of Green Belt on the west side of Guildford was undertaken over a long period and resulted in the movement of the Green Belt boundary to accommodate expansion of the University of Surrey onto Manor Farm. The “essential characteristics of Green Belts are their openness and their permanence” and the determination of a revised boundary that was then adopted in 2003 took this into account. The appraisal by Pegasus (conducted in 2009) failed to address this issue.

“Compartmentalisation and subdivision of land into separate land parcels”
There is concern as to why the land parcels H1 and H2 are treated separately - despite conclusion in the report that development of H2 would be linked to development of H1. They have also been grouped together within subsequent local planning documentation.

There is also concern that the original subdivision of parcels of land didn’t follow a more defined boundary along the western edge of H2 (“using physical features that are readily recognisable and likely to be permanent” - NPPF, para 85). It would seem more appropriate to choose a line of tarmac road as the boundary, which has a hedge alongside it, rather than a footpath which passes across a field.

This example suggests that initial site visits did not inform the sub-division of land parcels and a choice of a revised western boundary of H2 passing through the farm buildings and then passing along a line bordered by woodland would have been more appropriate. This would have resulted in a land parcel much closer in land area to H1 and consistent with others in the study.

Diagram to the right shows the extent of H2 if the boundary had been informed by site visits.

Note: Whilst we have indicated a revised boundary that would follow the methodology proposed (but not adopted) within the GBCS, the revised area for H2 does not indicate a land parcel that would be deemed acceptable as a PDA. It simply highlights that the pro-cess used by Pegasus to define boundaries and compartmentalise land parcels within the study was inadequate.

It would be interesting to see records and photographs from Pegasus to establish how they arrived at the decisions they did.

Modification to the boundary has no impact on the scores for H2 (which have been corrected to account for errors in the methodology and application of the methodology discussed later).

Green Belt Purpose 1 - to check the unrestricted sprawl of large built-up areas
The definition appears to be clear within the GBCS and the score for both H1 and H2, which is close to the existing Green Belt boundary around Guildford, is justifiable.

Westward development of Guildford along the Hogs Back
Over the last 100 years, extensive development on the west side of Guildford on the northern slopes of the Hogs Back has made a large impact on the character of this area from what was formerly farmland and parks. The planned low-density garden village “Onslow Garden Village” (now known as “Onslow Village”) on the site of the old Guildford Hunting Park was started in the 1920s. The building of the A3 Guildford and Godalming Bypass which opened to traffic in June 1934 effectively formed the western extent of this development for many years. [Mount Farm, on the higher slopes of the Hogs Back above Onslow Village was separately acquired to protect the views of the ridge - which formed the southern bound to development.]

Piecemeal development had taken place on the western side of the A3 following the gift of land to the UniS with the construction of the Royal Surrey Hospital and then the Holiday Inn hotel alongside the A3 on land that was leased by the University to help finance the construction of the low density Research Park development, which began in the 1980s on the lower slopes.
The Manor Park park campus and sports park was given permission in 2003, which was followed by the recently built surface car parks of the Onslow Park and Ride. This low density expansion of Guildford is bounded on the west by the ancient woodlands at Manor Copse, Strawberry Grove and Dean Bottom. The 90m contour also forms the extent of the Manor Park development which helps form a boundary to development and goes some way to protecting the rural views from the AONB and Blackwell Farm.

A further low-density expansion of Guildford leapfrogging the ancient woodland and rising above the 90m contour, as now proposed, would be an example of urban sprawl on a massive scale - rather than what is described as “urban extension” in the draft local plan.

**Green Belt Purpose 2 - to prevent neighbouring towns merging into one another**

The approach taken by the GBCS is to consider the merging of towns as well as settlements and this seems to be consistent with Green Belt reviews elsewhere. However, the analysis of coalescence of settlement patterns has sometimes been seen to be considered within Purpose 4 (in the way they provide the setting and special character of towns) or analysed as a separate purpose of Green Belt (eg Purpose 6).

The definition that Pegasus has adopted within its study and its criteria for scoring against this purpose seems muddled and unclear. Whilst it can be agreed that “Some areas of land contribute more effectively in maintaining separation than others, depending on the local environmental or site conditions, such as topography and tree cover”, it doesn’t follow that an open, expansive landscape “contributes less in terms of anti-coalescence (scoring 0), whereas a land parcel which forms a narrow gap between two settlements would have a significant anti-coalescence role (scoring 2)”. What really counts is whether building on this land would cause a bridge between these settlements causing them to merge.

A piece of land that (once developed) would result in the merging of communities should score a 1 regard-less of the open nature of the land or otherwise.

Land at H1 and H2 fulfils the purpose of preventing towns merging over the long term as the entire slopes of the northern face of the Hogs Back are under developmental pressure. Already a quarter of the 12km stretch between Farnham and Guildford is developed. The University’s plans would increase this to a third.

Land at Blackwell Farm also presents merging of in-dividual settlements. Development of land parcels H1 and H2 would bridge communities of Park Barn, the Research Park, Wood Street with settlements in Pinks Hill, Down Place in Compton, with the small settle-ment of farm cottages on Blackwell Farm, with the houses of Beechcroft Drive and Onslow Village and the new communities of students and key workers at Manor Park. The development also draws in the small settlement in Chalk Pit, which borders the development area and further development (as proposed by the University) would draw in the small community at Flexford.

**Green Belt Purpose 3 - to assist with safeguarding the countryside from encroachment**

Land parcels H1 and H2 fulfil the purpose of preventing encroachment onto open countryside. The land itself is open countryside and neighbouring land stretching along to Ash is open countryside. Whilst the GBCS argues that only land that has development may fulfil this purpose, it is clear from other Green Belt studies that this is not the case and that parcels that themselves are open countryside are ‘stronger’ in the way that they fulfil this purpose (see note 1).

Whilst concerns exist regarding the definition of encroachment used in the study, the presence of a small settlement at Down Place and also a small settlement comprising a few farm buildings and farm cottages at Blackwell Farm does mean that this land should score a 1 according to the GBCS definition. [This was some-thing acknowledged by the Pegasus representative at the meeting of 04 March 2014.]

**Green Belt Purpose 4 - to preserve the setting and special character of historic towns**

The Pegasus analysis as to whether a piece of land fulfils the purpose of preserving the setting and character of historic towns seems overly simplistic by just focusing on conservation areas. A more comprehensive and holistic approach which considers a number of broader issues is needed to provide a robust answer to this question. The SWRA report, for example, notes that the Cambridge Green Belt review has “withstood the rigour of Examination in Public, and comprised comprehensive and transparent assessment”.
The following factors were considered in Cambridge ("Qualities that preserve the unique character of Cambridge, and/or maintain and enhance the quality of its setting"):

- Views towards the city,
- Topographical framework for Cambridge,
- Specific sites that enrich the setting,
- Physical links with Cambridge,
- Elements and features contributing to the character of the setting,
- Contribution to a strongly rural landscape setting, and
- Social or economic links with Cambridge.

Applying equivalent factors to Guildford would indicate that H1 and H2 strongly assist in preserving the setting and character of Guildford.

It is also worth noting that in Coventry it was also acknowledged that the Meriden Gap formed part of the character of the area. It is therefore appropriate that the Hogs Back could be considered in the same light as a purpose of Green belt could be to assist in preserving the setting and character of the Hogs Back.

Clearly Green Belt land on H1 and H2 fulfils this purpose also.

In the St Albans review (section 7.5.2.), the key network of parcels that preserves setting and special character is identified as being: “to the south, west and north of St Albans (GB23, 24B, 30, 37, 38 & 39), especially to preserve views to the Cathedral and Abbey Church of St Albans”. There are uninterrupted views across open farmland from Blackwell Farm to Guildford Cathedral.

Green Belt Purpose 5 - assist in urban regeneration, by encouraging the recycling of derelict or other urban land

The study has chosen not to take into account a consideration of the purpose of Green Belt to “assist in urban regeneration, by encouraging the recycling of derelict or other urban land”. This has been based on assumption that all land meets this objective in equal measures.

However, other Green Belt reviews have taken this into account and have highlighted parcels of land that, due to their location (eg proximity to an urban setting), size and the extent to which they’ve been subjected to developmental pressure, would score higher than other areas.

In this context, land parcels H1 and H2 would score highly as the Green Belt has already been moved back to accommodate growth of the University; the University has already put forward proposals to build on Blackwell Farm; and, in response, the Council is already looking at alternative ways that the University can help meet housing needs by developing and regenerating areas with existing permissions (eg better use of surface car parking, the development of more student accommodation and the redevelopment of Hazel Farm).

The Research Park was created as a low density development:

"The notion of a research park had first occurred to the Vice Chancellor Professor Anthony Kelly back in 1977... “I remember thinking, Guildford is an attractive place too, where people enjoy living, and it has good communications. And we, the University, have land to spare. So why don’t we build a research park? - p48, UniS A History of Shaping the Future, 2011.

Unfortunately, 40 years later, Guildford is less attractive and there is less space to play around with and transport links are choked. The research park provides just 65,000 sqm of office space across 28.33 hectares. The University can easily increase this density six fold. The extract from the Estate Strategy shows that the University is planning to build up to 323,200 sqm across a smaller area of Manor Park 24.6 hectares. The resulting plot ratio would still be at the low end for a typical development in a major town like Guildford.

Guildford should make better use of its surface car parks across the borough.
The WWF’s new Living Planet Centre in Woking was built over existing surface car parks.
The University of Surrey has more than 17 Ha of surface car parks alone across its estate. At the same time, the University
is seeking to develop new homes on Blackwell Farm on the Green Belt. Recommendation: All new buildings on the
University estate should make provision for underground car parking so that land devoted to existing surface car parks can
be used more effectively. This is an efficient strategy for removing surface car parks. The new development for the Vet
School should incorporate these ideas.

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be used more effectively. This is an efficient strategy for removing surface car parks. The new development for the Vet
School should incorporate these ideas.

Rather than extending the outer edges of Guildford, GBC should make better use of its land near to the railway line. The
idea for building over railway lines isn’t new either
- the Metropolitan Line in London was built by cutting down to build the railway and covering it over for roads parks and
buildings. Other more recent examples include prestigious projects like Broadgate in London and the 320m long tunnel in
Gerrards Cross to create a Tesco supermarket over an existing railway cutting. A similar development in Guildford would
provide city centre ac-commodation (and easy access to the station!). It would also enable pedestrian and vehicular flows
across a railway line which helps to split the town and contributes to traffic woes.

The aerial photograph <see attachments> shows areas of surface car parks (in yellow) and areas of railway line (in green)
in the centre of Guildford which could be redeveloped for mixed use, including offices, retail and housing. The natural
slopes of the surrounding land down towards the railway line means that buildings could be built several storeys high
without reaching the height of the existing neighbouring buildings alongside the railway. This gives an opportunity for the
development to create a mixed use development at high densities, whilst blending in with the surroundings. A linear
development could be extended incrementally along the railway as Guildford needs to grow in the future. In doing so, the
development will help to regenerate the surrounding areas and would form a bridge which links the two sides of Guildford
which has been divided by the railway line and helping access across the town.

“The Hog’s Back Chalk Ridge landscape should be conserved, in particular the open nature of the landscape which forms a
backdrop to the surrounding rural areas and Guildford, the wide and far ranging views from the many viewpoints along the
ridge line and the sparse settlement pattern of traditional style and local materials. The intact large scale geometric field
pattern and hedgerow boundaries and hedgerow trees should be conserved while there is potential to enhance and reinforce
some of the hedgerows.” - Guildford Landscape Character Assessment

Environmental Capacity Analysis

It is not clear how the environmental capacity analysis has been used in the GBCS or how it will be used in deciding where
development is best placed when considering alternative parcels of land. The SWRA re-port makes it clear that ranking of
land parcels against Green Belt purposes should be considered in combination with landscape character and environmental
capacity.

The data presented in the environmental capacity analysis for H1 and H2 is not complete and is therefore not fit to assess
whether development could take place on this site.

The analysis does not allow a comparison to be made between the environmental capacity of different land parcels.

The simplistic approach adopted by the GBCS towards environmental capacity should be compared with the approach
undertaken by Coventry, which considered primary and secondary constraints, existing or proposed development,
landscape assessment and connectivity to the urban area when comparing alter-native land parcels.

The Environmental Capacity Analysis tables for H1 and H2 provides only superficial information about the land parcels,
for example information about the position of paths, bridleways and ancient woodland on the site is incomplete.

The analysis does not consider the impact on the AONB for the road and road junction that is planned for the site.
The analysis does not take into account the visual impact of street lighting which would be necessary at the large junction and which would be visible for miles around. One of the distinctive features of countryside is the dark night skies and development on H1 and H2 would have an impact on views from both sides of the A31 and across the Surrey Hills AONB.

The identification of priority species and ecological network should have been included in the analysis because they directly dictate restraints to development, so the following should have been included:

- Priority species (there are at least 4 at Blackwell Farm)
- Ancient hedgerows
- Ancient trees
- Single Payment, Entry Level Stewardship and Higher Level Stewardship measures
- Ponds and streams
- Biodiversity Action Plan Habitats
- Biodiversity Opportunity Areas
- Green/ecological infrastructure
- More (see box 4.1 p41 in DEFRA’s Guidance for Local Authorities

The analysis doesn’t include all the environmental criteria needed to make an informed decision, for example, quality of life capital should have been considered in the assessment as has been done in the Cambridge Green Belt Review and the Nottingham-Derby Green Belt Review. This would capture the recreational value of Blackwell Farm.

**Landscape Character Assessment**

The SWRA Strategic Green Belt Review describes how landscape character should have been included in the identification of areas for Green Belt review.

The Guildford Landscape Character Assessment says:

“The Hog’s Back Chalk Ridge landscape should be conserved, in particular the open nature of the landscape which forms a backdrop to the surrounding rural areas and Guildford, the wide and far ranging views from the many viewpoints along the ridge line and the sparse settlement pattern of traditional style and local materials. The intact large scale geometric field pattern and hedge-row boundaries and hedgerow trees should be conserved while there is potential to enhance and reinforce some of the hedgerows. The remnant areas of chalk grass-land should be conserved and opportunities taken to extend and link these isolated areas. Screening for the A31 should be carefully maintained to retain a balance between shielding views from below of moving vehicles while keeping important views out for those using the road. The restoration of links across the ridge should be explored.”

Landscape Character Assessment was not considered within the Pegasus study.

**Sustainability scores**

The sustainability score is very simplistic in its approach. It does not take account of a range of broader sustainability issues - such as traffic impact, loss of farmland etc.

**Commentary on conclusions of GBCS**

The conclusions regarding the land parcels at Blackwell Farm (H1 and H2) don’t stand up to scrutiny. The scoring should be 4 out of 4 (not 2/3 out of 4 as assessed).

Furthermore, whilst the GBCS does not seek to differentiate between land parcels (in terms of their ability to meet each purpose of Green Belt), the land parcels at Blackwell Farm serve each purpose of Green Belt strongly.

The study does not take into account existing GBC policy: “10.25 Development should not result in the loss of important views to and from the AONB” as described in the Local Plan.
The photograph above was taken across H1 from the AONB and there is ancient woodland at the bottom of the field. There is no opportunity for development which could meet GBC policy. It is therefore not clear how the Environmental Capacity analysis has fed into this study and the recommendations that have been made.

The conclusion states: “The Green Belt boundary could be realigned to exclude the sloping ground between the A3, Down Place and Manor Farm, with defensible boundaries located along hedgerows, tree belts and woodlands.” The photograph shows that this isn’t possible.

The conclusion for H2 seems to be linked with H1:

“the land is somewhat remote from highway infrastructure when compared with land parcel H1” and “Given this situation, it would be appropriate for land parcel H1 to come forward as a first phase with land parcel H2 providing an opportunity for further development in the longer term, allied to the initial phase of land parcel H1”.

Given that the dependency of H2 on H1 was highlighted in the GBCS findings, there appears to be a lack of thoroughness in its approach. Recognising this dependency, these parcels should have been looked at together as a combined land parcel and a revised score for the combined land parcel evaluated.

Comments regarding views to, and from, a large stretch of the Hogs Back (and therefore to and from the AONB) apply to land on H2. Development on H2 would be visible to vehicles as they drive along the Hogs Back. (NB development on the University’s Research Park is screened by ancient woodland at Strawberry Grove. Any development to the west of this woodland would be seen.) Long views to the AONB enjoyed from Pinks Hill would be lost - thereby breaching GBC’s existing policy 10.25.

**Going forward**

It is not clear how the GBCS is being used.

The approach to assessing each of the purposes of Green Belt in the GBCS appears simplistic and it isn’t always possible to follow the logic adopted.

The GBCS conclusion that it is possible to develop any part of area H1, whilst not building on the slopes of the AONB, but still providing a boundary that uses physical features as defined in the NPPF, is simply not possible. This causes concern that the site was not visited by the consultants or anyone checking its conclusions.

If a land parcel has scored 3 or 4 out of 4 under a revised assessment (such as the land at Blackwell Farm) then it would be reasonable to expect to see the PDA removed from consideration in the local planning exercise.

The existing Green Belt boundary coincides in with the historic boundary of Guildford’s Royal Park.

“The Park’s boundaries are still identifiable today
- However, the western boundary is most interesting, curving and kinking as it follows hedgerow, and passing through woodland with Manor Copse (shown as ‘The Parocke’ on the east, and Strawberry Grove on the west, following a path along the west edge of the Research Park and Park Barn housing estate to Broad Street, with sections of banking still evident. Clearly the Park was created within the existing field and natural boundaries, and it is possible that the west boundary followed ancient field systems, which dictated its curvatures.”

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
- GBCS Feedback Local Plan (4).pdf (2.3 MB)
- Re_Access to Blackwell Farm.eml (30 KB)
- Fwd_Blackwell access.eml (9 KB)
- EIR request - ID 3035.pdf (516 KB)
- Re_Down Place junction [UNC].eml (24 KB)

Comment ID: PSLPS16/1266  Respondent: 8729217 / Karen Stevens  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Introduction

Do you consider this section of the document; complies with the Duty to Cooperate? ( No ), is Sound? ( No ), is Legally Compliant? ( No )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I do not believe that the inclusion of development sites within the green belt, without providing any exceptional circumstances to justify adjustment to the green belt boundary, is either sound or legally compliant. An exceptional circumstance is rare, and it is highly unlikely that there are rare circumstances to create several large-scale developments in Guildford borough's green belt.

I have emailed a separate submission relating to Blackwell Farm (site allocation A26 - which I have looked at in detail). I strongly object to the inclusion of this site in the Local Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/8004  Respondent: 8729217 / Karen Stevens  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

This response focuses on the proposed allocation of Blackwell Farm as a major development area in Policy A26, together with associate Save Hogs Back and Campaign to Protect Rural England (Surrey) object to the Proposed Submission Local Plan on the following grounds:

Legal compliance:

1. Failure to have regard to national policies and advice contained in guidance issued by the Secretary of State, in respect of policy on Green Belt and Areas of Outstanding Natural Beauty (Planning and Compulsory Purchase Act 2004, s19(2)(a)); and
2. Failure to have regard to the resources likely to be available for implementing the proposals in the document, in respect of the infrastructure requirements needed to allow the Blackwell Farm development (Policy A26) to proceed (Planning and Compulsory Purchase Act 2004, s19(2)(i)).

Soundness:

1. The proposals to remove land from the Green Belt at Blackwell Farm and to promote development there within and in the setting of the Surrey Hills Area of Outstanding Natural Beauty are not consistent with Government policy;
2. The proposal to develop land at Blackwell Farm is not justified as this is not the most appropriate strategy when considered against its reasonable alternatives;
3. The proposal to develop land at Blackwell Farm would not be effective as it is not deliverable over the Plan period due to the impracticability of access and high infrastructure

This submission sets out the grounds on which Save Hogs Back and Campaign to Protect Rural England (Surrey) support these challenges to the Plan. We ask that:

1. Policy A26 Blackwell Farm, Hogs Back, Guildford be deleted;
2. The Blackwell Farm site remains in the Green Belt;
3. The housing provision in the Plan be reduced by 1,800 dwellings;
4. The infrastructure provision associated with Blackwell Farm be dropped

Access to Blackwell Farm and traffic

2.1 Policy A26 allocating Blackwell Farm for urban development is entirely clear (under 'Requirements: Infrastructure' that "The principal vehicular access to the site will be via the existing or a realigned junction of the A31 and the Down Place access road, which will be signalised". This is impractical. It is also so costly as to be undeliverable. The highways works are also highly undesirable on environmental grounds, which are addressed in section 3 below.

Impracticality of access from the Hogs Back

2.2 Compton Parish Council commissioned RGP - Transport Planning and Infrastructure Design Consultants to advise on the transport and highway implications of the proposed Blackwell Farm development. This report is in draft and available from Karen Stevens. It demonstrates that there is insufficient space on the A31 to construct the minimum necessary road space and associated infrastructure to allow the proposed signalised junction to be built. At least 20m total highway width is required, but the existing highway is just 14m at this point due to the road being contained within the A31 overbridge structure. This could only be remedied by hugely expensive highways improvements on the top of the Hogs Back, including widening the A31 bridge over the A3 and acquiring and demolishing dwellings on the north side of the A31. These have been omitted from the estimate of costs for enabling the Blackwell Farm development to proceed.

2.3 The report also shows that the anticipated traffic volumes on the roads meeting at the top of the Hogs Back are easily sufficient to warrant the construction of a roundabout at this Guildford Borough Council has not proposed a roundabout, presumably because there is wholly insufficient space for this to be built, and there is a likelihood of significant danger to highways users from attempting to insert a roundabout in immediate proximity to the split-level A31/A3 junction. Whether a signalised junction could work remains unproven.

2.4 The road layout at the eastern end of the Hogs Back is The proposed access off the A31 into Blackwell Farm would be at the existing Down Place junction. This is a very small junction which would need major improvement including left and right egress lanes onto the A31 which extend well back to absorb the substantial volume of vehicles expected to queue at the signalled junction. The road layout would need amendment to overcome the sharp dog-leg bend in Down Place close to the A31 junction. It is not certain that the existing bridge over the A31 exit slip-road (onto the A3 northbound) is wide enough given the need for bus, pedestrian and cycle access. There are also existing traffic restrictions in place to limit bridge loading.

2.5 Even if all these upgrades to the highways were achieved, the road layout would frustrate many drivers. First, modelling suggests (Surrey CC SINTRAM model - see RGP Figure 3.1) that two thirds of Blackwell Farm residents exiting Down Place onto the A31 in the morning peak would expect to turn left towards Guildford. The road is already
heavily congested at this point at this time, so exit would be limited to a few vehicles that could find some exit space at each phase of the proposed traffic lights. There would be substantial queues back towards Blackwell Farm. Second, the road layout also seriously impedes access to or from the A3 north-east of the site around Guildford city centre. Drivers southbound on the A3 aiming at Blackwell Farm would take the A31 diverge to join the A31 westbound, but this would find themselves west of the Down Place junction to Blackwell Farm. Drivers would therefore be obliged either to effect a U-turn through a point in the central reservation of the A31 or continue to the Puttenham junction with the B3000 where they could turn around. Either would be frustrating and time-consuming. Both would be dangerous, as accident statistics presented by RGP demonstrate. Correspondingly, any drivers leaving Blackwell Farm from Down Place and aiming for the A3 northbound would similarly need to turn right and begin their journey by travelling in the wrong direction: they too would need to effect a U-turn through a point in the central reservation of the A31 or continue to the Puttenham junction with the B3000. Then they would return eastbound on the A31, joining the morning peak queue, and take the slip-road to the A3 under the new Down Place bridge in order to travel north on the A3. The numbers of vehicles needing to make these awkward manoeuvres would increase the danger to themselves and to other road users. The alternative would be turn left out of Down Place into queue of traffic during peak hours before cutting through residential streets in Onslow Village and joining the A3 at the Tesco roundabout.

2.6 There is no certainty that the third party land required for the highways improvements would be available: the Borough Council has not demonstrated that it will be. There has been no indication that Highways England would agree to the widening of the A31 overbridge.

Alternative access to Blackwell Farm from Guildford

2.7 Proposed Submission Policy A26 states that "Secondary vehicular access is required from the site to Egerton Road, preferably via Gill Avenue."

2.8 Without this access, the Blackwell Farm site would not be an urban extension but a free-standing urban development which happened to be located close to the edge of Guildford. The likely reason Guildford BC views this as a secondary access rather than the primary one is because it will be very difficult to achieve in a way which significantly increases highway capacity. The starting point for considering the Blackwell Farm site is that access into Guildford and to the A3 would all be via the 'Tesco' roundabout on Egerton Road, which is already highly congested. The Inspector's Report into the Guildford Borough Local Plan Review, in September 2001, reported on the (then) proposed development of Manor Park on Manor Farm:

"The principal access to the site from the A3 and the Stag Hill Campus is the roundabout immediately to the west of the A3 (the Tesco roundabout). This roundabout and other elements of the local road network are likely to be operating above their normal capacity before the development of Manor Farm is commenced" (paragraph 16.9.5).
"...the Council and the highway authorities were satisfied that a sustainable solution to the movement implications of the [Manor Farm] Proposal could be found and that to this end the University would, and could, if need be in conjunction with the authorities, confine the increase in traffic generation from the Manor Farm site to no more than 5%..." (paragraph 16.9.7). "...it is implicit in the agreement that if the 5% ceiling can not be achieved, the scale of the development will also need to be limited" (paragraph 16.9.9).

With that development and much of the Manor Park scheme now implemented, the congestion locally is even worse. We are aware of no efforts to enforce a 5% limit on the increase in vehicles associated with University of Surrey development. Efforts to alleviate this congestion may help, but fundamentally the scale of congestion in the peak periods reflects problems across the local network. If capacity were to be created on the Tesco roundabout, the likelihood is that this would immediately be taken up by the generation of additional trips, currently frustrated.

2.9 Gill Avenue, which passes the Royal Surrey County Hospital and leads directly to Egerton Road, will be difficult to join to Blackwell Farm (to its west). This is because a road would need to follow an awkward route either north or south of the Ancient Woodlands of Strawberry Grove and Manor Copse which shield the whole of the western side of the Research We strongly oppose any access through the Ancient Woodland as this would be environmentally entirely unacceptable. Road access north of the Ancient Woodland would funnel Blackwell Farm traffic through the Research Park. Road access south of the Manor Copse Ancient Woodland would funnel traffic through the Manor Park student village and ruin the setting of a Scheduled Ancient Monument (a moat at Manor Farm). It would also isolate newly constructed Veterinary School buildings from their paddocks. The road would therefore introduce pollution into a series of sensitive
2.10 The problem appears to be that Guildford BC decided some years ago to allocate Blackwell Farm for development on the assumption that access problems could be resolved, but now finds that this is not practicable. The Issues and Options consultation in October 2013 proposed the site for urban development, but noted "There are however constraints in terms of access to the site from the A3, particularly given that where access would likely be required is in the AONB or very close to it. The site as a whole is very close to the AONB, which would require sensitive development and careful consideration." Following this, the Council tried to secure access direct from Guildford, via the 'Tesco' roundabout and Egerton Road. The heavy existing congestion on this side of Guildford turned out to make this problematic and little apparent progress has been made. Internal correspondence within Guildford BC on 12 June 2015 obtained only by Freedom of Information request illustrates this:

"Tesco Roundabout (Egerton Road/A3 northbound slips)

GBC has been developing a junction improvement scheme for Tesco roundabout which could offer a substantial capacity improvement and may significantly reduce peak hour queuing. The improvement is subject to funding and to the existing hotel access being closed to vehicular traffic with a new access from the Sports Park access road. The layout is also subject to Safety Audit and technical approval. However, we thought it would be beneficial to share this layout with you on a confidential basis so that you can be informed of the likely scale of improvement required.

The next stage is for GBC to discuss this layout in more detail with SCC in order to get some idea of the technical aspects of the proposal agreed. For your information, the layout has been presented at the Surrey CC/Guildford BC Joint Infrastructure Group meeting which is also attended by Highways England."

Email from [Response has been redacted due to statement containing personal data which cannot be disclosed due to the provisions of the Data Protection Act 1998], Transport Consultant (Policy) to [Response has been redacted due to statement containing personal data which cannot be disclosed due to the provisions of the Data Protection Act 1998] (Interim Head of Planning)

Little appears to have come of this initiative so far.

2.11 Meanwhile, Surrey County Council as Highways Authority is concerned about introducing additional traffic into this congested area from the A31. The extraordinary outcome of these difficulties is that the Proposed Submission Local Plan proposes the primary access for Blackwell Farm should be from the A31 at Down Place, whereas Surrey County Council has specifically advised that the primary access should be via Egerton Road.

2.12 Surrey County Council has advised a member of Save Hogs Back that a signalised junction at Down Place would not be adequate for the volume of traffic likely to want to use it, and has therefore been keen to discourage use of that access point. The methods proposed were making the route through Blackwell Farm tortuous and restricting access by means of Automatic Number Plate Recognition (ANPR). This is made clear in the exchange of correspondence between Karen Stevens (Save Hogs Back) and [Response has been redacted due to statement containing personal data which cannot be disclosed due to the provisions of the Data Protection Act 1998] (Transport Development Planning Manager West, Surrey CC) (see email exchange 3-7 June 2016 'Re: Access to Blackwell The Surrey CC response was after consultation began on the Proposed Submission Plan, demonstrating the gulf in approach between the two arms of local government at this critical stage. Surrey CC advised that:

"were ANPR to be implemented, it could be on a private section that formed the ultimate short link between the new development and the existing UniS activities in West Guildford. This section of the route would therefore not be adopted. ANPR is used on motorways / other routes (including the A3 between Boundless Road and the A333 where it is in a tunnel) where there are average speed restrictions in place. Clearly these are not used to control access on the public highway, and I recognise that this would be a quantum leap to use this technology on the public highway for these purposes.

2.13 Surrey County Council's position now is that "All of the principles behind the access strategy would need to be justified through the production of a Transport Assessment, which... would not come about until the planning application / pre-planning process " The effect of the impasse is therefore that Guildford BC is seeking to allocate a site which Surrey
CC is far from certain of being capable of delivery, with the County Council requesting that matters be left for sorting out at the planning application stage. Guildford Borough Council has been unhelpful in addressing the concerns raised by Save Hogs Back, with a failure to answer emails properly or at all (see 'RE: Down Place junction {UNC}’ 12-19 May 2016 and 'Fwd: Blackwell access’ 23 June 2016) and no engagement in the access difficulties raised by their own proposals. Our experiences illustrate the reticence of the parties to accept the lack of feasibility of access to the Blackwell Farm site. In our view it would be irresponsible for the forwarding planning process to allocate Blackwell Farm without absolutely clear understandings of how access to it would be achieved, what the network effects would be, how congestion would be avoided, and who would pay for the necessary infrastructure. It is clear that there are currently no answers to these questions.

Through access between the A31 and west Guildford via Blackwell Farm

2.14 The Proposed Submission Plan is clear in Policy A26 that "A through vehicular link is required via the above accesses between the A31 Farnham Road and Egerton Road to provide a new route to the Surrey Research Park, the University of Surrey’s Manor Park campus and the Royal Surrey County Hospital. This will provide relief to the A31/A3 junction, in advance of the delivery of Highways England's A3 Guildford scheme.” In other words, the intention is to attract additional traffic off the A31 and A3 through the Blackwell Farm site in a ‘Sustainable Movement Corridor’. We consider there is nothing sustainable in a glorified rat-run.

2.15 Guildford Borough Council is explicitly trying to promote what Surrey County Council is trying to avoid. Given that both ends of the route have proved impractical just to meet the impacts of the Blackwell Farm development, we consider a further increase in their capacity is wholly unrealistic. This confusion is wholly We consider the Plan is unsound on the ground that it is not deliverable. In addition to the practicability, we notice that Policy A26 in the Plan expects the Blackwell Farm development to pay for this additional infrastructure for other users attracted to the area: “Developer to provide the western route section of the Sustainable Movement Corridor on the site and make a necessary and proportionate contribution to delivering the western route section on the Local Road Network.”

2.16 There are practical problems in putting a through route into position between Gill Avenue and the A31 at Down Place while serving the Blackwell Farm Connecting the ‘Sustainable Movement Corridor’ to Gill Road will be problematic. The routes noted in paragraph 2.9 above would be tortuous if north of the Ancient Woodland, while a link south of the Ancient Woodland would barely serve the Blackwell Farm development at all (which would all be to its north). Both routes would send through traffic to the hospital and elsewhere through residential areas (Blackwell Farm or Manor Park campus).

2.17 Not only are the access routes in the Proposed Submission Plan inadequate for the task, but Surrey County Council and Guildford Borough Council have played down the traffic volumes which will need to use them at peak periods:

the data from SCC’s Strategic Highways Assessment Report are the average for the morning peak three hours (not the average for the morning peak one hour, which would be 16% higher);

no allowance has been made for the impacts of promoting a through vehicular link, but the SHAR is forced to acknowledge that, with this, "then flows through the development may be higher still" (paragraph 4.7.S).

The higher real traffic volumes in the peak may necessitate still larger works at the accesses, with associated practical problems and also additional costs.

2.18 The effect of these numerous deficiencies and confusions is that there is wholly insufficient evidence to demonstrate that the access arrangements in the Proposed Submission Plan to and through the Blackwell Farm site are actually deliverable. This is in breach of Government policy:

it is the intention in DfT Circular 02/2013 The strategic road network and the delivery of sustainable development on capacity enhancements that "Capacity enhancements and infrastructure requirements to deliver strategic growth should be identified at the Local Plan stage, which provides the best opportunity to consider development aspirations alongside the associated strategic infrastructure needs."

Paragraph 158 of the NPPF similarly requires that "Each local planning authority should ensure that the Local Plan is based on adequate, up-to-date and relevant evidence about the economic, social and environmental characteristics and prospects of the area” (emphasis added).
The proposals have therefore failed to have adequate regard to national policies and advice. The Plan is unsound because the proposal to develop land at Blackwell Farm would not be effective, as it is not deliverable over the Plan period due to the impracticability of access.

Cost of access to Blackwell Farm

2.19 The transport costs of the proposed works to give access to Blackwell Farm have been understated in the Proposed Submission Plan. Some of the costs are listed in Appendix C of the Plan. The need to resolve consequential highways infrastructure requirements is identified in Policy A26 but not costed. Further requirements have been identified by RGP but not costed. The table below lists the main transport-related items.

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<th>Project</th>
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2.20 The need for interventions to address highway network performance issues which could otherwise result from the development is especially acute in the case of Blackwell Farm. Surrey County Council's *Options Growth Scenarios Transport Assessment Report*, January 2014, (to some extent overtaken by the *Strategic Highway Assessment Report* in June 2016) explains the likely highways effects of the various major urban developments proposed by Guildford BC (though the size of the Blackwell Farm scheme has been reduced since then from 2,250 to 1,800 dwellings). Blackwell Farm was 'Scenario 3', the sum of Scenario 2 - development of all permitted sites and three large developments just beyond the Borough's boundaries - and the south-west Guildford urban development at Blackwell Farm itself. The Options study concluded that "When comparing scenarios 3 (south-west urban extension), 4 (north-east urban extension) and 5 (Wisley airfield development) to scenario 2, scenario 3 has the largest impact on general borough wide network statistics and scenario 4 the least" (paragraph 5.1.7). The 2016 SHAR did not conclude on the relative impacts of each major urban development.

2.21 The table above shows that the stated costs purely for access to the Blackwell Farm development (and associated through movement) amount to £60m. This is over £33,000 per dwelling In addition, there would be very serious additional highways costs to resolve the consequences of Blackwell Farm in the wider network beyond the site and to achieve the junction improvements with signalised lights around the Down Place access. Those are just the transport costs attributable to the development; in addition, Policy A26 refers to other supporting infrastructure including a two-form entry primary school, local retail centre, GP surgery, open space, playing fields and allotments. Secondary education is only not mentioned because a secondary school at the nearby proposed urban development at Flexford/ Normandy is expected to serve the Blackwell Farm development. Furthermore, 40% of the dwellings built will need to be affordable (Policy H2), largely cross-subsidised from the private open market housing for sale. All the usual gas, water, electricity and sewerage services would be needed, and typical contributions to local government services. The transport-related costs alone are far more than a development of 1,800 houses and 31,000m² of employment could realistically bear. Together with all the other infrastructure necessary to allow a new community to proceed, the scheme is undeliverable financially.

2.22 We conclude that Policy A26 on Blackwell Farm is not legally compliant because it has failed to have adequate regard to the resources likely to be available for implementing the proposals in the document, in respect of the infrastructure requirements needed for the development to proceed; no regard at all has been had to a range of substantial The policy is
also unsound because the proposal to develop land at Blackwell Farm would not be effective, as it is not deliverable over the Plan period due to very high infrastructure costs.

2.23 We recommend that the Blackwell Farm urban development proposal in Policy A26 is deleted on highways grounds.

**Impact on the Surrey Hills AONB and landscape**

*Direct impact on the AONB*

3.1 The proposed development at Blackwell Farm is the only major scheme in the Proposed Submission Plan which would directly affect the Surrey Hills. The built-up urban development is proposed in the setting of the AONB to the north of the Hogs Back, but the principal access road is proposed to cross the AONB in a highly intrusive manner, and the greatly expanded access at the A31/Down Place junction would also adversely affect the AONB.

3.2 The principal impact of the development within the AONB would be the construction of a major access road up and down the steep northern slope of the Hogs. The ridge of the AONB is at nearly 50m and the northern AONB boundary in the area at Om (on the contour through Down Place Stables, below the bend in the existing Down Place access road). The national landscape designation therefore includes the whole of the steepest part of the slope through a vertical elevation of 40 metres. A road on this slope at this point would be highly damaging to the AONB, and its construction would also have further very serious impacts.

3.3 The construction of 500m of major access road on the slope down from the AONB ridge is in our view major development as such it must pass the tests in paragraph 116 of the NPPF if it is to be acceptable. We consider it fails to do this. The proposal at Blackwell Farm is not of such overriding importance that the access to it through the AONB meets the "exceptional circumstances" required, nor can it be demonstrated to be in the public interest in view of the adverse effects. The need for the main development is predicated on an Objectively Assessed Need for housing which we consider far too high. Whether or not the Secretary of State agrees with us (either that this is major development in the AONB or that the OAN is too high), the AONB is a key consideration in its own right. The NPPF makes clear at paragraph 14 that 'sustainable development' involves reflecting policies from the NPPF where these indicate that development should be restricted, and AONB is one such policy. There is no policy presumption that housing needs should override AONB interests: the reverse applies. In view of the damage which would be done to the AONB by the proposed allocation, and this being the only major allocation to do that, we consider that Blackwell Farm should be the primary candidate of all the major sites for deletion from the Plan.

3.4 The Proposed Submission Plan states as a requirement that "Primary vehicular access to the site allocation will be via the existing or realigned junction of the A31 and the Down Place access road, which will be signalised. The design of the improved Down Place access road or a new adjacent parallel access road will be sympathetic to its setting variously within the AONB and AGLV". The comment on the design of the road is as foolish as it is undeliverable. The existing access road is a beautiful country lane flanked by mature trees which is entirely typical of the AONB landscape. The first option, of 'improving' this 'sympathetically' to the standards needed by an access road for a new settlement (let alone to provide a Sustainable Movement Corridor to serve the Research Park, Hospital and other facilities), is impossible. The road is too narrow to be widened sufficiently and has a sharp bend near the bottom. This option could only be effected by the large scale removal of mature trees on one or both sides of the route, plus further damage on the lower slope to overcome the bend. Taking the substantial adjacent land beyond the paved highway itself, used in highway construction, would cause further major damage to the heavily treed landscape of the AONB in this location. This could not be 'sympathetic' to the AONB.

3.5 The second option, of a 'new adjacent parallel access road', would introduce an appalling scar onto the steep northern slope of the Hogs. It would irreparably damage this nationally known iconic landscape, and it is absurd for the Plan to suggest that this also could be designed 'sympathetically' to the AONB (and AGLV). An inevitable consequence of forcing a wide road down a steep slope at the angle proposed would be to require a near vertical wall of chalk on the ridge-side and other earthworks. This would be part of the unavoidable degradation to the AONB associated with the road, which will be visible and intrusive from miles around. There is also a real possibility that the access road would be accompanied by street lighting under either option, introducing a damaging night-time impact into this dark AONB landscape.
3.6 The Highways Authority has indicated to us that it will require street lighting at and around the new signalised junction on the top of the Hogs Back on the A31 in the vicinity of Down Place and Down. This would be damaging to the current night-time experience: lighting currently stops east of the A3/A31 interchange, with the A31 and the AONB to the west of this largely unlit. The change would give the clear impression that Guildford had spread outwards to the west and upwards to the highest point around the city.

3.7 The proposed road down the AONB scarp would damage views to the AONB from public rights of way to the north and north east as well as from Manor Park and from more distant viewpoints in and around the. The construction of the road would itself greatly increase the damage to the experience of the AONB by introducing thousands of vehicle movements daily: this would force drivers and passengers to see and experience the visual damage done to this nationally important landscape, by the road they would be using.

3.8 In each of these respects, the proposed allocation at Blackwell Farm would run counter to the statement in the Plan's 'Spatial Vision' that "Areas of high environmental value such as Areas of Outstanding Natural Beauty and Sites of Special Scientific Interest will be retained and afforded great New development on the edges of urban areas will be required to treat the transition from urban to rural character in a sympathetic way."

**Impact on the setting of the AONB**

3.9 The proposed urban development would be in the setting of the AONB to the north of the Hogs Back (and also north of but abutting the Area of Great Landscape Value). Only the access road to the A31 would be permitted on land to the south of this development. If, however, the secondary access road was aligned south of Manor Copse, then this too would pass through the AGLV.

3.10 Regard must be had to the setting of AONBs. Section 85(1) of the Countryside and Rights of Way Act 2000 states: "In exercising or performing any functions in relation to, or so as to affect, land in an area of outstanding natural beauty, a relevant authority shall have regard to the purpose of conserving or enhancing the natural beauty of the area of outstanding natural beauty" (emphasis added). The Government's Planning Practice Guidance draws attention to this obligation and specifically mentions proposals "which might have an impact on the setting of AONBs (Natural Environment paragraph reference ID 8-003-20140306). The setting of AONBs is not protected as rigorously as land within AONBs, but various appeal decisions before and since the NPPF - which have rejected intrusive developments in the settings of AONBs - show that it continues to be relevant to decisions. In the absence of policy guidance, the formal position is that the weight to be given to setting is a matter for the decision-taker's discretion. NPPF paragraph 115 requires that in any decision "great weight should be given to conserving landscape and scenic beauty" in AONBs. In the context of paragraph 85 of the Act noted above, this applies not only to developments proposed within an AONB but if proposed in its setting such that the AONB would be affected. This should be taken into account in plan preparation.

3.11 Both Guildford Borough Council's and Surrey County Council's Landscape Character Assessments (LCAs) identify the drama of the chalk ridge and the panoramic views, north and south, as defining characteristics of the Hogs Back. Both these LCAs also identify the significance of views to and from the ridge. The Guildford BC LCA Rural Urban Fringe Assessment of the Hogs Back references the importance of the land in providing "the setting to and views from Guildford" and the desire to maintain the "essentially undeveloped rural character" of the land. The assessment notes that: "The setting of Guildford and the AONB are both highly sensitive to any small scale incremental change".

3.12 In the circumstances at Blackwell Farm, we would expect considerable weight to be given to protection of land from inappropriate change in the setting of the Surrey Hills AONB: this is the setting of the Hogs Back, a nationally known and revered part of an AONB; the steep slope to the north from the Hogs Back ridge opens up a wonderful vista which contributes enormously to the enjoyment of the AONB, and should be protected from inappropriate change; the setting has been relatively little-damaged to date (though development by the University of Surrey is creeping out of Guildford into it), and this achievement should be continued.

3.13 The proposed development would damage the setting of the AONB, causing Guildford to sprawl yet further into the rural vista that can be enjoyed from the AONB on the Hogs. We appreciate that urban built development is no longer proposed on land south of Down Place and Manor Farm (contrast the Issues & Options and Consultation Draft stages of the Plan), though there would continue to be visual intrusion into the AONB's setting. Moreover, the continued presence of the primary access road to the site passing through the immediate setting of the AONB (and the AONB itself) remains a very
seriously damaging aspect of the proposal by bringing noise and pollution into the setting, as well as visual damage from the road and the eye-catching effect of moving vehicles upon it. Furthermore, the thousands of northbound users of the primary access road daily would themselves experience comprehensive views into the setting of the AONB; their appreciation of this setting would be significantly marred by the Blackwell Farm development. We conclude that the allocation would conflict with Policy Pl Surrey Hills Area of Outstanding Natural Beauty not least because it would fail "to conserve and/or enhance the setting and views of the AONB". The impact of the urban development allocation on the setting of the AONB is not considered in Policy A26 and has therefore been neglected in the Proposed Submission Plan.

The future boundary of the AONB

3.14 Natural England has announced its intention to review the boundary of the Surrey Hills AONB. It commissioned a report in 2012, from Alison Farmer Associates, which identified areas of search for possible extensions to the AONB, including the whole of the Blackwell Farm allocation area. A further report was commissioned by Surrey County Council on behalf of the Surrey Planning Officers Association and the Surrey Hills AONB Board in 2013 from Hankinson Duckett Associates to further evaluate the natural beauty of those areas of search (and other Landscape Character Assessment work). This proposed extensions to the existing AONB boundary on the north side of the Hogs Back (and elsewhere), but just omitted the Blackwell Farm allocation area.

3.15 The Hankinson Duckett evaluation was not carried out in detail, so in 2016 Compton and Worplesdon Parish Councils commissioned another firm of landscape architects, Land Management Services (LMS), to undertake a more detailed natural beauty evaluation in the vicinity of Blackwell Farm, Down Place and Homestead Farm to the north of the Hogs Back. The LMS report (the final report is available from Karen Stevens) agreed that the area identified by Hankinson Duckett Associates should be included within a revised AONB boundary north of the Hogs Back, but also proposed a north-eastward extension of the AONB boundary to include Down Place and Blackwell Farm. No further land at Homestead Farm was proposed for inclusion.

3.16 The LMS evaluation identified small scale character areas, one of which covered the eastern-most parts of the study area, adjacent to the built-up area of There were two parcels: one on Manor Farm (south and east of Manor Copse Ancient Woodland) and one north of Strawberry Grove Ancient Woodland. The latter comprises the north-east corner of the Policy A26 development allocation at Blackwell Farm. LMS recommended that both these parcels should not be included within the revised AONB boundary, but recommended that they remain open as the setting of Guildford and the AONB. LMS concluded here: "This area does not merit inclusion within the AONB, but provides an important buffer and transitional landscape on the western edge of Guildford. It is recommended that the boundary to [the AONB here] follows the western edge of this sub character area but includes Strawberry and Manor Copses. The semi-rural transitional character of this landscape should be retained in order to conserve the currently limited impact of Guildford on the AONB and other rural land to the west."

3.17 We consider it vitally important that decisions on the Guildford Local Plan in the near future do not prejudice the outcome of the review of a nationally important landscape designation. The most detailed natural beauty evaluation north of the Hogs Back to date (against Natural England's criteria for designating AONBs) shows that most of the Policy A26 Blackwell Farm allocation area should be included within a revised AONB boundary. The principal remaining area, in the north-east corner of the allocation, should remain open as the setting of the AONB and of Guildford.

3.18 The Blackwell Farm allocation should therefore be withdrawn so that, with a high probability, most of the land can be included within the AONB in future after the boundary review has been completed. The LMS interpretation of natural beauty confirms our own local perception that the land identified does merit AONB designation. Its high landscape quality, in the setting of the current AONB, is a major consideration for the Local Plan in any event. This would be a highly damaging location for a major urban development in landscape terms.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents: [Response to GBC_Reg19_cons_by_SaveHogsBack_CPRESurrey_Final_Redacted.pdf](Response_to_GBC_Reg19_cons_by_SaveHogsBack_CPRESurrey_Final_Redacted.pdf) (875 KB)
[Appendix 3 - 2016-07-04 ISSUE.PDF](Appendix_3_-_2016-07-04_ISSUE.PDF) (2.4 MB)
[Appendix 4 - Hogs Back Natural Beauty Evaluation V2 24.05.16 (1).pdf](Appendix_4_-_Hogs_Back_Natural_Beauty_Evaluation_V2_24.05.16_(1).pdf) (6.0 MB)
### Direct impact on the AONB

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3.2 The principal impact of the development within the AONB would be the construction of a major access road up and down the steep northern slope of the Hogs Back. The ridge of the AONB is at nearly 150m and the northern AONB boundary in the area at 110m (on the contour through Down Place Stables, below the bend in the existing Down Place access road). The national landscape designation therefore includes the whole of the steepest part of the slope through a vertical elevation of 40 metres. A road on this slope at this point would be highly damaging to the AONB, and its construction would also have further very serious impacts.

3.3 The construction of 500m of major access road on the slope down from the AONB ridge is in our view major development. As such it must pass the tests in paragraph 116 of the NPPF if it is to be acceptable. We consider it fails to do this. The proposal at Blackwell Farm is not of such overriding importance that the access to it through the AONB meets the “exceptional circumstances” required, nor can it be demonstrated to be in the public interest in view of the adverse effects. The need for the main development is predicated on an Objectively Assessed Need for housing which we consider far too high. Whether or not the Secretary of State agrees with us (either that this is major development in the AONB or that the OAN is too high), the AONB is a key consideration in its own right. The NPPF makes clear at paragraph 14 that ‘sustainable development’ involves reflecting policies from the NPPF where these indicate that development should be restricted, and AONB is one such policy. There is no policy presumption that housing needs should override AONB interests: the reverse applies. In view of the damage which would be done to the AONB by the proposed allocation, and this being the only major allocation to do that, we consider that Blackwell Farm should be the primary candidate of all the major sites for deletion from the Plan.

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3.12 In the circumstances at Blackwell Farm, we would expect considerable weight to be given to protection of land from inappropriate change in the setting of the Surrey Hills AONB:

- this is the setting of the Hogs Back, a nationally known and revered part of an AONB;
- the steep slope to the north from the Hogs Back ridge opens up a wonderful vista which contributes enormously to the enjoyment of the AONB, and should be protected from inappropriate change;
• the setting has been relatively little-damaged to date (though development by the University of Surrey is creeping out of Guildford into it), and this achievement should be continued.

3.13 The proposed development would damage the setting of the AONB, causing Guildford to sprawl yet further into the rural vista that can be enjoyed from the AONB on the Hogs Back. We appreciate that urban built development is no longer proposed on land south of Down Place and Manor Farm (contrast the Issues & Options and Consultation Draft stages of the Plan), though there would continue to be visual intrusion into the AONB’s setting. Moreover, the continued presence of the primary access road to the site passing through the immediate setting of the AONB (and the AONB itself) remains a very seriously damaging aspect of the proposal by bringing noise and pollution into the setting, as well as visual damage from the road and the eye-catching effect of moving vehicles upon it. Furthermore, the thousands of northbound users of the primary access road daily would themselves experience comprehensive views into the setting of the AONB; their appreciation of this setting would be significantly marred by the Blackwell Farm development. We conclude that the allocation would conflict with Policy P1 Surrey Hills Area of Outstanding Natural Beauty not least because it would fail “to conserve and/or enhance the setting and views of the AONB”. The impact of the urban development allocation on the setting of the AONB is not considered in Policy A26 and has therefore been neglected in the Proposed Submission Plan.

The future boundary of the AONB

3.14 Natural England has announced its intention to review the boundary of the Surrey Hills AONB. It commissioned a report in 2012, from Alison Farmer Associates, which identified areas of search for possible extensions to the AONB. This included the whole of the Blackwell Farm allocation area. A further report was commissioned by Surrey County Council on behalf of the Surrey Planning Officers Association and the Surrey Hills AONB Board in 2013 from Hankinson Duckett Associates to further evaluate the natural beauty of those areas of search (and other Landscape Character Assessment work). This proposed extensions to the existing AONB boundary on the north side of the Hogs Back (and elsewhere), but just omitted the Blackwell Farm allocation area.

3.15 The Hankinson Duckett evaluation was not carried out in detail, so in 2016 Compton and Worplesdon Parish Councils commissioned another firm of landscape architects, Land Management Services (LMS), to undertake a more detailed natural beauty evaluation in the vicinity of Blackwell Farm, Down Place and Homestead Farm to the north of the Hogs Back. The LMS report (Appendix 4) agreed that the area identified by Hankinson Duckett Associates should be included within a revised AONB boundary north of the Hogs Back, but also proposed a north-eastward extension of the AONB boundary to include Down Place and Blackwell Farm. No further land at Homestead Farm was proposed for inclusion.

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3.17 We consider it vitally important that decisions on the Guildford Local Plan in the near future do not prejudice the outcome of the review of a nationally important landscape designation. The most detailed natural beauty evaluation north of the Hogs Back to date (against Natural England’s criteria for designating AONBs) shows that most of the Policy A26 Blackwell Farm allocation area should be included within a revised AONB boundary. The principal remaining area, in the north-east corner of the allocation, should remain open as the setting of the AONB and of Guildford.

3.18 The Blackwell Farm allocation should therefore be withdrawn so that, with a high probability, most of the land can be included within the AONB in future after the boundary review has been completed. The LMS interpretation of natural beauty confirms our own local perception that the land identified does merit AONB designation. Its high landscape quality – in the setting of the current AONB – is a major consideration for the Local Plan in any event. This would be a highly damaging location for a major urban development in landscape terms.
Conclusions

3.19 We consider that the Blackwell Farm development allocation should be removed by deleting Policy A26 because of its impact on the AONB:

- there would be a significant direct impact of the primary access road on the AONB;
- the primary access road through the AONB would be major development in its own right, and the proposals do not fulfil the criteria for allowing such development;
- the proposed built development and part of the primary access road would have a significant adverse effect on the setting of the AONB;
- the signalled junction to the primary access road, where Down Place joins the A31 on the top of the Hogs Back, would be lit at night, which would damage the appreciation of the rural qualities of the AONB at night and emphasise the sprawl of Guildford into it;
- the primary access road from the Blackwell Farm development to the Hogs Back ridge would probably be lit at night, which would also damage the appreciation of the rural qualities of the AONB and emphasise the sprawl of Guildford into it;
- most of the proposed development site should be included within a revised boundary of the Surrey Hills AONB, while its north-east corner (north of Strawberry Grove Ancient Woodland) would be in the immediate setting of the AONB and should be kept free of development as a buffer between urban Guildford (the research park) and the AONB.

3.20 We conclude that the Plan is unsound because the proposal to promote development at Blackwell Farm in the Surrey Hills Area of Outstanding Natural Beauty and within its setting is not consistent with Government policy. Insufficient regard has been had to the impact of the primary access road on the AONB (and which we also regard as major development). Insufficient regard has also been had to the primary access road on the setting of the AONB none at all to the impact of the urban development area on the setting of the AONB. In that last respect we consider there has been a legal failure to comply with the Planning and Compulsory Purchase Act 2004, s19(2)(a).

Green Belt at Blackwell Farm

4.1 Paragraph 83 of the NPPF states that “Once established, Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan. At that time, authorities should consider the Green Belt boundaries having regard to their intended permanence in the long term, so that they should be capable of enduring beyond the plan period.” This is a continuation in principle of previous Green Belt policy (from PPG2, paragraph 2.9).

4.2 In the most recent review of the Guildford Local Plan, following the report of the Inspector in September 2001, there was just one change to the Green Belt boundary. This was to allow the expansion of the University of Surrey (and two minor adjacent plots) into Manor Farm (the Manor Park development). It is a further withdrawal of the Green Belt boundary to allow more development immediately beyond the last land release that is proposed now. The Local Plan Inspector in 2001 was alert to the risk of nibbling away at the Green Belt and responded as follows to objectors who sought a more limited release of land from the Green Belt: “the guidance suggests that in reviewing Green Belt boundaries a longer time scale should be used than for other aspects of the Plan. If the normal period suggested for a local plan is ten years, it is not unreasonable to look at defining the Green Belt boundary with two local plan periods in mind. A cushion of undesignated land for future requirements, where they are reasonably foreseeable, can be accepted where it can avoid a succession of bites at the Green Belt” (paragraph 16.4.3).

4.3 The Borough Council and the University of Surrey are attempting to undermine this intention. The Local Plan was adopted in 2003, yet even when the Issues and Options report for the current Local Plan was issued in 2013, they were trying to release further land from the Green Belt in precisely the way the Inspector had been trying to prevent. Save Hogs Back and CPRE Surrey are appalled at this attempt to abuse and undermine Green Belt policy and principles. The proposal reflects a remarkably casual approach to the Green Belt which should not be tolerated. Further removal of land from the Green Belt at a location where Green Belt land has only recently been released is contrary to the expectations of Government planning policy and the Plan therefore unsound.

4.4 There should be no illusion about the University of Surrey’s desire to develop a huge swathe of land west of Manor Park at the foot of the Hogs Back. In November 2013 the University released its proposals for a ‘Garden Neighbourhood’
stretching as far west as Flexford House and occupying the whole area between the AONB and the railway beside Wood Street Village. An illustrative page from the proposals is attached as Appendix 1. This shows comprehensive development of the area, a new junction on the A31 and a road straight down the steep northern slope of the Hogs Back. The development of Blackwell Farm would only be a stepping stone in this expansionist thinking of the University which shows a serious lack of appreciation of the role of Green Belt, the Hogs Back and the Surrey Hills AONB. Releasing Blackwell Farm is highly undesirable in its own terms and would only fuel the desire of the University to press the Council for yet more land releases in future.

4.5 The Proposed Submission Local Plan has adopted “a controlled realignment of the Green Belt boundary and development of a small number of strategic sites, which will allow us to provide for mixed and inclusive communities supported by new infrastructure” (paragraph 2.28). The Plan is a coy as it possibly can be about the remarkable scale of Green Belt land release for housing which it proposes. Large urban developments are proposed in the Green Belt at Blackwell Farm (1,800 houses), Gosden Hill Farm (2,000 houses), former Wisley Airfield (2,000 houses) and between Normandy and Flexford (1,100 houses). Various Green Belt sites offering over 100 houses each are also proposed.

4.6 The Government policy on Green Belt in the NPPF begins with a statement of great clarity, but one which the Proposed Submission Plan appears to have neglected or sidelined: “The Government attaches great importance to Green Belts. The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence” (paragraph 79). The NPPF does of course also provide considerable encouragement to the provision of the housing which the nation needs. It explains how the conflict is to be dealt with between the pressure of housing and the constraint of Green Belt (and other nationally important designations) at paragraph 14: “Local Plans should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change, unless…. specific policies in this Framework indicate development should be restricted”. One such policy (footnote 9) is Green Belt.

4.7 For the avoidance of doubt, the Government has issued various statements confirming its commitment to Green Belt and reiterating how the pressure to release Green Belt land should be addressed in Local Plans. For example, Brandon Lewis MP, Minister for Housing and Planning told a Westminster Hall debate on 15 March 2016:

“…we have regularly made the point that the green belt is a legitimate constraint. It is an important part of the country’s infrastructure and the Government attach the highest importance to its protection. In fact, over the past few years we have increased it. The NPPF makes it clear that green belt boundaries should be established in local plans and can be altered only in exceptional circumstances, using the local plan’s process of consultation and independent examination. The Government do not specify what constitutes exceptional circumstances, as it is for each local authority to determine that and how much weight to attach to those circumstances” (Hansard column 307WH).

On 11 January 2016 Mr Lewis gave a written answer to a Parliamentary Question by Mr Laurence Robertson MP (Tewkesbury), as follows:

**Green Belt**

**Question 21089**

To ask the Secretary of State for Communities and Local Government, what his policy is on the priority that should be given to maintaining Green Belt land in Local Plans in areas where there is unmet housing need.

**Answer** Green Belt is protected by local authorities in line with national policy set out in the National Planning Policy Framework. The Framework states that permanence is an essential characteristic of Green Belt, and that a Green Belt boundary may be altered only in exceptional circumstances, using the Local Plan. Our supporting Guidance reminds local authorities that, in planning to meet their objectively assessed local housing needs, they must have due regard to national policies (including Green Belt policy) which indicate that development should be restricted and which may restrain the ability of an authority to meet all its needs. This applies even where there is no up-to-date Plan. It is for the Planning Inspector examining a revised Local Plan to determine whether it is based on sound evidence and in line with national policy.

A statement to *Planning* from DCLG reported on 25th April (attached as Appendix 2) said:
“There are no plans or policy to relax the strong protections that prevent inappropriate development on the green belt. Ministers have repeatedly been clear that demand for housing alone will not justify changing green belt boundaries.”

4.8 In our view, the statements from the Government clarify that releasing land from the Green Belt to meet housing needs is an option but is only to be undertaken in exceptional circumstances rather than lightly. Guildford Borough Council, in contrast, has chosen to meet all its Objectively Assessed Need for housing, taking whatever land is necessary from the Green Belt to secure this. Furthermore, the Proposed Submission Plan has made no real effort at all to justify the release of land from the Green Belt in the terms set by the NPPF. Paragraph 4.3.16 of the Plan simply states:

“National planning policy requires that Green Belt boundaries are only amended in exceptional circumstances and that this must be undertaken as part of the Local Plan process. We consider that exceptional circumstances exist to justify the amendment of Green Belt boundaries in order to facilitate the development that is needed and promote sustainable patterns of development.”

Claiming ‘exceptional circumstances’ is easy. However, there is no review of the arguments needed to demonstrate that exceptional circumstances might apply at any location in the Borough. In our view, this means that the Plan is unsound by virtue of not being consistent with Government policy, and also unlawful because it has failed to have regard to national policies and advice on Green Belt contained in guidance issued by the Secretary of State.

4.9 The purposes of Green Belt have played remarkably little part in the selection of areas for urban development in the Proposed Submission Plan. Pegasus Group for the Borough Council divided all non-urban land in the Borough into a series of large plots for analysis. Their most up-to-date analysis is given in their Green Belt and Countryside Study, Volume II Addendum Appendix 1, April 2014. This assumes that the Green Belt purpose of encouraging urban land recycling applies equally to all plots, but the other four purposes are assessed for each plot. If none or one purpose is served by the plot it is ranked as low sensitivity, two purposes is ranked as medium sensitivity and three or four purposes is ranked as high sensitivity. 41 plots in the Green Belt are identified as having low sensitivity, 67 as having medium sensitivity and 91 as having high sensitivity. Of the four major proposed urban developments noted in paragraph 4.1 above, three have medium sensitivity and one (Flexford/Normandy) has high sensitivity. It is striking that none of the plots having low sensitivity was chosen for development. The choice of sites for development was clearly not significantly influenced by suitability of sites in Green Belt terms.

4.10 Pegasus Group explains its approach to recommending ‘Potential Development Areas’ (PDAs) in its Volume II Addendum at paragraph 3.7:

“Volume II of the Study has focussed upon those parcels which directly adjoin the urban edge as they are likely to offer a more appropriate relationship with the main urban area than those parcels which are separate from it. It is recognised that if the Council do identify urban edge parcels as appropriate for development and removal from the Green Belt, this may offer the potential for some adjoining land parcels which do not currently connect with the urban edge to come forward in a more appropriate manner. However, such decisions will be best informed by the Council’s chosen spatial strategy, and choices upon the recommended PDAs around the urban edge set out in Volume II and this Addendum.”

In practice, the Borough Council did not accept this approach: two of the four main areas proposed for major development are essentially free-standing urban areas in the countryside, at Wisley Airfield and Flexford/Normandy. If these sites were considered suitable by the Council, then it should also have revisited the 41 plots previously identified as low sensitivity in Green Belt terms before deciding which to allocate.

4.11 We are not arguing that the choice of major development sites was random, but that Green Belt policy played hardly any part in the selection process. On not a single occasion is a Green Belt plot retained free of development ‘because it significantly fulfils Green Belt purposes’. Nor is a Green Belt plot proposed for release ‘because it has little benefit in fulfilling Green Belt purposes’. We consider that the Borough Council has fallen far short of being able to demonstrate exceptional circumstances to justify any of its choices of major development area in Green Belt terms. That is a major failure of policy implementation and, in our view, makes the selection of sites unsound as (i) contrary to national planning policy and (ii) not the most appropriate strategy when considered against its reasonable alternatives.

4.12 In reality, Pegasus Group has emphasised a range of non-Green Belt planning issues which it considers important, including a highly selective ‘sustainability assessment scoring’ system which is dominated by walking distances. No doubt
informed by this, there are important deficiencies in the Borough Council’s approach when considering the possibility of releasing Blackwell Farm for development. Policy A26 refers to ‘key considerations’ merely as “AONB, AGLV, Access, Surface water flood risk”. There is much else at stake, and no justification for changing the existing Green Belt boundary to the newly proposed one.

(i) The protection of Ancient Woodland has been given little attention by Pegasus Group or the Council. Although there is no formal proposal to fell Ancient Woodland at Blackwell Farm, the presence of Strawberry Grove, Manor Copse and Wildfield Copse immediately adjacent to the proposed development area will compromise these irreplaceable natural assets as the residents of 1,800 houses seek nearby leisure and recreation. It appears that zero weight has been given to the real impact on Ancient Woodlands and ancient hedgerows. The proposed allocation can be expected to cause the degradation of the Ancient Woodlands to the extent that over a period of time they lose much of their biological and historic interest.

(ii) The Pegasus Group study refers to development within landscape designations but omits review of the impact of development on the setting of the Surrey Hills AONB. This is a major omission which we have attempted to rectify in paragraphs 3.9-13 above. Reference is made to landscape character but not to visual impact: the latter is an important consideration in close proximity to the Hogs Back and therefore an important omission in relation to Blackwell Farm.

(iii) The Pegasus Group study assumed that Purpose 5 of the Green Belt “to assist in urban regeneration, by encouraging the recycling of derelict and other urban land” (NPPF paragraph 80) applied equally everywhere. We think not. The Blackwell Farm site is capable of achieving far more by way of concentration of land uses than most other sites. This is because the whole of the Blackwell Farm site is owned by the University of Surrey, as is all the land to the east. One effect of stopping development on Blackwell Farm would be to oblige the University to pay more attention to the efficient use of its land. At present the University takes a relaxed approach to land supply:

- the University has devoted large areas to inefficient surface-level car parks (view this on Google Earth, for example);
- the Research Park is specifically advertised as a ‘low density rural location’ (see the video spool on www.surrey-research-park.com/), and provides just 65,000m2 of office space across 28.33 hectares;
- the Guildford Local Plan Inspector’s Report in 2001 agreed to remove over 60 hectares of land from the Green Belt at Manor Park for University purposes, immediately east of Blackwell Farm, which has given the University an impression that land supply is not an issue; the Inspector commented “It may be that, as many Objectors felt, the Proposal is being overgenerous in the amount of land that is being taken out of the Green Belt and that this could be cut back. I have sympathy with that view” – though he still released the land for the reasons he gave in paragraph 16.10.2.

(iv) There is no Green Belt boundary available on Blackwell Farm which would be reliably permanent. The NPPF states that when Local Plans review Green Belt boundaries local planning authorities should “define boundaries clearly, using physical features which are readily recognisable and likely to be permanent” (paragraph 85). The Council’s proposed western boundary to the site – the new Green Belt boundary – would follow a hedge in a dip in the landscape. The existing Green Belt boundary is superior and there is a clear risk from the proposals that Guildford could in future sprawl further west of Blackwell Farm on the basis that the boundary proposed now is indefensible.

4.13 On all these grounds the existing Green Belt boundary has superior merit to the one now proposed further west.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

- Appendix 3 - 2016-07-04 ISSUE.PDF (2.4 MB)
- Response to GBC Reg19 cons by SaveHogsBack & CPRESurrey Final.pdf (900 KB)
- Appendix 4 - Hogs Back Natural Beauty Evaluation V2 24.05.16 (1).pdf (6.0 MB)
- Re_Access to Blackwell Farm.eml (30 KB)
- Re_Down Place junction [UNC].eml (24 KB)
- Fwd_Blackwell access.eml (9 KB)
- EIR request - ID 3035.pdf (516 KB)
Introduction

I object to Blackwell Farm (site allocation A26) being removed from the green belt and put forward as a Potential Development Area (PDA). I do not believe that the decision is justifiable or sound for three key reasons:

1. Inclusion of the site does not comply with national government policy on the adjustment of green belt boundaries. Furthermore there has been no proper review of this site and other sites across the borough in terms of their suit-ability for development from a green belt point of view. The Green Belt and Countryside Study by Pegasus is a flawed document, and in any case does not appear to have informed Guildford Borough Council’s selection of PDAs.

2. Inclusion of the site does not follow national government policy on development within Areas of Outstanding Natural Beauty (AONB) or national planning guidelines for the setting to AONBs. No exceptional circumstances have been put forward which demonstrate that the benefits of developing Blackwell Farm outweigh the harm to the AONB/AONB setting as is required by the NPPF for major developments (Section 11; Para 115-116).

3. The proposed vehicular access to the site is not viable, which means that the site is not “de-velopable”, it is not in a “suitable location for housing development” and there is no “reason-able prospect that the site is available and could be viably developed at the point envisaged” as is required by the NPPF (Section 6; para 47).

I fully support the detailed joint submission by Save Hog’s Back and CPRE Surrey which outlines objections on the grounds of legal compliance and soundness. In this, my personal response, I outline further reasons for my objection under the head-ings of Green Belt, AONB and Viability.

Green Belt Background

The proposed Blackwell Farm development is described in the draft Local Plan as an “urban extension”, and its location is described as “Guildford urban area”, both these descriptions are misleading and inaccurate (and are likely to skew public responses to the consultation). Blackwell Farm is in a rural location, completely dislocated from the town both geographically and in terms of its infrastruc-ture.

If you look at a map of the proposed development area, only the very far north-eastern corner of the site comes anywhere close to an urban area (Park Barn) and this is separated from it by a railway line and a belt of trees. The eastern edge is separated from the Surrey Research Park/University campus by ancient woodland and by an area of safeguarded agricultural land. The single row of houses at Beechcroft Drive at the southern end of Strawberry Meadow is part of Onslow Garden Village – not itself an “urban” area. Building a second “garden village” or “garden neighbourhood” within a few miles of an existing separated by an area of green belt and ancient wood-land would appear to make the term “urban extension” nonsense. Separating two “garden villages” by an area of green belt and an area of ancient woodland, would also effectively make this become an island within the urban area and would be gradually eroded by urban influence - just as has happened with the vet school being recently built on an area set aside as a buffer zone on the eastern side of Manor copse. The large areas of farmland within this green belt “island”, will be made redundant, just as the grade 2 farmland on Manor Park was made redundant in 2004 (and is now being levelled at the southern boundary to form new playing fields).

In terms of infrastructure too, Blackwell Farm is com-pletely disconnected from the town and cannot be inte-grated into the existing urban fabric. There are no existing public roads or sewerage systems or gas pipes connect-ing the site to the town,
which brings into question the economic viability and the deliverability of the proposals. This site could be anywhere outside the urban boundary of Guildford and should be treated as such within the Local Plan.

Satellite image shows that the site is dislocated from the rest of Guildford and therefore doesn’t form a true urban extension as claimed. Should the site connect through by road to the Tesco roundabout then there would be transport chaos rendering the proposals impractical and the plan unsound.

**Openness and permanence of the green belt**

Blackwell Farm lies entirely within the green belt and the proposal to develop this site overlooks the two fundamental principles of the green belt: its openness and permanence (NPPF Section 9, Para 79).

**Openness**

The central objective of Green Belt is to protect the openness of land. Blackwell Farm is very open, not concealed discernibly from any direction, except perhaps from behind the railway to the north, and is visible from surrounding areas – notably from the Hog’s Back ridge to the west and to the east (at the Mount – a popular public recreation area). The site therefore performs a significant function in keeping land open.

**Permanence**

Green belt boundaries should be realigned with regard to their permanence. The boundary on this western side of Guildford was moved at the last local plan and to move it again would not be in line with the NPPF (Section 9, para 83).

Following the Public Inquiry into the 2003 Local Plan, the green belt boundary at Manor Farm was rolled back to allow the University of Surrey’s expansion. A sizable area (63.3 hectares) was removed from the green belt and the new boundary (the belt of ancient woodland at Manor Copse and Strawberry Grove) was seen to be “a logical and defensible boundary well related to physical features on the ground and the land form, and it provides for the University’s long term requirements thereby avoiding pressure for further green belt releases in the future.” [Simon Birch, Director of Environmental and Planning Services for Guildford Borough Council, in his evidence to the Public Local Enquiry, para 16.]

The Planning Inspector’s report at the time confirmed this and made clear that this boundary review was for the long term (beyond the plan period):

“...frequent changes affecting the approved Green Belt...

A firm and justified boundary was therefore laid down with a firm statement that it would not be moved again. This substantially reinforces the NPPF ruling that boundaries need to be defensible and permanent [NPPF 9.85].

Furthermore, the University accepted this:

“The CPRE rightly quotes ... that ‘there should be a presumption against frequent changes affecting the approved Green Belt. ’ UniS does not advocate ‘frequent changes’ and fully supports the Borough Council’s proposal in 99U1 to exclude all of the land it requires for its long term expansion. [Tim Hancock, of Terence O’Rourke plc for the University (2.9 of his Supplementary proof in response to CPRE).]

Of all the Green Belt boundaries in Guildford, this one at Manor/Blackwell Farm is unique in having been altered in 2003 after lengthy and detailed examination over two local plan periods. The boundary selected in 2003 was recognised to be defensible – it followed a belt of ancient woodland and a prominent field boundary/ancient hedgerow. It also follows the deer leap, which bounded the 12th century Royal Hunting Ground and has formed the boundary to Guildford since medieval times. This existing boundary, is on raised ground and so provides a natural screen to Guildford town. The new boundary being proposed – a hedgerow further west – lies within a dip. It is therefore not at all defensible and would provide no screening; the development would be clearly visible for miles along the Hog’s Back ridge, blighting...
views from the AONB. Furthermore, the arbitrary nature of this new boundary means there is a clear risk from the proposals of sprawl further west.

The statements made in 2003 about the permanence of the new boundary have been completely ignored by GBC. This is unacceptable and cannot be passed off as new circumstances or previously unforeseeable needs now arising. It is clear that the University has been developing its own plans as if the green belt was not an impediment to its expansion aspirations, contrary to the commitments it gave at the time. Furthermore, its own proposals for future development west of Blackwell Farm at Chalk Pit and Wildfield Farms show quite clearly its casual approach to the impediment of green belt.

Urban sprawl on the western edge of Guildford

Over the last 100 years, extensive development on the west side of Guildford on the northern slopes of the Hog’s Back has made a large impact on the character of this area from what was formerly farmland and parkland. The planned low-density garden village “Onslow Garden Village” (now known as “Onslow Village”) on the site of the medieval Royal Hunting Park was started in the 1920s. The building of the A3 Guildford and Godalming Bypass, which opened to traffic in June 1934, effectively formed the western extent of this development for many years. (Mount Farm, on the higher slopes of the Hog’s Back above Onslow Village was separately acquired to protect the views of the ridge, which formed the southern bound to development.)

Piecemeal development had taken place on the western side of the A3 following the gift of land to the UniS, with the construction of the Royal Surrey Hospital and then the Holiday Inn Hotel alongside the A3 on land that was leased by the University to help finance the construction of the low-density Research Park, which began in the 1980s on the lower slopes.

The Manor Park campus and sports park were given permission in 2003, which was followed by the recently built surface car parks of the Onslow Park and Ride. This low-density expansion of Guildford is bounded on the west by the ancient woodlands at Manor Copse, Strawber-ry Grove and Dean Bottom. The 90m contour also forms the extent of the Manor Park development, which helps form a boundary to development and goes some way to protecting the rural views from the AONB and Blackwell Farm.

A further low-density expansion of Guildford, which “leapfrogs” the ancient woodland and rises above the 90m contour, as now proposed, would be an example of urban sprawl on a massive scale - rather than what is described as “urban extension” in the draft local plan.

Blackwell Farm meets 4 out of 5 purposes of green belt

The Green Belt and Countryside Study carried out by Pegasus is unsound and cannot be relied on as evidence. Although the worst aspects of it were rectified after a Guildford BC Scrutiny Committee meeting with public inputs, it is still a flawed document and does not address the problems highlighted in the report submitted by Tom Stevens, The purpose of Green Belt – Blackwell Farm, in September 2014 in response to the draft Local Plan (see Annex 1). A key problem with the revised Pegasus study is its “green belt sensitivity test”. It amounts to nothing more than a ‘tick-box’ exercise to see how many of the green belt purposes a particular site meets. No consideration is given to how effectively the site meets each function, and no weight is given to any one function above another. In the case of Blackwell Farm, the scoring was incorrect as the site meets all five green belt purposes, and yet is only considered by the Pegasus test to have met three.

Green Belt

- Purpose 1 - to check the unrestricted sprawl of large built-up areas
- Purpose 2 - to prevent neighbouring towns merging into one another
- Purpose 3 - to assist with safeguarding the countryside from encroachment
- Purpose 4 - to preserve the setting and special character of historic towns
- Purpose 5 - assist in urban regeneration, by encouraging the recycling of derelict or other urban land

(Please note that the purposes of Green Belt in this paper have been referred to, and numbered, according to the order they appear in within the NPPF, rather than the numbering adopted by Pegasus.)

Green belt purposes:

Purpose 1. The Blackwell Farm site fulfils the purpose of “checking the unrestricted sprawl of a large urban area” (Clearly the Metropolitan Green Belt refers to the sprawl of London, but the sprawl of Guildford is a significant consideration within that designated area.) Because Blackwell Farm is in the front line of Guildford’s sprawl, it is
achieving this purpose very strongly. There is huge pressure to develop on the western edge of Guildford; the University of Surrey has stated publicly that its key objective is to develop the whole of its landholdings (265 hectares), stretching west to Flexford Farm. This, combined with the indefensible boundary being proposed (a hedgerow rather than the existing belt of ancient woodland), will put more of the green belt and the Surrey Hills Area of Outstanding Natural Beauty (AONB) at risk of future development. The green belt was created to protect this kind of sprawl (ie to prevent Guildford from moving ever westward) and should be allowed to do its job, rather than cave in at the first opportunity to the pressure it was designed to resist.

Purpose 2. to prevent neighbouring towns merging into one another
The Pegasus study considered the merging of communities rather than towns in its study. If we were to assume that Blackwell Farm is an urban extension (as GBC contests), which is joined with Park Barn in the north western corner and with Onslow Village (via Beechcroft Drive) on the south west, then the development would form a bridge between these communities. Furthermore communities at Down Place and Pinks Hill would also be linked up. The extension of the development site westward to bring in Wildfield Farm (just 5 minutes walk from the Wood Street Village Green) also forms coalescence with this community. If the University continues to push for its stated key strategic aim of developing further west to build across its entire landholdings, then communities at Chalkpit Farm and Flexford would also merge within the urban boundary.

Purpose 3. The Blackwell Farm site assists strongly with “safeguarding the Countryside from encroachment” The proposed movement of the green belt boundary on the west of Guildford to allow for development of the University in 2004 resulted in the encroachment on countryside and the loss of working farmland (including some Grade 2) at Manor Farm. The proposed future change in the boundary would result in further encroachment and the loss of farmland, including further Grade 2. The proposed road development with access from the A31 would also effectively cut off farm access to the south of the development area leading to further urban influence on this countryside. The University’s stated key objective is to develop its entire landholding on this western edge of Guildford (including Chalkpit and Wildfield Farms), leading to the risk of further boundary change and further encroachment in future years.

Purpose 4. Blackwell Farm helps to preserve the setting and special character of the historic town of Guildford
It forms the views from the Hog’s Back ridge, which is acknowledged to be an important setting to the town, particularly through sightlines to the Cathedral. The site itself is visible along the ridge, both from the west and the east (the north-easter corner of the site being visible from The Mount – a popular recreation area and viewing platform). Guildford Borough Council’s Landscape Character Assessment makes it clear that the Hog’s Back forms and important setting to the town:

“The steep slopes rising from the River Wey and distinctive elevated ridge landform provides a natural containment for, and backdrop to, the lower lying town centre and allows panoramic views across Guildford, to the Cathedral… To the north the arable slopes north of the A3/A31 provide an important open backdrop to the emerging Manor Park site.” (Landscape Character Assessment, Vol II, Rural Urban Fringe, p37, Jan 2007)

A Landscape Evaluation Study, by landscape architect, Land Management Services, commissioned by three parish councils – Compton, Worplesdon and Wanborough (Annex 2) – confirms that land parcel H2 is “critical to the landscape setting of the chalk ridge” (Hog’s Back Natural Beauty Evaluation, June 2016, p16)

Henry II’s Royal Hunting Park also forms a major feature of Guildford and the historic setting for the town. The deer leap alongside the edge of the hunting park is still visible within the woods that separate Blackwell Farm from the Surrey Research Park as well as the Scheduled Ancient Monument (remains of the Royal Hunting Lodge), which also sit alongside the existing green belt boundary between Manor Park and Blackwell Farm. The field patterns are also influenced by this park and features such as Strawberry Grove on the north east corner of the PDA are clearly marked in historic maps of the town, which date back to when the Royal Park was still in existence.

Purpose 5.
The more effective that parcels of Green Belt are at restricting development, the more likely they are to have an effect in assisting urban regeneration. As Blackwell Farm is close to the urban edge, it has a significant inhibiting effect on development, and because both Blackwell Farm and the land adjacent to it at Manor Park (formerly Manor Farm) are under the control of the University of Surrey, not allowing building at Blackwell Farm would help to discourage the profligate use of land shown recently by the University. The University has 17 hectares of surface car parking that could be...
built over with offices and flats across its estate. This is a more sustainable option than building over open farmland (including grade 2 and 3a) within the green belt. Stopping development on Blackwell Farm would result in the University of Surrey investing in, and regenerating, land in its ownership and delivering its commitments following the 2003 boundary review (including 270 homes for key workers, 3,125 student residences and releasing further accommodation at Hazel Farm).

**How the green belt analysis has been used**

Considering the urban-edge parcels identified by Pegasus in Guildford Borough around Guildford and Tongham, there is just one considered ‘low sensitivity’ (K6) supporting just one of four green belt purposes. There are 11 parcels considered ‘medium sensitivity’ with two purposes supported, and 26 considered ‘high sensitivity’ with three or four purposes supported. Overall, there are 42 parcels around the borough identified as of ‘low sensitivity’, but Pegasus proposed a PDA on only one of them. It proposed PDAs on all or part of six urban edge parcels of ‘medium sensitivity’ and nine of ‘high sensitivity’. The evidence therefore clearly shows that the number of green belt purposes served by parcels has had hardly any effect on the selection of sites around the borough for development. The choice of land for development around Guildford has therefore not been guided by green belt. The whole exercise of looking for plots to release which are least sensitive in green belt terms has been a sham.

Instead, the choice of sites for release has been informed only by traditional planning issues (eg AONB, flood risk, protected wildlife areas, Registered Common Land, MoD land etc) and, to a lesser extent, by environmental capacity.

Although the environmental capacity assessments have considered some relevant issues, they have ignored other important ones, such as development in the setting of the AONB and visual impact. The conclusions of GBC’s Landscape Character Assessment (LCA), which forms part of the evidence base, have been largely ignored, and this is evident in relation to Blackwell Farm, where the LCA is very clear that the views from the Hog’s Back ridge should be conserved:

“The Hog’s Back Chalk Ridge landscape should be conserved, in particular the open nature of the landscape which forms a backdrop to the surrounding rural areas and Guildford, the wide and far ranging views from the many viewpoints along the ridge line and the sparse settlement pattern of traditional style and local materials. The intact large scale geometric field pattern and hedgerow boundaries and hedgerow trees should be conserved while there is potential to enhance and reinforce some of the hedgerows.” [Landscape Character Assessment (Chalk Ridge), 2007 p41]

In putting forward PDAs, GBC considers only landscape value (which is not the same thing as landscape character) and this is addressed only in terms of landscape designations. Furthermore, the protection of ancient woodland has been given little weight in that, even though such woodlands are not proposed to be removed, they would in some cases be severely compromised by development around them. The ancient woodland at Strawberry Grove/Manor Copse, for example, would be completely encircled should the proposed Blackwell Farm development go ahead, and a large road would pass through, or very close, to it. The ancient woodland at Wildfield Copse would also be harmed. The weight that is given to the various environmental capacity elements other than the absolute constraints is unclear, but appears to be only slightly above zero.

An additional round of evaluation has taken place in the form of a ‘sustainability assessment’. This scores urban edge sites that come through the environmental capacity assessment free of absolute constraints. This last assessment is purely on grounds of walking distance to a selection of nine facilities. There are some oddities in this: the most obvious point of ‘walking distance to a bus stop’ has been omitted on the dubious grounds that everywhere will be served by buses, but the nearly-pointless ‘walking distance to an A-road’ remains in the mix. The 16 sites assessed are rated from zero to 3 according to distances to be walked to nine facilities. The distances at which cut-offs between the rating-points occur varies from one facility to another, so there is some ranking of importance in this part of the process. The scores are then added up (ie each of the nine facilities has equal weight in this part of the exercise), with the highest number the most sustainable. The scores are then listed in descending order. Parcel H2 (Blackwell Farm) is ranked 14 overall, in other words it is one of the least sustainable sites, yet it has been put forward for development. Despite the work which went into the sustainability assessment, no use appears to have been made of it in the selection of PDAs. It is therefore unclear what the purpose was of the whole exercise.
Conclusion
The treatment of green belt in the choice of allocation sites is unacceptable. Despite going through the motions of carrying out a green belt review, the Council has selected sites for allocation for development irrespective of green belt constraints. Urban-edge sites have been chosen as if the green belt constraint did not exist at all. On not a single occasion is a green belt site retained free of development ‘because it significantly fulfils green belt purposes’. Nor is a green belt site released ‘because it has little benefit in fulfilling green belt purposes’. The green belt analysis has therefore been entirely misleading. Site selection has instead been on the basis of the Council’s selected planning preferences. The absence of actual attention to green belt constraint has played down the highly significant contribution of sites, such as H2 (Blackwell Farm), to green belt purposes, even though this should have been a fundamental consideration shaping the town’s development.

AONB

The Blackwell Farm development would result in harm to the setting of the Surrey Hills Area of Outstanding Natural Beauty (AONB), harm to an Area of Great Landscape Value (AGLV), and harm to the AONB itself.

Harm to the AONB setting
Blackwell Farm forms part of the views into and out of the Hogs Back ridge, which is an iconic landscape feature well known in the region. The ridge is located on the northern edge of the Surrey Hills AONB and, because of its elevated position, provides dramatic views over a long distance. The proposed large-scale development at Blackwell Farm would be clearly visible from many points along the ridge, thereby blighting the setting of the AONB.

In addition to the ridge itself, there would be an impact at the very least on two footpaths, one bridleway and three further access roads (unclassified), all of which come off the A31 on the north side of the Hogs Back in, or adjacent to, the AONB, from which the setting would be a consideration. There would also be an impact on views from the train on the North Downs Line between Reading and Gatwick.

The setting today for the AONB at Blackwell Farm includes a locally designated Area of Great Landscape Value and is arguably more beautiful than other areas within the AONB because the topography results in panoramic views over a great distance. If the planned development goes ahead, then the AONB will be seen by thousands of people in cars entering and leaving the housing estate – but the setting and views of the AONB that they would experience would be in marked contrast to those enjoyed by people today. It seems perverse to argue that developing a site would cause only slight harm because the AONB is not visible from a wide number of public locations, and then to open it up to much wider viewing by the public (through road and house building), but to destroy the beauty of the landscape in the process.

It is worth noting that the Government has, in its March 2014 National Planning Practice Guidance on Natural Environment – Landscape, emphasised the importance of protecting the setting of AONBs and National Parks. This affects proposals on land outside an AONB that might adversely affect its setting.

It states that under Section 85 of the Countryside and Rights of Way (CROW) Act 2000, “relevant authorities” are required in “exercising or performing any functions in relation to, or so as to affect land “ in an AONB to “have regard” to their purposes. It goes on to state:

“The duty is relevant in considering development proposals that are situated outside National Park or Area of Outstanding Natural Beauty boundaries, but which have an impact on the setting of, and implementation of, the statutory purposes of these protected areas.”

Harm to potential future AONB
Natural England has identified the Surrey Hills as one of only two AONBs in the country where a boundary review will be considered, and has agreed to support the process of evidence gathering to inform this process.

A new piece of evidence related to this review - an independent Landscape Evaluation Study by Land Management Services – was published in June 2016 and puts forward a strong case for including most of Blackwell Farm and its surrounding area within the revised AONB boundary. (See Annex 2.)

The study was commissioned by Worplesdon, Compton and Wanborough Parish Councils when it was realised that Surrey County Council’s evaluation of the land on the northern slopes of the Hog’s Back (by consultant Hankinson and Duckett),
had omitted Blackwell Farm from consideration and assessment. The Hankinson and Duckett evaluation had been funded by the Surrey Hills AONB Board as part of the AONB review process. This omission was despite a study by Alison Farmer Associates just a year earlier (in Jan 2012), which had recommended the area as meriting assessment. The Alison Farmer study, also commissioned by SCC, used up-to-date criteria, based on boundary reviews of the New Forest and South Downs National Parks. This map shows the area identified by Alison Farmer Associates for assessment.

It seems remarkable that Blackwell Farm should have been excluded from the Hankinson and Duckett evaluation, particularly given the strength of the arguments for including the area in the AONB that Land Management Services (LMS) has put forward in its report. LMS concludes:

“Land to the south and east of Wildfield Copse, in the vicinity of Down Place and Blackwell Farm (sub character areas 3 and 4) is of a landscape and scenic quality, character and condition which should merit inclusion within a revised AONB boundary… This landscape is therefore considered integral to the AONB and critical to the conservation of rural views to the north of equal, if not greater importance, to land to the west of Down Place included in Area 12-1.” (Section 6, p23.)

The fact that the H2 included an AGLV and that Surrey County Council’s and Guildford Borough Council’s own landscape character assessments also highlighted the scenic quality of this area, makes the omission even more striking:

“The Hog’s Back has a vital role in providing a dramatic landscape setting to Guildford” [Landscape Character Assessment, Vol II, Rural Urban Fringe, p37, Jan 2007]

It is also strange that the AONB boundary selected by SCC/Surrey Hills AONB Board for Area 12-1 follows a rather arbitrary line. As the LMS Study states:

“The proposed boundary to Area 12-1 between Misley Copse and Down Place and between Down Place and the current AONB boundary does not follow any defined land-scape features (such as a ridge line, wood-land edges, or prominent field boundary) or reflect a decline in landscape and scenic quality or changes in landscape character (for instance increased urban influences) which might justify exclusion.” (Section 6. p23)

The Surrey Hills AONB Planning Advisor Clive Smith, in writing to the Surrey Hills AONB Board on 25th June 2013, appears to have made the same observation. He states, “the proposed boundaries do appear in places tortuous and perhaps pedantic and the consideration of scale of landscape perhaps should be consid-ered.” Mr Smith also highlighted that Natural England had advised “that boundaries should follow clear physical features such as settlement boundaries and roads”. (See Annex 3.)

Perhaps a clue as why Surrey CC/Surrey Hills AONB Board did not opt for a more robust boundary (instead selecting one which in plac-es runs through the middle of a field) and why there was no AONB evaluation of the land at Blackwell Farm lies in this extract from a report by Surrey Hills AONB Board Director Rob Fairbanks:

“The Surrey Hills Board has established that there is a high level of support for a boundary modification among local authorities, including parish councils, although concerns have been raised by Waverley and Guildford regarding the potential implication that the evaluation process and areas identified for evaluation may have on their emerging Core Strategies. As a re-sult, it is important that all the local authorities on the AONB Board will be involved on any project steering group and the AONB partners will be made aware of the sensitive nature of the work.” – item 7 (Annex 4).

This begs the question: why do the local authorities need to be on the steering group for this project? – determining whether landscape is of AONB quality should be a purely technical exercise.

As most of land parcel H2 has been identified as an evaluation area for the forthcoming AONB boundary review, it is reasonable that GBC should treat it as though it is within the AONB during this local planning process. The field in the north eastern corner, adjacent to Chapel House Farm, which was not considered in the LMS Study to meet the criteria for AONB, should be retained, as an “important buffer and transitional landscape on the west-ern edge of Guildford” as recommended by LMS (Hogs Back Natural Beauty Evaluation, June 2016, p19.)

Harm to the AONB

The proposed access road to the new development, link-ing the site to the A31 in the south and to Gill Avenue in the north, would pass through the existing AONB, cre-ating a large scar across the northern slopes of the ridge, and bisecting a tree-
tunnelled, 18th century parkland drive – an attractive feature of the AONB. The road would carry two lanes of traffic and
would involve a complex junction on the ridge, with substantial environmental consequences (and cost). The lighting
associated with such an junction would also have an impact on the AONB for miles around.

The NPPF is clear that AONBs should be afforded the highest level of protection in relation to landscape and scenic
beauty. All development proposals within and ad-jacent to the AONB must conserve or enhance its special qualities. The
NPPF also makes it clear that applications for major development in the AONB will be refused unless exceptional
circumstances are demonstrated and the development is proven to be in the public’s interest (Section 1, Para 116).

Guildford Borough Council has not demonstrated that the proposed housing development or the extension of the Research
Park, or the proposed link road from the A31 to Gill Avenue, is in the wider public interest. Indeed, the increased traffic
through the already congested Egerton Road/Gill Avenue junction, which would result from the development, would
impede emergency vehicles travel-ling to the Hospital and this would be very much against public interest. It would also
impede commuter traffic travelling to the Hospital and Research Park (to major centres of employment) from the east.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

- Save Hogs Back Brochure (electronic) (6).pdf (2.0 MB)
- KJS response (rev c2).pdf (2.6 MB)

Comment ID: PSLPS16/8064   Respondent: 8729217 / Karen Stevens   Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally
Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Exceptional circumstances

Although the Council does not cite any exceptional circumstances that would offset harm to the AONB within the Local
Plan or its supporting evidence, Council Leader Paul Spooner has put forward a number of benefits that he considers the
development would deliver. These were outlined in his answer to my question to the Council Executive Committee on May
11, 2016 (See http://www2.guildford.gov.uk/councilmeetings/documents/b1616/
Supplementary%20Information%20Sheet%2011th-May-2016%20Executive.pdf?T=9) and include:

1. Provision of the access road through the site, which will provide an alternative route into Surrey Research Park
and the Royal Surrey County Hospital from the west via the A31 and relieve pressure on the A3 and Egerton
Road.
2. Provision of on-site infrastructure, including traveller pitches, a new local centre with associated community and
retail uses, a primary school, part of the Sus-tainable Movement Corridor linking the site to the town centre and
beyond, Suitable Alternative Natural Greenspace (SANG) and other open space.
3. A significant expansion of the Surrey Research Park, which will enable Guildford to build on its knowl-edge-
based industry, which is of regional significance.
4. Provide enhanced justification to Government for a new Guildford West railway station as there will be a better
business case with the additional employment and residential demand.

I have outlined below why I do not believe that any of these “benefits”, either alone or collectively, can be considered
“exceptional” enough to justify:
• taking 78 Ha out of green belt
• harming the AONB and its setting
• threatening further areas of green belt and AONB in future years.

Provision of an alternative route to the Surrey Research Park and Hospital
See Section 3 (Viability)

Provision of on-site infrastructure,
Cllr Spooner cites the provision of a range of infrastructure as a benefit to the site and the existing community. This includes:

- traveller pitches,
- a new local centre with associated community and retail uses,
- a primary school,
- part of the Sustainable Movement Corridor linking the site to the town centre and beyond,
- Suitable Alternative Natural Greenspace (SANG) and other open space.

Traveller pitches
From an infrastructure point of view, this site offers no particular benefit as a location for traveller pitches. As stated earlier, Blackwell Farm is in a rural location, disconnected from the fabric of the town, and has no sewerage or gas infrastructure, no schools etc. Furthermore, the requirement for traveller pitches can be met in other locations, which

- are not performing the functions of green belt so strongly
- do not form the setting to the AONB
- have not been identified as a potential candidate area for inclusion within the revised Surrey Hills AONB boundary
- do not require a new road and 4-way junction to be built in the AONB.

The provision of traveller pitches, therefore, does not form an “exceptional” circumstance

New local centre with associated community and retail uses
Any new local centre at this location would be of benefit only to those people living in the proposed new Blackwell Farm housing development (not the existing community). If 1,800 houses were not located at Blackwell Farm, then there would be no need for this facility. It is therefore, not, in itself, an “exceptional circumstance” for building in the green belt and developing the AONB.

Primary school
A new primary school, like the local centre, would be provided largely to serve the proposed new community at Blackwell Farm. There are already four junior schools serving this west side of Guildford, three of which are within a two-mile radius of Blackwell Farm – Guildford Grove School (1.1 miles away), Queen Eleanor’s C of E (aided) School, (1.3 miles away), St Joseph’s Catholic Primary School (1.7 miles away). If there is a need for additional school places to serve the existing community, these could be provided as part of Guildford Grove School on the existing King’s College School campus. King’s College is currently 57% undersubscribed.

Although King’s College is a high school, it is adjacent to the Grove School and could easily offer additional class-rooms to its neighbouring junior school if these were needed. Even if the under-utilised classrooms at King’s College were not deemed suitable, the campus itself is very large (see image above right) and there is plenty of space for Grove School to expand. There would be no significant loss of playing fields, and in any case the University-owned Surrey Sports Park, with its many playing fields, is only a 13 minute walk from the school, and a 3 minute drive away (without traffic). GBC does not seem to have explored these alternatives at all, and instead has chosen to site a new school at Blackwell Farm in the green belt (within the setting to the AONB).

The provision of a school is not an “exceptional circumstance” for building in this environmentally sensitive area. There are other, more appropriate, locations for a new school – locations that are not served as well by existing schools, and which would result in fewer peak-hour traffic movements (as children would be travelling shorter distances to go to school). This would be a more sensible option than bringing more peak-hour traffic into this already congested area.
Sustainable Movement Corridor
The Sustainable Movement Corridor is described in the draft Local Plan as “providing a priority route for buses, pedestrians and cyclists through the Guildford Urban area and serving new communities at Blackwell Farm, Gos-den Hill Farm and Slyfield Area Regeneration Project”. Beyond this, no further detail is given, other than that the Corridor is estimated to cost between £80-90 million and that this cost would be shared between the developer and the Local Growth Fund (via the Local Enterprise Partner-ship). No economic viability assessment for the scheme is provided, and there is no account of how the road net-work would be used or how proposed bus service would be funded going forwards (especially relevant in a climate where Surrey County Council is cutting back on its public transport budget).

Aside from the question of its economic viability, the provision of the Sustainable Movement Corridor is not dependent on the Blackwell Farm development going ahead in any way other than, perhaps, through the fund-ing that would be provided by the University. Allowing development in exchange for funding for infrastructure does not form an “exceptional circumstance” for building in the green belt and in the AONB setting. If this were to be the case, a developer need only offer to pay for a school or road, and it would be given carte blanche to build anywhere.

SANG and other open space
The final on-site benefit Cllr Spooner cites is the provision of SANG and other open space.

SANG - The University has confirmed at a stakeholder meeting held in March 2015 that it would only provide SANG to mitigate against development on its own land-holdings; it would not offer SANG to unlock housing elsewhere. It seems perverse to argue that SANG is a benefit to the wider community because it enables land in the green belt and AONB to be developed.

The submission draft of the Local Plan does not identify which area of Blackwell Farm will be allocated as SANG on Blackwell Farm. In a previous (Regulation 18) draft of the Local Plan, the ancient woodland at Manor Copse/Strawberry Grove was allocated for this purpose. Natu-ral England has stated that the identification of SANGs should “seek to avoid sites of high nature conservation value”, such as ancient woodland, which are likely to be damaged by increased visitor numbers. [Natural England Guidelines for the creation of Suitable Accessible Natural Green Space (SANGS) Introduction 12-06-08]

Open space - The land at Blackwell Farm is already en-joyed by the residents of the surrounding communities of Park Barn, Wood Street Village, Onslow Village, Down Place and Flexford, who walk along the public/permissive footpaths and bridleway that cross the site. [Footnote 1] It is difficult to see what benefit developing 78 hectares of this farmland would bring to these residents.

Furthermore, the University has already promised to open up Blackwell Farm for “informal recreation”. In the run up to the 2003 Local Plan, in order to allay fears at the time that the boundary review at Manor Farm signalled further loss of green belt at the adjacent Blackwell Farm, the University stated:

“The University has no plans for the development of its adjoining land at Blackwell Farm. In partnership with the Borough Council, the University intends to explore how the woodland and adjoining land at Blackwell Farm could be opened up to the public for informal rec-reation and link to existing areas of open space. Access would be gained via existing public footpaths crossing the site.” [Surrey Matters (University of Surrey news-letter), published in January 1998]

This intention was also included in GBC’s Local Plan 2003:

“The University has indicated that they...would like to explore how best appropriate parts of its Blackwell Farm lands might be further opened up to the com-munity (including the possibility of a country park).” (16.26)

The University has done nothing to honour this commit-ment - erecting signs that discouraged use of Blackwell Farm and allowing the rides through the ancient wood-land to become impassable. These signs remained in place until June 2015, when new signs appeared.

Given that the University has already committed to pro-vide this informal recreation space at Blackwell Farm (and reneged on it), there can be little benefit to the community receiving the same (potentially empty) promise again.
The research park is a low density development and there is great potential to increase capacity on this site - without having to expand onto Blackwell Farm next door.

Expansion of the Research Park
Cllr Spooner writes in response to my formal question to the Council Executive:

“A particular benefit of allocating Blackwell Farm is that it enables an extension to the Surrey Research Park, which is key to meeting our objectively assessed need. It is also a unique opportunity that enables us to build on knowledge-based employment that is of regional significance. This type of specialist employment could not be provided elsewhere in the borough.” [Supplementary Information Sheet, Guildford Borough Council Exec Meeting, May 11, 2016]

This “particular benefit” of allocating Blackwell Farm therefore seems to hinge on two arguments:

- Extension to the Surrey Research Park is key to meeting GBC’s objectively assessed need
- The opportunity to build on Guildford’s knowledge-based employment is unique to the Research Park and cannot be provided elsewhere in the borough

Both these arguments can be challenged, firstly:

- There is no need to extend the Research Park in order to meet GBC’s objectively assessed need because there is enough space on the existing footprint of the Research Park to meet the likely growth in the research and development (R&D) sector.
- There is already granted consent to expand by a further 9,000 square metres (14%). This space has been available for 10 years and is still to find a taker. It would appear from GBC’s own analysis that this would be sufficient to meet the demand for floor space in this sector. Guildford Borough’s Economic Land Needs Assessment (ELNA 2015), gives an annual floor space demand of 0.7% for office/research and development (Table 6-4 PMA Floorspace Growth Forecast CAGR). The necessary growth in floor space over the plan period is therefore 12% (17 years x 0.7%), which is less than the current expansion space of 14%.
- Even if growth in the R&D sector were to exceed that forecast in the ELNA, the existing Research Park has been built at a very low density. It provides just 65,000m² of office space on 27 hectares of land. There is scope to use this land more efficiently by building additional office space above the surface car parks, and by introducing mixed-use development across the site (so the area can be used for 24 hours a day, rather than just during office hours). Building at the same plot-ratio as the approved Master Plan for Manor Park would provide six times the office accommodation on the Research Park than exists at present. With better design on its existing brownfield estate, the University has the room to grow for the next 100 years without taking more greenfield land out of green belt.

Secondly, it is not true that the Surrey Research Park is unique in providing knowledge-based employment and that this type of employment cannot be provided elsewhere in the borough:

Policy E4 states: “The existing 28 hectare Surrey Research Park and the proposed extension will be protected for business use comprising offices, research, development and design activities, in any science, including social science, falling within Use Classes B1 (a), (b) and (c) of the Town and Country Planning (use Classes) Order 1987 (as amended), that is complementary to the activities of the University of Surrey.”

The inclusion of B1c uses (light industrial) will mean that the Surrey Research Park would lose its status as a “research park” and become no different to any business park across the borough; it certainly would not be “unique” as a centre for knowledge-based industry.

Knowledge-based businesses are already located in other areas of the borough, for example EA Games is situated in the town centre (Onslow Street), and advertises itself as “a 5 minute walk from the main train station and only minutes away from the town’s main shops, restaurants and bars”.

There is no evidence to suggest that businesses prefer out-of-town locations, in fact the ELNA suggests that the opposite is the case.
“Where sites are available the Council could seek to encourage office/R&D development in town centres. The town centre is a more sustainable location and there is evidence of demand from potential occupiers which currently do not necessarily have town centre offices that match their needs.” (ELNA, 7.3.2)

The University has argued that an important factor in attracting knowledge-based businesses to the Research Park is the proximity to, and contacts with, the University.

However, a survey conducted by the University in 2002 showed that less than half of the companies on the site (27 out of 46) believed this factor was of “weak or no influence”, and only 6 cited it as the “most important” factor.

The same survey also showed that links with other tenants on the Research Park was of even less importance (39 out of 46 said it was of “weak or no influence” and none felt it was the “most important” location factor). [See Annex 6 “A Vision of the future of Science Parks” para 28, by Dr Malcolm Parry, Managing Director, Surrey Research Park and University Planning Officer, 2002]. Based on this survey, it would appear that the Research Park offers little additional benefit to knowledge-based companies over other locations. In fact, the survey showed that the most influential factor attracting businesses was Guildford’s close proximity to international airports, road and rail links, which is applicable to locations almost anywhere in the borough.

Even if proximity to the University were considered essential to the growth of this business sector, Blackwell Farm would not be the best location to offer this. There are many sites in the urban centre much nearer to the University campus at Stag Hill, than this one. Manor Park is home only to the recently built Vet School.

Provide enhanced justification to Government for a new Guildford West railway station

As Cllr Spooner acknowledges, the business case for the new Guildford West station has not been proven. It also does not appear that the traffic impact of the new station has been looked at in any detail, as a rail halt at this location might bring more commuter traffic to this heavily congested area. Certainly the proposed station has not yet been assessed by Network Rail from an engineering or economic point of view, as a Freedom of Information request reveals:

“We understand that the Council has engaged a consultant to produce a GRIP 2 study to further investigate the feasibility of a station called Guildford West (previously known as Park Barn). We intend to review the study once it has finished and provide feedback from a railway perspective.”

Even if the new rail halt were to be considered viable from an engineering point of view (and GBC planners have acknowledged that there are likely to be problems with gradients at this location), it does not seem right that GBC should be ‘manufacturing’ an economic case for the station by proposing more housing and employment land in the vicinity. This certainly does not seem to be an ‘exceptional circumstance’ for building in the green belt within the AONB setting.

Conclusion

Blackwell Farm is the only major development being put forward in the Local Plan that will impact on the AONB and the setting of the AONB. In law, AONBs should be given the “highest level of protection”. We do not believe that GBC has given due consideration to the AONB; but rather has ignored this constraint entirely, and so the Plan is unsound in this regard.

The Council has not even cited the exceptional circumstances for development on Blackwell Farm, so it is impossible for the public to weigh up these against the harm to the AONB, when being consulted on the Plan. Rather than protecting this area of high quality landscape, Surrey CC and Guildford Borough Council almost seem to be covering up the fact of its beauty by excluding it from proper landscape assessment and by misleading the public into believing that it is a site within the “Guildford Urban Area” respectively.

Viability

The provision of an alternative route to the Surrey Research Park and Hospital, which Cllr Spooner has de-scribed as the “main benefit” to the community of developing Blackwell Farm, is not outlined in any detail. Whilst this alternative route might be a benefit to the owner of the Research Park (through its ability to charge higher rates for the office space) and to some businesses on the Park (by attracting more staff from the west), the greatest community benefits would be to those staff members who might be living on the west of the borough who would use the new route to access their place of work without having to join the increased queues at Gill Avenue and the Tesco roundabout. However the net benefit does not
appear to have been assessed (which needs to consider increased journey time for any workers who would be accessing the site from other parts of Guildford (via Gill Avenue/Tesco roundabout) from the east and the net community benefit could easily be negative as a result of this new development.

Furthermore, from information provided in the Plan and in the supporting Transport Assessment, and from communications with Surrey County Council’s Transport Development Planning Manager West, Mike Green (see Annex 7), it seems that the new road depends on the following 4 schemes:

1. A new signalised all-ways junction on the A31
2. A tortuous road through the new development (to deter rat running) and possibly a secondary route with restricted access, possibly controlled by automatic number plate recognition (ANPR)
3. Changes to the Tesco roundabout on Gill Avenue
4. Widening of the A3

The viability of implementing these 4 schemes is covered in the Technical Note prepared by traffic consultant RGP and commissioned jointly by Compton PC and Compton Village Association (Annex 8). However, at least three of these schemes are fraught with difficulties that make it questionable, from a highways point of view, whether they could be delivered at all.

1. It is not certain that a signalised all-ways junction would be adequate to cope with the volume of traffic that would use the new route. This is the conclusion reached in RGP’s Technical Note. Surrey County Council acknowledges that a roundabout on the A31 further west would be a better option in highways terms, and indeed a roundabout further west was the option of choice put forward by the University when it first outlined its plans for Blackwell Farm to the Guildford Society on February 18, 2014. Guildford Borough Council has since stated that a roundabout would be unacceptable in terms of impact on the AONB and traffic. The Council has failed to provide any details of route options studies taken for this access, despite repeated requests (see Annex 9) and despite Surrey County Council stating that such studies were undertaken by Guildford Borough Council and are in the public domain. Even if a signalised junction were to prove adequate, RGP points out that this would require four lanes of traffic, and that in order to accommodate this, the bridge over the A3 would need to be widened, adding significantly to the overall cost of the scheme and casting doubt on its economic viability.

2. Taking traffic on a tortuous route through a residential estate simply to deter rat running is neither sustainable nor safe, and such a route would not be suitable for use by emergency vehicles from the hospital, which often need to travel at speed. The roads through the Manor Park Campus and the Research Park were not designed for a large volume of traffic. Indeed, Manor Park was promised by the University as a “world class car-free campus” so putting a major highway through it would mean another broken commitment.

The Manor Farm Master Plan (2003) also makes it clear that this was to be “a sustainable and predominantly car-free campus, with the objective of restricting net increase in car travel to less than 5% of the University’s current and committed traffic generation (including the Surrey Research Park) measured at peak times.” (Section 5.1)

The road would also have to pass through, or very close to, a belt of ancient woodland. Given that commuters to Guildford from the west would be feeding into the existing bottleneck at Egerton Road/Gill Avenue, traffic is likely to be at a standstill during peak hours and this will create further problems for residents, students and the ancient woodland in terms of pollution.

ANPR would be fraught with difficulties – legal and administrative. What about visitors choosing to leave by the opposite route or delivery vehicles continuing through the site and out the other side? How would GBC keep up with changes in residents’/employees’ vehicles and who profits from fines or bears any losses? This whole idea smacks of “clutching at straws” and does not appear to have been thought through.

1. The Strategic Highway Assessment (June 2016) mentions “improvements to the Tesco and Cathedral junction” (3.2.1), but no further illustration or explanation of these improvements is given. Again, GBC has ignored repeated requests to have these modifications explained. What is made clear, however, is that these “improvements”, whilst they might alleviate traffic on the A3, would not mitigate against the volume of traffic generated by the new development at Blackwell Farm, and that this would impact on the Egerton Road/Gill Avenue junction.
“although there is a proposal to improve it [Tesco Junction], the additional access to and from the Blackwell Farm development via Gill Avenue results in a significant increase in trips on this part of the network. This is, in turn, impacting on junctions for which there are no schemes proposed at the moment, highlighting where additional improvements may be necessary. An example of this is the Egerton Road/Gill Avenue junction adjacent to the Royal Surrey County Hospital.”

(14.9.5)

It is not clear what improvement could be made to increase capacity at this junction: Gill Avenue has already been widened and widening Egerton Road would involve widening the road bridge over the railway line, for which no funding has been allocated.

Additional traffic at this junction could potentially impede access/egress from the A&E unit, which was identified as a problem by the Inspector at the 2003 Local Plan Inquiry. He recommended a cap of 5% on traffic generated by the Manor Farm site.

The Inspector’s Report states, “As a safeguard, it is implicit in the agreement that if the 5% ceiling cannot be achieved, the scale of development would also need to be limited.” The University’s latest survey shows that overall traffic with permissions already granted would exceed the 5% cap. The University consultant (PBA) has fudged the figures by removing buses and construction vehicles. Even had the cap not been breached, it would certainly be once the cars from 1,800 homes, an extended business park, a school, a supermarket and a new station are added to the mix. Further-more, the change from B1a (offices) to B1c (light industrial) may mean that more HGVs use this route, which could add to problems at this junction as well as on the business park and student campus – neither of which were designed for this type of traffic.

The Blackwell Farm development is dependent on Highways England committing to widening of the A3 between the A31 and A320. To date, HE has not told Guildford Borough Council what it plans to do, and adding a lane along this stretch is not straightforward because, as Neil Taylor (Director of Development at Guildford Borough Council) has pointed out, it is a “tight squeeze”. Putting forward a site without any tangible commitment from HE to provide the infrastructure necessary for sustainable delivery goes against Government policy (NPPF Section 6; para 47).

In addition to the difficulties in providing access to this proposed site from a highways point of view, it would appear that the new access road is unlikely to be economically viable either. The Technical Note produced by RGP indicates that the costs involved (£50-60m) have been grossly underestimated, and that they would not justify a 1,800 home development. In addition to the cost of road infrastructure, there are other infrastructure costs, eg:

- Suds (or reservoirs) to prevent surface water run-off flooding residential areas further north, eg at Wood Street Village. During heavy rainfall there would be 3.89 million gallons of water running off the Hog’s Back (based on one inch per hour, and one inch on one acre = 22,000 gallons). This would require at least two suds to release flows at a controlled rate, one of which would ideally need to be located in the area allocated for the Research Park extension (due to topography)
- A primary school
- Sewerage - 1,800 homes would produce 300,000 gallons of sewage per day. It is not explained in the Plan where this sewage would be treated. If it were directed to the Hockford sewage treatment works at Pirbright, this would mean building new trunk sewers across Broadstreet Common, as the existing sewers are already overloaded. Similarly, directing the sewage to the relocated treatment works in Slyfield would involve building new trunk sewers. Both options would likely require a new pumping station on the site
- Construction costs. These are likely to be unusually high - Blackwell Farm is situated where clay is next to chalk and this can lead to instability and subsidence. The whole area already suffers subsidence problems – it was the reason the former Vice Chancellor Professor Snowden cited for vacating his official residence at Blackwell Farm. It may also have been the reason why UniS demolished the halls of residence (Stag Hill is also on clay).

To mitigate against this, deeper foundations would be required, adding to building costs. The whole area is also subject to high levels of radon and houses located here may require remedial ventilation, again pushing up the costs.

Given all the above factors, it seems highly unlikely that the developer would be able to provide a significant proportion of affordable houses on the Blackwell Farm site.
Conclusion
Aside from environmental and landscape considerations – ie the loss of important and effective green belt and harm to the AONB and its setting – there are clearly significant infrastructure problems to be overcome before this site could be allocated in the Local Plan. The site infrastructure is not deliverable within the budget outlined in the Plan, which is already well above what would be expected for a development of this size. More worrying, perhaps, is that development here would exacerbate existing problems on the road network, and at the north east end of the site it would impede access to the hospital’s A&E department and a major incident unit. There is a sense that this site has been thrown into the mix simply to keep the University happy, with the intention of resolving the infrastructure/access problems down the line (at the planning application stage). This approach to plan making is far from sound, and proposals mentioned by Surrey County Highways and the University to introduce tortuous routes and Automatic Number Plate Recognition are unsustainable and unrealistic. If GBC has to resort to such measures to try to make the access work, then clearly a large-scale development at Blackwell Farm is in the wrong location.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:  
- Save Hogs Back Brochure (electronic) (6).pdf (2.0 MB)
- KJS response (rev c2).pdf (2.6 MB)

Comment ID:  PSLPS16/8300  Respondent:  8729217 / Karen Stevens  Agent:  

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Rather than conducting this consultation in the spirit of openness and fairness, GBC appears to be bending the facts to meet its own agenda, which includes plans to develop Blackwell Farm. Most notable examples of this are:

- The description of Blackwell Farm as within the “Guildford Urban Area” when it clearly is not
- The description of Blackwell Farm as an “urban extension” and the doctoring of maps to remove belts of woodland to make the site look as though it is adjacent to the Research Park.
- Telling the public that the Plan has no development within the AGLV and AONB, when the Blackwell Farm development and associated infrastructure falls within both these land designations.
- The video, which appears prominently on the Local Plan web page, originally purporting to reflect “the views of local people” (later changed to “some local people”). This video is unbalanced and unrepresentative. More than 7,000 people responded to the last consultation on the draft Local Plan and it was widely accepted that the vast majority of these objected to it. Yet we did not hear a single voice of dissent in this video.
- Questions from some Councillors to public speakers in the chamber have shown a clear bias towards development of Blackwell Farm.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
- Expansion of the Research Park onto green belt and the setting to the AONB requires exceptional circumstances, which have not been outlined in the plan. This policy does not therefore comply with planning law.

- There is ample opportunity for the Research Park to grow without increasing its existing footprint - there is already capacity for the growth predicted in the ELNA and, if further growth were needed, it could build more densely by utilising space above its extensive surface car parks.

- Expansion of the Research Park at Blackwell Farm is not sound as there is no viable access to Blackwell Farm, and it would not be possible to provide such an access that was viable from an economic or highways point of view.

- GBC has shown no Duty to cooperate in planning for an extension of the Research Park.

- GBC has not explored in detail any joined-up approaches to providing employment land across the region, dismissing off-hand such ideas on the basis that “we don’t want Guildford to be a dormitory town”. [Stephen Mansbridge, April 1, 2014].

In particular GBC is ignoring Bordon Eco-town, a brownfield site outside the Green Belt, which is less than 30 minutes from Guildford by road, and is looking for high quality businesses to locate there. This is exactly the right area for expansion of some of Guildford's businesses (particularly those on the Research Park).

There is also opportunity to develop rail links using existing lines and disused MOD lines.

In the Whitehill and Bordon Inward Investment Strategy 2012 Consultation Draft the masterplan recognises that “the town does not operate in isolation of its neighbouring business centres, such as Alton, Petersfield and Farnham and larger economic centres such as Portsmouth, Farnborough, Basingstoke and Guildford.”

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (No)

No I do not agree that the evidence used for the Submission draft of the Local Plan Strategy and Sites is adequate or relevant. The Strategic Housing Market Assessment (SHMA), the Strategic Highways Assessment Report (SHAR), the Sustainability Appraisal and the Green Belt and Countryside Study (GB&CS) are all either flawed, provide incomplete information or information that is not properly used to inform the Plan.

SHMA - I support the commentary on the SHMA provided by Neil Taylor (on behalf of the Guildford Residents Association) and Richard Bate (on behalf of CPRE). Furthermore, I do not believe that residents are being consulted properly on Plan when they have no means of understanding how the objectively assessed housing need has been derived. Without the ability to check this figure (and without any assurance that councillors have scrutinised this), it is impossible to know how many sites are required to meet the borough’s need.

SHAR - The SHAR is very thin on detail. There is no clear indication of how junctions will operate (eg the proposed 4-way junction at the top of the Farnham Road (on the A31)), or which routes new roads will take (eg the proposed link road from the A31 to Gill Avenue). No details are provided about how schemes have been costed (eg the A31-Gill Ave link road and the Sustainable Movement Corridor) or about what other alternatives have been considered and why they were ruled out. I fully support the commentary in the Technical Note by traffic consultant RGP on the proposed access to site A26 (Blackwell Farm), which was commissioned by Compton Parish Council.

Sustainability Appraisal - This appraisal appears to be based purely on grounds of walking distance to a selection of nine facilities. Even within this limited appraisal, there are some oddities: the most obvious point of ‘walking distance to a bus stop’ has been omitted on the dubious grounds that everywhere will be served by buses, but the nearly-pointless ‘walking distance to an A-road’ remains in the mix. It isn't clear how the Sustainability Appraisal is being used to inform site selection decisions. Parcel H2 (Blackwell Farm) is ranked 14 overall, in other words it is one of the least sustainable sites, yet it has been put forward for development.

Green Belt and Countryside Study - This study is inconsistent and flawed in its analysis. The sensitivity test it uses for determining how effectively a particular site meets green-belt purposes is simply to count how many of the purposes are met. This is too simplistic and gives little consideration to how well a particular function is met. The study also fails to take into account landscape character or environmental factors such as ancient woodland or the setting to the AONB.

The comments made by a member of Save Hogs Back at the Regulation 18 consultation were ignored.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents: GBCS Feedback Local Plan (4).pdf (2.3 MB)

Comment ID: SQLP16/625  Respondent: 8729217 / Karen Stevens  Agent:  

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 2: Legal compliance

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (No)
I do not consider that the Plan is legally compliant because huge areas have been taken out of green belt for development

- without any exceptional circumstances being put forward to justify this
- without any exceptional circumstances being put forward for a major road through the AONB or a major settlement in the setting to the AONB
- without proper constraints being applied (in terms of landscape designations or lack of infrastructure)
- without proper consideration of the viability of development schemes, especially from a highways point of view
- without proper use of the evidence base in the selection of sites

All of the above are necessary to make Guildford’s Local Plan legally compliant.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/626  Respondent: 8729217 / Karen Stevens  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (No)

I do not consider that the Plan is sound because huge areas have been taken out of green belt for development

- without an accompanying town master plan, which would demonstrate that proposals for the urban areas and villages and countryside are joined up
- without taking into account the views of the residents, particularly with regard to the levels of growth proposed for the borough and the feasibility of delivering this.
- without putting forward information relating to individual sites in a fair and balanced manner.

All of the above are necessary to make Guildford’s Local Plan sound.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/627  Respondent: 8729217 / Karen Stevens  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 4: Duty to cooperate

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (No)
I do not believe that GBC has complied fully with the Duty to Cooperate. The Strategic Housing Market Area, whilst it includes the neighbouring boroughs of Waverley and Woking, omits Rushmore entirely. Rushmore also has an impact on Guildford’s housing, employment and transport links.

GBC has not explored in detail any joined-up approaches to providing employment land across the region, dismissing off-hand such ideas on the basis that “we don’t want Guildford to be a dormitory town”. [Stephen Mansbridge, April 1, 2014].

In particular GBC is ignoring Bordon Eco-town, a brownfield site outside the Green Belt, which is less than 30 minutes from Guildford by road, and is looking for high quality businesses to locate there. This is exactly the right area for expansion of some of Guildford’s businesses (particularly those on the Research Park).

There is also opportunity to develop rail links using existing lines and disused MOD lines.

In the Whitehill and Bordon Inward Investment Strategy 2012 Consultation Draft the masterplan recognises that "the town does not operate in isolation of its neighbouring business centres, such as Alton, Petersfield and Farnham and larger economic centres such as Portsmouth, Farnborough, Basingstoke and Guildford."

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/628  Respondent: 8729217 / Karen Stevens  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (Yes)

I would like to participate in the Examination. I have engaged positively in the Local Plan from the outset. I have coordinated the Save Hogs Back campaign from its inception and am very familiar with the arguments for and against developing the Blackwell Farm site (Policy A26). For the past two years, I have immersed myself in the Local Plan, regularly attending meetings of the Guildford Residents Association (GRA), the Guildford Society (GSoc), the Campaign to Protect Rural England (CPRE), Guildford Borough Council and various parish councils and residents groups. I am a member of the GRA, GSoc and CPRE (Guildford branch), and up until May 2016, I was Chairman of Compton Parish Council.

I have prepared detailed responses to the Issues and Options Consultation and the Regulation 18 Local Plan consultations, which I hope will show the depth of knowledge that will allow me a place at the Examination.

The Save Hogs Back campaign is supported by three Local Parish Councils and numerous special interest groups and residents groups on the west of Guildford. It has helped to raise funds to draw on the knowledge of a planning expert to inform our contributions.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/3999  Respondent: 8729217 / Karen Stevens  Agent:
My overall objections to development on Blackwell Farm were spelt out last year in Local Plan Consultation – Objection to site selection Blackwell Farm (A26) – July 2016. Issues raised in this document apply to the amended proposals in the latest Local Plan document. I have therefore commented on the following specific changes in policy A26 (Blackwell Farm) made in the latest iteration of the Local Plan:

- The phased delivery of housing, with a minimum of 1,500 delivered during the Plan period (Allocation (1))
- The addition of a new secondary school on the site (up to six form entry, of which two forms are needed for the housing on the site, and the remainder for the wider area) (Allocation (9))
- Changes to vehicular access (Infrastructure requirement (1))
- The proposal to “control” a through-vehicular link (Infrastructure requirement (3))
- The requirement for the developer to “have regard to” the Sustainable Movement Corridor Supplementary Planning Document
- The addition of a significant bus network to serve the site and key destinations including the existing western suburbs of Guildford and the town centre (Infrastructure Requirement (5))

I have outlined the reason for my objections to these changes below.

**The phased delivery of housing, with a minimum of 1,500 delivered during the Plan period (Allocation (1))**

I object to the delivery of a minimum of 1,500 homes on Blackwell Farm in this iteration of the Local Plan. There is an oversupply of housing built into this Plan, even with the inflated OAN of 12,426 homes (3.2), and therefore it is not acceptable to put forward an area of high environmental sensitivity that is not needed in this Local Plan period. Any buffer required by the plan could be provided by building more densely. The objectively assessed housing need has reduced from 13,860 to 12,426 (3.2). Blackwell Farm should not have been selected as a proposed development area due to:

- Its impact of the development on the Surrey Hills Area of Outstanding Natural Beauty (AONB)
- Its role in effectively fulfilling the purposes of the green belt
- Its access problems, which render the site undeliverable

The impact on the AONB was spelt out in detail in my response to the consultation of July 2016 and in the Hog’s Back Natural Beauty Evaluation by Landscape Architects Land Management Services (Annex 2).

The role of Blackwell Farm in fulfilling the purposes of Green Belt was covered in my July 2016 response and also in the report titled: The Purpose of Green Belt – Blackwell Farm, (Annex 6).

Proposed access arrangements have changed in this latest draft of the Local Plan, and my comments/ objections are set out on pages 32 to 39.

**The addition of a new secondary school on the site**

The addition of a secondary school at Blackwell Farm would exacerbate traffic problems on the adjacent road network (local and strategic), particularly as this latest version of the Plan states that the school is to be sited “to the north of the site” (Infrastructure schedule SED3). The inclusion of a six-form entry school, which would attract significant peak-time traffic through a highly congested area, has not been considered in the traffic model.

**Changes to vehicular access**
I object to the changes to vehicular access to the A26 (Blackwell Farm) PDA. Instead of citing the A31 as the primary access to the development, the latest version of the Plan does not determine where the primary access will be. Similarly, the access/egress to Egerton Road is only ‘preferably’ via Gill Avenue. Other options for the access to Egerton Road are not given. This suggests that the routes into and out of the site have not yet been established or properly thought through.

[Figure 13] – Tailbacks from the Tesco roundabout onto the A3 and back to the A31 mean that ambulances are delayed in responding to emergencies and it causes particular inefficiency to the ambulance service in non-emergency situations as ambulances queue up alongside other road users.

Any change that gives greater priority to the Egerton Road/Gill Avenue access/egress will result in:

• increased traffic flows across the Cathedral and Egerton Road (Tesco) roundabouts. The SHAR shows that, despite the upgrade to the Egerton Road roundabout, the junction would be over capacity (and this excludes traffic generated by the new secondary school and new “Guildford West” station);
• increased rat-running through residential roads in Onslow Village, Park Barn, and Westborough – queues already form back to Queen Eleanor’s Primary School on Queen Eleanor’s Road at morning peak times and this problem will be exacerbated as drivers rat-run through Onslow Village to avoid delays on the A31 approach into Guildford;
• increased traffic backing up onto the A3. Even if the A3 widening goes ahead (which is uncertain) the A3 will remain over capacity between the Cathedral roundabout and the A31 (see SHAR Figure 4.7 and Table 4.5); and
• delays to ambulances heading to the A&E department from the town, which lies adjacent to the roundabout. Ambulances already struggle to cross this roundabout at peak hours (Figure 13).

The proposal to control a through-vehicular link (Infrastructure requirement (3))

I object to the proposal to “control” a section of the through-vehicular link from the A31 to Gill Avenue (policy A26 Infrastructure requirement (3)). The Plan does not state how this control is to be implemented, although officers at Guildford Borough Council and Surrey County Council have suggested that automatic number plate recognition (ANPR) cameras might be used. If the access road becomes an adopted highway, the highway authority would need to agree to ANPR being used, and this is not certain (Annexes 7 and 8), which means that the controlled section of the A31- Egerton Road link may well have to remain a private road.

A private road is not a practical option as its upkeep/policing would be the responsibility of a private organisation, which would be less reliable than if it rested with the local authority. Furthermore, if the Blackwell Farm site were sold off in parcels to developers, as the University stated at its Bite Size Briefing on 12 December 2013, then responsibility for the road would be divided and it would be even more difficult to guarantee its ongoing maintenance/policing.

There is a strong risk that trying to control a section of this new road would not work in practice, and that this proposed link from the A31 to Egerton Road would become a rat run through the AONB for all the traffic heading into Guildford from the west. As discussed above and in my earlier response document, neither the local road network nor the strategic network (A3) would be able to cope with this influx of vehicles crossing the Egerton Road roundabout, even if the junction is upgraded.

In addition, the impracticality of controlling a section of this new access road would have an adverse impact at the southern (A31) end of the link. Without controls in place, the new road would attract traffic from the wider network to the south, for example from Godalming, Farncombe, and Shalford. This traffic would head north-west along the B3000 (through The Street in Compton) and north up Down Lane. Down Lane has recently been designated a “Quiet Lane” by Surrey County Council and the B3000 already experiences high volumes of traffic. High levels of nitrogen oxides, which are well above the EU legal limit, have been consistently recorded over three years at one residential location on the B3000 in Compton.

The Air Quality Review of Guildford Borough Proposed Submission Local Plan: Strategy and Sites, June 2017 states: “In 2016 a detailed air quality assessment of emissions from traffic passing through the area along the B3000 (The Street) was carried out. The results of this assessment show that there are residential receptors at which the NO2 concentration is above the associated objective. However, it is predicted that if little development takes place within the area and vehicles emissions are reduced by technological advances these objective exceedance should reduce to below the objective into the future, without additional measures being required locally.” (2.3)
Clearly any new road traffic scheme which would increase flows through Compton (such as an uncontrolled link road through Blackwell Farm) would adversely impact air quality and mean that measures need to be implemented.

**Requirement for the developer to “have regard to” the Sustainable Movement Corridor Supplementary Planning Document**

There is no published Sustainable Movement Corridor Supplementary Planning document accompanying this version of the Local Plan and therefore I object to the inclusion of a requirement that is not fully explained within this policy (A26).

The most recent proposals for the SMC involve reducing road capacity along some of the busiest sections of Guildford’s road network in order to create bus and cycle lanes. However, this is not feasible in a town that is regularly gridlocked, and which is ranked sixth among Britain’s most congested towns/cities. Furthermore, it unlikely that the SMC would encourage any kind of “modal shift” as many of the routes proposed for cyclists would be unattractive, unsafe and probably polluted.

**The addition of a significant bus network to serve the site and key destinations including the existing western suburbs of Guildford and the town centre (Infrastructure Requirement (5))**

Whilst I support sustainable transport, I have been advised by Gordon Adam, a Fellow of the Chartered Institute of Highways and Transportation[13] that Guildford town’s population is too small to sustain a viable passenger transport system and therefore I object to this proposal, and any reliance within the Plan on modal shift.

Furthermore, the infrastructure schedule does not confirm how this new bus service (BT6) is to be funded, although the suggestion is that the developer would be expected to contribute upfront towards its costs. This would add to the already unacceptable infrastructure burden placed on the developer of Blackwell Farm and raises questions of economic viability (contrary to NPPF Para 173).

**Access problems, which render the site undeliverable**

This latest draft of the Local Plan has still not satisfactorily addressed the access problems to the site and it is therefore unsound. The site is dependent on two infrastructure requirements: 1) widening of the A3 between the A31 and Stoke Roundabout; and 2) a “controlled” link from the A31 to Gill Avenue/Egerton Road Roundabout. The former is uncertain, and the latter is impractical.

[Figure 14] – Traffic on A3 northbound carriageway during the morning peak on April 24, 2017

**Widening of the A3**

The only way that the strategic road network could cope with the cumulative impact of growth on the scale proposed in the Local Plan, would be if the A3 widening RIS2 scheme went ahead[14], but any reliance on this road scheme would be misplaced as there is no certainty that it would be delivered either within the Plan period or beyond. Patrick Blake, HE Area 3 Spatial Planning Manager, writes of the scheme:

“This is not a committed scheme and we are currently at the early stages of developing a business case which will include how proposals will achieve value for money. We anticipate any decisions of schemes to be funded for the next Roads Investment Strategy to be taken in 2019. This would be a Ministerial decision (facilitated by the Department for Transport) not Highways England and timing of decisions could change.

[13] Gordon Adam is Principal Development Engineer at Wokingham Borough Council with 25 years’ experience in strategic modelling, transport planning and policy, travel planning and development control. He is a member of the Chartered Institute of Logistics, a fellow of the Chartered Institute of Highways and Transportation and a member of the Transport Planners Society

On this basis, it is accepted that there is a level of uncertainty on the delivery of critical infrastructure necessary to facilitate growth on allocated strategic sites identified in Guildford’s Local Plan. We have been working with Guildford and Surrey County Council to ensure that the Local Plan provides a planning policy framework to ensure development does not come forward ahead of critical infrastructure to mitigate any potential adverse impacts to the A3 and M25.” (Email from Patrick Blake to Karen Stevens, April 13, 2017 [Emphasis mine.] – Annex 3)

It is unsound for GBC to be basing its plan-making on the uncertain delivery of the A3 widening scheme.)

Furthermore, Table 4.5 of the Strategic Highway Assessment Report (SHAR), shows that if the A3 were to be widened, this would result in a 16% increase in traffic volumes northbound on the A31 through Compton – an area where levels of NO2 exceeding EU legal limits have consistently been recorded. The Air Quality Review accompanying the Local Plan states that this location “was not declared as an AQMA as the assessment noted that emissions from traffic were expected to decrease into the future which should lead to a decrease in NO2 concentrations measured in the area.” (4.1) It is difficult to see how GBC is going to achieve this decrease with more than 1,000 vehicles per hour passing through the area in just one direction for three hours every weekday morning.

Despite HE making it clear in its original response to the Reg 19 draft of the Local Plan that “There is still a level of uncertainty on precisely what improvements on the A3 can be delivered and the quantum of growth any potential improvements will facilitate during the Local Plan period”, and despite the known problems of air pollution in Compton that would be exacerbated if the A3 widening went ahead, GBC is pushing ahead with its development proposals, and trying to pressurise HE into changing its position and deferring strategic highways issues until the planning application stage (Annex 9 and 10). GBC also appears to be trying to brush Compton’s air pollution problem under the carpet by challenging the NO2 readings on spurious grounds (Annex 9).

“Controlled” link - A31 to Gill Avenue/Egerton Road Roundabout

Rights of way

The Council’s Deputy Leader has stated that delivery of the Blackwell Farm development is dependent on a new “western link” road from the A31 to Egerton Road, and under this new plan, it is confirmed that this new road requires a section to be controlled. (Policy A21 - Infrastructure requirements (3)).

New signalised junction on A31 - impact on SRN (A3)

Although controlling the access would reduce usage of this new link, introducing a new signalised junction on the A31 would add to queues on the strategic road network (A3). This problem was identified in Highways England’s response to the 2016 Local Plan, which was subsequently withdrawn following a meeting with GBC on September 1.

This HE response stated:
“Whilst the new access is proposed just off the A3 on the adjoining A31, the traffic impacts of these proposals could potentially lead to significant detrimental impacts on the A3. Whilst Highways England has a number of significant concerns with the Strategic Highway Assessment modelling evidence base underpinning the Local Plan, it does suggest that Scenario 3, which includes the new Blackwell Farm access onto the A31, leads to a worsening of traffic impacts on the SAN.” [Emphasis mine.]

HE also adds:
“To date neither the Local Plan nor its transport evidence base has confirmed that the new access is essential for the delivery of the Blackwell Farm site in line with Circular 02/2013 or that the new junction can be delivered safely without compromising traffic flow along the A3. The proposed ‘relief to the A31/A3 junction’ has not been evidenced. The proposed new access and link road associated with the Blackwell Farm development is therefore not considered Justified, Effective, or “sound” in line with the NPPF.”

“Queues likely” signs on A31 warn of rush-hour queues on A31. On the right-hand lane, these queues lead all the way to Guildford down the Farnham Road. On the left-hand lane, these queues lead to the A3 slip road and subsequent turn off for the Tesco roundabout at Egerton Road.

The original plan for access to the Blackwell Farm site, described by the UniS was to construct “a massive piece of kit[17]” comprising of a lit, grade-separated junction on the top of the A31 ridge. This proposal followed an analysis by the University[18] for access to and from the site. The proposal to provide access along the Down Place driveway was originally dismissed as being impractical by representatives of the University. It is clear from studies undertaken by RGP and from observations of tailbacks out of Guildford (along the A31) and past the Down Place entrance that this solution is not viable.

Despite requests to look at the analysis of options for access to the site by the University and a follow up FOI request to GBC, it has not been possible to obtain a copy of the document, which originally dismissed the Down Place junction as impractical. The reason given by GBC was that this information is commercially confidential, presumably as it shows that access issues demonstrate the Blackwell Farm site development is not viable.

**New signalised junction on A31 - impact on LRN (A3)**

Although this version of the Plan no longer identifies the proposed new A31 junction as the main access to the Blackwell Farm site (Policy A26, Infrastructure Requirement (1)), this change is insufficient to address the traffic problems that would occur on the local road network to the south of Guildford should a new junction be installed on the A31.

Almost every weekday morning, peak-hour traffic heading east towards Guildford is backed up beyond the proposed site of the junction and also beyond the A3 slip road (Figure 16). GBC’s traffic model does not appear to accurately reflect this problem, and this gap in the traffic modelling data is pointed out by HE in its response:

"The journey time validation meets DMRB criteria within the borough of Guildford. However, it is noted that the A31 journey time routes five and six do not extend west of the junction with the A3. Therefore it is not known if the model is accurately reflecting peak delays on the A31 at its junction with the A3 during the average AM peak hour.” [Emphasis mine.]

If the new signalised junction goes ahead, there will be even more queuing on the A31 (Hog’s Back), especially if the A3 is also widened, as this will lead to a 9% increase in traffic on the eastbound carriageway (SHAR Table 4.5). Any hold-ups on the A31 result in increased traffic through the villages of Puttenham, Compton, Farncombe and Artington as Guildford-bound drivers seek out the fastest route. The Puttenham interchange, in particular, is an accident “hot spot”, and as discussed above, high levels of nitrogen oxides, which are well above the EU legal limit, have been consistently recorded at the A3 end of the B3000 in Compton.

[17] Presentation by Terence O'Rourke, representing University proposal at Guildford Society, February 13, 2014
[18] This position was confirmed in a discussion between UniS and a resident of Down Place.

**Figure 16** - Eastbound traffic on the A31 backing up to beyond the proposed access to the Blackwell Farm development (Morning peak, May 23, 2017)

Figure 17 (taken from Google maps) indicate levels of traffic along the A31 on the approach to Guildford on a typical weekday morning in the rush hour (during the University term). They demonstrate that when congestion occurs along the A31, vehicles will take alternative routes into Guildford, through Compton, and through the section which is experiencing air quality problems. This is contrary to the NPPF (para 171) and is therefore unsound.

Figure 17, shows that the shortest route (A) from Puttenham to Guildford Station Car Park on 08 March 2017, takes the longest journey time (31 mins). Route (B) shows that time can be saved by rat-running down Wodeland Avenue and cutting over the Mount (29 mins).

When the A31 (Hog’s Back) is congested, the longest route (in journey miles) through Compton, Binscombe, Farncombe and Artington is the quickest (23 mins). This is the route that Sat Nav systems will direct drivers to take (route (D)). Route (C) shows it is also quicker to divert onto A3 rather than take the shortest route along the A31 (25 mins). The other option
(Route (E)) also shows it might be quicker to divert off the A31, travel to Compton and cut up Down Lane to rejoin the A31 just to the east of the proposed access to the Blackwell Farm development.

**Egerton Road/Gill Avenue access - impact on SRN**

Any change that gives greater priority to the Egerton Road/Gill Avenue access/egress will add to traffic in this congested corner of Guildford and result in traffic backing up onto the A3. Even if more capacity is added to the A3 through the proposed widening scheme (which is uncertain), the A3 would remain over capacity between the Cathedral roundabout and the A31 (see SHAR Figure 4.7 and Table 4.5). In fact, the impact could be even more severe as traffic flows across the two roundabouts reported in the SHAR do not include additional traffic generated by the secondary school and the new railway station at Park Barn (Annex 12).

The problem of additional traffic from Manor Park impacting on the A3 (and on emergency vehicles to the nearby hospital A&E unit) was a concern for the Planning Inspector at the 2003 Local Plan examination when the University sought permission to move back the green belt boundary in 2005. His report stated that the University must “confine the increase in traffic generation from the Manor Farm site to no more than 5%.” However, the traffic figures put forward by the University in 2003, which were accepted by the Inspector (and which showed the University development would put almost no new traffic demands on the local community) did not include projections for the park and ride.

*Figure 17* - Journey times from Puttenham to Guildford Station - March 8, 2017 during morning peak

The University has not demonstrated that this 5% cap on traffic hasn’t been breached. The conclusions of the traffic assessment carried out by PBA in June 2013 (accompanying a planning application for a car park at Manor Park) are not valid as:

1. The traffic assessment was carried out outside term time
2. The decision was made to disregard certain journeys from the final figures.

**Egerton Road/Gill Avenue access - impact on LRN**

Any change that gives greater priority to the Egerton Road/Gill Avenue access/egress will have an impact on the surrounding road network on the west of Guildford, adding to existing peak hour congestion on Egerton Road, Gill Avenue, the A323 and on residential roads throughout Onslow Village, Park Barn, and Westborough.

Recent proposals to upgrade the Egerton Road roundabout and to introduce a rail halt at Park Barn (Policy A59) would offer some relief, but this is unlikely to be sufficient to mitigate against the impact on the road network from up to 1,800 homes, two schools, a local centre, an extended business park, a new railway station, and potentially all the additional traffic accessing the University and hospital from the west. Furthermore, under the Plan’s proposals, the capacity of the road network itself will be reduced by the need for a new bus lane/cycle lane (which would have to share road space through pinch points such as the A3 underpass).

It is evident that the Egerton Road junction would not be able to cope with traffic volumes from the Blackwell Farm development unless:

1. a link to the A31 was provided,
2. rat-running along this link was discouraged through the introduction of some kind of “control” (A26 Infrastructure Requirement (3)), and
3. the A3 was widened.

Details of how GBC plans to control this link are not provided, but it questionable whether SCC would introduce any control on a public road. It is probable, therefore, that the proposed “controlled section” would remain in private hands, and its ongoing maintenance and policing would rest with the developer(s). This is a far from reliable solution and there is a strong risk that measures to control the route would be subsequently abandoned due to its impracticality or due to funding not being forthcoming. This would have serious consequences for users of the road network on the west of Guildford and particularly for the emergency vehicles trying to reach the adjacent Royal Surrey County Hospital. Ambulances already struggle to cross this roundabout at peak hours (Figure 18).

*Figures 18 (a), (b) and (c)* - Blue light ambulance impeded by traffic at Egerton Road roundabout during morning rush hour on April 26, 2017. Traffic crossing this roundabout will increase as a result of the Blackwell Farm development.
[Figure 19] - Queues of traffic at Tesco roundabout cause tailbacks along The Chase and past Queen Eleanor’s Junior School during morning rush hour, as well as queues along the A3 and A31

Conclusion

The deliverability of the Blackwell Farm PDA depends on the provision of significant road infrastructure: the widening of a section of the A3 from the A31 to Stoke Roundabout; and a new access road from the west.

No business case has yet been proven for the widening of the A3 and HE has made it clear that the scheme is uncertain. It would therefore seem that the site is both “undeliverable” and “undevelopable” and runs counter to the NPPF (para 47, footnotes 11, 12)

“To be considered deliverable, sites should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years and in particular that development of the site is viable.” (Footnote 11)

“To be considered developable, sites should be in a suitable location for housing development and there should be a reasonable prospect that the site is available and could be viably developed at the point envisaged.” (Footnote 12).

The new western link road, upon which the site also depends, will slice through the Surrey Hills AONB and an Area of Great Landscape Value (which comprises historic parkland). It will also pass through, or very close to, a belt of ancient woodland (now acknowledged as a key consideration (Policy A26 key consideration (3))) and a scheduled ancient monument. In order to justify this level of environmental and landscape harm, GBC would need to demonstrate that the need for this new road outweighs this damage and that the road itself was practical (in terms of its impact on the surrounding road networks) and economically viable (NPPF para 173). GBC has demonstrated neither in this version of the Local Plan.

Resorting to untried and potentially unworkable measures, such as controlling part of what would become a major route into Guildford (A26 – Infrastructure requirement (3)) in order to take land out of green belt and force through development would be questionable in any circumstance, but to adopt these measures in order to force through development in the setting to an AONB, in an area that is also an AONB candidate area, is bad planning and suggests that decisions are being made based on who owns the land rather than its suitability for development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
- Annex 9 - correspondence M Furniss and F Curtis.pdf (61 KB)
- Annex 2 - Hogs Back Natural Beauty Evaluation V2 24.05.16.pdf (6.0 MB)
- Annex 10(b) 2016-07-04 ISSUE (10).PDF (2.4 MB)
- Annex 3 - correspondence P Blake and K Stevens.pdf (89 KB)
- Annex 6 - GBCS Feedback Local Plan (Dec 14).pdf (2.4 MB)
- Annex 7 - Mike Green correspondence with K Stevens.pdf (87 KB)
- Annex 10(a) 2017-06-28 TN02.pdf (254 KB)
- KJS 2017 consultation response (rev 01F).pdf (7.6 MB)
- Annex 8 - Camera Recognition - Surrey.pdf (461 KB)
- Annex 11 - GUILDFORD_STUDENT_PROPERTY_MARKET_ANALYSIS.pdf (971 KB)

Comment ID: pslp172/4001  Respondent: 8729217 / Karen Stevens  Agent:  

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A59

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I support the proposal for a new rail station at Park Barn. However, its delivery remains uncertain for the following reasons:

- There is no evidence accompanying this version of the plan that Network Rail has approved the scheme.
- The economic viability of operating such a station has not been demonstrated and it is unclear whether there is passenger demand for the train service offered on this line.
- The policy does not allocate land for taxis, buses, disabled parking and ‘kiss and ride’ (Requirement 3), and it is not confirmed that the Royal Surrey County Hospital estate would be prepared to provide this land.
- The station is located within a severely congested corner of Guildford, and the traffic generated by trips to and from this new station has not been included within the peak-hour modelling.
- The cost of the new station (£10m) will be met by the developer. This, again, would add to the already unacceptable infrastructure burden placed on the developer of Blackwell Farm and there is a risk that it would not fulfil all its infrastructure commitments (contrary to NPPF Para 173).
- There are likely to be much greater benefits for travellers in Guildford as a whole if £10m was spent on other transport schemes, such as providing safe access/egress for Beechcroft Drive, or a bus service targeted at all school-aged children.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/2066  Respondent: 8729217 / Karen Stevens  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy D1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the deletion in Policy D1 of the following wording:

“All developments will:
• respond meaningfully and sensitively to the site, its characteristics and constraints, and the layout, grain, massing and height of surrounding buildings
• be laid out to make the best use of the natural features such as trees and hedges and levels, and enhance views into and out of the site
• promote and reinforce local distinctiveness to create a sense of place, with innovative architecture encouraged and supported in the appropriate context
• be expected to have regard to and perform positively against Building for Life 12 criteria, and be expected to use art and materials of a nature appropriate to their setting.”

The requirements listed above would have improved the design of developments and reduced their adverse impact on the environment. There is no justification for their deletion.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:  KJS 2017 consultation response (rev 01F).pdf (7.6 MB)
Comment ID: pslp171/2067  Respondent: 8729217 / Karen Stevens  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I support the addition in paragraph 4.5.42, which recognises that “Historic landscapes are also undesignated heritage assets”. However, merely “considering” their local distinctive “through the Guildford and Surrey Landscape Character Assessments” is not enough. GBC’s Landscape Character Assessment (LCA) considers that the landscape of the Hog’s Back a key asset, which should be conserved.

Its landscape strategy states: “The Hog’s Back Chalk Ridge landscape should be conserved, in particular the open nature of the landscape which forms a backdrop to the surrounding rural areas and Guildford, the wide and far ranging views from the many viewpoints along the ridge line and the sparse settlement pattern of traditional style and local materials.” (Page 41 - emphasis mine.)

This strategy has been disregarded in the Blackwell Farm site allocation (policy A26), which proposes to build over this open landscape and damage views from the ridge line. This policy should be strengthened to ensure that recommendations in the LCA are adopted.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents: KJS 2017 consultation response (rev 01F).pdf (7.6 MB)

Comment ID: pslp171/2054  Respondent: 8729217 / Karen Stevens  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy E1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the changed statement in para 4.4.4 of the introduction to policy E1 that: “Innovative industries have emerged and clustered, some based at the Surrey Research Park and the University of Surrey and others in the town centre, such as electronic gaming, stem cell research and satellite technology. The borough has benefited from strong cluster growth in high tech innovative businesses including healthcare and bioscience and satellite technology.”

The rhetoric around the Surrey Research Park being a “hub” or “cluster” for these specialist industries is a myth created by the owner, the University of Surrey. The “hub” for these sectors is not in Guildford, but the whole of the South-East, including places such as Whitehill & Bordon, Basingstoke, Bracknell and Reading, and the East Midlands (in terms of satellite technology). The developer of Send Business Park is using this same rhetoric, claiming its Tandridge Studios site is a “hub” for the digital-creative sector: “Tandridge Studios is complementary to the science park and has the scale to become the creative hub for the area, and this development will provide opportunities with the M3 graduates... Guildford is the centre of a unique supply chain, with educators,
including ACM and Surrey University, as well as being the centre of the video games, virtual effects and animation sectors that currently lacks a hub - a gap we seek to meet.” George Hamburger (Borough, Economy and Infrastructure Executive Advisory Board, 20 April 2017).

It should also be noted that a number of organisations have moved away from the Surrey Research Park, notably Microsoft (with Lionhead studios) last year. Individual members of staff also have mixed feelings about working in Guildford, with an example of what should be a 30 minute commute, taking 70:

“I commute in from Hampshire and sadly work on the research park. The traffic situation is intolerable and I am at the point where I might just change jobs simply because the current morning rush hour puts me in such a foul mood for the rest of the day.” (Email from Chris Twin to Karen Stevens, dated July 18, 2017).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents: KJS 2017 consultation response (rev 01F).pdf (7.6 MB)
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to changes in policy E4 Surrey Research Park, which is earmarked for a 10-11 Ha expansion that is not supported by the findings of the ELNA 2017.

Neither is this expansion justified by the Research Park’s own growth, which has stagnated over the past 20 years, growing by just 14,000 sqm since 1996.

According the University of Surrey[8]:

"The original timescale for the development of the Surrey Research Park was 10 years. However, it has taken nearly 30 years to achieve 90% developed. Only sites for larger building still remain undeveloped after this period. The areas originally designated to micro and small companies was completed within the original planned 10 years. The slower rate of developments for larger companies reflects the fact that today many larger companies are not locating their R&D effort in a single large building but are looking to deploy their research activities as small specialist groups close to specific host organisations that have defined technology competencies."

After 30 years, the Surrey Research Park still has capacity 6,769 sqm of R&D office space on its original 71,250 sqm site, and uptake on the Park has declined. This, together with Dr Parry’s statement that the demand is now for “small specialist groups close to host organisations” suggests that there is no need to extend the Research Park further. Small specialist groups can be located in the town centre, which is more sustainable in terms of traffic movements.

[Figure 6] – Cumulative gross built space on the Surrey Research Park since its inception (sq m) by year. Source The Surrey Research Park; A Case Study of Strategic Planning for Economic Development, Parry M, September 2012 Were it necessary for GBC to find 30,000 sqm of B1b office space, there are other options that do not require any intrusion into the green belt or onto land that forms the setting to an AONB. For example:

A. It would be possible to provide this on the existing low-density Surrey Research Park. The existing Research Park, (which provides 65,000 sq m2 of office space on 27 hectares of land) is developed at a plot ratio of 25%. This could be increased to 50% within the footprint of the existing park without any adverse impact. The University Estates Strategy shows that the University is planning to build up to 323,200 sqm across a smaller area of Manor Park (24.6 hectares) – this is six times the plot ratio of the Research Park, and still at the low end for a typical development in a major town such as Guildford. GBC’s approach shows a clear desire to maintain low-density development and to extend this low-density development onto neighbouring countryside.

[Figure 7] – Planned density of development on Manor Park

B. It would be possible (and more sustainable in terms of reduced traffic movements) to provide this 30,000 sqm of office space within the town centre, on sites that have currently been allocated for retail space. Much of this space is closer to the University of Surrey than Blackwell Farm.

There is no evidence that the retail space within the town centre needs to be expanded by 41,000 sqm at North Street. There is falling demand for retail space in Guildford and other town centres, due to the rise in online shopping (which jumped 16 per cent between January 2015 and January 2016).

The Centre for Retail Research Report[9] forecasts that by 2018:
- Total store numbers will fall by 22%
- The share of online retail sales will rise from 12.7% (2012) to 21.5% by 2018 or the end of the decade
- 41% of town centres will lose 27,638 stores in the next five years

There is no evidence to support GBC’s assumption that Guildford will buck these trends. Its ability to do so won’t be
helped by increased congestion, resulting from proposals on Blackwell Farm.

C. A further option would be to expand the Surrey Research Park at Whitehill & Bordon, a former army barracks and brownfield site located 30 minutes south of Guildford by car. This new eco-town is seeking to attract exactly the sort of businesses that currently operate on the Surrey Research Park. The masterplan[10] for this ecotown recognises that:

“... the town does not operate in isolation of its neighbouring business centres, such as Alton, Petersfield and Farnham, and larger economic centres, such as Portsmouth, Farnborough, Basingstoke and Guildford. Links to these locations present opportunities to capture investment from important business sectors, such as defence, aerospace and communications, and higher education and research and from the Universities of Surrey, Portsmouth and Creative Arts at Farnham”

Duty to cooperate with Whitehill & Bordon clearly does suit the landowner and a local authority which wants to generate tax revenues within its own borough. There is a conflict of interest here, which means that GBC isn’t keen to promote this option. What is perceived by the Council to be good for them is bad in terms of planning, and bad for the environment.

Any arguments for expanding the Surrey Research Park by 30,000 sqm at its current location (sandwiched between the A31, A3 and A323) are untenable from a traffic point of view. The Surrey Research Park is in the wrong place and has contributed significantly to the traffic problems on the west of Guildford since its inception.

Problems with developing a business park at this location were identified in the 1980s at the time permission for the Research Park was first sought, and again when the University expanded onto what was then Manor Farm. The University and Hospital both objected to the nearby Tesco development in 1988 on the grounds of the traffic impact the superstore would have on their operations. Since then, the widening of Gill Avenue has provided some relief to traffic in this area, but congestion continues to be a chronic problem on the surrounding road network at morning and evening peak hours, with traffic backing up along local, residential roads and onto the A3. This problem would be further compounded by the addition of 35,000 sqm of offices, not to mention 1,800 residences and two schools proposed at the adjacent Blackwell Farm, and a new station at Park Barn.

I also object to the continued proposal to extend the Research Park to classes B1a and B1c (light industrial). This is both inappropriate and contrary to the original outline planning permission for the Research Park (as acknowledged in para 4.4.37 of the draft Plan). The land on which the Research Park sits was funded in part by Surrey County Council on behalf of the people of Surrey for educational purposes. It was not intended to become an industrial estate.

Low-density and surface car parks on the Surrey Research Park demonstrate wasteful use of space
[9] Centre for Retail Research Report Retail In 2018: Shop Numbers, Online And The High Street

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents: KJS 2017 consultation response (rev 01F).pdf (7.6 MB)

Comment ID: pslp171/2063  Respondent: 8729217 / Karen Stevens  Agent: KJS
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy E5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I support the addition of policy E5 (3), which states that “Agricultural land will be protected as set out in national policy and the economic and other benefits of the best and most versatile agricultural land will be taken into account.” However, this policy has not been applied in the Plan, and the true extent of agricultural land classifications 2 and 3a has not been accurately disclosed.

Blackwell Farm (policy A26) has both land classifications 2 and 3a (Figure 8) and yet there is no mention of its existence or extent in the Plan or accompanying evidence base. Furthermore, the site assessment criteria devised for agricultural land assessment do not mirror NPPF definitions of best and most versatile land and in their current form and application to sites do not reflect the true proportion of each grade within sites. It is unsound to present inaccurate and misleading information in documentation released for public consultation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:  
KJS 2017 consultation response (rev 01F).pdf (7.6 MB)

Comment ID: pslp171/2064  
Respondent: 8729217 / Karen Stevens  
Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy E6

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I support the statement in para 4.4.59 that “The plan seeks to ensure that the borough’s unique natural landscapes and heritage, which contribute so significantly to its appeal as a leisure and tourism destination, are preserved”. However, GBC has failed to put this policy into practice in forming its Plan, as it has included a proposal to build 1,800 homes in the setting to the AONB – an area that contributes significantly to Guildford’s landscape heritage by providing far-reaching views from the Hog’s Back ridge as well as a rural gateway to the town from the west.

It also is in close proximity to the Scheduled Ancient Monument at Manor Farm. Plans by the University to promote this site to local schools and create a small visitors’ centre and nature trails have unfortunately not materialised following the 2003 Local Plan. GBC should strengthen this policy to ensure that any commitments/promises made by developers (such as the University) come to fruition.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:  
KJS 2017 consultation response (rev 01F).pdf (7.6 MB)

Comment ID: pslp171/2065  
Respondent: 8729217 / Karen Stevens  
Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy E7

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
**Retail space**
I object to the changes in policy E7, which now propose 41,000 sqm expansion of retail space at North Street. This allocation is excessive and does not take into account growth in the online retail sector. Furthermore, it is not supported by adequate assessment of demand. This space should alternatively provide housing or office space.

**Town centre residential development**
I also object to the continued failure of this policy to provide adequate residential development in the town centre. The town centre is the most sustainable location for housing, and yet this version of the Plan allocates just 1,300 homes – around 10 per cent of the total planned for the borough. This allocation could be at least doubled. A master plan created by Allies and Morrison, and originally adopted by GBC, identified land in the town centre for 2,551 units.

In addition to the land identified by Allies and Morrison, Guildford has more than 25 acres of surface car parking in its ownership that could be built over, including the under-utilised Onslow Park and Ride, which until March 2017 was used as a free car park for the University and Hospital staff.

Guildford’s failure to fully exploit brownfield sites in the town centre is contrary to the NPPF and to the latest Government White Paper on housing, which states:

"the Government proposes to amend the National Planning Policy Framework to make it clear that plans and individual development proposals should ... address the particular scope for higher-density housing in urban locations” (A68)

I object to the deletion in paragraph 4.4.72 of the statement “we will continue and extend an active dialogue with our residents and other stakeholders”. This is contrary to the spirit of localism. This statement should also extend to “listening and considering views of stakeholders”, not just dialogue.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents: [KJS 2017 consultation response (rev 01F).pdf](#) (7.6 MB)

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**Density**
I object to the deletion of the paragraph on density:

"New residential development is required to make the most efficient use of land whilst responding to local character, context and distinctiveness. Residential densities will vary dependent upon the local area context and character and the sustainability of the location. Higher density development will be supported in Guildford town centre."

This suggests that GBC does not intend to build at a higher density on its new developments or within the existing urban area (which is the most sustainable location for development). The latest government white paper, Fixing our broken housing market[4], promotes “increasing the density of development”. It states:

“To help ensure that effective use is made of land, and building on its previous consultations, the Government proposes to amend the National Planning Policy Framework to make it clear that plans and individual development proposals should:

• make efficient use of land and avoid building homes at low densities where there is a shortage of land for meeting identified housing needs;

• address the particular scope for higher-density housing in urban locations that are well served by public transport (such as around many railway stations)”
Whilst I do not support any of the proposed development sites within the Metropolitan Green Belt (until legitimate constraints have been applied to the OAN and exceptional circumstances have demonstrated that these are necessary), were these to go ahead, the provision of housing should be at much higher densities in order to reduce adverse impact on the green belt and to avoid building on high quality landscapes such as at Blackwell Farm, which lies in the setting to the AONB. Across the whole of the borough, there is a high proportion of low-density housing – large units with large gardens. Even social housing in areas such as Fairlands and Park Barn has been built at a low density. Many of these family homes are now being used inappropriately as HMOs for student accommodation.

According to a report by Frank Knight[5], there are 3,500 students living in shared private rented sector dwellings. If alternative, purpose-built, smaller units existed for students, it would eliminate the need for these HMOs and they could be returned to homes for family groups.

The case study accompanying the 2017 Housing White Paper cites densities of 45-70 dwellings per hectare (dph) in the “urban, riverside and gateway quarters” of the award-winning Trumpington Meadows development outside Cambridge. It further states: “The lower density village quarter (30-45 dwellings per hectare) will provide larger, 3-4 bedroom homes”. [Emphasis mine.]

GBC’s Local Plan, in contrast, has:
• 23 dph at Blackwell Farm
• 22 dph at Gosden Hill
• 21 dph at Wisley Airfield
• 18 dph at Ash and Tongham
• 37.5 dph at Slyfield.

Apart from at Slyfield, which matches the “lower density village quarter” in terms of density, these proposed densities are very low. If GBC were to build at what the housing white paper terms “low-density” (ie around 40 dph) on the Countryside Beyond the Green Belt at Ash and Tongham, there would be no need to build on Blackwell Farm or on one of the other strategic sites within the green belt. Alternatively (and preferably), if GBC were to increase the density at the Slyfield Regeneration Site (a brownfield site within the urban area) to 75 dph, which is comparable to parts of Trumpington Meadows, this would also eliminate the need to develop one of the strategic green belt sites.

GBC has ignored the proposed amendment to national planning policy in the latest Government white paper on housing, as it has not demonstrated that it has “examined fully other reasonable options for meeting their required development requirements”, including “optimising the proposed density of development” (1.39).

Furthermore, Edge Analytics, which GBC commissioned to review the GL Hearn SHMA in 2014, stated:
“Whilst it is evident that Guildford Borough has a particularly acute affordability issue, it is less clear how an upwards adjustment to housing provision would manifest itself as an improvement to the affordability position”.[6]

[Figure 3] – The University of Surrey has more than 17 Ha of surface car parks across its estate. The University suggested (in the Council chamber at Millmead) that development on its main Stag Hill car park was not possible as it formed part of the landscape design for its campus. At the same time, the University was seeking to develop new homes on Blackwell Farm on the Green Belt and was actively promoting building on the AONB.

Given that boosting housing provision is unlikely to make housing in the borough more affordable, it is incumbent on the Council to consider alternative ways of deliver housing more cheaply and one such way is achieved by building more densely.

**Student housing**
I object to the changes in relation to student accommodation:

“About 60 per cent of full time Guildford based University of Surrey eligible students (full time equivalent) are expected to be provided with accommodation on campus.”

The addition of the word “about” weakens this policy and would enable the University to reduce the level of student provision below that which it committed to in the 2003 Local Plan.
As stated in my 2016 response, the University should provide accommodation for 100 per cent of its future Guildford-based student population, and 80 per cent of its existing student population on its two campuses at Manor Park and Stag Hill (which it could implement over the next three years without affecting any existing students). This would help the housing situation as it would quickly free up more than 1,000 houses close to the town centre, Hospital, Research Park and University.

By building student accommodation, the University would effectively be freeing up family homes close to the town centre, which are at a higher density than the proposed executive homes on Blackwell Farm. This would be a much more efficient plan for Guildford’s existing housing. It would also allow new development in the town to focus on the smaller units required due to changing demographics, which in turn would be more affordable. Furthermore, it would release Hazel Farm (promised at the last Local Plan) to be freed up for residential space/care/sheltered accommodation for the elderly – the type of accommodation required due to the changing age profile of the borough.

Increasing the proportion of students on campus would be of benefit to both Guildford and to students, who currently pay considerably higher rent in the private-sector market. The report by Frank Knight[7] reveals that:

“University rents for self-catered accommodation range from £69 - £99.50 per week (for shared non en suite accommodation) to £205.00 per week (for studio self-catered accommodation). The standard letting term is 38 weeks for undergraduates and 50 weeks for post-graduates, rents are paid inclusive of bills.”

[Table 2] – In 2003, the University of Surrey committed to housing 60% of its students on its two campuses. This table showing “the existing and potential total supply of bed spaces” indicates that only 36.8% of its students are currently in purpose-built student accommodation (PBSA), and that there is future provision for a total of 44% of students to live in PBSA. As 141 PBSA bed spaces are provided by a privately-operated company (Scape), the University has clearly fallen well below its 2003 commitment.

By comparison, advertised rents from private landlords during the 2016/2017 academic year “range from £195 to £205 per week for en-suite rooms and up to £310 per week for studios, inclusive of all bills” and “All rooms are provided as 51/52 week tenancies.”

Further data contained with the Frank Knight report shows that Guildford has “both a low existing and pipeline bed space count compared to its student population” and that, compared with other university cities, “Guildford is second lowest in terms of existing supply of bed spaces and second lowest in terms of student numbers. In comparison to Liverpool and Newcastle, the second and third largest university populations, it has considerably less existing and pipeline bed space supply.” [Emphasis mine.]

The report concludes that, “the market in Guildford for student accommodation is currently structurally undersupplied. The consented pipeline of proposed developments will do little to re-address the lack of student accommodation.”

The Council’s reluctance to increase the proportion of students living on campus, along with its failure over the past 13 years to encourage the University to build out its existing planning permissions for student accommodation in a timely manner, or to build more efficiently across its estate, (for example by building over its extensive surface car parks), are all indications of the Council’s pandering to the University and its drive to increase house building, rather than seeking alternative solutions, which would have less impact on the environment.

There is also clearly a huge conflict of interest with the University, which had previously argued the case for increasing the amount of purpose-built student accommodation when it wished to expand onto its Manor Park campus in 2003. Building this accommodation would clearly weaken the case for taking Blackwell Farm out of green belt – a move that would present it with huge profits. It is therefore no surprise that it has been slow to deliver on the commitments it made in 2003 (including the promise to provide greater access to Blackwell Farm for public recreation/ benefit).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:  KJS 2017 consultation response (rev 01F).pdf (7.6 MB)

Comment ID:  pslp171/2046  Respondent:  8729217 / Karen Stevens  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy H2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Affordable homes

Iobject to the changes in policy H2. This policy has been weakened by changing the wording of the policy from “At least 40 per cent of the homes on these sites must be as affordable homes” to “We will seek at least 40 per cent of the homes on these sites as affordable homes.” Simply “seeking” to achieve 40 per cent affordable homes, is not the same as making this provision a “must”.

The aspiration for London is that 50% of all new homes should be affordable within the next 10 years and lower land values should make this target achievable in Guildford now. I therefore believe that the target should be increased from 40% to 50%.

Viability

I also object to the “viability clause” and specifically the deletion in paragraph 4.2.40 of the statement that “In general, a need to make profit over and above the standard developer’s profit in order to fund other community benefits will not be accepted as an abnormal cost [which would make a scheme inviable to deliver].” This undermines any requirement placed on a developer to provide 40% affordable housing or to fund vital infrastructure on which developments may depend. This could leave the Council exposed to unforeseen infrastructure costs, with the risk that housing developments are progressed without the required infrastructure to support them.

[Figure 4] – “To Let” signs along Southway, Guildford (Image: Grahame Larter). Around 7000 students occupy private homes in the borough

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:  KJS 2017 consultation response (rev 01F).pdf (7.6 MB)

Comment ID:  pslp171/2068  Respondent:  8729217 / Karen Stevens  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy ID1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the changes in Policy 1D1, particularly the proposals that “delivery of infrastructure will be secured by planning condition and/or planning obligation.” (2) and “If the timely provision of infrastructure necessary to support new development cannot be secured, planning permission will be refused.” (3). This acknowledges that the provision of necessary infrastructure to unlock development may not be “secured” within five years and the Plan therefore runs counter to the NPPF[11], which states that:

“To be considered deliverable, sites should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years and in particular that development of the site is viable.”

The whole approach underpinning Guildford’s Local Plan is to allocate land for housing that does not currently have the infrastructure needed to support it in the hope that this will be provided downstream by the government (in terms of the A3 widening) or by developers. However, there is a risk that these schemes will not come to fruition: the widening of the A3 is uncertain, being subject to budget constraints and the whims of different government ministers (Annex 3); whilst required local road infrastructure could fail to be delivered if the developer abandons the project without fulfilling all the conditions and obligations, or claims that the cost of delivery is not viable (para 4.6.8 suggests that GBC would be prepared to negotiate reduced infrastructure requirements). This is a particular risk in the case of the Blackwell Farm allocation (A26), where the landowner (University of Surrey) has already demonstrated a poor track record in meeting the commitments it made at the last Local Plan.

I object to the fact that the changes within policy 1D1 (and indeed the whole policy) are based on flawed traffic modelling. Despite recommendations from Highways England (HE) (Annex 4) and other commentators on the Local Plan that the modelling should be revised using the latest OmniTRANS software tool (version 6.0.22), GBC has failed to instruct Surrey County Highways to update its modelling accordingly, and instead appears to have tried to browbeat HE into accepting less reliable modelling assumptions, as is apparent from the minutes to its meeting with HE on September 1 (Annex 5).

A Technical Note prepared by Mouchel on behalf of HE in response to the 2016 Local Plan (Annex 4) concludes that: “the future updated model, using the latest version of the OmniTRANS software, should help to address some of the concerns by including blocking back and true peak hours, but the inability to model merge delays on the A3 will remain a significant limitation. The results from the new version of the model could be significantly different from those presented in the GBC’s current Local Plan evidence Base.” [Page 6 – emphasis mine.]

It is unsound to base housing allocations on traffic scenarios that have been skewed by using outdated traffic modelling software and do not reflect the true situation.

I object to the deletion of infrastructure project SRN6 (Beechcroft Drive new access road/road safety scheme) from this version of the plan. The current access (a 90 degree junction on a blind bend of the A3) is dangerous not just to the residents of Beechcroft Drive, but to all drivers travelling on the A3.

The Manor Farm Master Plan (2004) states: “Benefits secured by legal agreement include... commitment to exploring ways of alleviating Beechcroft Drive access problems.” (Section 8.8). Thirteen years later this access has not been provided. If the University/GBC cannot fund a few metres of road linking Beechcroft Drive to Manor Farm in order to provide safe access for 21 existing residences (some with young families), it is questionable whether they would bother to pay to enforce a controlled section of the new link road from the A31 to Gill Avenue.


[Image] Empty spaces on car parks on the Surrey Research Park at weekends – Google image from March 25, 2017

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to Policy 1D3 (3), which states: “New development providing, contributing and/or close to the routes of the proposed Sustainable Movement Corridor in the Guildford urban area will have regard to the Sustainable Movement Corridor Supplementary Planning Document.”

The Sustainable Movement Corridor Supplementary Planning Document does not appear to have been published so GBC cannot consult meaningfully on this policy.

The whole concept of the Sustainable Movement Corridor (SMC) appears vague and uncertain – what began as a car-free route through Guildford for pedestrians, cyclists and buses/trams has been downgraded to a bus/cycle lane through some of the busiest sections of Guildford’s road network. Without widening sections of the route (which is not proposed), the SMC would reduce capacity on an already overstretched road network. This will be a particular problem at pinch-points along the route, such as the A3 underpass at Egerton Road, where cars are at a standstill most weekday mornings during the University term time (Figure 9(a) and Figure 9(b)).

Proposals to introduce a significant bus service to proposed key development sites to the town centre and other key destinations (Policy A26 Infrastructure requirement (5)), whilst a good idea in theory, are not practical. Guildford borough is too rural (with villages too far apart) and the town’s population too small and low density to sustain a viable passenger transport system. Furthermore, there appears to be no real expectation that the SMC would achieve a modal shift and reduce car movements significantly so it is questionable why GBC would propose expenditure of up to £250m on the scheme.

[Figure 9(a)] above and [Figure 9(b)] – The strategic movement corridor will reduce capacity of Egerton Road passing beneath the A3 during peak times

[Figure 10] – Concentric circles drawn from University of Surrey’s Senate House demonstrate how remote Blackwell Farm is from the central hub of Guildford, with its existing transport provision

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (

Green infrastructure

I support the addition of the statement in para 4.6.42a that: “Where proposals fall within or adjacent to a BOA [Biodiversity Opportunity Area], biodiversity measures should support the BOA’s objectives, including those set out in the BOA Policy Statements produced by SyNP [Surrey Nature Partnership].” However, it has not been explained how the Local Plan meets this requirement. The Blackwell Farm (A26) allocation has habitats and Species of Principal Importance for the Conservation of Biodiversity. It is located adjacent to a BOA, and arguably should have been included within it. Bizarrely, all the farmland along the northern slopes of the Hogs Back has been included with the BOA, except for that in the ownership of the University of Surrey. This begs the question: why has Surrey Nature Partnership omitted this land from this BOA, when it forms the same habitat and has the same biodiversity value as adjacent land included within it? This omission would appear to be deliberate, in the same way that SCC has not been able to demonstrate (despite FOI requests) that it carried out landscape character assessments for land on Blackwell Farm (as part of the AONB boundary review).

It is a policy of the NPPF to “Allocate land with the least environmental or amenity value, where consistent with other policies in this Framework”, and it is a strategic priority of Biodiversity 2020: A Strategy for England’s Wildlife and Ecosystem Services to “take a strategic approach to planning for nature within and across local areas” as “This approach will guide development to the best locations” in the context of reducing environmental pressures. It has not been explained how the Local Plan has used Surrey Nature Partnership’s identification of Biodiversity Opportunity Areas to guide developments to the best location.

Blue infrastructure

I object to the changes in policy ID4, which fail to take into account the environmental impacts on the River Wey of developing the Blackwell Farm site and other strategic sites.

GBC has been tasked with the specific action in the River Basin Management Plan that, when developing new DPDs and when making planning decisions, the planning authority should use evidence relating to “priority water bodies” (those that have been assigned “bad”/”poor” status, such as the River Wey), alongside other relevant evidence, to influence the location and scale of future development[12]. There is no indication in the Plan of how GBC has fulfilled this requirement. The River Wey is already failing the Water Framework Directive for phosphates and Natural England states that the majority of phosphates in rivers comes from treated/untreated sewerage. The current Plan will only make this matter worse.

[Figure 11] – Blackwell Farm remains home to a number of birds of Principal Importance for the Conservation of Biodiversity, despite the recent use of bird scarers on the University-owned farmland

[Figure 12] – More than a half of Blackwell Farm sits above the 90m contour (orange) and includes C18 parkland (light blue), ancient woodland and Grade 2 farmland (dark blue/ green). The farmland in yellow is criss crossed with ancient hedgerows and provides a habitat for ground nesting birds


What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents: KJS 2017 consultation response (rev 01F).pdf (7.6 MB)

Comment ID: pslp171/2047  Respondent: 8729217 / Karen Stevens  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P1
**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ()**

I support the changes to Policy P1, and particularly the addition of the following:

1. In accordance with national planning policy, there will be a presumption against major development in the AONB except in exceptional circumstances and where it can be demonstrated to be in the public interest. (P1 (2))
2. High priority will be given to the conservation and enhancement of the natural beauty of the AONB and development proposals must have regard to protecting its setting. (P1 (3))

However, the strategic allocation of land for housing in Policy A26 at Blackwell Farm and the proposed extension to the Research Park (policy E4) are in direct conflict with these amendments. The Blackwell Farm site allocation is the only significant proposed land release which will impact significantly on the AONB. No exceptional circumstances have been put forward for developing this site, and therefore it should be removed from the Local Plan. These impacts of developing Blackwell Farm are:

- A new access road through the AONB and AGLV. The Deputy Leader has stated that the Blackwell Farm development is dependent on a new “western link” road from the A31 (Hog’s Back) to Gill Avenue. Because the road would have to be built along a corniche, the earthworks required would create a huge scar on the northern face of the Hog’s Back ridge, which would be visible for miles to the west, as well as from the public footpaths/bridleways that cross the Farm.
- A 1,800-home development, as outlined in policy A26, would damage the setting to the AONB and this is contrary to national planning policy and to the amended policy P1 (3).
- Part of the 1,800-home development site has also been put forward as an AONB candidate area. An independent land evaluation by professional landscape architect Land Management Services (Annex 2) concluded that the majority of the Blackwell Farm site merited AONB status, and that the rest of the site should not be developed as it forms an important “buffer”/“setting”. This evaluation has been submitted to Natural England (NE) by Anne Milton on behalf of three parish councils so that the site can be included as a candidate area for NE’s forthcoming boundary review.
- The extension to the Surrey Research Park (Policy E4) would damage the setting to the AONB and is contrary to national planning policy and to the amended Policy P1 (3) in this version of the Plan. The area earmarked for the Research Park extension would be visible from the Mount – a popular recreation area in the AONB.

Under key evidence, I object to the omission of the Hog’s Back Natural Beauty Evaluation carried out by Land Management Services (LMS) on behalf of Compton, Worplesdon and Wanborough parish councils, which was submitted in response to the 2016 consultation by Compton Parish Council and by CPRE/Save Hogs Back. GBC has failed to recognise Blackwell Farm as a candidate area and has omitted this new study (of which it was aware) from its key evidence supporting Policy P1 (4.3.10), although it has included a similar landscape evaluation by Hankinson and Duckett, commissioned by Surrey County Council in 2013.

I consider it unsound to exclude a study from the consultation evidence base, which follows the same assessment criteria as the Surrey CC evaluation, and which has been carried out by a registered landscape practice (a consultancy that the Surrey Hills AONB Board has itself used). Please note that the Surrey CC evaluation study did not report its findings on the entire Blackwell Farm site on the basis that Surrey CC only had to put forward a case for areas that it proposed should be included in the AONB following NE’s boundary review. It was also not able to provide any detailed evaluation of different parts of the Blackwell Farm site following an FOI request.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
- [Annex 2 - Hogs Back Natural Beauty Evaluation V2 24.05.16.pdf](#) (6.0 MB)
- [KJS 2017 consultation response (rev 01F).pdf](#) (7.6 MB)
### Comment ID: pslp171/2048  Respondent: 8729217 / Karen Stevens  Agent:

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

I object to the changes in para (1): “The Metropolitan Green Belt will continue to be protected as shown designated on the Policies Map, against inappropriate development. In accordance with national planning policy, the construction of new development will be considered inappropriate and will not be permitted unless very special circumstances can be demonstrated.”

The words “as shown designated on the Policies Map” should be deleted, as this map has ignored huge areas of green belt protection.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:** [KJS 2017 consultation response (rev 01F).pdf](#) (7.6 MB)

### Comment ID: pslp171/2049  Respondent: 8729217 / Karen Stevens  Agent:

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy P3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

I object to the changes to policy P3, particularly the statement in para 4.3.28 “it is nevertheless important that we seek to manage growth in this area”, which shows a bias towards protecting the countryside beyond the green belt (near Ash and Tongham) above other areas with more important landscape designations.

Whilst I do not see the need to build on the countryside beyond the green belt (if constraints are applied to the OAN and housing is built more densely on brownfield sites), GBC appears to be more protective of this area than it is of AONB or the green belt, and this is contrary to the NPPF, which states that national parks and AONBs should have the highest level of protection.

The policy seems to attach greater importance to preventing the “coalescence between Ash and Tongham urban area and Aldershot” than it does to the primary purpose of Metropolitan Green belt, which is to stop London sprawl. Ash and Tongham lie beyond Guildford at a distance from London and therefore do not fulfil this purpose. That is presumably why Ash and Tongham are not in the green belt already. It also seems that GBC is more concerned about the coalescence between Ash & Tongham and Aldershot than it is between Guildford and Woking, or between Flexford and Guildford, or between Wood Street Village and Guildford.

In the 2014 version of the Plan, the reason given for extending the green belt to Ash and Tongham was that this would protect important views from the Hog’s Back ridge, but this justification was changed to “preventing coalescence” after it was pointed out that Blackwell Farm equally protected the views from the ridge. It appears that policies (and elements of the evidence base) are being adapted to ensure that certain sites are included in the Local Plan (and others excluded), rather
than using sound evidence and policies as a starting point to determine which are the most suitable locations for
development. The whole approach to the Local Plan is therefore unsound.

“The Hog’s Back Chalk Ridge landscape should be conserved, in particular the open nature of the landscape which forms
a backdrop to the surrounding rural areas and Guildford, the wide and far ranging views from the many viewpoints along
the ridge line and the sparse settlement pattern of traditional style and local materials. The intact large scale geometric
field pattern and hedgerow boundaries and hedgerow trees should be conserved while there is potential to enhance and
reinforce some of the hedgerows.” - Guildford Landscape Character Assessment

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/2050  Respondent: 8729217 / Karen Stevens  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally
Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Climate change
I support the addition in para 4.3.37, which states that “New development should be carefully planned to ensure that
vulnerability to the range of impacts associated with climate change is not increased.”

Land drainage
I also support requirement (5) in this policy that “all development proposals are required to demonstrate that land drainage
will be adequate”. However, GBC has failed to put this policy into practice in forming its Plan and does not demonstrate
exactly how it will prevent the increased impermeable surface water run off from the Blackwell Farm development
exacerbating flooding at Wood Street Village, Fairlands and Whitmoor Common Special Protection Area (SPA).
In particular, it has not addressed the likely requirement (and cost) for two reservoirs to control flow – one of which (due to
topography) would ideally be located in the north-east corner of the site, which is currently allocated for the Research Park
extension.
The Whitmoor Common SPA does require flooding at times in order to maintain its wetland habitat, and so damming
streams that flow from Blackwell Farm would not be a straightforward solution. The Plan does not explain how the
developers of Blackwell Farm site would achieve the balance between damming up streams to prevent surface water run off
flooding residential areas and preserving the wetland habitat of the SPA.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents: KJS 2017 consultation response (rev 01F).pdf (7.6 MB)

Comment ID: pslp171/2051  Respondent: 8729217 / Karen Stevens  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P5
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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I support the addition of paragraph 4.3.50a, which recognises contribution of Special Protection Areas (SPAs) and Areas of Special Conservation Interest in meeting the UK’s international agreements and treaties. However, I object to the insertion of a new paragraph 4.3.50c, which states “... if residential developments provide or contribute to appropriate SANG and SAMM measures, they will not be required to undergo Appropriate Assessment.”

It is not sufficient mitigation against harm to the SPA to merely allocate land as SANG or to contribute to SAMM measures. There is no evidence that SANGS actually alleviate pressure on the SPAs and, without this, it is irresponsible to plan large-scale developments within 5km of them. For example, Blackwell Farm is likely to have a negative impact on Whitmoor Common (Guildford’s primary SPA) and Pirbright Common SPA, even with bespoke SANG provision, for the following reasons:

- The centre of the site is within 5km of the centre of Whitmoor Common and 3.8km to the nearest boundary point. It is highly likely that additional recreational pressure will be put on Whitmoor and Pirbright Commons as a result of the quantity of dwellings proposed (1,800). Even if only 5% of households use the SPAs, that is an increased recreational pressure of 90 households and this is without considering the combined recreational pressures caused by all planned sites.

- The Habitats Regulations Assessment also notes that the Blackwell Farm site “could contribute to reduced air quality through traffic movements past Thames Basin Heaths SPA in combination.” (Page 37)

The Surrey Wildlife Trust describes the Thames Heath lowland heaths as a rarer habitat than rainforest. They are home to large numbers of rare insects, rare amphibians, rare plants, and rare bats – in addition to the EU protected Dartford warbler and nightjar. It is irresponsible to plan for development which does not safeguard this habitat.

It should further be noted that many local residents on the west of Guildford, including Flexford, Park Barn, Onslow Village and Wood Street village currently use Blackwell Farm as an area to walk dogs (one of the biggest threats to ground-nesting birds). It is possible that these people might encroach on the SPA instead, if Blackwell Farm was to become urbanised.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents: KJS 2017 consultation response (rev 01F).pdf (7.6 MB)

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Comment ID: pslp171/2031  Respondent: 8729217 / Karen Stevens  Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I support the addition of the conditional statement “unless any adverse impacts of doing so would significantly outweigh the benefits or specific policies in the NPPF suggest that development should be restricted” (4.1.1). And I also support the new statement in Reasoned Justification that:

“When implementing Policy S1, local circumstances will be taken into account to respond to different opportunities for achieving sustainable development. In accordance with the NPPF, the presumption will not automatically apply to policies relating to sites protected under the Birds and Habitats Directives and/or designated as Sites of Special Scientific Interest (SSSIs), land designated as Green Belt, Local Green Space, the Surrey Hills Area of Outstanding Natural Beauty, designated heritage assets and locations identified as at risk of flooding.” (4.1.4)

However, Guildford Borough Council (GBC) appears to have taken little or no account of local circumstances (namely Guildford’s inadequate transport infrastructure and chronic traffic congestion), and little or no account of the specific policies in the NPPF, when putting forward its proposed development sites.

[Figure 1] - Does a development of 1800 homes on this farmland on the Hog’s Back at Blackwell Farm and an access road cutting through the AONB, as shown above, constitute sustainable development?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents: KJS 2017 consultation response (rev 01F).pdf (7.6 MB)

Comment ID: pslp171/2037  Respondent: 8729217 / Karen Stevens  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the commitment to build 12,426 homes (Policy S2 (1)), based on the Strategic Housing Market Assessment (SHMA) 2017 prepared by GL Hearn. The objectively assessed need (OAN) figure of 12,426 has been inflated and does not apply any of the constraints required under the NPPF and the National Planning Policy Guidance.

Inflated OAN
The Strategic Housing Market Assessment (SHMA) modelling has been found to be unreliable. A detailed, professional review of the Guildford and West Surrey SHMA, undertaken in June 2017 by NMSS on behalf of the Guildford Residents Association and Parish Councils has shown that the demographic and economic need figures put forward are fundamentally flawed. The NMSS analysis highlights a large gap between projections and census figures in Guildford and identifies under recording of students moving away as the most plausible explanation. It concludes that if this recording error is corrected by making plausible adjustments for the outflow of students in the period 2001-15, this would reduce the demographically-based estimate of the number of homes needed from 558 homes a year during 2015-34 to 404 per annum[1].

Failure to apply constraints
According to the INRIX 2016 Traffic Scorecard[2], Guildford is the town with the worst traffic congestion in the UK, and its congestion is worse than many major cities, such as Glasgow, Cardiff, Liverpool, Bristol, and Southampton, making it the sixth worst congestion hotspot in the UK (Table 1). Furthermore, there is no resilience in the road network, and when incidents occur almost the whole of the borough is gridlocked. Figure 2 shows what happens to the network on the west of Guildford when there is an accident on the A3. This screen grab of traffic was taken on 14 April 2017.

In planning its spatial development strategy, GBC does not appear to have taken the borough’s traffic problems into account. Nor has it taken into account the fact that 89 per cent of the borough lies within the green belt and that 64 per cent
lies within the AONB. The neighbouring borough of Woking has reduced its OAN by 50 per cent as a result of constraints, and yet it has a lower percentage of green belt (60 per cent) and no AONB. Woking is also less congested. It seems a nonsense that Guildford should apply zero constraint (on the grounds of traffic and landscape) to its OAN and then seek to provide for the shortfall of a neighbouring borough, which is less constrained. It would appear that GBC’s refusal to apply constraints is driven by the Lead Councillor’s wish to maintain higher housing figures, as evidenced in his statement to the GBC Council Meeting on May 15, 2017:

“I’ll take the objectively assessed need as it is at 12,426, but I can tell you I’m not going to celebrate the fact that the number has come down.” (Cllr Paul Spooner, GBC Council Meeting, May 15 2017)

This suggests that, given a choice, Cllr Spooner would wish to build over the green belt, as this is a direct consequence of a higher housing number. It seems that the real driver is to boost the size of Guildford and its economy rather than to meet housing need at all, and this has resulted in the opportunity being taken at every turn to adopt the higher housing figure within the SHMA modelling. Unfortunately, Cllr Spooner has overlooked the fact that traffic congestion is detrimental to Guildford’s economic growth. A business survey carried out by GBC in 2008 found that the main reasons, given for businesses moving out of the borough – aside from the cost of property – were transport and congestion. Traffic problems are also cited as a deterrent to businesses setting up in Guildford[3].

Given that boosting housing provision is unlikely to make housing in the borough more affordable, it is incumbent on the Council to deliver a Local Plan that will encourage (per capita) growth and therefore will not exacerbate existing traffic problems.


Table 1: INRIX 2016 Traffic Scorecard – UK’s 10 most congested cities/large urban areas

Figure 2: Typical build-up of traffic on Guildford’s local roads and on A31 Hog’s Back following an accident on the A3 - 14 April 2017

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents: KJS 2017 consultation response (rev 01F).pdf (7.6 MB)
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<td>SUPPORT. But homes must be affordable for Hospital staff.</td>
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<td>OBJECT. Greenbelt site.</td>
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<td>OBJECT. Close to historic building.</td>
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<td>OBJECT, traffic implications for an already gridlocked area.</td>
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Keens Lane will have to be widened to accommodate the traffic.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

OBJECT. Greenbelt site which should be protected.

OBJECT to the destruction of farmland

OBJecct also to the impact of traffic on an already gridlocked A3, London Rd Burpham and surrounding area.

Burpham and Merrow already have shops and services.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

---

Overall the proposals are unsound as the road will plough through AONB to the South and road 2 will cut up existing Ancient Woodland.

Greenbelt and Countryside study flawed and made to fit as per developer wishes. Ditto SHMA figures.

No cooperation with Rushmoor or Hart District Council ref traffic impacts from the West.
OBJECT- AONB setting. Also, a new assessment commissioned by Worplesdon, Compton and Wanborough Parish Councils says the whole of this area should be reclassified AONB. Surrey Hills AONB and Natural England for some strange reason did not include Blackwell Farm in their own AONB review, they chose to exclude it.

OBJECT- All land currently classified Greenbelt and AGLV.

OBJECT. More cars along Egerton Rd /Gill Avenue which is already gridlocked. A&E dept access problems for ambulances.

OBJECT- Road and housing destroying Ancient Woodland.

OBJECT, Surface water will increase flooding at Wood Street Village and Fairlands (who already have an issue with rising sewerage when it rains heavy)

OBJECT, protected species both animal and plant will be destroyed. Skylarks, Newts, Kites, Orchids etc etc

OBJECT, Working Arable Farmland should be protected so we can feed ourselves.

OBJECT, Historical importance of Henry 8 Deer Park, features still visible.

OBJECT, Surrey Research Park isn't full now, has empty units and acres and acres of unused space. Other office facilities in the area are also vacant.

OBJECT to the increase in Air pollution in the area. Destroying the plants that currently help to clean our air and then building 1800 houses with all the emissions AND car pollution is a double whammy for the West of Guildford. We already have high air pollution in this area.

OBJECT to urban sprawl

OBJECT to merge of Guildford Urban area with Wood Street Village

OBJECT to sacrifice of Arable land for SANG.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPS16/1203</th>
<th>Respondent: 8729313 / Lisa Wright</th>
<th>Agent:</th>
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<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A29</td>
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</table>

Do you consider this section of the document; complies with the Duty to Cooperate? (No), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

No cooperation with Rushmoor Council

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/1202  Respondent: 8729313 / Lisa Wright  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

OBJECT, This was already refused by the planning committee.

OBJECT Its Greenbelt

OBJECT Traffic nightmare for the whole of the area. Ripley, Send, Ockham, Horsleys, Effingham are already running at road capacity.

OBJECT- Air pollution is already bad at the M25/A3 Junction.

OBJECT- unsustainable as stuck in the middle of nowhere, no facilities, no utilities.

OBJECT, impact on SPA Cannot be mitigated by SANG on its doorstep.

OBJECT current rights of way being affected or ignored.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/1206  Respondent: 8729313 / Lisa Wright  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A37

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Object. Site in Greenbelt and should be protected

Object, Site in Conservation Area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/1207  Respondent: 8729313 / Lisa Wright  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A38

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

OBJECT. Site is Greenbelt and should be protected.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/1208  Respondent: 8729313 / Lisa Wright  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A39

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

OBJECT, Site is Greenbelt and should be protected.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/1209  Respondent: 8729313 / Lisa Wright  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A40

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
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<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy A41</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<th>Agent:</th>
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<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy A43</td>
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<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( No )</td>
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<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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</table>

This is a new site which has been added to this version of the Local Plan at the last minute.

OBJECT, Site is Greenbelt and should be protected.

OBJECT, Traffic in Send is Gridlocked every morning.

OBJECT, no sufficient school or doctor spaces.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
| Comment ID:   | PSLPS16/1212   | Respondent: | 8729313 / Lisa Wright   | Agent: |
|--------------|----------------|-------------|-------------------------|
| Document:    | Proposed Submission Local Plan: strategy and sites 2016 / Policy A44 |
| Question 1:  | Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( No ) |
| Answer:      | () |

This site has been added since the reg 18 consultation

OBJECT, Site is Greenbelt and should be protected.

Object, site gives access to 'Garden Grabbing'

Object, Site is on a very narrow rural road.

Object, travellers should be compliant with usual planning control for Greenbelt policies and should therefore be dismissed.

This site is previously Land Fill.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

| Comment ID:   | PSLPS16/1213   | Respondent: | 8729313 / Lisa Wright   | Agent: |
|--------------|----------------|-------------|-------------------------|
| Document:    | Proposed Submission Local Plan: strategy and sites 2016 / Policy A46 |
| Question 1:  | Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( No ) |
| Answer:      | () |

This site was previously safeguarded for future development. The villagers were promised that this site would not come forward for another 15 years, essentially they were lied to!

No consultation with Rushmoor Council ref traffic.

OBJECT, Site is Greenbelt and should be protected.
OBJECT, There are no proven special circumstances to bring this site forward.

OBJECT, sensitive wildlife site.

OBJECT, Road network cannot cope with current traffic. Both Glaziers Lane and Westwood Lane have severe restrictions.

OBJECT, Impact of Traffic on Aldershot Road.

OBJECT, not enough trains to take people to Guildford or London.

OBJECT, this site floods and Normandy already has issues with sewerage flooding when it rains heavy.

OBJECT, Impact on local doctors and primary school capacity.

OBJECT, Urban sprawl, joining of 4 small hamlets into a very large village.

OBJECT, air and traffic pollution.

OBJECT, Impact on Ancient Woodland.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/1215  Respondent: 8729313 / Lisa Wright  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A46

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

OBJECT, No special circumstances exist to warrant building this site. No secondary school is required in the West of Guildford. Please see SCC data.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/1214  Respondent: 8729313 / Lisa Wright  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A47
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

OBJECT. Site is greenbelt and should be protected.

OBJECT, There is no need for a secondary school in the West of Guildford as we have space in Ash Manor and Kings College. Furthermore, a planning application has just gone in for a secondary school a couple of miles away at Fairlands.

OBJECT to the disturbance of the protected vole.

OBJECT to building on anything that has protection from SNCI

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/1216  Respondent: 8729313 / Lisa Wright  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy A48

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

OBJECT, Site is Greenbelt and should be protected

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/1217  Respondent: 8729313 / Lisa Wright  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy A49

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
OBJECT. This site has been through planning numerous times already. It is currently a small site with temporary permission. Please see previous application for details.

OBJECT, Site is Greenbelt and should be protected.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/1190  Respondent: 8729313 / Lisa Wright  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

the Eastern edge of this site alongside the railway line should be saved for a road to access the Station car park, thus taking traffic away from the gridlocked Walnut tree Road

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/1218  Respondent: 8729313 / Lisa Wright  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A52

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

OBJECT, Site is Greenbelt and should be protected.

No special circumstances are given by GBC to allow this expansion.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/1219  Respondent: 8729313 / Lisa Wright  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A53
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

OBJECT. Site is greenbelt and should be protected.

Again, there is much planning history with this site which you may wish to consider.

No special circumstances exist to warrant removing this land from Greenbelt status

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/1220  Respondent: 8729313 / Lisa Wright  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A55

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

OBJECT. This site is AONB and therefore deserves the upmost protection.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/1191  Respondent: 8729313 / Lisa Wright  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A6

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
OBJECT to over allocation of retail space. more affordable homes needed instead.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/1192   Respondent: 8729313 / Lisa Wright   Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A7

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

OBJECT, room for a road along the eastern edge for traffic to station needs to be incorporated.

OBJECT- no need for so much retail.

OBJECT- not enough housing

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/1193   Respondent: 8729313 / Lisa Wright   Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A9

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

OBJECT. This should be allocated for housing instead. no need for more in town employment offices as we have empty places already

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2407   Respondent: 8729313 / Lisa Wright   Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E4
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

<table>
<thead>
<tr>
<th>OBJECT. Site should be included as AONB as per review provided by Worplesdon, Compton and Wanborough Parish Councils.</th>
</tr>
</thead>
<tbody>
<tr>
<td>OBJECT, even if site hasn’t got AONB designation, it affects the current Hogs Back AONB, adjacent AGLV and is wholly Greenbelt.</td>
</tr>
<tr>
<td>Currently, According to SRP website, 10,000sqft of built, unlet property on the Research Park.</td>
</tr>
<tr>
<td>SRP has in the last 3 weeks, started work on building one of the two remaining huge office buildings on the site. It has had planning for ages and coincidently thought it might start building it now?</td>
</tr>
<tr>
<td>OBJECT. Building this site will destroy Ancient Woodland.</td>
</tr>
<tr>
<td>OBJECT, destruction of valuable arable Farmland.</td>
</tr>
<tr>
<td>OBJECT, site joins up Urban Guildford to Wood Street Village.</td>
</tr>
<tr>
<td>OBJECT, Road to site destroys border of old Deer Park and visible remains of the boundary.</td>
</tr>
<tr>
<td>OBJECT, Site increases traffic through Egerton Road Junction, a local gridlock area which is also the road to the A and E dept and Hospital. Traffic queues here for hours every day.</td>
</tr>
<tr>
<td>OBJECT, light pollution from the current Research Park means you can’t see the stars at night. The Streetlight lights are horrendously bright, especially in Winter.</td>
</tr>
<tr>
<td>OBJECT, Buildings on the Western edge of the current SRP are reflective silver and already impact on the views to and from the AONB in Winter.</td>
</tr>
</tbody>
</table>

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

| Comment ID: PSLPP16/2412  | Respondent: 8729313 / Lisa Wright  | Agent:  |
| Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H2 |  |

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()
OBJECT. not enough affordable homes planned for.

Clarification of affordable required.

in a rich town, how can affordable actually be affordable?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/536  Respondent: 8729313 / Lisa Wright  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (Yes)

SHMA- OBJECT. No calculations available. No scrutiny in Council. No constraints applied.

OBJECT- No mention of recent AONB review.

OBJECT- LAA sites added from last consultation.

OBJECT- NO data available for Local Housing Needs Assessment. Nothing about this mentioned at Worplesdon Parish Council so not sure what GBC intend to do?

OBJECT- Retail and Leisure. Guildford do not need more retail space. Retail is declining as people shop online.

OBJECT- No update for Rural Economy, LAA and SNCI data.

On the whole a very shabby collection of rushed work without the dat to support it.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/539  Respondent: 8729313 / Lisa Wright  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 2: Legal compliance

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
Answer (if comment is on questions 1-7 of the questionnaire): (Yes)

No.

It has been developer lead.

GBC are too friendly with the University of Surrey. Uni heads are always in council, Uni staff are featured in GBC promotional video.

Local radio station, Eagle, has not published any news item related to the Local Plan in days. Question relationship between GBC leader and Eagle Director.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/537  Respondent: 8729313 / Lisa Wright  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (Yes)

No

SHMA is deeply flawed. No calculation available, No Scrutiny of figures in Council. Unconstrained numbers.

Look at the independent GRA SHMA which gives a figure of 510 unconstrained. We did tell GBC it was wrong but they repeatedly ignore us and refuse to show the maths behind the numbers.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/543  Respondent: 8729313 / Lisa Wright  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 4: Duty to cooperate
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (Yes)

NO consultation with neighbouring councils, Rushmoor Borough Council being next door as an example.

Rushmoor is building thousands of homes which impact our road network. A31, A3

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Respondent: 8729313 / Lisa Wright</th>
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<tr>
<td>Document:  Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination</td>
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</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (Yes)

Depending on who is already booked to speak, yes, i would like to be heard

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<tr>
<th>Comment ID:  SQLP16/547</th>
<th>Respondent: 8729313 / Lisa Wright</th>
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<tr>
<td>Document:  Proposed Submission Local Plan: strategy and sites 2016 / Question 7: Any other comments?</td>
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</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (Yes)
Maps change frequently. First you see ancient woodland then with the next draft you don't. Maps are using old data and do not reflect the true nature of places. The whole thing's been a mess since they started.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** SQLP16/563  **Respondent:** 8729313 / Lisa Wright  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 7: Any other comments?

**Do you consider this section of the document; complies with the Duty to Cooperate?** ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** (Yes)

**OBJECT** To building anything on Greenbelt, AGLV or AONB sites. It should be protected as per election promises from Local and Central Government.

**OBJECT** to amount, or lack of, homes planned for the town.

**OBJECT** to SHMA figure of 693, Guildford is promoted as a growth town and this plan does not reflect Local Need. Further independent scrutiny of the base line data shows that this document is seriously flawed. GBC insists it is right but they haven't seen the calculations.

**OBJECT** to the proposals for more employment space as guildford already has a very high employment rate. We also have a range of buildings which are empty.

**OBJECT** to huge retail expansion in Guildford. These places should be reserved for homes. Guildford already has ample retail space, some of which are still empty. Our local businesses will be unable to compete with big retailers and will be forced to close.

**OBJECT** to the current lack of infrastructure. Guildford is gridlocked, no one seems to do anything about it. We can't get to the station, it takes longer to drive 2.4 miles from the station as it does to get a train from Waterloo to Guildford. More people will make this journey ridiculous.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** SQLP16/590  **Respondent:** 8729313 / Lisa Wright  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 7: Any other comments?
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to Greenbelt being created in Ash and Tonghm to the detriment of another site elsewhere.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/1763  Respondent: 8729313 / Lisa Wright  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Question 7: Any other comments?

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

In addition to my online comments.

I would like to object at the way Guildford Borough Council consulted Worplesdon Borough Council and neighbouring councils on the Local Plan. They had one meeting with us in three years at which they promised that in Worplesdon 'we would be pleased'. They showed us a map of all the sites, without labels.

They then showed neighbouring parish councils different maps and gave different views of the same plan.

It seemed different maps and explanations were given to every Parish Council across Guildford. The whole thing was just a tick box exercise.

Furthermore, as a Parish Councillor, we were warned that if the current Local Plan sites didn't go forward for approval, other sites, e.g Fairlands safeguarded land would come back in the plan. This I took as a direct threat, knowing that the residents of Fairlands had previously objected to their safeguarded land for a multitude of reasons and had it removed from this consultation.

Therefore, I must object to the lack of openness, honesty and transparency Guildford Borough Council has given to its residents and Councillors during this consultation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/2606  Respondent: 8729313 / Lisa Wright  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Introduction
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Overall, I object to this local plan as it;

Does not make efficient use of Guildford's Brownfield sites for homes.

Relies on housing need projection which has not been publically scrutinised.

It is too reliant on Greenbelt to provide housing where no special circumstances have been listed to warrant changing Greenbelt boundaries, especially ignoring residents and elected councillors wishes to protect these areas.

It does not protect our Greenbelt, AGLV and AONB from development.

It makes no attempt to protect our wildlife.

It has no social/council housing provision.

It predominantly adds to traffic congestion, flooding, air pollution and the subsequent physical and mental health issues of our communities.

It takes no account of Brexit and the likely impact of migration or population change.

It does not account for our very large native and foreign student population which should be housed by the University of Surrey to free up our family housing stock.

It adds to the travel congestion from trains, buses and traffic that we have in Guildford with no solution available.

It does not specify what affordable housing is and makes no attempt to provide enough affordable housing for our young people, elderly or key workers.

Most of my comments on previous consultations have been largely ignored and unresolved.

Some of the sites which are still included in this plan have already been refused planning permission.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/2234  Respondent: 8729313 / Lisa Wright  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A12

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to the reduction of homes proposed on this brownfield site.
Put the car park under ground and you have room for more than 60 homes.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp172/2235  Respondent: 8729313 / Lisa Wright  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A14

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the low density of this site and question whether a higher amount of homes can be provided on this Brownfield site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp172/2284  Respondent: 8729313 / Lisa Wright  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( No ), is Sound? ( No ), is Legally Compliant? ( No )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to any building on this Greenbelt, AGLV and AONB.

Residents and the wider community have not been listened to and most of the objections to this site have not be addressed, primarily the protection of our designated greenbelt, AGLV and AONB.

An independent assessment of the whole site, commissioned by Worplesdon and Compton Parish Councils shows that the site warrants inclusion into the AONB. This has been completely ignored. (strangely, the council excluded these particular fields from the AONB review list to be assessed by their own chosen consultant last year).

3, I object to further expansion of the Surrey Research Park when the current business park is not being fully utilised. There are still 'plots' which haven't been built on yet, while other units are still vacant. The existing park is covered in surface car parks which could be built over. The lack of efficiency with the current Research Park with large unused space is criminal. There is huge traffic congestion throughout the local area impacting the Hospital, A3, Park Barn- tailing back to
Worplesdon, Tesco roundabout and of course, the business park itself. Doubling the traffic from a whole new business park would double the congestion and severly impact our Hospital. The only access road would have to be cut through a section of Ancient Woodland (they've already started the road access). A joint traffic study commissioned by Worplesdon and Compton Parish Councils has shown an increase in traffic queues and congestion along the A31 and A3 which currently are gridlocked in rush hour.

9. Surrey County Council have already stated that there is no need for a further secondary school in this area. The nearby 'Kings College' is historically under subscribed and has ample room for expansion should it be required.

ref Infrastructure.

note 1,

I object to another major road, serving 1800 homes and a new business park being added to The Egerton Road/ Gill Avenue area. It is currently one of the worst congested road networks in Guilford, always at a stand still every morning and evening with people trying to access the Research Park, University, Hospital, Tesco and the A3, the road has no further capacity, In particular, I am concerned about Hospital ambulance access, rising pollution levels and road accidents. I am also concerned that the this new road will serve as a cut through from everything North and West trying to bypass Guildford itself (which is a nightmare any day of the week or weekend).

I also strongly object to the impact on the current Ancient Woodland and adjoining SNCI Commons, this road will cut a gaping hole through a very important wildlife corridor.

Furthermore, I object to the proposed route coming off the A31 into Blackwell Farm as it will significantly impact the beauty of the Nationally protected AONB and have a detrimental affect on the arable land, large native trees and wildlife in the area.

note 3.

I object to the University and GBC statement here. The proposal of 'controlled access' to the Blackwell farm site is completely unworkable. Aside from the fact that no working model of a large scale housing estate with ANPR or similar can be found (because it doesn't work), how can we possibly police this type of situation? Will the taxpayer have to pay to monitor this site?

note 4,

The sustainable Movement corridor does not work on this site as it is very hilly, the average person will be unlikely to want to either cycle or walk up this steep hill. I object to Green Belt land being used for this purpose.

note 5.

Who is providing this bus network? Has Surrey County Council agreed to provide these services? We have recently seen our local bus network in Worplesdon being shrunk as it is not profitable for the bus companies to run the services. Buses do not work, people like to drive!

Note 10. Primary provision is available in Park Barn and I therefore object to the building of a new school on this site.

Note 11, SCC has no need for extra school capacity in West Guildford. I object to this clause being added at this point to try and 'sweeten' the development, it is irrelevant for this Local Plan document.
Note 22. I object to this. As already stated, the current Business Park has empty units, unbuilt plots and acres of unused land (which was taken from the greenbelt in 2003). There is no supporting evidence to warrant a further Research Park.

In Addition, these issues are missing from the proposal, have not been addressed and should be noted;

There is no statement of special or exceptional circumstances to warrant taking this land out of its protection and this should be divulged ASAP so we can make informed decisions.

Air pollution is very high in this area as shown by recent Guildford reports, I am very concerned about the current levels and I object to this development as it will dangerously increase that pollution and subsequent health of our communities. I already have a friend that was forced to move from the area to Scotland to avoid air pollution!

This farmland includes some of the best arable land at grade 2 and 3 and should be preserved for farming.

There is no mention of protected species, skylarks, bats, badgers etc and I object to their destruction.

Flooding is a serious problem in Worplesdon, this development will increase those problems.

This document is not Legally Compliant as disregards various policies of the NPPF, which include but are not limited to, the protection of the views to and from an AONB, the protection of our best and most versatile Agricultural land, Greenbelt protection etc etc.

This plan is not Sound as this site A26 has so many environmental, traffic, flooding and financial issues it is unlikely to be built within the plan period or at all. It is unlikely with all the mitigation required that the site will offer any form of affordable housing after a viability calculation.

This plan fails the Duty to Cooperate as has not considered our neighbours in Rushmoor who have a huge development proposal for thousands of houses, most of which will rely on the A31 and A3 as their major transport links. Furthermore, Waverley sites such as Dunsfold which also have a huge impact on the A31/A3 junction have not been assessed for their additional impact.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
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<th>pslp172/2580</th>
<th>Respondent:</th>
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</table>
I object to the change of name of this proposed site.

This site is not just an old airfield! The majority of this site is agricultural and the title should reflect that.

I object to the increase in the size of this land parcel, all of which is in the greenbelt.

I object to the intended mitigation regarding traffic at Clandon/Send junction as this will do nothing to protect the local area. Traffic from this site will predominantly be travelling towards London in the morning, as is reflected around the home counties, thus the impact will be felt at Jct 10 /M25. Air pollution and congestion at this junction is severe and further traffic movements will increase the problem.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp172/2219  Respondent: 8729313 / Lisa Wright  Agent:  
Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy A4  

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( No )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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I object to this BROWNFIELD, town centre site being deleted from the Local Plan as it could provide homes for many of our young people.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

reinstate the site and utilise this area for crucial homes.

Attached documents:

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Comment ID: pslp172/2581  Respondent: 8729313 / Lisa Wright  Agent:  
Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy A42  

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to the increase in housing on this site. Tannery Lane is a very narrow lane and will not be able to cope with the traffic congestion. Furthermore, the whole village of Send has terrible congestion as it is used as a Rat Run for cars coming from Woking, joining the A3, any further developments in Send will add to this congestion.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** pslp172/2583  **Respondent:** 8729313 / Lisa Wright  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

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I object to this huge land parcel of 29 Hectares, all of which is Greenbelt being allocated for only 406 homes. What is all the spare land going to be used for?

I object as it is Greenbelt and no special circumstances have been provided for its change of use.

I object as it will cause further congestion to roads which are already gridlocked in Rush Hour.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** pslp172/2584  **Respondent:** 8729313 / Lisa Wright  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy A44

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

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I object as my previous comments have not been resolved. This is an old land fill site, is greenbelt, and provides some much needed public space for walkers etc.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** pslp172/2224  **Respondent:** 8729313 / Lisa Wright  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy A5
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The amount of homes can be increased on this BROWNFIELD site, 175 is not enough.
May I suggest a direct 'back route' to the station to keep traffic and pedestrians away from Walnut Tree Close?
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/2586  Respondent: 8729313 / Lisa Wright  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A58

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object as this is a brand new addition to the Local Plan and has not be subject to the same scrutiny as other sites in the Plan.
I object on the following basis;
It's Greenbelt and no special circumstances have been given to change this land classification.
Traffic along this stretch of Send is dangerously fast, there will be a multitude of accidents if you increase the traffic in this area.
You only need 2-3 acres of land to build 7000sq m of property, Why have you allocated 10 times that amount for this site? Would it not have been more 'open' to say that you intend to build 500,000 sq m of industrial units on this site rather than lie?
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/2574  Respondent: 8729313 / Lisa Wright  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A59

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I am concerned with the traffic impact in Park Barn, Worplesdon and the areas around the hospital with the increased car journeys to drop off and collect travellers at the new station.

I am also concerned that Park Barn will become one large parking area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/2228  Respondent: 8729313 / Lisa Wright  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A6

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the amount of retail and office space this site has been allocated. Retail is in demise and guildford still has empty shops in the Friary, High Street and North Street.

I object to the huge increase in Food outlet space which is very unnecessary as we have a very nice offering of restaurants and fast food outlets already. If built, could force some of our top, independent restaurants out of business.

I object to the low amount of housing this site offers. Surely, with such a high housing target, Guildford should be utilising these brownfield sites for homes. I estimate that at least 1000 sustainable homes could be provided in this town centre site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/1181  Respondent: 8729313 / Lisa Wright  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy E4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Object.

The University has plenty of space on the existing Surrey Research Park for expanding its buildings. the current site is full of surface car parking, huge empty plots, extensive greenery and landscaping.
The University markets this site as Low Density and should do very much more to EFFICIENTLY use its land before taking more of our countryside for development. They should invest in building out the huge empty plots, filling the empty offices and building over their car parks.

This proposed extension will also damage a very important Wildlife corridor, which is Ancient Woodland. It will also increase flooding in Wood Street, Fairlands, Park Barn and Guildford.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents: IMG_1735.PNG (3.4 MB)
community”. The cost, however, would be to completely degrade or destroy an existing community in Normandy and Flexford.

While you talk about “appropriate mitigation for flood risk and flood risk management”, these are merely hollow words that totally underestimate the long-established problems faced by Normandy and Flexford in relation to flooding. If developers manage to make the 67-acre site “flood-free” (which I would greatly doubt), they would merely pass the problem on to surrounding lands and properties. This is irresponsible and unforgiveable and would have huge financial, insurance and quality-of-life implications for people already resident in Normandy and Flexford.

The proposed development at site A46 would also have huge impacts on local roads and would create even more traffic and access problems for local people. I would invite councillors and planning officers to visit Normandy and Flexford at peak times – and then to imagine the further chaos that will be caused by 1,100 additional homes, not to mention 1,400 pupils (or more) on a typical “school run”!

I am only too conscious that any objections to your proposals must be based on hard facts, not simple emotions or “NIMBYism”. I would therefore highlight the following specific points for your consideration:

• Guildford Borough Council has failed beyond any question to demonstrate “exceptional circumstances” why site A46 should lose its Green Belt status and therefore be developed.
• The allocation of site A46 for development does not take account of local communities’ needs and priorities – and therefore falls down on National Planning Policy Framework.
• Potential development of brownfield sites across the borough has not been adequately assessed before green belt has been lined up for potential sacrifice.
• A doubling of the size of Normandy and Flexford’s population is disproportionate and would destroy the rural environment.
• The council has failed to take serious consideration of the potential impact on local roads and commuters and the potential for creating gridlock in an already-pressured road system.
• The impact of additional vehicles (particularly queuing as they attempt to get on to or along the A323) would cause unacceptable levels of air pollution and would put public health at risk.
• There is no evidence whatsoever that a secondary school (or an additional primary school) will be required for Normandy. (If there is a need in the borough, there are arguably much better sites that would not require such huge numbers of people to travel by road to reach the new facilities.)
• The environmental impact (on valuable green space, ancient woodlands and potentially diverse wildlife) would be huge – and has not been considered adequately by the council.
• A number of important or protected species (such as hedgehogs, newts, snakes, badgers, bats and dormice) are known to live in and around Normandy, so are threatened by the development of site A46.
• Flood risk and flood management has not been considered adequately.
• The development site falls just 800 metres from the Thames Basin Heath Special Protection Area, so ignores requirements for “protection zones” to be respected around such locations.

Finally, I express my grave concerns that development of site A46 would be so clearly unjustifiable that Guildford Borough Council would face inevitable (and potentially protracted) legal battles if it presses ahead with its plans.

As a local council-tax payer, I can see that valuable financial resources would be lost and – at a time of ongoing national and international economic uncertainty – that the borough council would therefore have to make further and wholly unnecessary cuts to local services. We do not live in an economic climate where much-needed resources can be squandered on doomed legal battles by our elected representatives and their officials.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Proposal to build 385 new homes in a village of 1100 houses - an increase of 35% would change the rural character and openness of the village forever.

The infrastructure cannot support this large number of homes and is unsustainable.

Transport:
- The lanes are too narrow and in poor condition with tree roots growing underneath them making them very bumpy. Few have public footpaths
- Limited bus service
- Limited public footpaths
- Lanes too narrow for Cycle lanes
- Nearest Railway station is East Horsley with limited parking
- Drainage system is inadequate,

Schooling
- 1 x subscribed junior school The Raleigh shared with East Horsley
- Nearest secondary school is The Howard of Effingham also over subscribed
- 1x shared medical centre with East Horsley
- 1 x shop in West Horsley. No Post office. 1 x shared library in East Horsley
- Limited parking

385 new homes in West Horsley

OBJECT
This is a substantial number of homes for a small village to absorb and will change the character of the village significantly.

West Horsley’s Neighbourhood Plan survey estimated that we might require as many as 20 new homes.

A37 Bell & Colville site being on the main road with public transport links could meet the village requirement by limiting to 20 homes not 40.

Regarding the other plots of land under consideration, I believe that either plot A38 at Manor Farm or Plot A40 Waterloo Farm would have the least impact. However the number of houses proposed is excessive.

Consideration could perhaps be given to relocating the village hall to Manor Farm area where the public tennis courts and football club are situated.

Long Reach Sang Area Object
Why do we need a public park in this area of rolling acres of beautiful countryside? An extension of public footpaths and bridleways would be far more beneficial.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9652  Respondent: 8729569 / Carolyn Kimpton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E6

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy E6 The Leisure and visitor experience

Guildford town centre is a most attractive market town overlooking hills and countryside.

Its greatest draw being that it is not a stereotypical town engulfed by ugly outlet stores and industrial buildings and has much to offer.

Visitors from overseas, London and the rest of the UK enjoy the benefits of a sophisticated town offering excellent shopping, culture, sports and attractions whilst retaining its character and size. It is pleasurable to visit in comparison to Croydon, Reading, Portsmouth, Southampton and Kingston.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9650  Respondent: 8729569 / Carolyn Kimpton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy H1 Homes for All Object

I support high density housing in urban areas, and would encourage the University to provide the majority of student accommodation on site with the land they have available. Thereby releasing a large number of rental houses back onto the market. Allocation of additional travellers sites to be reviewed as currently generous allocation in comparison with other boroughs.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy H2 Affordable Homes Object

Affordable homes in the South East is a contradiction in terms. Location is key.

Cheaper land sites should be prioritised in the borough to make it financially possible to build more affordable homes.

Land North of Guildford, West Horsley for example is more expensive and property developers will not build ‘affordable homes’ but expensive executive homes to sell at premium prices. We would be losing valuable countryside for no local benefit.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Policy P1 Surrey Hills area of outstanding natural beauty Object

This area should be protected from development

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
<table>
<thead>
<tr>
<th>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2</th>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ( )</td>
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</table>

**Policy 2 Borough Wide Strategy Object**

The house numbers proposed are unsubstantiated and require further review given the new economic and political climate since Brexit decision.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

<table>
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<th>Comment ID: PSLPP16/9654  Respondent: 8729569 / Carolyn Kimpton  Agent:</th>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ( )</td>
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</table>

**Policy P2 Green Belt**

Object to the insetting of 14 villages from the Green Belt.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

<table>
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<th>Comment ID: PSLPP16/9648  Respondent: 8729569 / Carolyn Kimpton  Agent:</th>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ( )</td>
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</table>
Policy S1 Presumption in favour of sustainable development

Object

The proposed scale of development in rural areas with inadequate transport and other infrastructure is unsustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/18624</th>
<th>Respondent: 8729569 / Carolyn Kimpton</th>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Object

The house numbers proposed are unsubstantiated and require further review given the new economic and political climate since Brexit decision.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
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<th>Respondent: 8729569 / Carolyn Kimpton</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2017 / Appendix H: Maps - West Horsley North</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

It is with relief that the number of new homes proposed in the Green Belt in West Horsley has been reduced. However, I strongly object to the following proposals in the current plan:-

1. Insetting West Horsley from the Green Belt The historic village of West Horsley with 41 listed buildings and set in glorious open countryside is in danger from the proposed development plan and insetting of becoming linked with East Horsley and creating Town Horsley. The character of West Horsley would be destroyed and should be preserved for future generations to enjoy. The West side of West Horsley is extraordinarily beautiful with rolling acres, copses, natural springs and streams meandering through the quintessential English open countryside and should be preserved at all costs. We are grateful to you and your team for removing the land between the back of Stilkmore lane and Ripley Lane. This area should be considered for inclusion in the Surrey Hills area of outstanding natural beauty and be within the village's conservation area. The open countryside is not only valued and enjoyed by locals but by visitors from nearby towns and cities and overseas.
2. Village Boundary West Horsley
We object to the straightening up of the village boundary at the back of Silkmore Lane/Ripley Lane (image left) to allow building on this land would be of huge detriment to the character of the village and the pastoral scene enjoyed by all residents and visitors alike for the sake of lining the pockets of a property developer. The open fields are enjoyed by so many with the public footpath leading across the fields beyond to Ripley Lane and visitors to Hatchtands House and parkland. Orchard Cottage is a prime example of how ruthless property developers can be in putting their own, interests before those of the whole community. See image below of the house that replaced the pretty Victorian cottage- an absolute monstrosity which blights the countryside and is seen for miles and of a size and architectural style totally inappropriate for the village, particuarly given its open location. Why was this ever allowed? This could happen to the acres of land that you propose to include into the village settlement area by straightening the village boundary. Please seriously reconsider extending out the village boundary. Thank you.

3. Sustainability for West Horsley
It appears that nothing has been put forward since last year's consultation to improve the sustainability of West Horsley development sites and thus meet national policy requirements.

4 New Homes - these should be built in the towns where there is work not in the countryside. Apartments and social Housing is required particularly in Guildford. Shopping space is not a priority for Guildford town centre with the increasing trend for shopping online etc. Housing is.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/145  Respondent: 8729793 / Muriel Metson  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Thank you for inviting me to comment on the local plan.

I am very strongly against the building of so many new houses. When the local roads are already far too full, why are we trying to make the situation even worse by bringing in more people and cars. The schools are already too full – I understand it is quite difficult to get the school of one’s choice for our children. It gets more difficult to make appointments with doctors and we are rapidly losing our green and pleasant land and our attractive villages will lose their identity.

I think it would be much more sensible to stop the ever increasing immigration figures so that all these new houses will not be needed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/295  Respondent: 8730753 / P A Lines  Agent:

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Page 2084 of 3335
I would like to object to some of the plans for East Horsley on the following grounds.

1. Including The Warren and Park Horsley inside the village boundary. If Infilling was allowed, it would mean increased traffic onto the A246 from building lorries and new residents, onto what is an extremely dangerous part of the road, and where accidents occur with monotonous regularity. The Highways dept has, in the past, recommended refusal to new properties on those grounds. They are also in the Green Belt.

2. Developing Thatchers site. Thatchers is also on a very dangerous bend. Plus, we need an hotel in the village. Plus it gives employment.

3. Other sites planned for development are on flood areas, and would mean increased flooding on the roundabout onto the A3, which also occurs regularly.

4. Infrastructure in already under great strain, and the council recently stated that development would not happen unless infrastructure could cope. Already the Station car park is full, with people missing trains due to nowhere to park. The car park behind the shops is also frequently full, ditto the Village Hall and Doctor's. The schools are full and so are the doctors.

5. 3 of your proposed sights, Thatchers, Carlians and Bell and Colville, are local employers. Your stated desire to increase local employment, 4.4.1 shows that you should be encouraging local economy, not removing it for the sake of a few houses.

6. Removal of areas from the Green Belt. The Prime Minister, no less, promised that no housing would be built on Green Belt. It should be sacrosanct, previous generations fought hard for us to have it.

7. Guildford has enough brownfield sites for building, and already builds more houses than suggested by government. We really cannot cope with much more.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
With regard to any future development of planning, Normandy and Flexford’s need and priorities have not been decided by the residents. National Planning Policy Framework (NPPF) 1 ‘provides a framework within which local people and their parish councils can produce their own distinctive local and neighbourhood plans reflecting their needs and priorities of their communities.’ Evidence has shown that at least 2 years ago, documentation for A46 was submitted on behalf of Taylor Wimpey to Guildford Borough Council Planning Policy. At this stage, NO ‘Meaningful engagement was made or requested from local people’, despite NPPF 155 clearly stating that ‘early and meaningful’ engagement and collaboration with neighbourhoods and local organisations being essential.

There is no proven need for a secondary school in Normandy, yet this is one of the primary reasons and rationale as to why sites A48 and A47 (due to A47 site’s ‘close proximity to the proposed new secondary school’) have been identified as proposed sites for planning permission and building in the Guildford Borough Local Plan. Indeed, the birth rate has fallen in the last 2 years and secondary schools to the west of the Borough are under subscribed by 736. Another 480 places will be available at the new Technical College (2018) and there are approved expansions at Guildford County and St Peters. The New Hoe Valley school will have 120 places available per year, 25 places this year not taken (no catchment areas). Blackwell Farm was suggested to be a more accessible option for a school. With no proven need for a secondary school in the Normandy and Flexford area, comes no development requirement.

I purchased [Response has been redacted due to statement containing personal data which cannot be disclosed due to the provisions of the Data Protection Act 1998] in 2012, moving in to the property in September of that year. The property backs onto the proposed site (A47). During the process of purchasing the property, I conducted (via my solicitor) all the necessary searches as well as conducting my own due diligence. The biggest concern surrounded site A47 and whether this would ever be built upon. We were sufficiently satisfied that site A47 was in fact green belt (and privately owned) and could not and would not be built upon. As such we purchased the property.

You can imagine our surprise and immense concern on discovering the plans set out by Guildford Borough Council in relation to building on this beautiful piece of green belt land. My understanding of green belt is that, "it is a policy for controlling urban growth; the idea is for a ring of countryside where urbanisation will be resisted for the foreseeable future, maintaining an area where agriculture, forestry and outdoor leisure can be expected to prevail. The fundamental aim of green belt policy is to prevent urban sprawl by keeping land permanently open and consequently the most important attribute of green belts is their openness."

Privacy is of paramount importance to us. As things stand, we are not overlooked at any side of our property (a key reason why we purchased the property) and are afforded privacy by the trees on site A47, immediately at the back of our house, (another key reason why we purchased the property).

In fact, so magnificent are the views at the back of my property (looking onto site A47) that I have retained an open wire fence to allow me to enjoy the views and nature that site A47 supports year round. I regularly see and watch a broad spectrum of animals and birds on site A47 including, herons, blue tits, robins, wood peckers, starlings, wood pigeons, black birds, magpies, chaffinches, sparrows, owls and bats. Additionally, I see hedgehogs and toads. I also enjoy watching the 2 horses that currently reside on site A47. I’d point out also that, this proposed planning permission would bring a threat to the Thames Basin Heath Special Protection Area (TBHSPA), being within the 400m – 5km zone of protection.

As I’m sure you are aware site A47 is also a floodplain which had significant surface water on it throughout the early part of 2013 and more recently in 2015. A ditch runs directly adjacent (on site A47) to my property and the ditch was also flooded during this period and most times there is any medium to heavy rainfall. Building further properties on site A47 will not improve this situation and could ultimately cause more problems in a village with a history of flooding.

I currently reside in a cul de sac (which was a key reason for purchasing the property) and as such am not subject to any through traffic. I appreciate that one of the possible access points to any development on site A47 could be between numbers [Response has been redacted due to statement containing personal data which cannot be disclosed due to the provisions of the Data Protection Act 1998]. This would mean that my property would reside on a through road, that there would be constant traffic (in both development and after completion), that my currently peaceful road would become increasing noisy, the potential for increased crime in the area, polluted with exhaust fumes and would result in my general privacy being infringed. Myself and my wife moved to Normandy with the hope that we may start a family in the future and that any children we have would be able to play freely and safely in the cul de sac. It angers me that this may not be an
option for them or any other children or grandchildren that neighbours may have. An additional point is that we moved from an overcrowded area and deliberately sought out a peaceful, semi-rural cul de sac.

I would also like to highlight my objection to the likely massive increase in traffic on both Flexford Road and Glaziers Lane as possible access points. Even if the site access is not via The Paddocks, surely a significant increase in construction traffic (and thereafter residential traffic) will cause me and my fellow Paddocks residents increased disruption in our travels in and around Normandy. Glaziers Lane is called ‘Lane’ for a reason – it does not provide adequate pavement or road infrastructure for the increased road and pedestrian traffic which both a new school and increased population in the village of at least 1100 new homes would bring.

I would also like to make the point that I am opposed to our lovely village of Normandy being cherry picked for so much unnecessary development. At least 1100 new dwellings (some of which will be social housing) would nearly double the size and population of Normandy. This would obviously put increased stress on existing infrastructure for water, sewage, gas, electricity, telephones and broadband services. As mentioned above, this would also add a massive increase in traffic which will require extensive and costly urbanisation of local roads. It would remove and destroy the rural character of the village and make Normandy a large (and probably ugly) commuter dormitory for Guildford. I do not want this.

To conclude, unsurprisingly, I will fight this proposal for housing (of any kind, including social housing). I will work in unison with my fellow neighbours and ensure that this proposal does not go ahead. For all the reasons given above, it angers me that you are even considering it as an option.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp173/565  Respondent: 8731265 / Peter Robertson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Appendix H: Maps - Normandy and Flexford

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to the ‘insetting’ in the Green Belt of the three most settled areas of Normandy and Flexford for 2 reasons.
   1. Firstly, no case has been made on the grounds of ‘exceptional circumstances’ for removing this land from the Green Belt, and by so doing, GBC will make it easier for further attrition of the Green Belt to take place in future as a result of extensions to the settlement area on adjacent Green Belt land (Traveller site at Palm House Nurseries (Policy/Site A50).
   2. Secondly, all three settlements contribute to the openness of the Green Belt and should therefore remain ‘washed over’ by it. This view has been supported by Planning Inspectors, who have indicated while rejecting recent appeal decisions that the land at Flexford and Normandy contributes to the openness of the Green Belt. ‘Insetting’ will make it much harder to sustain this crucial openness in future.

With regard to the 10,000 homes that will likely be built within a 10 mile radius of Normandy as a result of various Local Plans, this will put more pressure on our roads and will have a detrimental impact on our village along with other rural communities. I would urge GBC to commit to the improvements that are necessary to the roads and other infrastructure for the scale of these developments ahead of construction, such as the new road bridge and footbridge at Ash to enable the closure of the level crossing (ref. LRN21).
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/4943  Respondent: 8731265 / Peter Robertson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

• disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
• directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
• ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
• adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/4013  Respondent: 8731265 / Peter Robertson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A47

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I support the removal of sites A46 and A47 from the 2017 Plan, which were strongly opposed by Councillors and other Normandy residents due to the fact that they would have significantly and irretrievably destroyed the character of Normandy and Flexford. Additionally, a significant burden would have been placed on the local transport and other infrastructure.

I am pleased that Guildford Borough Council (GBC) have taken note of the many objections to these proposed sites and also of the findings of the revised Sustainability Appraisal 2017 and removed them from the Plan.
With regard to A47, as the reason for this amendment highlighted in the summary of key changes to the Proposed Submission Local Plan, ‘the site continues to meet the criteria for a Site of Nature Conservation Interest (SNCI), which is incompatible with development.’

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/2099  Respondent: 8731265 / Peter Robertson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the removal from the Green Belt of homes in Guildford Road, the northern end of Glaziers Lane, Flexford, Walden Cottages and Palm House Nurseries Traveller site. Placing these houses outside the Green Belt could enable development within these areas at a much higher density and will give greater success for planning applications. I believe that this is the wrong decision as these areas contribute to the “openness of the Green Belt”.

I am pleased to see the reversion of the Green Belt boundaries to similar to their existing levels (with the exception of ‘insetting’) as a consequence of the withdrawal of the previously proposed strategic sites (A46 and A47). In particular, I welcome the protection this offers to our countryside. Specifically, I welcome and support the acknowledgement that the land lying between Normandy and Flexford (the previous site A46) is particularly sensitive in Green Belt terms as it contributes significantly to the ‘openness’ of the Green Belt in this area, as well as being of high grade agriculturally and therefore of importance in terms of the rural economy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/386  Respondent: 8731297 / Roger Bathurst  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
This email registers my strong objection to the proposed Local Plan, particularly as respect to the Horsleys. I note in horror that you propose to withdraw the villages from the Green Belt and, entirely wrongly and as a “flag of convenience” for your Plan, redefine them as semi urban. I am sure you are well aware of the Planning Practice Guide but, since your Plan seems to ignore at least part of them, they are set out below for your convenience.

**Once established, Green Belt boundaries should only be altered in exceptional circumstances.**

When considering any planning application, local planning authorities should ensure that substantial weight is given to any harm to the Green Belt. ‘Very special circumstances’ will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm, is clearly outweighed by other considerations.

I recognise that there is a housing need in the Borough. I also recognise that Guildford has to respect the NPPF. Further, I recognise that certain of the brown field sites proposed in the Horsleys - Thatcher’s Hotel and Bell and Colvill - have some measure of rationality in terms of size and scope.

However, I totally disagree that destruction of Green Belt and extraordinary levels of proposed development in two villages (which would indeed become semi urban if your ill thought out Plan is executed) is in any way necessary at this juncture.

You make it plain in your presentation that your considerations were first for urban development, then for brownfield sites, then for areas of infill and finally for Green Belt. This again makes sense.

It is, however, at this point, that it stops making sense because it was represented clearly to me by the planning officer that this is, of course, a whole Plan. In other words, you are seeking to pass the Plan in its entirety. Once accepted, you will be seeking quick wins. What will be quicker than building on green fields? So much easier than an urban development. When challenged, the planning officer agreed with my assessment. In other words, the nonsense about Green Belt being the last to be considered is totally misleading. In fact, it will likely be the FIRST to be developed. That is a travesty.

It may well be that we need the number of houses in the Borough by 2033 that we envisage today, but equally it may well not. Such is the political uncertainty that realistic projections are well nigh impossible. To build on Green Belt way, way ahead of any necessity to do so is borderline criminal vandalism. The Council is perfectly well aware that, once the Horsleys are removed from the Green Belt, there will be a deluge of planning applications which, given the extraordinary scale of your awful current Plan, will be almost impossible to resist. The utter ruination of two wonderful VILLAGES (that is what they are) would be an appalling misuse of your power.

I urge the Council to think again. The Plan absolutely MUST be altered to a structure whereby housing is built in the same order as was assessed: urban, brown field, infill and finally, and only when absolutely necessary AT THAT TIME AND NOT BEFORE, Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** PSLPA16/3640  **Respondent:** 8731361 / Caroline Robertson  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Normandy and Flexford

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I am writing to strongly object to the proposed planning permission for sites A47 (land to the east of the Paddocks) and A46 (land to the south of Normandy and north of Flexford) within the Guildford Borough Local Plan.

A46 was not proposed or considered as a strategic site in the first consultation. In fact, in the 2014 consultation, this site was ‘safeguarded’ and was not removed from the Metropolitan Greenbelt. ‘Exceptional circumstances’ have not been demonstrated or approved by the inspectorate. In the Solihull ruling, boundary cannot be drawn around sections of land and urbanised, (A46/A47).

With regard to any future development of planning, Normandy and Flexford’s need and priorities have not been decided by the residents. National Planning Policy Framework (NPPF) 1 ‘provides a framework within which local people and their parish councils can produce their own distinctive local and neighbourhood plans reflecting their needs and priorities of their communities.’ Evidence has shown that at least 2 years ago, documentation for A46 was submitted on behalf of Taylor Wimpey to Guildford Borough Council Planning Policy. At this stage, NO ‘Meaningful engagement was made or requested from local people’, despite NPPF 155 clearly stating that ‘early and meaningful’ engagement and collaboration with neighbourhoods and local organisations being essential.

There is no proven need for a secondary school in Normandy, yet this is one of the primary reasons and rationale as to why sites A46 and A47 (due to A47 site’s ‘close proximity to the proposed new secondary school’) have been identified as proposed sites for planning permission and building in the Guildford Borough Local Plan. Indeed, the birth rate has fallen in the last 2 years and secondary schools to the west of the Borough are under subscribed by 736. Another 480 places will be available at the new Technical College (2018) and there are approved expansions at Guildford County and St Peters. The New Hoe Valley school will have 120 places available per year, 25 places this year not taken (no catchment areas). Blackwell Farm was suggested to be a more accessible option for a school. With no proven need for a secondary school in the Normandy and Flexford area, comes no development requirement.

I purchased 36 The Paddocks in 2012, moving in to the property in September of that year. The property backs onto the proposed site (A47). During the process of purchasing the property, I conducted (via my solicitor) all the necessary searches as well as conducting my own due diligence. The biggest concern surrounded site A47 and whether this would ever be built upon. We were sufficiently satisfied that site A47 was in fact green belt (and privately owned) and could not and would not be built upon. As such we purchased the property.

Privacy is of paramount importance to us. As things stand, we are not overlooked at any side of our property (a key reason why we purchased the property) and are afforded privacy by the trees on site A47, immediately at the back of our house, (another key reason why we purchased the property).

You can imagine our surprise and immense concern on discovering the plans set out by Guildford Borough Council in relation to building on this beautiful piece of green belt land. My understanding of green belt is that, "it is a policy for controlling urban growth; the idea is for a ring of countryside where urbanisation will be resisted for the foreseeable future, maintaining an area where agriculture, forestry and outdoor leisure can be expected to prevail. The fundamental aim of green belt policy is to prevent urban sprawl by keeping land permanently open and consequently the most important attribute of green belts is their openness."

In fact, so magnificent are the views at the back of my property (looking onto site A47) that I have retained an open wire fence to allow me to enjoy the views and nature that site A47 supports year round. I regularly see and watch a broad spectrum of animals and birds on site A47 including, herons, blue tits, robins, wood peckers, starlings, wood pigeons, black birds, magpies, chaffinches, sparrows, owls and bats. Additionally, I see hedgehogs and toads. I also enjoy watching the 2 horses that currently reside on site A47. I’d point out also that, this proposed planning permission would bring a threat to the Thames Basin Heath Special Protection Area (TBHSPA), being within the 400m – 5km zone of protection.

As I'm sure you are aware site A47 is also a floodplain which had significant surface water on it throughout the early part of 2013 and more recently in 2015. A ditch runs directly adjacent (on site A47) to my property and the ditch was also flooded during this period and most times there is any medium to heavy rainfall. Building further properties on site A47 will not improve this situation and could ultimately cause more problems in a village with a history of flooding.

I currently reside in a cul de sac (which was a key reason for purchasing the property) and as such am not subject to any through traffic. I appreciate that one of the possible access points to any development on site A47 could be between
numbers 27 and 38 The Paddocks (38 The Paddocks being immediately next door to my property). This would mean that my property would reside on a through road, that there would be constant traffic (in both development and after completion), that my currently peaceful road would become increasingly noisy, the potential for increased crime in the area, polluted with exhaust fumes and would result in my general privacy being infringed. Myself and my wife moved to Normandy with the hope that we might start a family in the future and that any children we have would be able to play freely and safely in the cul de sac. It angers me that this may not be an option for them or any other children or grandchildren that neighbours may have. An additional point is that we moved from an overcrowded area and deliberately sought out a peaceful, semi-rural cul de sac.

I would also like to highlight my strong objection to the likely massive increase in traffic on both Flexford Road and Glaziers Lane as possible access points to A47. Even if the site access is not via The Paddocks, surely a significant increase in construction traffic (and thereafter residential traffic) will cause me and my fellow Paddocks residents increased disruption in our travels in and around Normandy. Glaziers Lane is called ‘Lane’ for a reason – it does not provide adequate pavement or road infrastructure for the increased road and pedestrian traffic which both a new school and increased population in the village of at least 1100 new homes would bring.

I would also like to make the point that I am opposed to our lovely village of Normandy being cherry picked for so much unnecessary development. At least 1100 new dwellings (some of which will be social housing) would nearly double the size and population of Normandy. This would obviously put increased stress on existing infrastructure for water, sewage, gas, electricity, telephones and broadband services. As mentioned above, this would also add a massive increase in traffic which will require extensive and costly urbanisation of local roads. It would remove and destroy the rural character of the village and make Normandy a large (and probably ugly) commuter dormitory for Guildford. I do not want this.

To conclude, unsurprisingly, I will fight this proposal for housing (of any kind, including social housing). I will work in unison with my fellow neighbours and ensure that this proposal does not go ahead. For all the reasons given above, it angers me that you are even considering it as an option.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/4047  Response: 8731361 / Caroline Robertson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A46

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I support the removal of sites A46 and A47 from the 2017 Plan, which were strongly opposed by Councillors and other Normandy residents due to the fact that they would have significantly and irretrievably destroyed the character of Normandy and Flexford. Additionally, a significant burden would have been placed on the local transport and other infrastructure.

I am pleased that Guildford Borough Council (GBC) have taken note of the many objections to these proposed sites and also of the findings of the revised Sustainability Appraisal 2017 and removed them from the Plan.

With regard to A47, as the reason for this amendment highlighted in the summary of key changes to the Proposed Submission Local Plan, ‘the site continues to meet the criteria for a Site of Nature Conservation Interest (SNCI), which is incompatible with development.’
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/2149  Respondent: 8731361 / Caroline Robertson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to the removal from the Green Belt of homes in Guildford Road, the northern end of Glaziers Lane, Flexford, Walden Cottages and Palm House Nurseries Traveller site. Placing these houses outside the Green Belt could enable development within these areas at a much higher density and will give greater success for planning applications. I believe that this is the wrong decision as these areas contribute to the “openness of the Green Belt”.

1. I am pleased to see the reversion of the Green Belt boundaries to similar to their existing levels (with the exception of ‘insetting’) as a consequence of the withdrawal of the previously proposed strategic sites (A46 and A47). In particular, I welcome the protection this offers to our countryside. Specifically, I welcome and support the acknowledgement that the land lying between Normandy and Flexford (the previous site A46) is particularly sensitive in Green Belt terms as it contributes significantly to the ‘openness’ of the Green Belt in this area, as well as being of high grade agriculturally and therefore of importance in terms of the rural economy.

1. I object to the ‘insetting’ in the Green Belt of the three most settled areas of Normandy and Flexford for 2 reasons.

   1. Firstly, no case has been made on the grounds of ‘exceptional circumstances’ for removing this land from the Green Belt, and by so doing, GBC will make it easier for further attrition of the Green Belt to take place in future as a result of extensions to the settlement area on adjacent Green Belt land (Traveller site at Palm House Nurseries (Policy/Site A50).

   2. Secondly, all three settlements contribute to the openness of the Green Belt and should therefore remain ‘washed over’ by it. This view has been supported by Planning Inspectors, who have indicated while rejecting recent appeal decisions that the land at Flexford and Normandy contributes to the openness of the Green Belt. ‘Insetting’ will make it much harder to sustain this crucial openness in future.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/1615  Respondent: 8731649 / Ian Slater  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. APPENDIX C

I OBJECT to the proposed Infrastructure Schedule (Appendix C)

The Infrastructure Schedule sets out the key infrastructure requirements on which the delivery of the plan depends. For each of the Key Allocated Sites in the borough it identifies infrastructure projects that are required, except for Garlick’s Arch (A43) which is not mentioned. It is clear that the Plan takes no account of the infrastructure required for this site and is therefore not fit for purpose.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/1614  Respondent: 8731649 / Ian Slater  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. The housing needs assessment is flawed in various respects and overstates housing need. In addition since it was produced, the referendum Brexit decision has almost certainly reduced future housing need and rendered the previous assessment seriously out of date. As a result any assessment of Green Belt sites which took place to consider whether “exceptional circumstances” existed to outweigh the harm to the Green Belt was based on false premises and should be reconsidered.

2. Having determined housing need the Council was entitled to consider constraints before determining the housing number. I believe that as ill as being entitled to do this the Council was required to give proper consideration to constraints. The scarcity of sites outside the Green Belt as ill as infrastructure (most notable roads) considerations all represented constraints which should have been taken into account in determining the final housing number. Accordingly in this regard our objection to the allocation of Green Belt sites is twofold. First I believe constraints should have been applied. Secondly I believe the Council did not properly consider constraints and that their decision making process was flawed and thus subject to being set aside by the Inspector.

3. Even if having properly applied constraints there is a need to develop in the Green Belt then specific Green Belt sites should not be included in the plan unless “exceptional circumstances” for development are proven in relation to that specific site, as stipulated repeatedly in the NPPF. The Green Belt should trump short-term considerations such as perceived housing need, as case law has established. There needs to be a specific balancing exercise conducted on each Green Belt site weighing the harm to the Green Belt against the very special circumstances which are argued in favour of development at that particular site. There is no evidence this has been done. Instead the council have appeared to say that having chosen a housing needs figure and decided it cannot be met without building on Green Belt then there is no need for any further consideration and any convenient Green Belt site can be allocated for building at will.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
I OBJECT to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)

- The “objectively assessed need” figure of 693 homes a year is too high.
- A professional review by NMSS has concluded that, even basing the calculations on a period of stronger economic and student growth, the housing need figure should be revised down to 510 homes a year and the method changed to consider student housing need separately due to the distorting effects.
- The current SHMA inflates the proposed housing figure due to
  - failure to correct for errors in the historical data for international migration flows,
  - issues with the way it considers students and affordability and
  - flaws in the method for estimating the number of homes needed to support job growth.
- It is unacceptable that demographic and economic model assumptions have been withheld and cannot be checked making the process unaccountable.

The Plan’s proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the borough, it is over double the previous figure of 322 used in previous plans. The SHMA report methodology is I believe inaccurate; it inflates the needs of the borough by distorted student numbers. However, it is based on commercially confidential modelling assumptions that cannot be checked or reviewed. There is no transparency to this evidence base and it is therefore impossible to assess its accuracy. This is not democratic and is not appropriate for consultation of the Plan.

The National Planning Policy Framework allows the overall housing target to be reduced to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. **POLICY A25 - Gosden Hill Farm**

I OBJECT to Policy A25 with proposals for Gosden Hill Farm.

The Green Belt at this point serves the important function of separating West Clandon from the edge of urban Guildford. Development here will cause the two to coalesce defeating one of the objectives of the Green Belt. If this development proceeds I believe the narrow strip of Green Belt remaining between Guildford and Clandon at this point will be too narrow and will come under further pressure.

It will represent an undesirable ribbon development along the A3. It will be highly visible from the A3 when approaching Guildford and will, in conjunction with A43a at Garlick's Arch give the appearance of almost continuous development from Send through to Guildford.

The Plan does not put forward any evidence that exceptional circumstances exist to justify removing this site from the Green Belt.

The development will overburden the local road network and increase congestion on the A3 and A247 through the centre of West Clandon. This is already very heavily used whilst being unsuitable for designation as an A road. In places it is too narrow for two lorries to pass causing them to mount the pavement.

Note the following accident data:

2010 – 2014 from Crashmap data

- Clandon Cross Roads Area to Bulls Head - 17 incidents
- Bulls Heads Head to Bennett Way - 8 incidents
- Bennett Way to Highcotts Lane - 15 incidents
- Tithebarn Lane to Portsmouth Road Birch Close - 8 incidents

2015

- 21 Oct 2015 – A247 near shell garage - Three vehicles collided causing delays
  
Surrey Fire and Rescue deployed.

2016

- 15 April 2016 12 year old boy injured in The Street – A247 closed in both directions
- 28 April 2016 A3 West Clandon London bound between A247 Tythebarns Lane (Burntcommon and M25J10 (Wisley Interchange) congestion on A3 to A3100 Clay Lane Burpham
- 30 6 2016 Motorcyclists with injuries airlifted to hospital Send Marsh Road

Attempts have been made over many years to reduce traffic, traffic speeds and accident risks through West Clandon, however little has been achieved as the road cannot be widened and SCC is reluctant to impose further speed limits as congestion is already very high.

I object most strongly to the proposal for a link road to bring traffic from the Gosden Hill development to the proposed 4 way junction at Burnt Common. This has the potential to generate large volumes of traffic (including commercial vehicles) on the A247 through West Clandon - a road which is already under traffic stress (see below).
The land in Gosden Hill does exactly what the Greenbelt was designed to achieve. It provides a green buffer between the Guildford Urban Area and West Clandon, gives Burpham a defined green boundary and breathing space and it hides Guildford town from visitors until they pass the off-slip to Burpham.

No exceptional circumstances have been demonstrated for building on this site and therefore it does not comply with paragraphs 87-89 of the NPPF. It stops the sprawl of Guildford town, assists in safeguarding the countryside from encroachment and assists in urban regeneration by encouraging the recycling of derelict and other urban land. All of these are requirements of the NPPF.

The scale of Gosden Hill is out of proportion to West Clandon. It would have four times the amount of housing plus shops, offices/factories, GP surgery, schools. Development on this scale would blight a historic village with a history going back to the doomsday book and beyond.

Gosden Hill is the most obvious location for the north end of an A3 tunnel. It has rising ground and is situated just before the urban area. If it is built on, it will be very difficult to construct a tunnel.

The development will generate in the region of 6,000 vehicles which will pour on to the A3 which is stationary every day during rush hours. The linking of the A3100, B2215 and A247 would channel thousands of cars through the narrow, winding road through West Clandon, a road where large lorries mount the pavement virtually every day and through Send and Ripley which are also severely constrained.

The volume of traffic will greatly increase air pollution which is particularly critical given the proposal to build two schools.

Currently, a two way junction at the site would require vehicles wanting to go north on the A3 to go through Burpham which is grid-locked every day.

Burpham’s sewers are at capacity. Sewage would have to be pumped to Slyfield for processing, a project of enormous cost.

There is inadequate fresh water in Guildford and current supplies could not meet the needs of a development of this size.

Electricity supply is also inadequate and would require a big infrastructure development.

The railway station was rejected by Guildford Borough Council in 1984 because it feared Gosden Hill would become a dormitory estate for London.

The wording of the Local Plan with regard to Gosden Hill is so loose that the developer could virtually do whatever it wants.

The remaining agricultural land between Gosden Hill and West Clandon is so small that it is highly likely to be uneconomic and therefore a prime candidate for further development which would roll the Guildford Urban Area over West Clandon towards East Clandon and Wisley.

If the Strategic Sites are developed, the north of Guildford will deliver 36%, 5,036 houses towards the total of around 14,000. The infrastructures of the existing villages and the A3 will be overwhelmed by the scale of development.

A new on-slip at Burpham would only be 1.8km from the on-slip at Burnt Common which is against Highway England’s requirement of 2km.

Development of the A3 at best will not start until after 2020 and the building of a tunnel, which is only an “aspiration” in the Local Plan, is likely to be many years after. In the meantime given that developers build houses to provide cash-flow for infrastructure, Gosden Hill will have a crippling effect on villages like West Clandon and the A3.

Gosden Hill already has surface water problems. Merrow Stream crosses the site. No hydrological survey has been carried out to assess the implications. Electricity pylons run through the centre of Gosden Hill which have health and safety issues.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Attached documents:

Comment ID: PSLPS16/3096  Respondent: 8731649 / Ian Slater  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. POLICY A43 AND A43a – Garlick’s Arch

I OBJECT to Policy A43 and A43a on Garlick’s Arch.

The site was only inserted in the draft plan at a late stage just before publication of the consultation draft which is a shabby way for the Council to proceed. The site is not a sustainable site being far from any infrastructure facilities and transport links. The bus service is infrequent and it is almost certain any future residents will rely almost entirely on cars for journeys. Similarly any employees at the employment areas will almost undoubtedly arrive and leave by car.

The site is susceptible to flooding and will not make a suitable site.

The Green Belt at this point serves the important function of separating West Clandon from Send. Building here will cause the two to coalesce defeating one of the objectives of the Green Belt.

I have seen no evidence that exceptional circumstances exist to justify removing this site from the Green Belt or that this important issue has been addressed. The Green Belt and Countryside study did not even consider this site.

It is understood the Council’s eyes may have been turned by the possibility of receiving for free the land which might be used for new A3 slip roads in return for allowing this development, thus justifying it as some form of enabling development. However the slip road land if needed could be safeguarded in the plan and acquired by compulsory purchase when required. Lack of current funding for the slip road is not a justification for allowing the development of this site. If the slip road is genuinely needed then government funding will be available for it. (One of the reasons for turning down the so called enabling development proposal intended to fund the rebuilding of the Howard of Effingham School was that the redevelopment of the school was not essential. As and when it became essential Government funding would become available. Accordingly enabling development was not necessary. The same principle applies here.)

The A247 running south past this site through the centre of West Clandon is already very heavily used whilst being unsuitable for designation as an A road. In places it is too narrow for two lorries to pass causing them to mount the pavement- often at speed. It has narrow bends with poor sight lines, an infants school and a hump-backed bridge concealing the entrance road to the station for southward traffic. In addition, there are no continuous footpaths which forces pedestrians to cross and re-cross the road. Development at Garlick’s Arch will only exacerbate the problem and make the road even more congested and unsafe for pedestrians.

The development will cause harm to the ancient woodland on and by the site.

Taken together with the Gosden Hill site, there will be a ribbon of development along the A3 in contrast to the current “soft” edge approach to Guildford.
Garlick’s Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8). There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).

The Plan states the preference is to making the best use of previously developed land. Yet at the 11th hour a perfectly acceptable brown field site at Burnt Common, capable of accommodating approximately 100 houses, was removed from the Plan and replaced with the Garlick’s Arch site. There was no proper consultation in relation to the inclusion of this site. Why was a brownfield site removed and replaced with a Greenfield site? There is no evidence that Section 18 of the Planning and Compulsory Purchase Act 2004, which requires local planning authorities to produce a Statement of Community Involvement, has been complied with for this site. This only came to light for local residents following a Council meeting on 11th May 2016.

Moreover, Guildford Borough Council’s own Green Belt & Countryside Report does not address Garlick’s Arch at all, so there is no evidence base to support the inclusion of this site.

National Planning Policy promotes sustainable developments, with sustainable transport. With ever reducing bus services in the area and no train station within reasonable walking distance it is impossible for any development on this site to offer a sustainable transport solution. Development on this site is wholly inappropriate (Policy I3).

The stream, which runs through the site, is identified as having a high risk of flooding by the Environment Agency. There are other sites that do not flood that can be developed and therefore this site should be removed from the Plan (Policy P4).

This site is bordered by Ancient Woodland and within it a number of trees are protected by Tree Preservation Orders (Policy D3).

The site has an abundance of wildlife, some of which are protected. It is home to many types of owls and bats, with the woods having cuckoos and woodpeckers. In addition there are regular sightings of badgers, deer and red kites. The development of the site will result in the loss of habitat. No wildlife report has been conducted on the site. (Policy I4)

It is clear that with this site being added at the 11th hours no infrastructure planning has been undertaken. The Infrastructure Schedule makes no provision for any infrastructure improvements for this site. How will the local services such as schools and doctors cope, many of which are already at capacity? (Policy I1)

Furthermore, several electricity pylon runs through the site, which will have the potential to be a health hazard for any residents.

I OBJECT to the inclusion of the land for new on/off ramps at Burnt Common (A43a)

The addition north facing ramps to the A3 at Burnt Common would be a disaster for local communities. There is no requirement for local traffic to access the A3 to the north, but the addition will draw in a huge amount of ‘through’ traffic.

The route from London/M25 to Woking or would now be through Burnt Common and Send. Equally traffic from the east of Guildford (Merrow etc) and the A25 will now go through West Clandon and Burnt Common. This will cause immense damage to those areas on small roads which cannot be improved.

This Plan does not address the needs of local communities or the Borough in this regard. There has again been no Section 18 consultation on this.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6703  Respondent: 8731649 / Ian Slater  Agent:  
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy D3
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

<table>
<thead>
<tr>
<th>1. POLICY D3</th>
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</thead>
<tbody>
<tr>
<td>I OBJECT to the damage to the historic environment as a result of the scale of the proposed development (Policy D3)</td>
</tr>
<tr>
<td>I OBJECT to the local plan based on the impact it will have on the special countryside of the borough.</td>
</tr>
<tr>
<td>The proposed development at Garlick’s Arch (A43) will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees.</td>
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<tr>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
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<tr>
<td>Attached documents:</td>
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Comment ID: PSLPP16/6710   Respondent: 8731649 / Ian Slater   Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

<table>
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<tr>
<th>1. POLICY D3</th>
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<tbody>
<tr>
<td>I OBJECT to Policy D3 - Historic environment</td>
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<tr>
<td>I object to this policy as it is very weak and I do not think it is clear enough in its support for the conservation of the historic environment. It provides for development which will “enhance” heritage assets which I fear is a developer’s charter as it leaves plenty of room for abuse.</td>
</tr>
<tr>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
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<td>Attached documents:</td>
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Comment ID: PSLPP16/6711   Respondent: 8731649 / Ian Slater   Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
1. **POLICY D4**

I OBJECT to Policy D4 - Development in urban areas and inset villages

The policy should place much greater emphasis on residential development in the existing urban centres. In this way housing needs can be met without resorting to large developments in the Green Belt. There are urban areas in need of regeneration but these are ignored in favour of Green Belt development.

The policy should not be applied to the villages which should remain in the Green Belt. Unrestricted application of this policy to the villages intended to be inset will change their characters radically and for the worse. The development it encourages will increase traffic and congestion disproportionately.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/6700  **Respondent:** 8731649 / Ian Slater  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E1

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ()**

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1. **POLICY E1**

I OBJECT to the sustainable employment policy (Policy E1)

I object to the inclusion of a strategic employment site at Gosden Hill Farm. Employment sites should be concentrated on previously developed land in more sustainable locations with good transport links where the infrastructure can support development. Warehousing, distribution and industrial premises cause considerable commercial traffic, noise, pollution and general disruption. They are not good neighbours for schools and 2000 houses. Many of the jobs will be taken by people outside the area leading to additional congestion in Burpham and on the A3.

I object to the inclusion of a strategic employment site at Garlick’s Arch. It is in a non-sustainable location remote from any facilities of any kind and with poor public transport links. It is unlikely jobs will be taken by local residents and it is likely all travel to and from work will be by car adding to local congestion. Employment sites should be concentrated on previously developed land in more sustainable location with good transport links where the infrastructure can support development.

The site is in any event subject to frequent flooding and unsuitable for development.

If developed, the new employment site at Garlick’s Arch, Send Marsh/Burnt Common (A43), would be treated as a Strategic Employment Site.

The proposed development of up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8) at Garlick’s Arch (A43) is in the scheme of industrial development relatively small. Just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m. The Garlick’s Arch site which is in the Green Belt should not be developed as a Strategic Employment Site when there is a suitable alternative brownfield site very close by, which is far more sustainable.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6701  Respondent: 8731649 / Ian Slater  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. POLICY E2

I OBJECT to the location for new employment floorspace (Policy E2)

I object to this policy. It would be more sensible to confine new office and research and development floor space to the urban Guildford area. I also oppose the policy of expanding the Research Park onto Blackwell Farm. No exceptional circumstances, as defined under the NPPF, have been advanced to justify incursion into this permanent and high-quality area of Green Belt.

Proposals for new industrial, warehousing and storage (use Class B1c, B2 and B8) floorspace will be directed to the Industrial Strategic Employment Sites.

There is no need for the new employment floorspace to be located at Garlick’s Arch or Gosden Hill Farm, when near to these sites at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6702  Respondent: 8731649 / Ian Slater  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
1. **POLICY E5**

I OBJECT to the loss of rural employment (Policy E5)

Policy E5 supports the retention and development of local services and community facilities in our inset and identified villages. Yet the development at Garlick’s Arch (A43) would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises. The Plan does not promote rural employment; rather it will result in the loss of existing local rural businesses.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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Comment ID: PSLPP16/6713  **Respondent:** 8731649 / Ian Slater  **Agent:**

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E6

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

Answer (if comment is on questions 1-7 of the questionnaire): ()

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1. **POLICY E6**

I OBJECT to Policy E6 - The leisure and visitor experience.

The policy should acknowledge that whilst in some areas new and enhanced leisure facilities are valuable (for example the new Opera House at West Horsley Place Towers), much tourism depends on the undeveloped nature of Green Belt areas surrounding Guildford. Accordingly the policy should recognize that in many rural areas new and enhanced visitor facilities may be unnecessary and counterproductive, particularly away from existing buildings and development. For example the attraction of Newlands Corner is its undeveloped nature. Significant development of visitor facilities there is likely to diminish rather than increase its attractions. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment. Heritage sites and the Green Belt are particularly vulnerable to harm.

Tourism and visitors do not depend on new visitor “attractions” and could actually be damaged by them, as compellingly argued in the current debate over Newlands Corner. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment/“Disneyfication”. Heritage sites and the Green Belt are particularly vulnerable to harm.

Guildford has many “leisure and visitor attractions” already. The case for creating more is not made and no examples are given. Instead, the plan’s explicit priorities should be:

1. To protect the borough’s prime leisure and tourism asset, its countryside, from inappropriate development. This is all the more valuable because of its accessibility from London, the rest of Britain and the Continent, in that order. Rural residents are its custodians and require no Council interference. Economically, the most valuable forms of tourism, such as walking and cycling, require no new development. In the overcrowded South-East of England, lack of development is a leisure and tourism asset, not a liability.
2. To help make Guildford’s river landscape less off-putting and support town-break packages for high-value tourists. To achieve this, the policy needs to define what leverage, if any, Council planners have to influence normal tourism market mechanisms.
3. To help private providers market local tourism. This need not involve extra spending. The Council could, for instance, help co-ordinate ready-made, local tourism packages under a distinctive brand at an all-in price. An “English town break” (including B&B accommodation, a walking tour of Guildford, a pub lunch in the Surrey Hills, a visit to Wisley Gardens and a National Trust property and a Southwest Trains travelcard for a day out in London) would be highly attractive to many European visitors who currently by-pass Guildford to go to Bath, Oxford or Cambridge instead.

4. To rule out the redevelopment of scarce rural hotel sites (e.g. Thatchers, East Horsley, earmarked for 40 new houses under Site A37 of the plan yet just a short walk from the new opera house).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<tr>
<th>Comment ID:</th>
<th>PSLPP16/6709</th>
<th>Respondent:</th>
<th>8731649 / Ian Slater</th>
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<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy E7</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. POLICY E7

I OBJECT to Policy E7 Guildford Town Centre

The policy “vision” describes protecting the Guildford’s unique setting and historical character and sets out some of the ways this will be done. However none of this is included in the formal Policy wording in the blue box. I suspect the Vision wording is effectively of little or any force. These principles should be included in the formal policy.

There should be a much greater focus on residential use of the town centre where many people would like to live and where the necessary amenities and infrastructure exist. The policy misses the opportunity to propose forward looking sustainable residential development plans in, for example the Walnut Tree Close area, where very significant numbers of new homes could be provided. Such town centre sites could meet much of the housing need over the plan period without harming the countryside.

There is an urgent need for a strategy to focus on brownfield redevelopment before considering development outside the existing urban area.

The policy does not address any of the major issues raised by the Council’s own Town Centre Master Plan, the Guildford Vision Group’s proposal for new river and rail crossings or plans for the redevelopment of Guildford Station, all of which are already the subject of public discussion.

The policy also fails to provide guidance on design requirements, as required by the NPPF.

The policy and surrounding text concentrates too much on shopping without regard to its nature which risks a proliferation of dull high-street chain stores. The policy should seek to enhance Guildford’s character and encourage a wider variety of small shops including locally owned businesses and shops of use to consumers. (For example there is no butcher in Guildford.)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. POLICY H1

I OBJECT to Policy H1 – Homes for all. Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan period. It fails to set rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions.

The housing mix is based on out-of-date, pre-Brexit projections and on assumptions set out in a flawed SHMA that has not been scrutinised or evaluated.

I support higher density development in the urban area, without resorting to dehumanising, high-rise buildings that developers commonly claim are necessary for financial viability. Much of Guildford town could usefully be regenerated with 4-5 storey blocks with landscaping and underground parking, as often seen on the Continent and, recently, in London.

Student accommodation should provided for 100% of new students and more than 60% of existing students, which would free up ideal family accommodation in the urban area. Other university cities (e.g. Oxford) insist on higher percentages than those proposed in the plan. In my view, the Council’s timidity is a case of “regulatory capture” by Surrey University, which has failed to use its existing planning permissions (dating from 2004) to accommodate 3,000 students or to improve the efficient development of its campus (e.g. by building on its extensive and under-used surface car parks). If all students were accommodated in this way, 2,000 homes would be freed up in town and there would be no need to build on the Hog’s Back.

It is not appropriate to release Green Belt land to house students who could be accommodated on the Surrey campus or other university sites. The plan should take account of the university's ability to house its own students and reduce the housing number accordingly.

Guildford borough has already a higher proportion of traveller sites than most comparable boroughs. Over-provision is inappropriate given other constraints.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. **POLICY H2**

I OBJECT to this policy on affordable homes (Policy H2) on the grounds of feasibility and that it should be more firm and explicit on unviability in paragraph 4.2.40.

In particular a scheme is only unviable if the value of developing the land (including some allowance for development risk and a normal level of profit) falls below the sale vale of the land for alternative non-premium uses such as agriculture. The price paid for the land is not relevant. The possibility of avoiding the affordable housing obligation through use of unviability arguments only serves to inflate land values. It will become clear that developments are unviable when developers start selling land for alternative non-development uses.

It should be noted in the plan that because of Guildford's relative popularity as a place to live combined with its location close to others towns and within the London Commuter belt no amount of building will meet demand. Similarly no amount of affordable housing will ever meet demand.

In addition the definition of an ‘affordable home’ is 80% of market value. With even a 2 bedroom flat in Guildford now having a market value of +£360,000 the discounted price is still not going to be affordable to anyone on a normal income.

And at what point will ‘affordable homes’ be able to go onto the market at full market price?

As we have seen with council houses it is not long before the discounted property is sold at full market value with the original owner simply pocketing the profit.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/6712  Respondent: 8731649 / Ian Slater  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. **POLICY H3**

I OBJECT to Policy H3 – Rural Exception Homes as this Trojan horse policy. It says that homes can be built anywhere near a settlement of any form (including agricultural land and the AONB). These homes are meant for people with a village connection, but they could be for anyone on the Guildford borough housing list. To make the housing viable, or to improve the “mix” this can include “market” housing (i.e. normal commercial development which in Guildford usually means large executive homes). This policy means building anywhere, and ignoring all historic planning restrictions.
The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove “exceptional circumstances.”

The wording of the policy is far too wide and drives a coach and horses though all other aspects of planning policy. As drafted the planning authority could be obliged to grant permission for inappropriate and unsuitable developments.

The wording provides no ability to balance the desirability of the development against other considerations including harm to the Green Belt or the AONB. (If the housing would meet identified need and adjoins a settlement under this policy wording permission would have to be granted even in the most sensitive AONB location, even if more suitable locations are available.) The policy should include the need for a balancing exercise including consideration whether more suitable locations exist.

The policy wording should not allow market housing. The ability to include market housing is likely to inflate land values, leading to a self-perpetuating need to include market housing. It may lead to spurious developer led proposals which will be difficult to resist.

The policy wording should define small, either in land size or number of units. I am concerned that if small is left undefined the policy could be used to justify significant developments. In the context of the plan a development of 150 homes might be argued as small. (If Wisley at 2,500 homes is a big development then 500 homes might be a medium development and 150 could be small.)

The policy wording should be restricted to adjoining sites or define the concept of being "closely related". In particular I believe adding the concept of safe and easy walking distance extends the potential radius within which sites will be argued to be “closely related” Many people would regard a mile or so as an easy walking distance. (School children are expected to walk further than that before being eligible for free school travel.)

The wording of the policy itself does not require the local connection requirement for tenants to be secured in perpetuity - only the affordability must be secured in perpetuity. (For example housing could be built for retired Cabinet Ministers under this policy so long as the first tenant was required to have a local connection.) The introduction to the policy mentions this point, but it is not part of the policy itself and may carry little weight at appeal.

The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove “exceptional circumstances.” The size and location of sites should be better defined and it should be clear market housing cannot be included.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
1. **POLICY I1**

I OBJECT, due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1)

Our villages are already suffering from severe congestion for much of the day, for example the Newark Road & Rose Lane junction in the centre of Ripley and the A247 through West Clandon. The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.

Furthermore, many of the country lanes around the villages of Ripley, Send and Clandon are narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition.

I OBJECT to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces.

Many of the affected villages, such as West Clandon, already suffer from traffic congestion. Further development around these villages will only result in more traffic and more parking problems.

With some 5,000 houses being proposed close to the village of Ripley, the roads serving the village will become even more congested. Cycling has become an ever popular past time, particularly at weekends hundreds of cyclists past through the villages on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road accidents involving cyclists as a result of the development proposed under the local plan.

The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the road becoming ever more dangerous for pedestrians.

The council has a statutory obligation to protect the public and the additional traffic flows will bring added accidents, noise, pollution and injury of the public. In the case of West Clandon the Street often only has a narrow footpath on one side of the road making it very dangerous, especially when vehicles mount the pavements.

This policy as it is inappropriate and inadequate and fails to respond to the challenges raised by the proposed significant Green belt developments. The borough’s infrastructure is already heavily strained. However the plan’s determination to build large housing estates across the Guildford countryside significantly increases the need for infrastructure investment without securing the means for its provision. Placing housing in the established urban areas would reduce the need for enhanced infrastructure as would a more realistic housing number.

The policy wording says nothing about roads and traffic. The Council’s methodology for assessing traffic congestion - averaging it over periods of several hours and ignoring the effects of junctions - simply hides the problem, which will get worse as development proceeds. The schemes referred to in this policy will not solve existing congestion and the local road network has not been given sufficient consideration. Some proposed development locations would require highway schemes that are unlikely ever to happen.

Adequate infrastructure provision is a pre-condition of sustainable development. But in this plan it is an afterthought buried away in Policy I1. By prioritizing greenfield over urban, brownfield regeneration, the plan creates insurmountable (and unnecessary) obstacles for itself. Common sense suggests a local plan should first assess the borough’s infrastructure capacity for sustainable development, and then tailor development accordingly. This plan, however, assumes infrastructure will follow on the heels of housebuilding as if by magic. It makes implementation critically dependent on providers outside the Council’s control and on the vagaries of CIL income. Instead of recognizing this as a key constraint, the plan is based on hope. It is also highly likely that developers faced with the imposition of large infrastructure requirements will go to court to invoke the NPPF provision that prevents authorities from imposing conditions that make a development non-viable.

Policy I1 requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.
Despite the Garlick’s Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents’ in the locality will see their quality of life significantly deteriorate in many ways.

Many of the utilities in the Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers. No plans to improve these services should mean no development of the Garlick’s Arch site.

Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are already at capacity and suffering from funding cuts or freezes. Any further development without funding will place further stress upon existing health services.

Police services are seeing funding reduced. The development of the proposed 13,860 homes during the plan period will stretch the police services further and is unsustainable.

There is no provision of the increased capacity of Guildford hospital, where is this assessed and remedied?

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

---

**Comment ID:** PSLPP16/6705  **Respondent:** 8731649 / Ian Slater  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy ID2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

1. **POLICY I2**

I OBJECT due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2)

I object to this policy as it is too vague and optimistic. Significant improvements to the road infrastructure are like to be many years away even if they ever happen. The draft plan, however, commits to building massive housing estates in the countryside before any of these road improvements are in place. This is inappropriate and will lead to massive traffic disruption during the construction phase and will add permanently to an already congested network (about 3,000 private cars from the 2,100 new homes at Wisley Airfield alone).

Road infrastructure represents a major constraint that should have been applied to the housing target at a much earlier stage in the plan process and not left as an unresolved difficulty in the draft plan.

There is no certainty that either the A3 or M25 in the borough will be improved to increase capacity and reduce congestion during the Plan period. Highways England has no plans to even examine improving the A3 before 2020. I have considerable concerns that development of the large residential sites identified at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), will take place before any improvements are made to the trunk road network. The A3 & M25 are already at capacity during peak hours and any development prior to improvement of these roads will only make the situations worse.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**
### Comment ID: PSLPP16/6706  
**Respondent:** 8731649 / Ian Slater  
**Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire): ( )**

#### 1. POLICY ID3

I OBJECT to poor air quality concerns (Policy ID3)

Paragraph 4.6.27 of the Plan states that “Development must also mitigate its traffic impacts, including its environmental impacts and impacts on amenity and health.” The significant level of development being proposed, particularly in the north east of the borough will lead to considerable further congestion, despite any attempts to mitigate this through travel plans. This will be particularly acute in built up residential areas and will only lead to greater levels of air pollution, which will have a detrimental effect on local residents and their health and can result in early death.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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### Comment ID: PSLPP16/6698  
**Respondent:** 8731649 / Ian Slater  
**Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire): ( )**

#### 1. POLICY P2

I OBJECT to not protecting the Green Belt (Policy P2)

This policy does not sufficiently safeguard the Green Belt even though Green Belt constitutes 89% of the borough and should be the cornerstone of all local planning policy. The Green Belt is not the Council’s to give away and once it is gone it is gone forever. Sacrificing areas of the Green Belt to a developer influenced growth agenda is a betrayal of future generations and does not constitute sustainable development.
The Green Belt should be protected in perpetuity, but Policy P2 seeks to justify excessive development in supposedly protected areas. This is in breach of party manifesto commitments and contrary to previous responses to public consultation. It is disreputable to argue, as the Council does, that the Plan would involve the loss of “only” 1.6% of the borough’s Green Belt. Leaving aside the reliability of that statistic, the NPPF does not set an “acceptable” percentage. The fact remains that the plan proposes that 65% of the housing plus industrial development be built on land to be taken out of the Green Belt.

Paragraph 4.3.16 is seriously deficient in simply stating that the Council considers that exceptional circumstances exist to justify amendment of Green Belt boundaries. The exceptional circumstances are not identified. It is clear from national guidance that unmet housing need is not on its own an exceptional circumstance. Even to the extent that exceptional circumstances exist, these have to be balanced against the harm to the Green Belt in the specific sites proposed to be taken out of the Green Belt. This balancing exercise appears not to have been done.

The Countryside Study which the Council may argue fulfilled the need to demonstrate the exceptional circumstances required to justify removal of areas from the Green Belt was a simplistic tick box exercise. Within limits it may have answered certain questions about different attributes of different areas of Green Belt but it did not carry out the balancing exercise needed to determine whether specific exceptional circumstances justified removal of specific areas of land from the Green Belt. I believe that each of the identified Green Belt site proposed to be removed from the Green Belt should be carefully assessed against any exceptional circumstances in deciding whether it should be removed from the Green Belt in the final plan. This exercise should bear in mind that housing need in itself is not an exceptional circumstance and nor is the Council’s growth aspiration. An important consideration is that more housing need could be met on urban sites than is currently planned. The Plan has fallen into the developers’ hands and developers prefer building on undeveloped land rather than brown field sites.

I object to the “insetting” of 14 villages from the Green Belt. Contrary to assertions made in the Plan process many of these villages do contribute to the openness of the Green Belt and there is no need to inset them.

I also object to the wholesale extensions to the settlement boundaries in many villages to allow for infilling and that infilling is also proposed outside the settlement boundaries of 11 further villages. Many Guildford villages are linear. It is all too easy to square off boundaries by including countryside bounded on only one or two sides by existing development, claiming it contributes nothing to the “openness” of the Green Belt, a term which neither the plan nor the NPPF defines. The NPPF’s other 4 tests of Green Belt status, including the prevention of urban sprawl, are ignored. Effectively, this policy makes all villages within the Green Belt vulnerable to large blocks of new development and seems almost calculated to secure the rejection of the plan as a whole.

To “inset” two-thirds of the borough’s rural villages on the grounds that they no longer contribute to the purposes of the Green Belt is extreme and inherently implausible, given the borough’s location on the edge of Metropolitan London. I cannot see how such extensive areas fail to contribute to the purposes of the Green Belt under the NPPF, but this could quickly be the case if the proposed “insetting” and boundary extensions go ahead.

This policy is wildly disproportionate in terms of any foreseeable development need and has caused tidal waves of opposition from residents. It flies in the face of NPPF paragraph 17’s aim of “empowering local people to shape their surroundings” and other NPPF provisions.

Paragraph 4.3.17 states that “the general extent of the Green Belt has been retained.” I believe this should be deleted as an untruth.

In addition I OBJECT to the proposals to remove from the Green Belt the so called ‘strategic sites’ of Wisley Airfield (A35), Gosden Hill Farm (A25) and Garlick’s Arch (A43) and all other strategic sites. National Planning Policy requires
there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these sites and villages (as mere housing need does not constitute a ‘special circumstance’) to be taken from the Green Belt. Once taken from the green belt they will be lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached.

GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site.

Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPP16/6714  **Respondent:** 8731649 / Ian Slater  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

*Answer (if comment is on questions 1-7 of the questionnaire):* ()

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1. **SITES - POLICIES A1 TO A57**

I OBJECT to all strategic sites proposed in the draft Plan to be built in the Green Belt.

1. I object to the identification and allocation of sites in this plan without regard to Green Belt, infrastructure or other constraints. The plan says that “allocating these sites does not grant planning permission for development.” However, each of the sites will be removed from the Green Belt and will be available in principle for development and non-Green Belt uses. The inclusion of these sites without detailed site by site justification shows contempt for the thousands of detailed comments the Council have received about individual sites ever since the Issues and Options consultation in 2013. The plan has hardly changed since the Council received 20,000 objections to its first draft plan in 2014. The Inspector considering the plan may conclude that the consultation has not been properly conducted.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPP16/6699  **Respondent:** 8731649 / Ian Slater  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P4
I OBJECT to development in areas which are at risk of flooding (Policy P4)

National Planning Policy states that Local Plans should take account of climate change over the longer term, including factors such as flood risk. It goes on to say that new development should be planned to avoid increased vulnerability to the range of impacts arising from climate change.

The Plan states that in accordance with national planning practice guidance, the Level 1 SFRA has been used to guide development towards areas at the lowest risk of flooding and identify areas unsuitable for development. However, the document concludes that land outside of the area of flood risk is not capable of accommodating all of the borough’s identified development needs. A Level 2 SFRA has therefore also been produced and will help the Council apply the exceptions test (as described in the NPPG) as necessary to development proposals in areas at risk of flooding.

The site at Garlick’s Arch (A43) is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. Knowing the area well I am aware that this site often floods during the winter months and the flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6696  Respondent: 8731649 / Ian Slater  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Re: Responses to Guildford Borough Proposed Submission Local Plan (June 2016)

I OBJECT in the strongest possible terms to the Guildford Borough Proposed Submission Local Plan (June 2016). This Plan is unsustainable, unworkable and, in many provisions, unnecessary.

I set out below my objections to specific policies and matters within the Plan.

1. **POLICY S1**

I OBJECT to this Policy as the development proposed will not be sustainable (Policy S1)
The NPPF states that the presumption in favour of sustainable development “should be seen as a golden thread running through both plan-making and decision-taking.” As the first policy in the Plan, Policy S1 ought to set a clear framework. Instead, no definition of “sustainable development” is given. The policy also fails to set out any principles for applying sustainable development in practice to local planning decisions, which often have serious long-term impacts.

The policy states that it aims “to secure development that secures the economic, social and environmental conditions in the area”. This fails to recognize that economic growth, social justice and environmental protection often conflict. The policy does not say how each element is to be weighted or conflicts resolved. As a practical guide to the planning decision to be taken in the Plan period it is seriously deficient. The policy is likely to be used by developers to justify inappropriate developments on economic grounds. Under this policy, virtually any development will qualify as “sustainable”, in breach of the NPPF’s most important guideline.

Policy S1 is also seriously deficient in making no mention of the Green Belt. The Green Belt is a long term Government policy enshrined in primary legislation to protect green areas in perpetuity. The Green Belt is a living example of sustainable development in practice and is one of the most important factors affecting sustainable development in the area covered by the Plan and should be acknowledged in this policy. Policy S1 should include a commitment to protect the Green Belt from inappropriate development and to uphold Green Belt boundaries and protections. This would set at least one clear boundary to planning decisions. The Plan and the Council have treated the Green Belt as a developable land bank rather than as a constraint to development.

The commitment to approve planning applications “wherever possible” and “without delay” reveals the pro-development bias of the plan. Countervailing references to sustainability are so vague that the NPPF presumption in favour of sustainable development becomes a presumption in favour of any development at all.

This policy also ignores, as if they are inconvenient constraints, most of the 12 Core Planning Principles set out in NPPF paragraph 17.

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill Farm (A25) are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are also unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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<th>Comment ID:</th>
<th>PSLPP16/6697</th>
<th>Respondent:</th>
<th>8731649 / Ian Slater</th>
<th>Agent:</th>
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<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. POLICY S2

I OBJECT to the Borough Wide Strategy (Policy S2)

The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

The housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.

The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guilford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

The assumptions and calculations in the SHMA are widely regarded as flawed and even before Brexit, produced an inflated housing needs number. The figure of 13,860 new homes is completely unsubstantiated. It has not been scrutinized by Councillors despite repeated requests for debate. The assumptions and calculations underlying the model are hidden, protected by a claim to intellectual property by a commercial sub-contractor used in preparing the SHMA. I have serious doubts about the objectivity of the SHMA because it has been produced by consultants whose website openly proclaims their pro-development agenda leading to reasonable suspicion that the figures are inflated. Guildford’s OAN is not transparent but has been taken on trust by the authors of the plan. Given that almost every element of the plan is predicated on this OAN, the plan as a whole cannot be considered “sound”.

The status of the 13,860 figure is ambiguous. The Council has said that the housing number and the OAN are identical because the OAN is “deliverable” and is by definition objective and cannot be contradicted. The OAN is only deliverable because of the Council’s cavalier approach to the Green Belt in contravention of the NPPF, ministerial statements and local and national Conservative Party manifesto commitments. The plan also states that infrastructure or other constraints may in due course affect deliverability. It is also unlikely that the number of houses can be built at the rate proposed. In recent years, housing starts have on average been less than half the proposed rate. This is not because developers do not have the land or cannot get planning permission. Constraints in the supply chain and maintaining profit levels have been more important.

The plan cannot be considered “deliverable”. In addition, the number of homes proposed, plus existing planning permissions, plus expected “windfall” sites, exceeds the total of 13,860. So how many homes (taking account of these
adjustments) do the Council want built? The plan does not say. Without this figure it is hard to see how anything else can be planned. This undermines the validity of the whole consultation. It is unreasonable to ask the public to approve a “plan” that fails to propose a target number that takes all the standard constraints and adjustments realistically into account, leaving the Council to set one without further consultation. Even if the OAN Ire not flawed, it is at best only a baseline figure and should not be passed off as a policy proposal.

It is unreasonable to embark on a radical transformation of the borough on the basis of an unclear housing target. Most of Guildford Borough is highly protected from development (89% Green Belt, 44% AONB and about 75% protected by SPA). Whether or not increasing the number of dwellings by up to a quarter is desirable, it would be a major and irreversible change, arguably turning a largely rural borough into a mainly urban or suburban one like Woking. The scale of the housing number increases the onus for it to be seen to be sound. A substantially lower number, on the other hand, would remove the need to build on Green Belt or open countryside, and instantly meet the single biggest public objection to the plan as a whole.

The Plan in general and this policy in particular does not address the point that Guildford exists as part of London's commuter belt. Any increase in supply of housing in Guildford, particularly if the increase is proportionately greater than elsewhere in the commuter belt, will simply result in a shift of population into the area. It will not reduce prices or increase availability except imperceptibly. The Plan also ignores the point that many of those working in the area live elsewhere. Accordingly in considering the housing number the Plan should take into account that in this part of London’s commuter belt, demand for housing is, in practical terms, unlimited.

This policy does not take proper accounts of the constraints to development which exist, principally posed by the Green Belt and by infrastructure limitations. I believe the Council is under a duty to properly consider applying these constraints. It is clear the Council has failed to do this. This approach differs from all the other boroughs in Surrey. The Plan appears to have deliberately been manipulated towards a growth agenda without disclosing why this is being done. The housing that is needed should be concentrated on urban brown field sites and through increasing the housing density of existing built up urban areas.

The development of 13,860 homes in the Plan period with 65% in the Green Belt does not constitute sustainable development. It will have a permanently detrimental impact on the Borough in general and on West Clandon and surrounding area in particular. The developments at Garlick’s Arch and Gosden Hill Farm do not meet the needs of the local communities. The road infrastructure in and around West Clandon will be unable to cope with additional demand. The edge of urban Guildford will creep that much closer to West Clandon, thus negating the purposes of the Green Belt in the area which include safeguarding the countryside from encroachment, checking the unrestricted sprawl of large built up areas and preventing neighboring towns merging into one another.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill Farm (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Questions posed by Guildford Borough Council as part of its consultation.

Questions from GBC

24.A. Question 1: The evidence base and submission documents

The Proposed Submission Local Plan: strategy and sites is based on up-to-date evidence. The evidence base documents contributing to the preparation of the plan are listed in Appendix D and can be found on our website (links open in a new window).

Do you agree that the evidence used for the Proposed Submission Local Plan Strategy and Sites is adequate, up-to-date and relevant?

ANSWER

I do not agree that the evidence used for the Proposed Submission Local Plan Strategy and Sites is adequate, up-to-date and relevant.

The fundamental driving forces for much of the development proposed in the Plan (particularly that on Green Belt land) are based on:

1. An excessive ambition to expand the local economy which is neither warranted nor wanted by the local population. Guildford is already one of the highest ‘value creation’ areas in the country and has one of the lowest unemployment rates. There is no evidence that massive and accelerated expansion is required.

1. SHMA figures which are neither transparent nor justifiable, especially in view of previous figures set. Independent assessments of the SHMA (eg from Guildford Residents’ Association and David Reeve) show it is set far too high and so cannot be said to be adequate, up-to-date or relevant.

In addition the recent vote to leave the EU and the impact this will have on the economy and migration have not been taken into account.

The Plan should be re-assessed and the methodology for arriving at housing need figures should be fully transparent.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
24.B. Question 2: Legal Compliance

Do you consider the Proposed Submission Local Plan: strategy and sites as a whole is legally compliant? Please provide the following information being as precise as possible:

• why you consider it is or is not legally compliant and
• what change(s) (if any) you consider necessary to make it legally compliant, explaining why this is the case.

ANSWER

I do not consider the Proposed Submission Local Plan: strategy and sites as a whole to be legally compliant because it mainly ignores the consultation process for the 2014 draft Plan it is claimed to be based on.

That consultation process was absolutely clear by some +20,000 responses that that Plan was flawed and no development should be carried out on Green Belt land.

Instead this 2016 draft Plan actually increases the number of dwellings being built on the Green Belt, in direct contradiction to the consultation process, yet is stated to be a Regulation 19 proposal.

As a result I do not see how the 2016 draft Plan can be Legally Compliant.

The 2016 draft Plan should be re-assessed and should take into account the views of the majority of responses from the consultation process for the 2014 draft Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/1030  Respondent: 8731649 / Ian Slater  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

24.C. Question 3: Soundness

Do you consider the Proposed Submission Local Plan: strategy and sites as a whole to be sound? Please provide the following information being as precise as possible:

• why you consider it is or is not sound and
• what change(s) (if any) you consider necessary to make it sound, explaining why this is the case.

ANSWER
I do not consider the Proposed Submission Local Plan: strategy and sites as a whole to be sound, because, but not limited to, the following reasons:

1. “Only sites that propose sustainable solutions have been included in the Plan and the Plan rejects any schemes that would have a detrimental effect on the green belt.” Summer 2016 edition of “About Guildford” (published by the Council) on page 5. This is demonstrably untrue and appears designed to bias the consultation process.

2. The housing OAN figure has been calculated by a process which is not transparent. It has not been properly examined by Councillors before being adopted.

3. The OAN has been adopted as the housing number without the application of any constraints to take account of Guildford's circumstances, including in particular the Green Belt, AONB and road infrastructure. National policy permits such constraints to be applied and it is inappropriate not to consider the need to do this.

4. The draft Plan does not accord with the NPPF policies on protecting the Green Belt. Exceptional circumstances need to be shown to justify removing areas from the Green Belt and this has not been done. The housing need number is not justification in itself according to published ministerial statements. Having properly calculated an OAN, constraints should be applied to it to reflect the Green Belt, AONB and infrastructure. Each proposed Green Belt site then needs to be justified on its own merits. The benefits of the proposed development need to be identified together with the harm to the Green Belt. Only if there are exceptional circumstances and following a proper balancing exercise demonstrating that these exceptional circumstances outweigh the harm to the Green Belt can the proposal proceed. The draft Plan does not demonstrate that this has been done. The housing number has been used as a blanket justification for all Green Belt sites—which amount to 65% of the proposed housing number.

5. Whatever the justification for the assumptions made in calculating the OAN, those assumptions are now almost certainly incorrect following the referendum.

6. The housing number is at least twice the achieved rate of building in the Borough over the last few years. There is no evidence in the Plan to show that this rate is achievable and sustainable.

7. Much of the infrastructure required to support the level of development proposed is outside the Council’s control. The Infrastructure Plan is long on possibilities and aspirations and very short on commitments. The infrastructure requirements placed on developers are supposed to be in place before development commences. This is utterly unrealistic and indicates a lack of knowledge of developer’s business models which depend on positive cash flow. It seems very clear that at best, infrastructure provision will seriously lag development and leave higher levels of congestion than now. This will reduce the quality of life for residents through congestion and disruption.

8. The 40-45% requirement for affordable homes together with infrastructure such as railway stations, park and ride facilities, schools and roads is highly likely to be challenged on a site by site basis by developers using the NPPF provision that Councils cannot impose conditions which make development non-viable.

9. GBC has not included details of its Town Centre Master Plan and urban development proposals in time for and as a part of the Guildford Local Plan consultation.

10. GBC has failed to provide an Infrastructure Report in time for and as a part of the Guildford Local Plan consultation.

11. GBC has proposed an OAN of 693 houses per annum in the GL Hearn West Surrey Strategic Housing Market Assessment (SHMA) which many, including independent assessors, consider unsound.

12. Highways England will not start to consider what it intends to do as regards the A3 in the vicinity of Guildford until 2018.

13. Network Rail have not made available for the public consultation any plans for a new railway station at Merrow with an adjacent Park & Ride for 1,000 cars.

14. The GBC proposals for Gosden Hill Farm do not appear to be in coordination with the Neighbourhood Plan for Burpham.

15. The draft Local Plan will cause further linear development along the A3 between Burpham and West Clandon PC and encroachment onto open Green Belt countryside in clear conflict with the National Planning Policy Framework.

16. The proposal for Garlick’s Arch was added to the draft Local Plan without any prior consultation under Regulation 18.

17. The Land Availability Assessment (LAA) indicates a range of planning difficulties for Gosden Hill Farm and Burpham which have to be met by the developer involved. These include Electricity Grid supply problems and...
foul sewage and surface water issues that suggest the development proposed cannot easily be implemented both technically and financially.

10. No adequate explanation is given as to how the aspirational proposal for a tunnel will be used to overcome traffic issues relating to the quality of life and amenity of Burpham, West Clandon, Send and Ripley citizens.

11. In common with many others I do not believe the housing figure has been properly calculated and I believe it overstates housing need. The Council has prevented councilors or others from properly considering the SHMA by refusing to make public the basis on which it was drawn up.

12. The housing figure, when properly recalculated, should be subject to constraints to reflect Guildford’s circumstances, including in particular the Green Belt and road infrastructure. National policy permits such constraints to be applied and it is inappropriate not to consider the need to do this.

13. Even once a housing number has been calculated it cannot be used to justify taking land out of the Green Belt on a wholesale basis.

14. Cast iron commitment should be included in the plan that development can only commence when required infrastructure improvements have been secured.

15. The status of the text which accompanies each policy box is not clear. If the accompanying text does not have the force of policy a number of the policies (i.e. the text in blue) are so vague and general that they commit the Council to very little.

The draft Plan should be re-assessed with housing on brownfield sites made a priority over commercial development and Greenfield sites and each of the above points addressed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
The Council has failed to co-operate with the results of the consultation process for the 2014 draft Plan which was meant to inform and guide this 2016 draft Plan.

Despite campaigning on a clear statement ‘Conservatives Say Green Belt To Stay’, the ruling party on GBC is now intent on pushing through a Plan which will devastate Green Belt land and extend the Guildford Urban Area to further merge into surrounding rural villages.

This is not cooperation by any definition.

In addition the Council has failed to cooperate in providing any transparency to the housing need figures commissioned by the Council from GL Hearn.

The 2016 draft Local Plan should be reassessed with a reviewed and transparent SHMA and revised to reflect the views of the residents of the Borough, who pay for Guildford Borough Council to act in their interests, and not those of developers and central government.

I trust that the objections made above are fully taken into consideration and that the 2016 draft Local Plan is amended accordingly.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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I object to removal of Brownfield sites (A4) from the Plan

Site A4 in Guildford has been removed. This is a perfectly good housing site, within the town centre and therefore with sustainable infrastructure, and would make use of a brownfield site that is in need of redevelopment. The Plan has removed housing from this site, in favour of commercial retail – thereby effectively substituting Green Belt land for retail development, which is totally unacceptable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to the extended development in the Green Belt (Policy P2, Site A43)

I object to Garlick’s Arch (A43) being extended and the resulting urban sprawl. There are no exceptional circumstances for this site being removed from the Green Belt, as required by the National Planning Policy.

I object to the allocation of 6 Traveling Showpeople sites in A34 Garlick’s Arch

The allocation of 6 Travelling Showpeople plots is the designated formula for 1500-1999 homes on the same site according to the 2017 Local Plan. There should be no inclusion of any Travelling Showpeople plots in A43 Garlicks Arch as this development site is for 400 homes and so is not compliant with the minimum of 500 in as stated in section 4.2.24 of the Plan.

I object to the potential and ill-defined increase in housing allocation at A43 Garlick’s Arch

The potential of an increase from 400 houses at site A43 Garlick’s Arch will be extremely harmful to the rural nature of the surrounding villages of Ripley, Send and Clandon and will cause coalescence of these villages.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

I object to the unfair imbalance of the Plan across the borough.

With the removal of site A46 from the Plan (with its proposed 1100 houses) and reductions of housing planned in this version of the Plan in other parts of the borough the Plan has become even more biased against the North East of the borough. Guildford Borough is over 100 square miles. Of the11350 homes proposed in the Plan, 40.6% (4613) are within 3 miles of Send Marsh, most of them on Green Belt. This is grossly unfair on an already overcrowded part of the borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. **The Plan is self-inconsistent in respect of traveller sites.**
   A50 Whittles Drive, Normandy, shows on the Site details: “Allocation: The site is allocated for approximately 14 Travelling Showpeople plots ...” Clearly A50 more than covers the total “need” of 8, (page 40, 4.2.22.) and so no “need” exists for this in site A43. This and other inconsistencies in the Plan mean no decision can be made on the basis of this document.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp172/1033  Respondent: 8731649 / Ian Slater  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A58

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. **The inclusion of site A58 Burt Common, removes the need for A43 Garlick’s Arch)**

GBC’s own reasons for including Garlick’s Arch A43 in the 2016 version were

1. a)The site [A43] location affords greater separation between Send Marsh/Burnt Common and the proposed site allocation at Gosden Hill Farm, … (site allocation A25) [ than the Burnt Common site did ]”
2. b)The site [A43] provides the employment floorspace needed in the plan to help meet identified needs”

Since A58 Burnt Common is now in the Plan (2017) the separation issue is clearly being ignored as BOTH sites (which are almost contiguous) are in the plan; therefore GBC are not following their own guidelines and objectives.

Since A58 Burnt Common is now in the Plan (2017) more than the “required” industrial space is available there, so there is no reason for Garlick’s Arch to be included.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp171/122  Respondent: 8731649 / Ian Slater  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy H2
I object the change in policy on affordable homes (Policy 4.2.23)

The previous version of the plan stated that “Developers will be expected to provide land for affordable homes at nil value”.

The 2017 version says: Off-site provision or payment in lieu is expected to enable the same amount of additional affordable housing as would have been delivered on site.”

So the developer doesn’t even have to provide any ‘affordable’ homes, just to make a negotiated payment to the Council. This is very unlikely to result in the construction of these ‘affordable’ homes.

Furthermore, the 2016 Plan used to state (section 4.2.40) “In general, a need to make profit over and above the standard developer’s profit in order to fund other community benefits will not be accepted as an abnormal cost [i.e. a reason for not delivering affordable houses]. That has now been removed, thereby accepting that needing to make greater than normal profit is to be an acceptable reason not to deliver affordable homes. This is a shocking sop to the developers.

I object to the lack of proper infrastructure planning for sites (A43 and A42)

The Foreword to the plan by Paul Spooner includes on page 5:

“We recognise that significant infrastructure upgrades are required to support existing communities and the planned growth of the borough. The delivery of sites allocated in this plan is contingent upon the provision of new infrastructure, which is a key theme of our Local Plan”.

The lack of any plan for either physical or green infrastructure improvement clearly contradicts this in respect of both A43 Garlicks Arch and A42 Clockbarn Nursery, Tannery Lane, Send. Development of these sites without the contingent infrastructure would therefore be contrary to the stated aims and themes of the Plan, and should not go ahead.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object removing Send Business Park from the Green Belt (4.3.15).
Send Business park is a very small collection of local businesses in a very rural area in the Green Belt. There can be no justification for it’s insetting (removal) from the Green Belt, and indeed GBC have not even attempted one. Therefore no “exceptional circumstances”, as required by the NPPF can be claimed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the overstated and completely unsubstantiated "housing need" development of 13,860 dwellings

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Answer (if comment is on questions 1-7 of the questionnaire): ()
1. I OBJECT to the overstated and completely unsubstantiated "housing need" development of 13,860 dwellings.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/2878  Respondent: 8732321 / John Freeland  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A42

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to 45 new houses at Clockbarn Nursery, due to inadequate road capacity for access.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/7437  Respondent: 8732321 / John Freeland  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A42

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT to 45 new houses at Clockbarn Nursery, due to inadequate road capacity for access.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6307  Respondent: 8732321 / John Freeland  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I OBJECT to Send Village being taken out of the Green Belt which, under the aegis of the National Planning Policy Framework, is supposed to be inviolate. Guidelines and manifesto commitments should safeguard this unless there are "special circumstances", of which there are none.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT to Send Village being taken out of the Green Belt which, under the aegis of the National Planning Policy Framework, is supposed to be inviolate. Guidelines and manifesto commitments should safeguard this unless there are "special circumstances", of which there are none.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the Council's intention to declassify large areas of Green Belt in and around the borough and, in particular, the proposed excessive number of houses earmarked for Send and adjacent parishes. My reasons for objecting are as follows:-

- the housing numbers have been calculated on flawed data
- it will result in urban sprawl which is precisely what the Green Belt was designed to protect
- in addition to the earmarked sites, removal of Green Belt status will open the floodgates for further planning applications from developers and local landowners
- there is insufficient infrastructure to support such wholesale development
- local schools are at capacity now
- roads are at a standstill at peak times already and building on this scale will add hundreds more vehicles
- the Villages Medical Centre is already running to stand still
The plan has been fraught with controversy from its first airing and, despite overwhelming opposition to most of its proposals, planning councilors have completely ignored the 20,000 odd written objections. I object most strongly to the plan and trust that if Guildford Borough Council doesn't rethink its position, the planning inspector will reject it altogether.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/1011  Respondent: 8732321 / John Freeland  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 2: Legal compliance

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT because the consultation process has been flawed with false/exaggerated data and the council's own procedures have been short-circuited.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/1835  Respondent: 8732321 / John Freeland  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 2: Legal compliance

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT because the consultation process has been flawed with false/exaggerated data and the council's own procedures have been short-circuited

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/114  Respondent: 8732321 / John Freeland  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy H1
Use of Land - Policy H13 the wording relating to density of housing in Policy H1 has been removed, leaving the door open for developers to use land inefficiently or inappropriately.

This plan seems to have been drawn up entirely for the benefit of avaricious developers, supported by a few greedy landowners, most of whom do not reside in this area and are therefore totally unconcerned at its destruction. The evidence base is heavily flawed, misleading by error/omission and skewed completely towards housing development in the Green Belt at any price to the local environment, and complete disregard for the aspirations of local residents.

Quite simply, if this plan is allowed to go ahead it will be an absolute disaster for the local community and I sincerely trust there will be sufficient objection to force the council to re-think its position.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<tr>
<td><strong>Green Belt - Policy P2, P3, E5 and sites GBC has made no attempt to justify wholesale destruction of the Green Belt, which should only be developed in “exceptional circumstances”. A massive 58% of all development is targeted in the Green Belt, showing complete contempt for the widely understood guidelines</strong></td>
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<td><strong>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</strong></td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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</table>
I object to Policy S2 - Housing Number:
• Guildford Borough Council (GBC) has chosen to ignore the professional advice of Neil MacDonald of NMSS and conjured up a proposed housing target of 12,426, which is clearly based on flawed data and based on criteria that has not been made public.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<tr>
<th>Comment ID: PSLPA16/3902</th>
<th>Respondent: 8732353 / Simon Marshall</th>
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I object to any removal of villages from the Green belt and to the disproportionate amount of development in one area of the borough and i object to the lack of any evidence for the alleged housing need numbers.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<th>Comment ID: PSLPA16/3903</th>
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Ripley has had many houses built anymore will change this lovely village to a town

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<th>Comment ID: PSLPS16/7286</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A25</td>
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I object to site A25 Gosden hill farm another massive overdevelopment in the Green Belt as is site A35 Wisley airfield inappropriate and unsustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/7283  Respondent: 8732353 / Simon Marshall  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

I object to site A43a Garlicks Arch.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/7284  Respondent: 8732353 / Simon Marshall  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

I object to site A43a the on and off ramp at Burnt Common which will only lead to yet more traffic congestion.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<td>I object to site A45 the Talbot another overdevelopment in a conservation area.</td>
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<td>I object to site A57 The paddocks - 4 traveller pitches.</td>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A21</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ( )</td>
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<td>my wife and I support this policy of retaining this land for Allotment use.</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Wish to register objections to the local plan job 13,860 new proposed houses, as not sustainable.

>>> There will be damage to local communities, these will not be villages any more.

>>> We need to check unrestricted sprawl of large buildup areas, We need

>>> to protect our Green Belt land and fields.

>>> We live here because it is a village and surrounded by green fields and farmland.

>>> We like the village atmosphere, knowing our neighbours and meeting them in our villages, being part of a small community.

97% of comments are against this policy, and the damage to local communities, there will not be any villages any more, an unrestricted sprawl of large built up areas.

We need to encourage development of urban land.
Leave some of our villages in Green Belt areas, we must preserve our countryside for future generations.

>>> I OBJECT

>>> To the huge influx of traffic this planning will cause.

>>> Our little country roads cannot cope with the traffic as it is. The condition of our local roads is Appalling! Pot holes everywhere, causing dangerous driving, trying to avoid the holes, damaging cars.

>>> We have narrow country roads, not suitable for hundreds more ‘large family cars’.

>>> We don’t want yellow/white lines all over our village and road signs, which are quite unnecessary, which will only increase with your planning proposals.

The footpaths are few and far between, and narrow. We don’t want huge expansion of roads and paths to accommodate thousands more people just because they will have thousands more cars!

>>> I OBJECT

>>> To the lack of facilities suitable for thousands more people using our Doctors Surgery.

>>> We cannot get an appointment within a week as it is, there is nowhere to expand the Surgery, are you planning to build another?

>>> The local hospital The Royal Surrey is overcrowded already, there is nowhere else for us in our villages fro go

To the influx of thousands more families with school age children, when our local junior school, The Raleigh, is full and they want to move to a larger site now! If they took one of your sites and you took over their 2 sites, at least the planners would have a few hundred more houses and the school would be able to accommodate more new children, but only a few! Not the hundreds you propose to bring into our little villages.

>>> We cannot accommodate these new children into the local Senior schools either. Where do you propose to build these new schools?

>>> We are villages, people want to move here, as we did because of the quiet, the fields, the village atmosphere, and the safety of a village.

>>> I OBJECT

>>> there is no infrastructure which has been confirmed.

>>> The flood plans in these areas get flooded every winter. West Horsley is known for being a flood plain area, totally unsuitable for hundreds more houses.

>>> Thames Water has advised that the current wastewater network is unlikely to support the demand from all these developments!

>>> I OBJECT

>>> To the overcrowding at our shops, we have two little parades of shops for the use of the two villages, not thousands more people using them. There is only limited parking, only one little supermarket, Budgens, and no access to any larger Supermarket.

>>> The train does not take us into Cobham centre, only Stoke D’Abernen, miles away from the Cobham town Centre, how do all these new people get to ships?
>>> We have no bus which has a regular timetable to Cobham, our nearest town, there would have to be in place public transport regularly into Cobham and Guildford.

>>> I OBJECT

>>> To the state of our roads when thousands more people will be using them. The Drift, which is a narrow lane from West Horsley to Effingham, is already used by lorries, coaches from the schools, and many local businesses, it is full job potholes from constant use, how is that going to cope?

>>> All our roads are narrow, we are a village, the drainage is already a problem through the village every winter.

>>> BROWNFIELD ARE BEING IGNORED

>>> We need more houses in the centre of towns, not out in our villages, therefore using more cars, more pollution, more congestion on our already crowded roads.

>>> Recycle derelict and urban land.

No exceptional circumstances have been disclosed to Green Belt boundaries should not be changed through the planning process

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/6276  Respondent: 8732737 / G McCourt  Agent: 

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Again no infrastructure : Transport?

>>> No regular busses to take people to the only 2 train stations near by, being Horsley or Effingham, which are both totally unsuitable for thousands more commuters either from the Wisley site or from the Horsley proposed sites.

>>> These train stations are small and serve the villagers at the moment, but could not accommodate thousands more commuters.

>>> The Wisley site needs busses to take the population to Guildford, Cobham.

>>> They would need a Doctors Surgery, schools, junior and senior as all the local schools are over subscribed in the surrounding areas

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
APPENDIX C

I OBJECT to the proposed Infrastructure Schedule (Appendix C)

The Infrastructure Schedule sets out the key infrastructure requirements on which the delivery of the plan depends. For each of the Key Allocated Sites in the borough it identifies infrastructure projects that are required, except for Garlick’s Arch (A43) which is not mentioned. It is clear that the Plan takes no account of the infrastructure required for this site and is therefore not fit for purpose.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I OBJECT to all strategic sites proposed in the draft Plan to be built in the Green Belt.

1. I object to the identification and allocation of sites in this plan without regard to Green Belt, infrastructure or other constraints. The plan says that “allocating these sites does not grant planning permission for development.” However, each of the sites will be removed from the Green Belt and will be available in principle for development and non-Green Belt uses. The inclusion of these sites without detailed site by site justification shows contempt for the thousands of detailed comments the Council have received about individual sites ever since the Issues and Options consultation in 2013. The plan has hardly changed since the Council received 20,000 objections to its first draft plan in 2014. The Inspector considering the plan may conclude that the consultation has not been properly conducted.

2. The housing needs assessment is flawed in various respects and overstates housing need. In addition since it was produced, the referendum Brexit decision has almost certainly reduced future housing need and rendered the previous assessment seriously out of date. As a result any assessment of Green Belt sites which took place to consider whether “exceptional circumstances” existed to outweigh the harm to the Green Belt was based on false premises and should be reconsidered.

3. Having determined housing need the Council was entitled to consider constraints before determining the housing number. I believe that as Ill as being entitled to do this the Council was required to give proper consideration to constraints. The scarcity of sites outside the Green Belt as Ill as infrastructure (most notable roads) considerations all represented constraints which should have been taken into account in determining the final housing number. Accordingly in this regard our objection to the allocation of Green Belt sites is twofold. First I believe constraints should have been applied. Secondly I believe the Council did not properly consider constraints and that their decision making process was flawed and thus subject to being set aside by the Inspector.

4. Even if having properly applied constraints there is a need to develop in the Green Belt then specific Green Belt sites should not be included in the plan unless “exceptional circumstances” for development are proven in relation to that specific site, as stipulated repeatedly in the NPPF. The Green Belt should trump short-term considerations such as perceived housing need, as case law has established. There needs to be a specific balancing exercise conducted on each Green Belt site weighing the harm to the Green Belt against the very special circumstances which are argued in favour of development at that particular site. There is no evidence this has been done. Instead the council have appeared to say that having chosen a housing needs figure and decided it cannot be met without building on Green Belt then there is no need for any further consideration and any convenient Green Belt site can be allocated for building at will.

I OBJECT to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)

- The “objectively assessed need” figure of 693 homes a year is too high.
- A professional review by NMSS has concluded that, even basing the calculations on a period of stronger economic and student growth, the housing need figure should be revised down to 510 homes a year and the method changed to consider student housing need separately due to the distorting effects.
- The current SHMA inflates the proposed housing figure due to
  - failure to correct for errors in the historical data for international migration flows,
  - issues with the way it considers students and affordability and
  - flaws in the method for estimating the number of homes needed to support job growth.
- It is unacceptable that demographic and economic model assumptions have been withheld and cannot be checked making the process unaccountable.

The Plan’s proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the borough, it is over double the previous figure of 322 used in previous plans. The SHMA report methodology is I believe inaccurate; it inflates the needs of the borough by distorted student numbers. However, it is based on commercially

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confidential modelling assumptions that cannot be checked or reviewed. There is no transparency to this evidence base and it is therefore impossible to assess its accuracy. This is not democratic and is not appropriate for consultation of the Plan.

The National Planning Policy Framework allows the overall housing target to be reduced to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/6639  
Respondent: 8732993 / Michael Weber  
Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A25

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY A25 - Gosden Hill Farm

I OBJECT to Policy A25 with proposals for Gosden Hill Farm.

The Green Belt at this point serves the important function of separating West Clandon from the edge of urban Guildford. Development here will cause the two to coalesce defeating one of the objectives of the Green Belt. If this development proceeds I believe the narrow strip of Green Belt remaining between Guildford and Clandon at this point will be too narrow and will come under further pressure.

It will represent an undesirable ribbon development along the A3. It will be highly visible from the A3 when approaching Guildford and will, in conjunction with A43a at Garlick’s Arch give the appearance of almost continuous development from Send through to Guildford.

The Plan does not put forward any evidence that exceptional circumstances exist to justify removing this site from the Green Belt.

The development will overburden the local road network and increase congestion on the A3 and A247 through the centre of West Clandon. This is already very heavily used whilst being unsuitable for designation as an A road. In places it is too narrow for two lorries to pass causing them to mount the pavement.

Note the following accident data:

2010 – 2014 from Crashmap data

- Clandon Cross Roads Area to Bulls Head - 17 incidents
- Bulls Heads Head to Bennett Way - 8 incidents
- Bennett Way to Highecotts Lane - 15 incidents
- Tithebarn Lane to Portsmouth Road Birch Close - 8 incidents

2015

- 21 Oct 2015 – A247 near shell garage - Three vehicles collided causing delays
Surrey Fire and Rescue deployed.

2016

- 15 April 2016 12 year old boy injured in The Street – A247 closed in both directions
- 28 April 2016 A3 West Clandon London bound between A247 Tythebarns Lane (Burntcommon and M25J10 (Wisley Interchange) congestion on A3 to A3100 Clay Lane Burpham
- 30 6 2016 Motorcyclists with injuries airlifted to hospital Send Marsh Road

Attempts have been made over many years to reduce traffic, traffic speeds and accident risks through West Clandon, however little has been achieved as the road cannot be widened and SCC is reluctant to impose further speed limits as congestion is already very high.

I object most strongly to the proposal for a link road to bring traffic from the Gosden Hill development to the proposed 4 way junction at Burnt Common. This has the potential to generate large volumes of traffic (including commercial vehicles) on the A247 through West Clandon - a road which is already under traffic stress (see below).

The land in Gosden Hill does exactly what the Greenbelt was designed to achieve. It provides a green buffer between the Guildford Urban Area and West Clandon, gives Burpham a defined green boundary and breathing space and it hides Guildford town from visitors until they pass the off-slip to Burpham.

No exceptional circumstances have been demonstrated for building on this site and therefore it does not comply with paragraphs 87-89 of the NPPF. It stops the sprawl of Guildford town, assists in safeguarding the countryside from encroachment and assists in urban regeneration by encouraging the recycling of derelict and other urban land. All of these are requirements of the NPPF.

The scale of Gosden Hill is out of proportion to West Clandon. It would have four times the amount of housing plus shops, offices/factories, GP surgery, schools. Development on this scale would blight a historic village with a history going back to the doomsday book and beyond.

Gosden Hill is the most obvious location for the north end of an A3 tunnel. It has rising ground and is situated just before the urban area. If it is built on, it will be very difficult to construct a tunnel.

The development will generate in the region of 6,000 vehicles which will pour on to the A3 which is stationary every day during rush hours. The linking of the A3100, B2215 and A247 would channel thousands of cars through the narrow, winding road through West Clandon, a road where large lorries mount the pavement virtually every day and through Send and Ripley which are also severely constrained.

The volume of traffic will greatly increase air pollution which is particularly critical given the proposal to build two schools.

Currently, a two way junction at the site would require vehicles wanting to go north on the A3 to go through Burpham which is grid-locked every day.

Burpham’s sewers are at capacity. Sewage would have to be pumped to Slyfield for processing, a project of enormous cost.

There is inadequate fresh water in Guildford and current supplies could not meet the needs of a development of this size.

Electricity supply is also inadequate and would require a big infrastructure development.

The railway station was rejected by Guildford Borough Council in 1984 because it feared Gosden Hill would become a dormitory estate for London.

The wording of the Local Plan with regard to Gosden Hill is so loose that the developer could virtually do whatever it wants.
The remaining agricultural land between Gosden Hill and West Clandon is so small that it is highly likely to be uneconomic and therefore a prime candidate for further development which would roll the Guildford Urban Area over West Clandon towards East Clandon and Wisley.

If the Strategic Sites are developed, the north of Guildford will deliver 36%, 5,036 houses towards the total of around 14,000. The infrastructures of the existing villages and the A3 will be overwhelmed by the scale of development.

A new on-slip at Burpham would only be 1.8km from the on-slip at Burnt Common which is against Highway England’s requirement of 2km.

Development of the A3 at best will not start until after 2020 and the building of a tunnel, which is only an “aspiration” in the Local Plan, is likely to be many years after. In the meantime given that developers build houses to provide cash-flow for infrastructure, Gosden Hill will have a crippling effect on villages like West Clandon and the A3.

Gosden Hill already has surface water problems. Merrow Stream crosses the site. No hydrological survey has been carried out to assess the implications. Electricity pylons run through the centre of Gosden Hill which have health and safety issues.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPS16/7075  **Respondent:** 8732993 / Michael Weber  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A25

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<th>Respondent: 8732993 / Michael Weber</th>
<th>Agent:</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43</td>
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Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY A43 AND A43a – Garlick’s Arch

I OBJECT to Policy A43 and A43a on Garlick’s Arch.

The site was only inserted in the draft plan at a late stage just before publication of the consultation draft which is a shabby way for the Council to proceed. The site is not a sustainable site being far from any infrastructure facilities and transport links. The bus service is infrequent and it is almost certain any future residents will rely almost entirely on cars for journeys. Similarly any employees at the employment areas will almost undoubtedly arrive and leave by car.

The site is susceptible to flooding and will not make a suitable site.

The Green Belt at this point serves the important function of separating West Clandon from Send. Building here will cause the two to coalesce defeating one of the objectives of the Green Belt.

I have seen no evidence that exceptional circumstances exist to justify removing this site from the Green Belt or that this important issue has been addressed. The Green Belt and Countryside study did not even consider this site.
It is understood the Council's eyes may have been turned by the possibility of receiving for free the land which might be used for new A3 slip roads in return for allowing this development, thus justifying it as some form of enabling development. However the slip road land if needed could be safeguarded in the plan and acquired by compulsory purchase when required. Lack of current funding for the slip road is not a justification for allowing the development of this site. If the slip road is genuinely needed then government funding will be available for it. (One of the reasons for turning down the so called enabling development proposal intended to fund the rebuilding of the Howard of Effingham School was that the redevelopment of the school was not essential. As and when it became essential Government funding would become available. Accordingly enabling development was not necessary. The same principle applies here.)

The A247 running south past this site through the centre of West Clandon is already very heavily used whilst being unsuitable for designation as an A road. In places it is too narrow for two lorries to pass causing them to mount the pavement- often at speed. It has narrow bends with poor sight lines, an infants school and a hump-backed bridge concealing the entrance road to the station for southward traffic. In addition, there are no continuous footpaths which forces pedestrians to cross and re-cross the road. Development at Garlick’s Arch will only exacerbate the problem and make the road even more congested and unsafe for pedestrians.

The development will cause harm to the ancient woodland on and by the site.

Taken together with the Gosden Hill site, there will be a ribbon of development along the A3 in contrast to the current “soft” edge approach to Guildford.

Garlick’s Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8). There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).

The Plan states the preference is to making the best use of previously developed land. Yet at the 11th hour a perfectly acceptable brown field site at Burnt Common, capable of accommodating approximately 100 houses, was removed from the Plan and replaced with the Garlick’s Arch site. There was no proper consultation in relation to the inclusion of this site. Why was a brownfield site removed and replaced with a Greenfield site? There is no evidence that Section 18 of the Planning and Compulsory Purchase Act 2004, which requires local planning authorities to produce a Statement of Community Involvement, has been complied with for this site. This only came to light for local residents following a Council meeting on 11th May 2016.

Moreover, Guildford Borough Council’s own Green Belt & Countryside Report does not address Garlick’s Arch at all, so there is no evidence base to support the inclusion of this site.

National Planning Policy promotes sustainable developments, with sustainable transport. With ever reducing bus services in the area and no train station within reasonable walking distance it is impossible for any development on this site to offer a sustainable transport solution. Development on this site is wholly inappropriate (Policy I3).

The stream, which runs through the site, is identified as having a high risk of flooding by the Environment Agency. There are other sites that do not flood that can be developed and therefore this site should be removed from the Plan (Policy P4).

This site is bordered by Ancient Woodland and within it a number of trees are protected by Tree Preservation Orders (Policy D3).

The site has an abundance of wildlife, some of which are protected. It is home to many types of owls and bats, with the woods having cuckoos and woodpeckers. In addition there are regular sightings of badgers, deer and red kites. The development of the site will result in the loss of habitat. No wildlife report has been conducted on the site. (Policy I4)

It is clear that with this site being added at the 11th hours no infrastructure planning has been undertaken. The Infrastructure Schedule makes no provision for any infrastructure improvements for this site. How will the local services such as schools and doctors cope, many of which are already at capacity? (Policy I1)

Furthermore, several electricity pylon runs through the site, which will have the potential to be a health hazard for any residents.
I OBJECT to the inclusion of the land for new on/off ramps at Burnt Common (A43a)

The addition north facing ramps to the A3 at Burnt Common would be a disaster for local communities. There is no requirement for local traffic to access the A3 to the north, but the addition will draw in a huge amount of ‘through’ traffic.

The route from London/M25 to Woking or would now be through Burnt Common and Send. Equally traffic from the east of Guildford (Merrow etc) and the A25 will now go through West Clandon and Burnt Common. This will cause immense damage to those areas on small roads which cannot be improved.

This Plan does not address the needs of local communities or the Borough in this regard. There has again been no Section 18 consultation on this.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13925  Respondent: 8732993 / Michael Weber  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY D3

I OBJECT to the damage to the historic environment as a result of the scale of the proposed development (Policy D3)

I OBJECT to the local plan based on the impact it will have on the special countryside of the borough.

The proposed development at Garlick’s Arch (A43) will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13935  Respondent: 8732993 / Michael Weber  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
POLICY D3

I OBJECT to Policy D3 - Historic environment

I object to this policy as it is very weak and I do not think it is clear enough in its support for the conservation of the historic environment. It provides for development which will “enhance” heritage assets which I fear is a developer’s charter as it leaves plenty of room for abuse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15804  Respondent: 8732993 / Michael Weber  Agent: 

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Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the damage to the historic environment as a result of the scale of the proposed development (Policy D3)

I OBJECT to the local plan based on the impact it will have on the special countryside of the borough.

The proposed development at Garlick’s Arch (A43) will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15826  Respondent: 8732993 / Michael Weber  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy D3 - Historic environment

I object to this policy as it is very weak and I do not think it is clear enough in its support for the conservation of the historic environment. It provides for development which will “enhance” heritage assets which I fear is a developer’s charter as it leaves plenty of room for abuse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Comment ID: PSLPP16/13936  Respondent: 8732993 / Michael Weber  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY D4

I OBJECT to Policy D4 - Development in urban areas and inset villages

The policy should place much greater emphasis on residential development in the existing urban centres. In this way housing needs can be met without resorting to large developments in the Green Belt. There are urban areas in need of regeneration but these are ignored in favour of Green Belt development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15829  Respondent: 8732993 / Michael Weber  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy D4 - Development in urban areas and inset villages

The policy should place much greater emphasis on residential development in the existing urban centres. In this way housing needs can be met without resorting to large developments in the Green Belt. There are urban areas in need of regeneration but these are ignored in favour of Green Belt development.

The policy should not be applied to the villages which should remain in the Green Belt. Unrestricted application of this policy to the villages intended to be inset will change their characters radically and for the worse. The development it encourages will increase traffic and congestion disproportionately.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Attached documents:

Comment ID: PSLPP16/13922  Respondent: 8732993 / Michael Weber  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY E1

I OBJECT to the sustainable employment policy (Policy E1)

I object to the inclusion of a strategic employment site at Gosden Hill Farm. Employment sites should be concentrated on previously developed land in more sustainable locations with good transport links where the infrastructure can support development. Warehousing, distribution and industrial premises cause considerable commercial traffic, noise, pollution and general disruption. They are not good neighbours for schools and 2000 houses. Many of the jobs will be taken by people outside the area leading to additional congestion in Burpham and on the A3.

I object to the inclusion of a strategic employment site at Garlick’s Arch. It is in a non-sustainable location remote from any facilities of any kind and with poor public transport links. It is unlikely jobs there will be taken by local residents and it is likely all travel to and from work will be by car adding to local congestion. Employment sites should be concentrated on previously developed land in more sustainable location with good transport links where the infrastructure can support development.

The site is in any event subject to frequent flooding and unsuitable for development.

If developed, the new employment site at Garlick’s Arch, Send Marsh/Burnt Common (A43), would be treated as a Strategic Employment Site.

The proposed development of up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8) at Garlick’s Arch (A43) is in the scheme of industrial development relatively small. Just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m. The Garlick’s Arch site which is in the Green Belt should not be developed as a Strategic Employment Site when there is a suitable alternative brownfield site very close by, which is far more sustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15797  Respondent: 8732993 / Michael Weber  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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I object to the inclusion of a strategic employment site at Garlick’s Arch. It is in a non-sustainable location remote from any facilities of any kind and with poor public transport links. It is unlikely jobs there will be taken by local residents and it is likely all travel to and from work will be by car adding to local congestion. Employment sites should be concentrated on previously developed land in more sustainable location with good transport links where the infrastructure can support development.

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13923   Respondent: 8732993 / Michael Weber   Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY E2

I OBJECT to the location for new employment floorspace (Policy E2)

I object to this policy. It would be more sensible to confine new office and research and development floor space to the urban Guildford area. I also oppose the policy of expanding the Research Park onto Blackwell Farm. No exceptional
circumstances, as defined under the NPPF, have been advanced to justify incursion into this permanent and high-quality area of Green Belt.

Proposals for new industrial, warehousing and storage (use Class B1c, B2 and B8) floorspace will be directed to the Industrial Strategic Employment Sites.

There is no need for the new employment floorspace to be located at Garlick’s Arch or Gosden Hill Farm, when near to these sites at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15800  Respondent: 8732993 / Michael Weber  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the location for new employment floorspace (Policy E2)

I object to this policy. It would be more sensible to confine new office and research and development floor space to the urban Guildford area. I also oppose the policy of expanding the Research Park onto Blackwell Farm. No exceptional circumstances, as defined under the NPPF, have been advanced to justify incursion into this permanent and high-quality area of Green Belt.

Proposals for new industrial, warehousing and storage (use Class B1c, B2 and B8) floorspace will be directed to the Industrial Strategic Employment Sites.

There is no need for the new employment floorspace to be located at Garlick’s Arch or Gosden Hill Farm, when near to these sites at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13924  Respondent: 8732993 / Michael Weber  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
POLICY E5

I OBJECT to the loss of rural employment (Policy E5)

Policy E5 supports the retention and development of local services and community facilities in our inset and identified villages. Yet the development at Garlick’s Arch (A43) would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises. The Plan does not promote rural employment; rather it will result in the loss of existing local rural businesses.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15803  Respondent: 8732993 / Michael Weber  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the loss of rural employment (Policy E5)

Policy E5 supports the retention and development of local services and community facilities in our inset and identified villages. Yet the development at Garlick’s Arch (A43) would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises. The Plan does not promote rural employment; rather it will result in the loss of existing local rural businesses.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13940  Respondent: 8732993 / Michael Weber  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E6

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
POLICY E6

I OBJECT to Policy E6 - The leisure and visitor experience.

The policy should acknowledge that whilst in some areas new and enhanced leisure facilities are valuable (for example the new Opera House at West Horsley Place Towers), much tourism depends on the undeveloped nature of Green Belt areas surrounding Guildford. Accordingly the policy should recognize that in many rural areas new and enhanced visitor facilities may be unnecessary and counterproductive, particularly away from existing buildings and development. For example the attraction of Newlands Corner is its undeveloped nature. Significant development of visitor facilities there is likely to diminish rather than increase its attractions. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment. Heritage sites and the Green Belt are particularly vulnerable to harm.

Tourism and visitors do not depend on new visitor “attractions” and could actually be damaged by them, as compellingly argued in the current debate over Newlands Corner. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment/“Disneyfication”. Heritage sites and the Green Belt are particularly vulnerable to harm.

Guildford has many “leisure and visitor attractions” already. The case for creating more is not made and no examples are given. Instead, the plan’s explicit priorities should be:

1. To protect the borough’s prime leisure and tourism asset, its countryside, from inappropriate development. This is all the more valuable because of its accessibility from London, the rest of Britain and the Continent, in that order. Rural residents are its custodians and require no Council interference. Economically, the most valuable forms of tourism, such as walking and cycling, require no new development. In the overcrowded South-East of England, lack of development is a leisure and tourism asset, not a liability.

2. To help make Guildford’s river landscape less off-putting and support town-break packages for high-value tourists. To achieve this, the policy needs to define what leverage, if any, Council planners have to influence normal tourism market mechanisms.

3. To help private providers market local tourism. This need not involve extra spending. The Council could, for instance, help co-ordinate ready-made, local tourism packages under a distinctive brand at an all-in price. An “English town break” (including B&B accommodation, a walking tour of Guildford, a pub lunch in the Surrey Hills, a visit to Wisley Gardens and a National Trust property and a Southwest Trains travelcard for a day out in London) would be highly attractive to many European visitors who currently by-pass Guildford to go to Bath, Oxford or Cambridge instead.

4. To rule out the redevelopment of scarce rural hotel sites (e.g. Thatchers, East Horsley, earmarked for 40 new houses under Site A37 of the plan yet just a short walk from the new opera house).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15835  Respondent: 8732993 / Michael Weber  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E6

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I OBJECT to Policy E6 - The leisure and visitor experience.

The policy should acknowledge that whilst in some areas new and enhanced leisure facilities are valuable (for example the new Opera House at West Horsley Place Towers), much tourism depends on the undeveloped nature of Green Belt areas surrounding Guildford. Accordingly the policy should recognize that in many rural areas new and enhanced visitor facilities may be unnecessary and counterproductive, particularly away from existing buildings and development. For example the attraction of Newlands Corner is its undeveloped nature. Significant development of visitor facilities there is likely to diminish rather than increase its attractions. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment. Heritage sites and the Green Belt are particularly vulnerable to harm.

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13933  Respondent: 8732993 / Michael Weber  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E7

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )
POLICY E7

I OBJECT to Policy E7 Guildford Town Centre

The policy “vision” describes protecting the Guildford’s unique setting and historical character and sets out some of the ways this will be done. However none of this is included in the formal Policy wording in the blue box. I suspect the Vision wording is effectively of little or any force. These principles should be included in the formal policy.

There should be a much greater focus on residential use of the town centre where many people would like to live and where the necessary amenities and infrastructure exist. The policy misses the opportunity to propose forward looking sustainable residential development plans in, for example the Walnut Tree Close area, where very significant numbers of new homes could be provided. Such town centre sites could meet much of the housing need over the plan period without harming the countryside.

There is an urgent need for a strategy to focus on brownfield redevelopment before considering development outside the existing urban area.

The policy does not address any of the major issues raised by the Council’s own Town Centre Master Plan, the Guildford Vision Group’s proposal for new river and rail crossings or plans for the redevelopment of Guildford Station, all of which are already the subject of public discussion.

The policy also fails to provide guidance on design requirements, as required by the NPPF.

The policy and surrounding text concentrates too much on shopping without regard to its nature which risks a proliferation of dull high-street chain stores. The policy should seek to enhance Guildford’s character and encourage a wider variety of small shops including locally owned businesses and shops of use to consumers. (For example there is no butcher in Guildford.)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15823  Respondent: 8732993 / Michael Weber  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E7

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy E7 Guildford Town Centre

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13929  Respondent: 8732993 / Michael Weber  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY H1

I OBJECT to Policy H1 – Homes for all. Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan period. It fails to set rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions.

The housing mix is based on out-of-date, pre-Brexit projections and on assumptions set out in a flawed SHMA that has not been scrutinised or evaluated.

I support higher density development in the urban area, without resorting to dehumanising, high-rise buildings that developers commonly claim are necessary for financial viability. Much of Guildford town could usefully be regenerated with 4-5 storey blocks with landscaping and underground parking, as often seen on the Continent and, recently, in London.

Student accommodation should be provided for 100% of new students and more than 60% of existing students, which would free up ideal family accommodation in the urban area. Other university cities (e.g. Oxford) insist on higher percentages than those proposed in the plan. In my view, the Council’s timidity is a case of “regulatory capture” by Surrey University, which has failed to use its existing planning permissions (dating from 2004) to accommodate 3,000 students or to improve the efficient development of its campus (e.g. by building on its extensive and under-used surface car parks). If all students were accommodated in this way, 2,000 homes would be freed up in town and there would be no need to build on the Hog’s Back.

It is not appropriate to release Green Belt land to house students who could be accommodated on the Surrey campus or other university sites. The plan should take account of the university's ability to house its own students and reduce the housing number accordingly.
Guildford borough has already a higher proportion of traveller sites than most comparable boroughs. Over-provision is inappropriate given other constraints.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15817  Respondent: 8732993 / Michael Weber  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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Guildford borough has already a higher proportion of traveller sites than most comparable boroughs. Over-provision is inappropriate given other constraints.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13931  Respondent: 8732993 / Michael Weber  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H2
I OBJECT to this policy on affordable homes (Policy H2) on the grounds of feasibility and that it should be more firm and explicit on unviability in paragraph 4.2.40.

In particular a scheme is only unviable if the value of developing the land (including some allowance for development risk and a normal level of profit) falls below the sale value of the land for alternative non-premium uses such as agriculture. The price paid for the land is not relevant. The possibility of avoiding the affordable housing obligation through use of unviability arguments only serves to inflate land values. It will become clear that developments are unviable when developers start selling land for alternative non-development uses.

It should be noted in the plan that because of Guildford's relative popularity as a place to live combined with its location close to others towns and within the London Commuter belt no amount of building will meet demand. Similarly no amount of affordable housing will ever meet demand.

In addition the definition of an ‘affordable home’ is 80% of market value. With even a 2 bedroom flat in Guildford now having a market value of +£360,000 the discounted price is still not going to be affordable to anyone on a normal income.

And at what point will ‘affordable homes’ be able to go onto the market at full market price?

As we have seen with council houses it is not long before the discounted property is sold at full market value with the original owner simply pocketing the profit.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
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And at what point will ‘affordable homes’ be able to go onto the market at full market price?

As we have seen with council houses it is not long before the discounted property is sold at full market value with the original owner simply pocketing the profit.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**POLICY H3**

I OBJECT to Policy H3 – Rural Exception Homes as this Trojan horse policy. It says that homes can be built anywhere near a settlement of any form (including agricultural land and the AONB). These homes are meant for people with a village connection, but they could be for anyone on the Guildford borough housing list. To make the housing viable, or to improve the “mix” this can include “market” housing (i.e. normal commercial development which in Guildford usually means large executive homes). This policy means building anywhere, and ignoring all historic planning restrictions.

The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove “exceptional circumstances.”

The wording of the policy is far too wide and drives a coach and horses though all other aspects of planning policy. As drafted the planning authority could be obliged to grant permission for inappropriate and unsuitable developments.

The wording provides no ability to balance the desirability of the development against other considerations including harm to the Green Belt or the AONB. (If the housing would meet identified need and adjoins a settlement under this policy wording permission would have to be granted even in the most sensitive AONB location, even if more suitable locations are available.) The policy should include the need for a balancing exercise including consideration whether more suitable locations exist.

The policy wording should not allow market housing. The ability to include market housing is likely to inflate land values, leading to a self-perpetuating need to include market housing. It may lead to spurious developer led proposals which will be difficult to resist.

The policy wording should define small, either in land size or number of units. I am concerned that if small is left undefined the policy could be used to justify significant developments. In the context of the plan a development of 150
homes might be argued as small. (If Wisley at 2,500 homes is a big development then 500 homes might be a medium
development and 150 could be small.)

The policy wording should be restricted to adjoining sites or define the concept of being "closely related". In particular I
believe adding the concept of safe and easy walking distance extends the potential radius within which sites will be argued
to be “closely related” Many people would regard a mile or so as an easy walking distance. (School children are expected
to walk further than that before being eligible for free school travel.)

The wording of the policy itself does not require the local connection requirement for tenants to be secured in perpetuity -
only the affordability must be secured in perpetuity. (For example housing could be built for retired Cabinet Ministers
under this policy so long as the first tenant was required to have a local connection.) The introduction to the policy
mentions this point, but it is not part of the policy itself and may carry little weight at appeal.

The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that
cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including
the need to prove “exceptional circumstances.” The size and location of sites should be better defined and it should be clear
market housing cannot be included.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15832  Respondent: 8732993 / Michael Weber  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally
Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy H3 – Rural Exception Homes as this Trojan horse policy. It says that homes can be built anywhere
near a settlement of any form (including agricultural land and the AONB). These homes are meant for people with a village
connection, but they could be for anyone on the Guildford borough housing list. To make the housing viable, or to improve
the “mix” this can include “market” housing (i.e. normal commercial development which in Guildford usually means large
executive homes). This policy means building anywhere, and ignoring all historic planning restrictions.

The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that
cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including
the need to prove “exceptional circumstances.”

The wording of the policy is far too wide and drives a coach and horses though all other aspects of planning policy. As
drafted the planning authority could be obliged to grant permission for inappropriate and unsuitable developments.

The wording provides no ability to balance the desirability of the development against other considerations including harm
to the Green Belt or the AONB. (If the housing would meet identified need and adjoins a settlement under this policy
wording permission would have to be granted even in the most sensitive AONB location, even if more suitable locations Ire
available.) The policy should include the need for a balancing exercise including consideration whether more suitable
locations exist.
The policy wording should not allow market housing. The ability to include market housing is likely to inflate land values, leading to a self-perpetuating need to include market housing. It may lead to spurious developer led proposals which will be difficult to resist.

The policy wording should define small, either in land size or number of units. I am concerned that if small is left undefined the policy could be used to justify significant developments. In the context of the plan a development of 150 homes might be argued as small. (If Wisley at 2,500 homes is a big development then 500 homes might be a medium development and 150 could be small.)

The policy wording should be restricted to adjoining sites or define the concept of being "closely related". In particular I believe adding the concept of safe and easy walking distance extends the potential radius within which sites will be argued to be “closely related” Many people would regard a mile or so as an easy walking distance. (School children are expected to walk further than that before being eligible for free school travel.)

The wording of the policy itself does not require the local connection requirement for tenants to be secured in perpetuity - only the affordability must be secured in perpetuity. (For example housing could be built for retired Cabinet Ministers under this policy so long as the first tenant was required to have a local connection.) The introduction to the policy mentions this point, but it is not part of the policy itself and may carry little weight at appeal.

The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove “exceptional circumstances.” The size and location of sites should be better defined and it should be clear market housing cannot be included.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13926  Respondent: 8732993 / Michael Weber  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY II

I OBJECT, due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy II)

Our villages are already suffering from severe congestion for much of the day, for example the Newark Road & Rose Lane junction in the centre of Ripley and the A247 through West Clandon. The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.

Furthermore, many of the country lanes around the villages of Ripley, Send and Clandon are narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition.

I OBJECT to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces.
Many of the affected villages, such as West Clandon, already suffer from traffic congestion. Further development around these villages will only result in more traffic and more parking problems.

With some 5,000 houses being proposed close to the village of Ripley, the roads serving the village will become even more congested. Cycling has become an ever popular past time, particularly at weekends hundreds of cyclists past through the villages on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road accidents involving cyclists as a result of the development proposed under the local plan.

The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the road becoming ever more dangerous for pedestrians.

The council has a statutory obligation to protect the public and the additional traffic flows will bring added accidents, noise, pollution and injury of the public. In the case of West Clandon the Street often only has a narrow footpath on one side of the road making it very dangerous, especially when vehicles mount the pavements.

This policy, as it is, is inappropriate and inadequate and fails to respond to the challenges raised by the proposed significant Green belt developments. The borough’s infrastructure is already heavily strained. However the plan’s determination to build large housing estates across the Guildford countryside significantly increases the need for infrastructure investment without securing the means for its provision. Placing housing in the established urban areas would reduce the need for enhanced infrastructure as would a more realistic housing number.

The policy wording says nothing about roads and traffic. The Council’s methodology for assessing traffic congestion - averaging it over periods of several hours and ignoring the effects of junctions - simply hides the problem, which will get worse as development proceeds. The schemes referred to in this policy will not solve existing congestion and the local road network has not been given sufficient consideration. Some proposed development locations would require highway schemes that are unlikely ever to happen.

Adequate infrastructure provision is a pre-condition of sustainable development. But in this plan it is an afterthought buried away in Policy I1. By prioritizing greenfield over urban, brownfield regeneration, the plan creates insurmountable (and unnecessary) obstacles for itself. Common sense suggests a local plan should first assess the borough’s infrastructure capacity for sustainable development, and then tailor development accordingly. This plan, however, assumes infrastructure will follow on the heels of housebuilding as if by magic. It makes implementation critically dependent on providers outside the Council’s control and on the vagaries of CIL income. Instead of recognizing this as a key constraint, the plan is based on hope. It is also highly likely that developers faced with the imposition of large infrastructure requirements will go to court to invoke the NPPF provision that prevents authorities from imposing conditions that make a development non-viable.

Policy I1 requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.

Despite the Garlick’s Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents’ in the locality will see their quality of life significantly deteriorate in many ways.

Many of the utilities in the Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers. No plans to improve these services should mean no development of the Garlick’s Arch site.

Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are already at capacity and suffering from funding cuts or freezes. Any further development without funding will place further stress upon existing health services.

Police services are seeing funding reduced. The development of the proposed 13,860 homes during the plan period will stretch the police services further and is unsustainable.
There is no provision of the increased capacity of Guildford hospital, where is this assessed and remedied?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15808  Respondent: 8732993 / Michael Weber  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT, due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1).

Our villages are already suffering from severe congestion for much of the day, for example the Newark Road & Rose Lane junction in the centre of Ripley and the A247 through West Clandon. The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.

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The council has a statutory obligation to protect the public and the additional traffic flows will bring added accidents, noise, pollution and injury of the public. In the case of West Clandon the street often only has a narrow footpath on one side of the road making it very dangerous, especially when vehicles mount the pavements.

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The policy wording says nothing about roads and traffic. The Council’s methodology for assessing traffic congestion - averaging it over periods of several hours and ignoring the effects of junctions - simply hides the problem, which will get worse as development proceeds. The schemes referred to in this policy will not solve existing congestion and the local road network has not been given sufficient consideration. Some proposed development locations would require highway schemes that are unlikely ever to happen.

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Police services are seeing funding reduced. The development of the proposed 13,860 homes during the plan period will stretch the police services further and is unsustainable.

There is no provision of the increased capacity of Guildford hospital, where is this assessed and remedied?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
POLICY I2

I OBJECT due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2)

I object to this policy as it is too vague and optimistic. Significant improvements to the road infrastructure are like to be many years away even if they ever happen. The draft plan, however, commits to building massive housing estates in the countryside before any of these road improvements are in place. This is inappropriate and will lead to massive traffic disruption during the construction phase and will add permanently to an already congested network (about 3,000 private cars from the 2,100 new homes at Wisley Airfield alone).

Road infrastructure represents a major constraint that should have been applied to the housing target at a much earlier stage in the plan process and not left as an unresolved difficulty in the draft plan.

There is no certainty that either the A3 or M25 in the borough will be improved to increase capacity and reduce congestion during the Plan period. Highways England has no plans to even examine improving the A3 before 2020. I have considerable concerns that development of the large residential sites identified at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), will take place before any improvements are made to the trunk road network. The A3 & M25 are already at capacity during peak hours and any development prior to improvement of these roads will only make the situations worse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
POLICY I3

I OBJECT to poor air quality concerns (Policy I3)

Paragraph 4.6.27 of the Plan states that “Development must also mitigate its traffic impacts, including its environmental impacts and impacts on amenity and health.” The significant level of development being proposed, particularly in the north east of the borough will lead to considerable further congestion, despite any attempts to mitigate this through travel plans. This will be particularly acute in built up residential areas and will only lead to greater levels of air pollution, which will have a detrimental effect on local residents and their health and can result in early death.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
POLICY P2

I OBJECT to not protecting the Green Belt (Policy P2)

This policy does not sufficiently safeguard the Green Belt even though Green Belt constitutes 89% of the borough and should be the cornerstone of all local planning policy. The Green Belt is not the Council’s to give away and once it is gone it is gone forever. Sacrificing areas of the Green Belt to a developer influenced growth agenda is a betrayal of future generations and does not constitute sustainable development.

The Green Belt should be protected in perpetuity, but Policy P2 seeks to justify excessive development in supposedly protected areas. This is in breach of party manifesto commitments and contrary to previous responses to public consultation. It is disreputable to argue, as the Council does, that the Plan would involve the loss of “only” 1.6% of the borough’s Green Belt. Leaving aside the reliability of that statistic, the NPPF does not set an “acceptable” percentage. The fact remains that the plan proposes that 65% of the housing plus industrial development be built on land to be taken out of the Green Belt.

Paragraph 4.3.16 is seriously deficient in simply stating that the Council considers that exceptional circumstances exist to justify amendment of Green Belt boundaries. The exceptional circumstances are not identified. It is clear from national guidance that unmet housing need is not on its own an exceptional circumstance. Even to the extent that exceptional circumstances exist, these have to be balanced against the harm to the Green Belt in the specific sites proposed to be taken out of the Green Belt. This balancing exercise appears not to have been done.

The Countryside Study which the Council may argue fulfilled the need to demonstrate the exceptional circumstances required to justify removal of areas from the Green Belt was a simplistic tick box exercise. Within limits it may have answered certain questions about different attributes of different areas of Green Belt but it did not carry out the balancing exercise needed to determine whether specific exceptional circumstances justified removal of specific areas of land from the Green Belt. I believe that each of the identified Green Belt site proposed to be removed from the Green Belt should be carefully assessed against any exceptional circumstances in deciding whether it should be removed from the Green Belt in the final plan. This exercise should bear in mind that housing need in itself is not an exceptional circumstance and nor is the Council’s growth aspiration. An important consideration is that more housing need could be met on urban sites than is currently planned. The Plan has fallen into the developers’ hands and developers prefer building on undeveloped land rather than brown field sites.

I note that the Summer 2016 edition of "About Guildford" (published by the Council) on page 5 states that "... the Plan rejects any schemes that would have a detrimental impact on the Green Belt." This is demonstrably untrue and I consider this to be a deliberate untruth which compromises the consultation process. I would ask that this untruth be corrected and the consultation period restarted after the correction has been given the same distribution as the original statement.
assume the document was delivered to most houses in the Borough.) I reserve the right to argue before the inspector that the consultation process was flawed and ineffective because of this.

I object to the “insetting” of 14 villages from the Green Belt. Contrary to assertions made in the Plan process many of these villages do contribute to the openness of the Green Belt and there is no need to inset them.

I also object to the wholesale extensions to the settlement boundaries in many villages to allow for infilling and that infilling is also proposed outside the settlement boundaries of 11 further villages. Many Guildford villages are linear. It is all too easy to square off boundaries by including countryside bounded on only one or two sides by existing development, claiming it contributes nothing to the “openness” of the Green Belt, a term which neither the plan nor the NPPF defines. The NPPF’s other 4 tests of Green Belt status, including the prevention of urban sprawl, are ignored. Effectively, this policy makes all villages within the Green Belt vulnerable to large blocks of new development and seems almost calculated to secure the rejection of the plan as a whole.

To “inset” two-thirds of the borough’s rural villages on the grounds that they no longer contribute to the purposes of the Green Belt is extreme and inherently implausible, given the borough’s location on the edge of Metropolitan London. I cannot see how such extensive areas fail to contribute to the purposes of the Green Belt under the NPPF, but this could quickly be the case if the proposed “insetting” and boundary extensions go ahead.

This policy is wildly disproportionate in terms of any foreseeable development need and has caused tidal waves of opposition from residents. It flies in the face of NPPF paragraph 17’s aim of “empowering local people to shape their surroundings” and other NPPF provisions.

Paragraph 4.3.17 states that “the general extent of the Green Belt has been retained.” I believe this should be deleted as an untruth.

In addition I OBJECT to the proposals to remove from the Green Belt the so called ‘strategic sites’ of Wisley Airfield (A35), Gosden Hill Farm (A25) and Garlick’s Arch (A43) and all other strategic sites. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these sites and villages (as mere housing need does not constitute a ‘special circumstance’) to be taken from the Green Belt. Once taken from the green belt they will be lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached.

GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13943  Respondent: 8732993 / Michael Weber  Agent:  

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2  

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )  

Answer (if comment is on questions 1-7 of the questionnaire): ( )
I OBJECT to all strategic sites proposed in the draft Plan to be built in the Green Belt.

1. I object to the identification and allocation of sites in this plan without regard to Green Belt, infrastructure or other constraints. **The plan says that “allocating these sites does not grant planning permission for development.”** However, each of the sites will be removed from the Green Belt and will be available in principle for development and non-Green Belt uses. The inclusion of these sites without detailed site by site justification shows contempt for the thousands of detailed comments the Council have received about individual sites ever since the Issues and Options consultation in 2013. The plan has hardly changed since the Council received 20,000 objections to its first draft plan in 2014. The Inspector considering the plan may conclude that the consultation has not been properly conducted.

2. The housing needs assessment is flawed in various respects and overstates housing need. In addition since it was produced, the referendum Brexit decision has almost certainly reduced future housing need and rendered the previous assessment seriously out of date. As a result any assessment of Green Belt sites which took place to consider whether “exceptional circumstances” existed to outweigh the harm to the Green Belt was based on false premises and should be reconsidered.

3. Having determined housing need the Council was entitled to consider constraints before determining the housing number. I believe that as Ill as being entitled to do this the Council was required to give proper consideration to constraints. The scarcity of sites outside the Green Belt as Ill as infrastructure (most notable roads) considerations all represented constraints which should have been taken into account in determining the final housing number. Accordingly in this regard our objection to the allocation of Green Belt sites is twofold. First I believe constraints should have been applied. Secondly I believe the Council did not properly consider constraints and that their decision making process was flawed and thus subject to being set aside by the Inspector.

4. Even if having properly applied constraints there is a need to develop in the Green Belt then specific Green Belt sites should not be included in the plan unless “exceptional circumstances” for development are proven in relation to that specific site, as stipulated repeatedly in the NPPF. The Green Belt should trump short-term considerations such as perceived housing need, as case law has established. There needs to be a specific balancing exercise conducted on each Green Belt site weighing the harm to the Green Belt against the very special circumstances which are argued in favour of development at that particular site. There is no evidence this has been done. Instead the council have appeared to say that having chosen a housing needs figure and decided it cannot be met without building on Green Belt then there is no need for any further consideration and any convenient Green Belt site can be allocated for building at will.

I OBJECT to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)

- The “objectively assessed need” figure of 693 homes a year is too high.
- A professional review by NMSS has concluded that, even basing the calculations on a period of stronger economic and student growth, the housing need figure should be revised down to 510 homes a year and the method changed to consider student housing need separately due to the distorting effects.
- The current SHMA inflates the proposed housing figure due to
  - failure to correct for errors in the historical data for international migration flows,
  - issues with the way it considers students and affordability and
  - flaws in the method for estimating the number of homes needed to support job growth.
- It is unacceptable that demographic and economic model assumptions have been withheld and cannot be checked making the process unaccountable.

The Plan’s proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the borough, it is over double the previous figure of 322 used in previous plans. The SHMA report methodology is I believe inaccurate; it inflates the needs of the borough by distorted student numbers. However, it is based on commercially confidential modelling assumptions that cannot be checked or reviewed. There is no transparency to this evidence base and it is therefore impossible to assess its accuracy. This is not democratic and is not appropriate for consultation of the Plan.

The National Planning Policy Framework allows the overall housing target to be reduced to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant...
infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/15791  Respondent: 8732993 / Michael Weber  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to not protecting the Green Belt (Policy P2)

This policy does not sufficiently safeguard the Green Belt even though Green Belt constitutes 89% of the borough and should be the cornerstone of all local planning policy. The Green Belt is not the Council’s to give away and once it is gone it is gone forever. Sacrificing areas of the Green Belt to a developer influenced growth agenda is a betrayal of future generations and does not constitute sustainable development.

The Green Belt should be protected in perpetuity, but Policy P2 seeks to justify excessive development in supposedly protected areas. This is in breach of party manifesto commitments and contrary to previous responses to public consultation. It is disreputable to argue, as the Council does, that the Plan would involve the loss of “only” 1.6% of the borough’s Green Belt. Leaving aside the reliability of that statistic, the NPPF does not set an “acceptable” percentage. The fact remains that the plan proposes that 65% of the housing plus industrial development be built on land to be taken out of the Green Belt.

Paragraph 4.3.16 is seriously deficient in simply stating that the Council considers that exceptional circumstances exist to justify amendment of Green Belt boundaries. The exceptional circumstances are not identified. It is clear from national guidance that unmet housing need is not on its own an exceptional circumstance. Even to the extent that exceptional circumstances exist, these have to be balanced against the harm to the Green Belt in the specific sites proposed to be taken out of the Green Belt. This balancing exercise appears not to have been done.

The Countryside Study which the Council may argue fulfilled the need to demonstrate the exceptional circumstances required to justify removal of areas from the Green Belt was a simplistic tick box exercise. Within limits it may have answered certain questions about different attributes of different areas of Green Belt but it did not carry out the balancing exercise needed to determine whether specific exceptional circumstances justified removal of specific areas of land from the Green Belt. I believe that each of the identified Green Belt site proposed to be removed from the Green Belt should be carefully assessed against any exceptional circumstances in deciding whether it should be removed from the Green Belt in the final plan. This exercise should bear in mind that housing need in itself is not an exceptional circumstance and nor is the Council’s growth aspiration. An important consideration is that more housing need could be met on urban sites than is currently planned. The Plan has fallen into the developers’ hands and developers prefer building on undeveloped land rather than brown field sites.

I note that the Summer 2016 edition of "About Guildford" (published by the Council) on page 5 states that "... the Plan rejects any schemes that would have a detrimental impact on the Green Belt." This is demonstrably untrue and I consider this to be a deliberate untruth which compromises the consultation process. I would ask that this untruth be corrected and the consultation period restarted after the correction has been given the same distribution as the original statement. (I
assume the document was delivered to most houses in the Borough.) I reserve the right to argue before the inspector that the consultation process was flawed and ineffective because of this.

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I also object to the wholesale extensions to the settlement boundaries in many villages to allow for infilling and that infilling is also proposed outside the settlement boundaries of 11 further villages. Many Guildford villages are linear. It is all too easy to square off boundaries by including countryside bounded on only one or two sides by existing development, claiming it contributes nothing to the “openness” of the Green Belt, a term which neither the plan nor the NPPF defines. The NPPF’s other 4 tests of Green Belt status, including the prevention of urban sprawl, are ignored. Effectively, this policy makes all villages within the Green Belt vulnerable to large blocks of new development and seems almost calculated to secure the rejection of the plan as a whole.

To “inset” two-thirds of the borough’s rural villages on the grounds that they no longer contribute to the purposes of the Green Belt is extreme and inherently implausible, given the borough’s location on the edge of Metropolitan London. I cannot see how such extensive areas fail to contribute to the purposes of the Green Belt under the NPPF, but this could quickly be the case if the proposed “insetting” and boundary extensions go ahead.

This policy is wildly disproportionate in terms of any foreseeable development need and has caused tidal waves of opposition from residents. It flies in the face of NPPF paragraph 17’s aim of “empowering local people to shape their surroundings” and other NPPF provisions.

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There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached.

GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site.

Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents: 

Comment ID: PSLPP16/13921  Respondent: 8732993 / Michael Weber  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
**POLICY P4**

I OBJECT to development in areas which are at risk of flooding (Policy P4)

National Planning Policy states that Local Plans should take account of climate change over the longer term, including factors such as flood risk. It goes on to say that new development should be planned to avoid increased vulnerability to the range of impacts arising from climate change.

The Plan states that in accordance with national planning practice guidance, the Level 1 SFRA has been used to guide development towards areas at the lowest risk of flooding and identify areas unsuitable for development. However, the document concludes that land outside of the area of flood risk is not capable of accommodating all of the borough’s identified development needs. A Level 2 SFRA has therefore also been produced and will help the Council apply the exceptions test (as described in the NPPG) as necessary to development proposals in areas at risk of flooding.

The site at Garlick’s Arch (A43) is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. Knowing the area well I am aware that this site often floods during the winter months and the flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.

*What changes (2016)/further amendments (2017) do you suggest should be made to the document?*

*Attached documents:*

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**Comment ID:** PSLPP16/15793  **Respondent:** 8732993 / Michael Weber  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ( )**

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National Planning Policy states that Local Plans should take account of climate change over the longer term, including factors such as flood risk. It goes on to say that new development should be planned to avoid increased vulnerability to the range of impacts arising from climate change.

The Plan states that in accordance with national planning practice guidance, the Level 1 SFRA has been used to guide development towards areas at the lowest risk of flooding and identify areas unsuitable for development. However, the document concludes that land outside of the area of flood risk is not capable of accommodating all of the borough’s identified development needs. A Level 2 SFRA has therefore also been produced and will help the Council apply the exceptions test (as described in the NPPG) as necessary to development proposals in areas at risk of flooding.

The site at Garlick’s Arch (A43) is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. Knowing the area well I am aware that this site often floods during the winter months and the flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
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<th>Comment ID:</th>
<th>PSLPP16/13916</th>
<th>Respondent:</th>
<th>8732993 / Michael Weber</th>
<th>Agent:</th>
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<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy S1</td>
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</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. **POLICY S1**

I OBJECT to this Policy as the development proposed will not be sustainable (Policy S1).

The NPPF states that the presumption in favour of sustainable development “should be seen as a golden thread running through both plan-making and decision-taking.” As the first policy in the Plan, Policy S1 ought to set a clear framework. Instead, no definition of “sustainable development” is given. The policy also fails to set out any principles for applying sustainable development in practice to local planning decisions, which often have serious long-term impacts.

The policy states that it aims “to secure development that secures the economic, social and environmental conditions in the area”. This fails to recognize that economic growth, social justice and environmental protection often conflict. The policy does not say how each element is to be weighted or conflicts resolved. As a practical guide to the planning decision to be taken in the Plan period it is seriously deficient. The policy is likely to be used by developers to justify inappropriate developments on economic grounds. Under this policy, virtually any development will qualify as “sustainable”, in breach of the NPPF’s most important guideline.

Policy S1 is also seriously deficient in making no mention of the Green Belt. The Green Belt is a long term Government policy enshrined in primary legislation to protect green areas in perpetuity. The Green Belt is a living example of sustainable development in practice and is one of the most important factors affecting sustainable development in the area covered by the Plan and should be acknowledged in this policy. Policy S1 should include a commitment to protect the Green Belt from inappropriate development and to uphold Green Belt boundaries and protections. This would set at least one clear boundary to planning decisions. The Plan and the Council have treated the Green Belt as a developable land bank rather than as a constraint to development.

The commitment to approve planning applications “wherever possible” and “without delay” reveals the pro-development bias of the plan. Countervailing references to sustainability are so vague that the NPPF presumption in favour of sustainable development becomes a presumption in favour of any development at all.

This policy also ignores, as if they are inconvenient constraints, most of the 12 Core Planning Principles set out in NPPF paragraph 17.

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact existing local communities by over-development, particularly for the villages between Guildford and the M25, including
Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill Farm (A25) are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are also unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick’s Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

In addition to the increase in congestion that would inevitably occur, there would be a human cost in increase traffic accidents.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

---

**Comment ID:** PSLPP16/15785  **Respondent:** 8732993 / Michael Weber  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ( )**

I OBJECT to this Policy as the development proposed will not be sustainable (Policy S1)

The NPPF states that the presumption in favour of sustainable development “should be seen as a golden thread running through both plan-making and decision-taking.” As the first policy in the Plan, Policy S1 ought to set a clear framework. Instead, no definition of “sustainable development” is given. The policy also fails to set out any principles for applying sustainable development in practice to local planning decisions, which often have serious long-term impacts.

The policy states that it aims “to secure development that secures the economic, social and environmental conditions in the area”. This fails to recognize that economic growth, social justice and environmental protection often conflict. The policy does not say how each element is to be weighted or conflicts resolved. As a practical guide to the planning decision to be taken in the Plan period it is seriously deficient. The policy is likely to be used by developers to justify inappropriate developments on economic grounds. Under this policy, virtually any development will qualify as “sustainable”, in breach of the NPPF’s most important guideline.

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**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

| Comment ID: | PSLPP16/13918 | Respondent: | 8732993 / Michael Weber | Agent: |
|-------------|---------------|-------------|------------------------|
| Document:   | Proposed Submission Local Plan: strategy and sites 2016 / Policy S2 |
| **Do you consider this section of the document; complies with the Duty to Cooperate?** ( ), is Sound? ( ), is Legally Compliant? ( ) |
| Answer (if comment is on questions 1-7 of the questionnaire): | () |

**POLICY S2**

I OBJECT to the Borough Wide Strategy (Policy S2)

The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

*The housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.*

The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or
study. On any common sense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guildford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

The assumptions and calculations in the SHMA are widely regarded as flawed and even before Brexit, produced an inflated housing needs number. The figure of 13,860 new homes is completely unsubstantiated. It has not been scrutinized by Councillors despite repeated requests for debate. The assumptions and calculations underlying the model are hidden, protected by a claim to intellectual property by a commercial sub-contractor used in preparing the SHMA. I have serious doubts about the objectivity of the SHMA because it has been produced by consultants whose website openly proclaims their pro-development agenda leading to reasonable suspicion that the figures are inflated. Guildford’s OAN is not transparent but has been taken on trust by the authors of the plan. Given that almost every element of the plan is predicated on this OAN, the plan as a whole cannot be considered “sound”.

The status of the 13,860 figure is ambiguous. The Council has said that the housing number and the OAN are identical because the OAN is “deliverable” and is by definition objective and cannot be contradicted. The OAN is only deliverable because of the Council’s cavalier approach to the Green Belt in contravention of the NPPF, ministerial statements and local and national Conservative Party manifesto commitments. The plan also states that infrastructure or other constraints may in due course affect deliverability. It is also unlikely that the number of houses can be built at the rate proposed. In recent years, housing starts have on average been less than half the proposed rate. This is not because developers do not have the land or cannot get planning permission. Constraints in the supply chain and maintaining profit levels have been more important.

The plan cannot be considered “deliverable”. In addition, the number of homes proposed, plus existing planning permissions, plus expected “windfall” sites, exceeds the total of 13,860. So how many homes (taking account of these adjustments) do the Council want built? The plan does not say. Without this figure it is hard to see how anything else can be planned. This undermines the validity of the whole consultation. It is unreasonable to ask the public to approve a “plan” that fails to propose a target number that takes all the standard constraints and adjustments realistically into account, leaving the Council to set one without further consultation. Even if the OAN is not flawed, it is at best only a baseline figure and should not be passed off as a policy proposal.

It is unreasonable to embark on a radical transformation of the borough on the basis of an unclear housing target. Most of Guildford Borough is highly protected from development (89% Green Belt, 44% AONB and about 75% protected by SPA). Whether or not increasing the number of dwellings by up to a quarter is desirable, it would be a major and irreversible change, arguably turning a largely rural borough into a mainly urban or suburban one like Woking. The scale of the housing number increases the onus for it to be seen to be sound. A substantially lower number, on the other hand, would remove the need to build on Green Belt or open countryside, and instantly meet the single biggest public objection to the plan as a whole.

The Plan in general and this policy in particular does not address the point that Guildford exists as part of London’s commuter belt. Any increase in supply of housing in Guildford, particularly if the increase is proportionately greater than elsewhere in the commuter belt, will simply result in a shift of population into the area. It will not reduce prices or increase availability except imperceptibly. The Plan also ignores the point that many of those working in the area live elsewhere. Accordingly in considering the housing number the Plan should take into account that in this part of London’s commuter belt, demand for housing is, in practical terms, unlimited.
This policy does not take proper accounts of the constraints to development which exist, principally posed by the Green Belt and by infrastructure limitations. I believe the Council is under a duty to properly consider applying these constraints. It is clear the Council has failed to do this. This approach differs from all the other boroughs in Surrey. The Plan appears to have deliberately been manipulated towards a growth agenda without disclosing why this is being done. The housing that is needed should be concentrated on urban brown field sites and through increasing the housing density of existing built up urban areas.

The development of 13,860 homes in the Plan period with 65% in the Green Belt does not constitute sustainable development. It will have a permanently detrimental impact on the Borough in general and on West Clandon and surrounding area in particular. The developments at Garlick’s Arch and Gosden Hill Farm do not meet the needs of the local communities. The road infrastructure in and around West Clandon will be unable to cope with additional demand. The edge of urban Guildford will creep that much closer to West Clandon, thus negating the purposes of the Green Belt in the area which include safeguarding the countryside from encroachment, checking the unrestricted sprawl of large built up areas and preventing neighboring towns merging into one another.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill Farm (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Answer (if comment is on questions 1-7 of the questionnaire): ()

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/6162  Respondent: 8733537 / Helen Ward  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy A21

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I rented a full sized allotment for 9 years on this, the Aldershot Road site. I had to give it up due to bad knees and my husband was suffering with prostate cancer and I was finding I couldn't devote the time to cultivate such a large plot of land. I did miss it but late last year was offered as much as I thought I could realistically cultivate on what was being set up as a "Community Plot", The idea was to bring people like me back into the allotment community or to let people rent a piece of land which was manageable for tem. My little quarter plot has really given me an escape as I am a carer for my husband who has various metal and physical health issues. I is of a size where I don't have to disappear for an entire day to keep it cultivated.....2 hours is just nice without leaving me feeling guilty and if I can get there in the morning I can do my work and get back home before hubby wakes up!. I also means I can grow fresh vg for my family. I have a large garden but most is unsuitable for veg growing.
This allotment site has been there since before the First World War so is of historical value. They must be protected at all costs and should be included in the list of green spaces within the definition of “green and blue infrastructure” in para 4.6.31 of the draft plan (page 116).

The site also boasts a self help group (WASHA) which runs an educational program for local school children and novice gardeners.

This site must stay and holders also require adequate vehicular access and parking, especially if those who will be loosing their plots on the Bellfields site (also for housing!) wish to relocate to ours.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd’s (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter.

Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
9] I object to the fact that the proposed plan does not meet the needs and desires of local communities, as evidenced through the Ockham Parish Plan. The top two responses as to why local residents enjoy life in Ockham are (1) access to the countryside and clean air and (2) the peace and quiet afforded by wide open spaces. Over 90% wish to see both the historic features of the village maintained and the village’s green spaces, including the FWA/TFM, protected.

10] I object to the continued inclusion of a site (the former Wisley Airfield - known as Three Farm Meadows - where the planning application has already been unanimously rejected by GBC’s Planning Committee.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3193  Respondent: 8733857 / Tony Edwards  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to the threat the Local Plan poses to the historic rural village of Ockham and the blight on properties there. The plan calls for a village of 159 residences (with narrow lanes, no streetlights, very few pavements and many listed houses) to be subsumed into a 2,000+ dwelling development, with urban-style buildings up to five storeys high and a population density higher than most London boroughs.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3194  Respondent: 8733857 / Tony Edwards  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
6] I object to the detrimental impact on transport, local roads and road safety. I specifically object to:

1. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars.
2. The increased volume of car traffic. A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads.
3. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements.
4. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them).
5. The increase in the already severe congestion on the Strategic Road Network of the A3 and M25. A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest.
6. The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3195  Respondent: 8733857 / Tony Edwards  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

7] I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).

8] I object to the fact that air quality concerns have all but been ignored. Air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3189  Respondent: 8733857 / Tony Edwards  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Objections to Guildford Borough Council Proposed Local Plan (June 2016) and to the continued inclusion in the plan of the Former Wisley Airfield (FWA), known as Three Farms Meadows (TFM) – Allocation A35 - for the phased development of a new settlement of up to 2100 houses

I object to the draft Local Plan for 10 fundamental reasons:

1. I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.

2. I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban sprawl stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3190  Respondent: 8733857 / Tony Edwards  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3191  Respondent: 8733857 / Tony Edwards  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy S2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/557  Respondent: 8733857 / Tony Edwards  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy E1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Employment land – POLICY E1, E2

Contrary to national trends, too much potential development land within the town centre is being allocated for retail or commercial development rather than housing. High added value businesses are welcome in the borough, but much of the employment land is designated for retail or low added value employment floorspace, which only exacerbates current issues such as lack of low cost housing and heavy traffic. Sites such as the Burnt Common Triangle, currently in the Green Belt, are inappropriate for heavy industry,

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/550  Respondent: 8733857 / Tony Edwards  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
**Use of land – density POLICY H13.**

The paragraphs relating to density in Policy H1 have been deleted. To ensure developments make optimal use of space there must be a policy to cover minimum and maximum densities. Without a policy to cover density, there is a risk that developers will use land inefficiently, putting additional pressure on the countryside and undeveloped land. This deletion is inappropriate.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

 Attached documents:

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<th>Comment ID: pslp171/551</th>
<th>Respondent: 8733857 / Tony Edwards</th>
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<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2017 / Policy P1</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

**AONB – POLICY P1 and POLICY E5**

The policy relating to AONB weakens the protections offered, and (unlike previously) does not have restrictions on non-major development. This is a move in the wrong direction. Previously all proposals were considered against the 5 key tests – now development in the AONB seems to be more acceptable. This is weaker, not stronger, and is contrary to huge responses from the public in previous consultations and the weight of protection given to AONB in the NPPF.  

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

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<th>Comment ID: pslp171/556</th>
<th>Respondent: 8733857 / Tony Edwards</th>
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<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2017 / Policy P2</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

**Green Belt – POLICY P2, POLICY P3, POLICY E5 and sites**

Exceptional circumstances must be demonstrated in order to develop Greenbelt yet despite the weight of public opinion against weakening of this policy, 70% of new housing development will be in the countryside, of which, 58% will be in Greenbelt. By definition, this is not an exception and no attempt is made to demonstrate exceptional circumstances, in line with the requirements of the NPPF. Insetting villages is of concern since restrictions within the settlement boundary raises concerns over loss of character.
The Rural Economic Strategy covered in 4.51a, promoting affordable homes everywhere in the countryside including the AONB as a main aim, is a mechanism for promoting overdevelopment in our countryside. It has not been subject to full public consultation and is based on data, which is not up-to-date.

Three major strategic sites – Blackwell Farm, the former Wisley Airfield [Three Farms Meadows] and Gosden Hill Farm – are in the Green Belt. Previous consultations show that, in line with the NPPF, the public would prefer to use brownfield land in the urban area first.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/547  Respondent: 8733857 / Tony Edwards  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Housing number – POLICY S2

The housing target proposed, of 12,426 is based on assumptions that have not been made public and includes flaws that have not been corrected in the modified SHMA (verified by professional analyst Neil MacDonald of NMSS who concluded that an annual housing figure of 400 per year would meet Guildford's overall need). The phased approach (more homes built towards the end of the plan period) is appropriate in order to permit necessary infrastructure but open-ended targets where an unknown figure is held back until after the plan period is not a reduction but a postponement and does not allow for optimal planning or transparency.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/1153  Respondent: 8734241 / Andrew Ingham  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans. This also needs to be updated to take into account the inevitable population impact from the recent European Union referendum decision.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<th>Comment ID: PSLPA16/1154</th>
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<td>There is also no evidence in the consultation document of provision for the large amount of additional infrastructure that will be required to support the vast population increase that the proposals will bring. Both from the additional housing developments proposed and the inevitable village sprawl resulting from relaxing planning restrictions. These considerations should be addressed as a priority before any future retrofit developments are even considered.</td>
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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<td>I object to the proposed Wisley Airfield development which would have an enormous unquantified impact on the surrounding villages. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.</td>
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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E8</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the proposed designation of East Horsley as a "district centre". This completely misreads the nature of the facilities currently provided and will make it a target for future inappropriate developments.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4448  Respondent: 8734241 / Andrew Ingham  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I am not against controlled and reasonable sustainable development in local villages as a means of providing good quality affordable housing in response to demand, but it has to be in keeping with the surrounding environment and existing population density. Future development proposals should be dealt with on a case by case basis.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4449  Respondent: 8734241 / Andrew Ingham  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Points that need to be addressed include:

Provision of nursery and school places - Schools in the area are already heavily oversubscribed, with no additional schools where will the influx of children be educated? Nurseries are already at maximum capacity - parents of young children will not have the choice of going to work if they cannot find affordable child care facilities in the local area.

Rail Travel - Those living in Horsley and the surrounding villages, who need to work in London, need viable transport options to commute into work. Peak rail services are already at maximum capacity and over crowded. Minor problems on
the network regularly cause huge difficulties for commuters getting to and from work. Car parks at Effingham Junction and Horsley stations are already full most days and cycling is positively dangerous in the dark given the very poor state of the roads and lack of street lighting. Given the distance of these new developments from the station, lack of paths and lighting, walking is not realistic for most.

**Roads** - No new roads are identified in the plan. Roads in the Horsleys are already inadequately sized, in a dreadful state and continually subject to roadworks and repair which regularly cause delays. Roads are very busy at peak times and could not take the inevitable significant increase in work and school traffic that would result. This would lead to gridlock at rush hour and significant noise and air pollution. Limited traffic controls also mean that speeding is a common problem - the number of accidents and injuries will continue to increase.

**Utilities** - Roads in the area are continually being dug up by utility companies due to deficiencies in the existing infrastructure. These need to be upgraded to cope with the increased demand. Water pressure in many parts is already too low and broadband speeds are not great. There appear to be no plans to roll out fibre based communications in Horsley and so the extra demand on existing telecoms infrastructure will just slow down access for everyone. This will put a stop to any home working aspirations residents might have.

Many people have chosen to live in the area due to its village nature and heritage which makes it special. The surrounding countryside is also a huge benefit to the quality of life and health of local residents and London visitors who flocked to the area in the recent 2012 Olympics. This quality of life is something that should not be under estimated and therefore protected at all costs.

In summary, the plan is not fit for purpose. It does not make sense from an environment and economic perspective to keep adding homes to local villages without consideration for the infrastructure which will slowly erode the viability of the village. That plan is poorly thought through and everyone will suffer. Do we really want or even need the Guildford borough population to be subject to uncontrolled increase year on year?

There are also many other options which should be considered first before the easier and higher profit option of bulldozing green field sites. There are numerous brownfield sites which could be identified with a little effort and developed using innovative solutions. Poorly utilised existing sites such as sprawling car parks around Guildford town centre which could be more efficiently utilised. London is also not very far away and is better sized to accommodate the population numbers proposed.

I object to proposals to put up large swathes of Green Belt land up for development due to the irreparable damage that will be caused. I hope you are able to give my comments the attention they deserve and urge you to rethink the proposals outlined in the plan.

I would urge you to remember that once our outstandingly beautiful countryside and Greenbelt land has been bulldozed to make way for homes, it will be gone forever, for us and our generations to come.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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<th>Comment ID:</th>
<th>PSLPP16/4444</th>
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I am compelled to write after having read the latest version of the Guildford local plan. It shocks me that Guildford council, who has been voted in to look after the needs of local residents, could put such a set of concerning proposals forward and has still not taken on board the numerous concerns of its residents. If adopted, the repercussions will be regretted by all of us and our generations to come.

I object to the proposal to remove the Horsleys from the Green Belt and in turn destroy large amounts of Green Belt land around London - the exceptional circumstances required have not been demonstrated. This land was put in place to stop the inevitable urban sprawl and control pollution levels. This land should be considered sacrosanct and protected for local residents and visitors to enjoy, as an area of outstanding natural beauty and as an important habitat for local wildlife.

I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<th>Comment ID: PSLPP16/4445</th>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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As a Horsley resident I also object to the proposals to squeeze large numbers of homes into local villages that just do not have the infrastructure to support them. These villages are part of our unique English Heritage which should be preserved at all costs, especially considering their proximity to the built up suburbs of London.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<th>Comment ID: PSLPP16/4447</th>
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Additionally I also object to the disproportionate allocation of housing in this particular part of the borough. Over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/4648  Respondent: 8734721 / M Bruder  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A22

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The Keens Lane development plans are inappropriate.

This is Green Belt area.

Vehicle volumes are already a problem and the infrastructure just cannot cope. A narrow road and even if work done at local junctions it just extends the problem to Rydeshill, Saltbox or other congested junctions.

The near vicinity of Whitmoor common means there will be an inevitable impact on wildlife, in particular as is a wildlife corridor between Whitmoor and Broadstreet Commons

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9920  Respondent: 8734721 / M Bruder  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to

14,000 (690 per year) is unjustified, unproven and been subject to scrutiny.

The number excludes currently granted permissions and potential windfall sites which extends this number even higher.

This number is too high and is leading to numerous issues around lack of infrastructure and inevitable encroachment on Green Belt; there is lack of protection for our countryside.
At this level there are certain to be delays that will create problems down the line with pressure to bring in locations currently excluded.

There is no specific policy in the Local Plan to prevent inappropriate development within current communities such as Fairlands, e.g. garden grabbing. Which the government has stipulated should not be part of development plans. As above delays elsewhere will lend weight to such applications in order to meet the excessively high number. There needs to be a specific policy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/242  Respondent: 8734785 / Bill Houghton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Send

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Plans A25, A42, A43, A43a, A44

I object to all the above plans as they are an unconstitutional attack on the local Green Belt & based on unsubstantiated housing needs

I also object on the grounds that they are a disproportionate development in our area of the borough.

They do not take into consideration the lack of schools & medical facilities but above all they will have a devastating effect on the A247. Plans already agreed – ie the Send Marina, & the additional houses on the Vision Engineering plot will be more than enough to bring this road to rush hour standstill & the Tannery Lane crossroads, already difficult for large commercial vehicles will become an even more hazardous accident spot.

The short section of the A247 between the Burnt Common roundabout & the new north & south A3 slip roads will have to absorb all this new local traffic but it will also attract those who currently go through Ripley.

A traffic survey of current levels would surely confirm that there are certain times of the day when we can take several minutes to gain access to the road.

I most strongly object to the inevitable increase in air pollution & noise. It is worrying to think that we would have to endure even higher levels of both, a further increase will be a serious threat to health & well above acceptable levels.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/3966  Respondent: 8734785 / Bill Houghton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North
I object to all the above plans as they are an attack on the local green belt and are based on unsubstantiated housing needs. I also object on the grounds that they are a disproportionate development in our area of the borough.

They do not take into consideration the lack of schools and medical facilities but above all they will have a devastating effect on the A247. Plans already agreed – ie the Send Marina, and the additional houses on the Vision Engineering plot will be more than enough to bring this road to rush hour standstill and the Tannery Lane crossroads, already difficult for large commercial vehicles will become an even more hazardous accident spot. Plan A42, the Clockbarn Nursery development will be especially detrimental at that spot.

The short section of the A247 between the Burnt Common roundabout and the new north & south A3 slip roads will have to absorb all this new local traffic but it will also attract those who currently go through Ripley.

A traffic survey of current levels would surely confirm that there are certain times of the day when we can take several minutes to gain access to the road.

I most strongly object to the inevitable increase in air pollution and noise.

It is sad to think that we would have to endure even higher levels of both when in our gardens, any further increase will be a threat to health and too much to bear.

To me it is transparently obvious that all the developments are blatant attempts to make money at others expense. The people behind them will make money by making all the local residents' lives less enjoyable. Traffic problems are already bad. It is difficult to leave the house and turn left in the morning. Turning right would be unthinkable.

If the plans are allowed to go ahead this will be a triumph of greed and conspiracy of greedy people against the common good.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to the policy A42 change at Clockharn in Tannery Lane because it will add a further burden to the A247 especially at its junction with Tannery Lane. This will have an worsening affect on traffic flow from the Old Woking t-junction all the way up to Clandon. It will also destroy the Green Belt nature of this area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp172/828  Respondent: 8734785 / Bill Houghton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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I object to the policy A43 change at Garlick's Arch as: This is a precious natural barrier between Ripley & Send, It has long been established as an ancient woodland, It is an area susceptible to flooding, It will add extra traffic to existing roads which are already carrying more than are manageable at busy times of the day.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp172/829  Respondent: 8734785 / Bill Houghton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A58

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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I object to the policy A58 at Burnt Common because

a. The new proposal refers to a 'minimum' development whereas the original proposal asked for a 'maximum' allocation. In other words no set limit. Any requirement for industrial or warehousing should be part of the Slyfield site & should in no way encroach on our Green Belt.

b. The 2017 Land Need Assessment made it clear that a reduction in demand for such development was envisaged

c. This would have a disastrous affect on local traffic flow, the short section of the A247 between Burnt Common roundabout & the bridge over the A3 already creates real & dangerous problems at busy times of the day when trying to join the almost continuous flow of traffic.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
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<td>I object to the proposal to inset Send Business Park from the Green belt because of the very restricted vehicle access along Tannery Lane. Any survey of traffic trying to enter Tannery Lane from either end, especially large commercial vehicles should discourage any development, gridlock would become an everyday problem.</td>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North</td>
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<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<td>As an elderly person I am sad to read of the over development of these green villages! I have lived here for many years and it is an oasis in what I thought was Green Belt. I have put up With very poor drainage even flooding and so without a huge infrastructure more houses are going to cause much flooding. The pressure on these roads and and villages will change the area into another Woking,</td>
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<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
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<tr>
<th>Comment ID: PSLPS16/1729</th>
<th>Respondent: 8735841 / Joanna Fenning</th>
<th>Agent:</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26</td>
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We object to Guildford Borough Council’s draft Local Plan Proposals to build 1800 houses, an industrial park and a highway on the slopes of the Hog’s Back at Blackwell Far, which will:
- Destroy views from the Hog’s Back ridge of a nationally designated Area of Outstanding Natural Beauty
- Remove 72 hectares of scenic farmland and additional ancient woodland from the green belt
- Increase tailbacks on the A31 and traffic congestion
- Result in rat-running through local roads
- Add to Guildford’s pollution

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I OBJECT to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)

- The “objectively assessed need” figure of 693 homes a year is too high.
- A professional review by NMSS has concluded that, even basing the calculations on a period of stronger economic and student growth, the housing need figure should be revised down to 510 homes a year and the method changed to consider student housing need separately due to the distorting effects.
- The current SHMA inflates the proposed housing figure due to
  - failure to correct for errors in the historical data for international migration flows,
  - issues with the way it considers students and affordability and
  - flaws in the method for estimating the number of homes needed to support job growth.
- It is unacceptable that demographic and economic model assumptions have been withheld and cannot be checked making the process unaccountable.

The Plan’s proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the borough, it is over double the previous figure of 322 used in previous plans. The SHMA report methodology is I believe inaccurate; it inflates the needs of the borough by distorted student numbers. However, it is based on commercially confidential modelling assumptions that cannot be checked or reviewed. There is no transparency to this evidence base and it is therefore impossible to assess its accuracy. This is not democratic and is not appropriate for consultation of the Plan.

The National Planning Policy Framework allows the overall housing target to be reduced to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
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<tr>
<th>Comment ID: PSLPS16/6255</th>
<th>Respondent: 8735873 / David and Gillian Allan</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A25</td>
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I OBJECT to Policy A25 with proposals for Gosden Hill Farm.

The Green Belt at this point serves the important function of separating West Clandon from the edge of urban Guildford. Development here will cause the two to coalesce defeating one of the objectives of the Green Belt. If this development proceeds I believe the narrow strip of Green Belt remaining between Guildford and Clandon at this point will be too narrow and will come under further pressure.

It will represent an undesirable ribbon development along the A3. It will be highly visible from the A3 when approaching Guildford and will, in conjunction with A43a at Garlick’s Arch give the appearance of almost continuous development from Send through to Guildford.

The Plan does not put forward any evidence that exceptional circumstances exist to justify removing this site from the Green Belt.
The development will overburden the local road network and increase congestion on the A3 and A247 through the centre of West Clandon. This is already very heavily used whilst being unsuitable for designation as an A road. In places it is too narrow for two lorries to pass causing them to mount the pavement.

Note the following accident data:

2010 –2014 from Crashmap data

- Clandon Cross Roads Area to Bulls Head - 17 incidents
- Bulls Heads Head to Bennett Way - 8 incidents
- Bennett Way to Highcotts Lane - 15 incidents
- Tithebarn Lane to Portsmouth Road Birch Close - 8 incidents

2015

- 21 Oct 2015 – A247 near shell garage - Three vehicles collided causing delays
  Surrey Fire and Rescue deployed.

2016

- 15 April 2016 12 year old boy injured in The Street – A247 closed in both directions
- 28 April 2016 A3 West Clandon London bound between A247 Tythebarns Lane (Burntcommon and M25J10 (Wisley Interchange) congestion on A3 to A3100 Clay Lane Burpham
- 30 6 2016 Motorcyclists with injuries airlifted to hospital Send Marsh Road

Attempts have been made over many years to reduce traffic, traffic speeds and accident risks through West Clandon, however little has been achieved as the road cannot be widened and SCC is reluctant to impose further speed limits as congestion is already very high.

I object most strongly to the proposal for a link road to bring traffic from the Gosden Hill development to the proposed 4 way junction at Burnt Common. This has the potential to generate large volumes of traffic (including commercial vehicles) on the A247 through West Clandon - a road which is already under traffic stress (see below).

The land in Gosden Hill does exactly what the Greenbelt was designed to achieve. It provides a green buffer between the Guildford Urban Area and West Clandon, gives Burpham a defined green boundary and breathing space and it hides Guildford town from visitors until they pass the off-slip to Burpham.

No exceptional circumstances have been demonstrated for building on this site and therefore it does not comply with paragraphs 87-89 of the NPPF. It stops the sprawl of Guildford town, assists in safeguarding the countryside from encroachment and assists in urban regeneration by encouraging the recycling of derelict and other urban land. All of these are requirements of the NPPF.

The scale of Gosden Hill is out of proportion to West Clandon. It would have four times the amount of housing plus shops, offices/factories, GP surgery, schools. Development on this scale would blight a historic village with a history going back to the doomsday book and beyond.

Gosden Hill is the most obvious location for the north end of an A3 tunnel. It has rising ground and is situated just before the urban area. If it is built on, it will be very difficult to construct a tunnel.

The development will generate in the region of 6,000 vehicles which will pour on to the A3 which is stationary every day during rush hours. The linking of the A3100, B2215 and A247 would channel thousands of cars through the narrow, winding road through West Clandon, a road where large lorries mount the pavement virtually every day and through Send and Ripley which are also severely constrained.

The volume of traffic will greatly increase air pollution which is particularly critical given the proposal to build two schools.
Currently, a two way junction at the site would require vehicles wanting to go north on the A3 to go through Burpham which is grid-locked every day.

Burpham’s sewers are at capacity. Sewage would have to be pumped to Slyfield for processing, a project of enormous cost.

There is inadequate fresh water in Guildford and current supplies could not meet the needs of a development of this size.

Electricity supply is also inadequate and would require a big infrastructure development.

The railway station was rejected by Guildford Borough Council in 1984 because it feared Gosden Hill would become a dormitory estate for London.

The wording of the Local Plan with regard to Gosden Hill is so loose that the developer could virtually do whatever it wants.

The remaining agricultural land between Gosden Hill and West Clandon is so small that it is highly likely to be uneconomic and therefore a prime candidate for further development which would roll the Guildford Urban Area over West Clandon towards East Clandon and Wisley.

If the Strategic Sites are developed, the north of Guildford will deliver 36%, 5,036 houses towards the total of around 14,000. The infrastructures of the existing villages and the A3 will be overwhelmed by the scale of development.

A new on-slip at Burpham would only be 1.8km from the on-slip at Burnt Common which is against Highway England’s requirement of 2km.

Development of the A3 at best will not start until after 2020 and the building of a tunnel, which is only an “aspiration” in the Local Plan, is likely to be many years after. In the meantime given that developers build houses to provide cash-flow for infrastructure, Gosden Hill will have a crippling effect on villages like West Clandon and the A3.

Gosden Hill already has surface water problems. Merrow Stream crosses the site. No hydrological survey has been carried out to assess the implications. Electricity pylons run through the centre of Gosden Hill which have health and safety issues.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

<table>
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<tr>
<th>Comment ID:</th>
<th>PSLPS16/6256</th>
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<th>8735873 / David and Gillian Allan</th>
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<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy A43</td>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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I OBJECT to Policy A43 and A43a on Garlick’s Arch.

The site was only inserted in the draft plan at a late stage just before publication of the consultation draft which is a shabby way for the Council to proceed. The site is not a sustainable site being far from any infrastructure facilities and transport links. The bus service is infrequent and it is almost certain any future residents will rely almost entirely on cars for journeys. Similarly any employees at the employment areas will almost undoubtedly arrive and leave by car.

The site is susceptible to flooding and will not make a suitable site.
The Green Belt at this point serves the important function of separating West Clandon from Send. Building here will cause the two to coalesce defeating one of the objectives of the Green Belt.

I have seen no evidence that exceptional circumstances exist to justify removing this site from the Green Belt or that this important issue has been addressed. The Green Belt and Countryside study did not even consider this site.

It is understood the Council's eyes may have been turned by the possibility of receiving for free the land which might be used for new A3 slip roads in return for allowing this development, thus justifying it as some form of enabling development. However the slip road land if needed could be safeguarded in the plan and acquired by compulsory purchase when required. Lack of current funding for the slip road is not a justification for allowing the development of this site. If the slip road is genuinely needed then government funding will be available for it. (One of the reasons for turning down the so called enabling development proposal intended to fund the rebuilding of the Howard of Effingham School was that the redevelopment of the school was not essential. As and when it became essential Government funding would become available. Accordingly enabling development was not necessary. The same principle applies here.)

The A247 running south past this site through the centre of West Clandon is already very heavily used whilst being unsuitable for designation as an A road. In places it is too narrow for two lorries to pass causing them to mount the pavement- often at speed. It has narrow bends with poor sight lines, an infants school and a hump-backed bridge concealing the entrance road to the station for southward traffic. In addition, there are no continuous footpaths which forces pedestrians to cross and re-cross the road. Development at Garlick’s Arch will only exacerbate the problem and make the road even more congested and unsafe for pedestrians.

The development will cause harm to the ancient woodland on and by the site.

Taken together with the Gosden Hill site, there will be a ribbon of development along the A3 in contrast to the current “soft” edge approach to Guildford.

Garlick’s Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8). There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).

The Plan states the preference is to making the best use of previously developed land. Yet at the 11th hour a perfectly acceptable brown field site at Burnt Common, capable of accommodating approximately 100 houses, was removed from the Plan and replaced with the Garlick’s Arch site. There was no proper consultation in relation to the inclusion of this site. Why was a brownfield site removed and replaced with a Greenfield site? There is no evidence that Section 18 of the Planning and Compulsory Purchase Act 2004, which requires local planning authorities to produce a Statement of Community Involvement, has been complied with for this site. This only came to light for local residents following a Council meeting on 11th May 2016.

Moreover, Guildford Borough Council’s own Green Belt & Countryside Report does not address Garlick’s Arch at all, so there is no evidence base to support the inclusion of this site.

National Planning Policy promotes sustainable developments, with sustainable transport. With ever reducing bus services in the area and no train station within reasonable walking distance it is impossible for any development on this site to offer a sustainable transport solution. Development on this site is wholly inappropriate (Policy I3).

The stream, which runs through the site, is identified as having a high risk of flooding by the Environment Agency. There are other sites that do not flood that can be developed and therefore this site should be removed from the Plan (Policy P4).

This site is bordered by Ancient Woodland and within it a number of trees are protected by Tree Preservation Orders (Policy D3).

The site has an abundance of wildlife, some of which are protected. It is home to many types of owls and bats, with the woods having cuckoos and woodpeckers. In addition there are regular sightings of badgers, deer and red kites. The development of the site will result in the loss of habitat. No wildlife report has been conducted on the site. (Policy I4)
It is clear that with this site being added at the 11th hours no infrastructure planning has been undertaken. The Infrastructure Schedule makes no provision for any infrastructure improvements for this site. How will the local services such as schools and doctors cope, many of which are already at capacity? (Policy I1)

Furthermore, several electricity pylon runs through the site, which will have the potential to be a health hazard for any residents.

I OBJECT to the inclusion of the land for new on/off ramps at Burnt Common (A43a)

The addition north facing ramps to the A3 at Burnt Common would be a disaster for local communities. There is no requirement for local traffic to access the A3 to the north, but the addition will draw in a huge amount of ‘through’ traffic.

The route from London/M25 to Woking or would now be through Burnt Common and Send. Equally traffic from the east of Guildford (Merrow etc) and the A25 will now go through West Clandon and Burnt Common. This will cause immense damage to those areas on small roads which cannot be improved.

This Plan does not address the needs of local communities or the Borough in this regard. There has again been no Section 18 consultation on this.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12939  Respondent: 8735873 / David and Gillian Allan  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the damage to the historic environment as a result of the scale of the proposed development (Policy D3)

I OBJECT to the local plan based on the impact it will have on the special countryside of the borough.

The proposed development at Garlick’s Arch (A43) will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12965  Respondent: 8735873 / David and Gillian Allan  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I OBJECT to Policy D3 - Historic environment

I object to this policy as it is very weak and I do not think it is clear enough in its support for the conservation of the historic environment. It provides for development which will “enhance” heritage assets which I fear is a developer’s charter as it leaves plenty of room for abuse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

I OBJECT to Policy D4 - Development in urban areas and inset villages

The policy should place much greater emphasis on residential development in the existing urban centres. In this way housing needs can be met without resorting to large developments in the Green Belt. There are urban areas in need of regeneration but these are ignored in favour of Green Belt development.

The policy should not be applied to the villages which should remain in the Green Belt. Unrestricted application of this policy to the villages intended to be inset will change their characters radically and for the worse. The development it encourages will increase traffic and congestion disproportionately.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I OBJECT to the sustainable employment policy (Policy E1)

I object to the inclusion of a strategic employment site at Gosden Hill Farm. Employment sites should be concentrated on previously developed land in more sustainable locations with good transport links where the infrastructure can support development. Warehousing, distribution and industrial premises cause considerable commercial traffic, noise, pollution and general disruption. They are not good neighbours for schools and 2000 houses. Many of the jobs will be taken by people outside the area leading to additional congestion in Burpham and on the A3.

I object to the inclusion of a strategic employment site at Garlick’s Arch. It is in a non-sustainable location remote from any facilities of any kind and with poor public transport links. It is unlikely jobs there will be taken by local residents and it is likely all travel to and from work will be by car adding to local congestion. Employment sites should be concentrated on previously developed land in more sustainable location with good transport links where the infrastructure can support development.

The site is in any event subject to frequent flooding and unsuitable for development.

If developed, the new employment site at Garlick’s Arch, Send Marsh/Burnt Common (A43), would be treated as a Strategic Employment Site.

The proposed development of up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8) at Garlick’s Arch (A43) is in the scheme of industrial development relatively small. Just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m. The Garlick’s Arch site which is in the Green Belt should not be developed as a Strategic Employment Site when there is a suitable alternative brownfield site very close by, which is far more sustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID:  PSLPP16/12932  Respondent:  8735873 / David and Gillian Allan  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the location for new employment floorspace (Policy E2)

I object to this policy. It would be more sensible to confine new office and research and development floor space to the urban Guildford area. I also oppose the policy of expanding the Research Park onto Blackwell Farm. No exceptional circumstances, as defined under the NPPF, have been advanced to justify incursion into this permanent and high-quality area of Green Belt.

Proposals for new industrial, warehousing and storage (use Class B1c, B2 and B8) floorspace will be directed to the Industrial Strategic Employment Sites.

There is no need for the new employment floorspace to be located at Garlick’s Arch or Gosden Hill Farm, when near to these sites at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12937  Respondent: 8735873 / David and Gillian Allan  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the loss of rural employment (Policy E5)

Policy E5 supports the retention and development of local services and community facilities in our inset and identified villages. Yet the development at Garlick’s Arch (A43) would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises. The Plan does not promote rural employment; rather it will result in the loss of existing local rural businesses.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12972  Respondent: 8735873 / David and Gillian Allan  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E6

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy E6 - The leisure and visitor experience.

The policy should acknowledge that whilst in some areas new and enhanced leisure facilities are valuable (for example the new Opera House at West Horsley Place Towers), much tourism depends on the undeveloped nature of Green Belt areas surrounding Guildford. Accordingly the policy should recognize that in many rural areas new and enhanced visitor facilities may be unnecessary and counterproductive, particularly away from existing buildings and development. For example the attraction of Newlands Corner is its undeveloped nature. Significant development of visitor facilities there is likely to diminish rather than increase its attractions. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment. Heritage sites and the Green Belt are particularly vulnerable to harm.

Tourism and visitors do not depend on new visitor “attractions” and could actually be damaged by them, as compellingly argued in the current debate over Newlands Corner. In this policy, the presumption in favour of development runs the risk of...
of becoming an excuse for overdevelopment/“Disneyfication”. Heritage sites and the Green Belt are particularly vulnerable to harm.

Guildford has many “leisure and visitor attractions” already. The case for creating more is not made and no examples are given. Instead, the plan’s explicit priorities should be:

1. To protect the borough’s prime leisure and tourism asset, its countryside, from inappropriate development. This is all the more valuable because of its accessibility from London, the rest of Britain and the Continent, in that order. Rural residents are its custodians and require no Council interference. Economically, the most valuable forms of tourism, such as walking and cycling, require no new development. In the overcrowded South-East of England, lack of development is a leisure and tourism asset, not a liability.

2. To help make Guildford’s river landscape less off-putting and support town-break packages for high-value tourists. To achieve this, the policy needs to define what leverage, if any, Council planners have to influence normal tourism market mechanisms.

3. To help private providers market local tourism. This need not involve extra spending. The Council could, for instance, help co-ordinate ready-made, local tourism packages under a distinctive brand at an all-in price. An “English town break” (including B&B accommodation, a walking tour of Guildford, a pub lunch in the Surrey Hills, a visit to Wisley Gardens and a National Trust property and a Southwest Trains travelcard for a day out in London) would be highly attractive to many European visitors who currently by-pass Guildford to go to Bath, Oxford or Cambridge instead.

4. To rule out the redevelopment of scarce rural hotel sites (e.g. Thatchers, East Horsley, earmarked for 40 new houses under Site A37 of the plan yet just a short walk from the new opera house).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12962  Respondent: 8735873 / David and Gillian Allan  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E7

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy E7 Guildford Town Centre

The policy “vision” describes protecting the Guildford’s unique setting and historical character and sets out some of the ways this will be done. However none of this is included in the formal Policy wording in the blue box. I suspect the Vision wording is effectively of little or any force. These principles should be included in the formal policy.

There should be a much greater focus on residential use of the town centre where many people would like to live and where the necessary amenities and infrastructure exist. The policy misses the opportunity to propose forward looking sustainable residential development plans in, for example the Walnut Tree Close area, where very significant numbers of new homes could be provided. Such town centre sites could meet much of the housing need over the plan period without harming the countryside.

There is an urgent need for a strategy to focus on brownfield redevelopment before considering development outside the existing urban area.
The policy does not address any of the major issues raised by the Council’s own Town Centre Master Plan, the Guildford Vision Group’s proposal for new river and rail crossings or plans for the redevelopment of Guildford Station, all of which are already the subject of public discussion.

The policy also fails to provide guidance on design requirements, as required by the NPPF.

The policy and surrounding text concentrates too much on shopping without regard to its nature which risks a proliferation of dull high-street chain stores. The policy should seek to enhance Guildford’s character and encourage a wider variety of small shops including locally owned businesses and shops of use to consumers. (For example there is no butcher in Guildford.)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID:  PSLPP16/12956  Respondent:  8735873 / David and Gillian Allan  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy H1 – Homes for all. Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan period. It fails to set rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions.

The housing mix is based on out-of-date, pre-Brexit projections and on assumptions set out in a flawed SHMA that has not been scrutinised or evaluated.

I support higher density development in the urban area, without resorting to dehumanising, high-rise buildings that developers commonly claim are necessary for financial viability. Much of Guildford town could usefully be regenerated with 4-5 storey blocks with landscaping and underground parking, as often seen on the Continent and, recently, in London.

Student accommodation should provided for 100% of new students and more than 60% of existing students, which would free up ideal family accommodation in the urban area. Other university cities (e.g. Oxford) insist on higher percentages than those proposed in the plan. In my view, the Council’s timidity is a case of “regulatory capture” by Surrey University, which has failed to use its existing planning permissions (dating from 2004) to accommodate 3,000 students or to improve the efficient development of its campus (e.g. by building on its extensive and under-used surface car parks). If all students were accommodated in this way, 2,000 homes would be freed up in town and there would be no need to build on the Hog’s Back.

It is not appropriate to release Green Belt land to house students who could be accommodated on the Surrey campus or other university sites. The plan should take account of the university's ability to house its own students and reduce the housing number accordingly.

Guildford borough has already a higher proportion of traveller sites than most comparable boroughs. Over-provision is inappropriate given other constraints.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
I OBJECT to this policy on affordable homes (Policy H2) on the grounds of feasibility and that it should be more firm and explicit on unviability in paragraph 4.2.40.

In particular a scheme is only unviable if the value of developing the land (including some allowance for development risk and a normal level of profit) falls below the sale vale of the land for alternative non-premium uses such as agriculture. The price paid for the land is not relevant. The possibility of avoiding the affordable housing obligation through use of unviability arguments only serves to inflate land values. It will become clear that developments are unviable when developers start selling land for alternative non-development uses.

It should be noted in the plan that because of Guildford's relative popularity as a place to live combined with its location close to others towns and within the London Commuter belt no amount of building will meet demand. Similarly no amount of affordable housing will ever meet demand.

In addition the definition of an ‘affordable home’ is 80% of market value. With even a 2 bedroom flat in Guildford now having a market value of +£360,000 the discounted price is still not going to be affordable to anyone on a normal income.

And at what point will ‘affordable homes’ be able to go onto the market at full market price?

As we have seen with council houses it is not long before the discounted property is sold at full market value with the original owner simply pocketing the profit.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I OBJECT to Policy H3 – Rural Exception Homes as this Trojan horse policy. It says that homes can be built anywhere near a settlement of any form (including agricultural land and the AONB). These homes are meant for people with a village connection, but they could be for anyone on the Guildford borough housing list. To make the housing viable, or to improve the “mix” this can include “market” housing (i.e. normal commercial development which in Guildford usually means large executive homes). This policy means building anywhere, and ignoring all historic planning restrictions.

The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove “exceptional circumstances.”

The wording of the policy is far too wide and drives a coach and horses though all other aspects of planning policy. As drafted the planning authority could be obliged to grant permission for inappropriate and unsuitable developments.

The wording provides no ability to balance the desirability of the development against other considerations including harm to the Green Belt or the AONB. (If the housing would meet identified need and adjoins a settlement under this policy wording permission would have to be granted even in the most sensitive AONB location, even if more suitable locations are available.) The policy should include the need for a balancing exercise including consideration whether more suitable locations exist.

The policy wording should not allow market housing. The ability to include market housing is likely to inflate land values, leading to a self-perpetuating need to include market housing. It may lead to spurious developer led proposals which will be difficult to resist.

The policy wording should define small, either in land size or number of units. I am concerned that if small is left undefined the policy could be used to justify significant developments. In the context of the plan a development of 150 homes might be argued as small. (If Wisley at 2,500 homes is a big development then 500 homes might be a medium development and 150 could be small.)

The policy wording should be restricted to adjoining sites or define the concept of being "closely related". In particular I believe adding the concept of safe and easy walking distance extends the potential radius within which sites will be argued to be “closely related” Many people would regard a mile or so as an easy walking distance. (School children are expected to walk further than that before being eligible for free school travel.)

The wording of the policy itself does not require the local connection requirement for tenants to be secured in perpetuity - only the affordability must be secured in perpetuity. (For example housing could be built for retired Cabinet Ministers under this policy so long as the first tenant was required to have a local connection.) The introduction to the policy mentions this point, but it is not part of the policy itself and may carry little weight at appeal.

The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove “exceptional circumstances.” The size and location of sites should be better defined and it should be clear market housing cannot be included.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12944  Respondent: 8735873 / David and Gillian Allan  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I OBJECT, due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1)

Our villages are already suffering from severe congestion for much of the day, for example the Newark Road & Rose Lane junction in the centre of Ripley and the A247 through West Clandon. The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.

Furthermore, many of the country lanes around the villages of Ripley, Send and Clandon are narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition.

I OBJECT to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces.

Many of the affected villages, such as West Clandon, already suffer from traffic congestion. Further development around these villages will only result in more traffic and more parking problems.

With some 5,000 houses being proposed close to the village of Ripley, the roads serving the village will become even more congested. Cycling has become an ever popular past time, particularly at weekends hundreds of cyclists past through the villages on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road accidents involving cyclists as a result of the development proposed under the local plan.

The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the road becoming ever more dangerous for pedestrians.

The council has a statutory obligation to protect the public and the additional traffic flows will bring added accidents, noise, pollution and injury of the public. In the case of West Clandon the Street often only has a narrow footpath on one side of the road making it very dangerous, especially when vehicles mount the pavements.

This policy as it is inappropriate and inadequate and fails to respond to the challenges raised by the proposed significant Green belt developments. The borough’s infrastructure is already heavily strained. However the plan’s determination to build large housing estates across the Guildford countryside significantly increases the need for infrastructure investment without securing the means for its provision. Placing housing in the established urban areas would reduce the need for enhanced infrastructure as would a more realistic housing number.

The policy wording says nothing about roads and traffic. The Council’s methodology for assessing traffic congestion - averaging it over periods of several hours and ignoring the effects of junctions - simply hides the problem, which will get worse as development proceeds. The schemes referred to in this policy will not solve existing congestion and the local road network has not been given sufficient consideration. Some proposed development locations would require highway schemes that are unlikely ever to happen.

Adequate infrastructure provision is a pre-condition of sustainable development. But in this plan it is an afterthought buried away in Policy I1. By prioritizing greenfield over urban, brownfield regeneration, the plan creates insurmountable (and unnecessary) obstacles for itself. Common sense suggests a local plan should first assess the borough’s infrastructure capacity for sustainable development, and then tailor development accordingly. This plan, however, assumes infrastructure will follow on the heels of housebuilding as if by magic. It makes implementation critically dependent on providers outside the Council’s control and on the vagaries of CIL income. Instead of recognizing this as a key constraint, the plan is based on hope. It is also highly likely that developers faced with the imposition of large infrastructure requirements will go to court to invoke the NPPF provision that prevents authorities from imposing conditions that make a development non-viable.
Policy I1 requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.

Despite the Garlick’s Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents’ in the locality will see their quality of life significantly deteriorate in many ways.

Many of the utilities in the Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers. No plans to improve these services should mean no development of the Garlick’s Arch site.

Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are already at capacity and suffering from funding cuts or freezes. Any further development without funding will place further stress upon existing health services.

Police services are seeing funding reduced. The development of the proposed 13,860 homes during the plan period will stretch the police services further and is unsustainable.

There is no provision of the increased capacity of Guildford hospital, where is this assessed and remedied?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12948  Respondent: 8735873 / David and Gillian Allan  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2)

I object to this policy as it is too vague and optimistic. Significant improvements to the road infrastructure are like to be many years away even if they ever happen. The draft plan, however, commits to building massive housing estates in the countryside before any of these road improvements are in place. This is inappropriate and will lead to massive traffic disruption during the construction phase and will add permanently to an already congested network (about 3,000 private cars from the 2,100 new homes at Wisley Airfield alone).

Road infrastructure represents a major constraint that should have been applied to the housing target at a much earlier stage in the plan process and not left as an unresolved difficulty in the draft plan.

There is no certainty that either the A3 or M25 in the borough will be improved to increase capacity and reduce congestion during the Plan period. Highways England has no plans to even examine improving the A3 before 2020. I have considerable concerns that development of the large residential sites identified at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), will take place before any improvements are made to the trunk road network. The A3 & M25 are already at capacity during peak hours and any development prior to improvement of these roads will only make the situations worse.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12951  Respondent: 8735873 / David and Gillian Allan  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to poor air quality concerns (Policy I3)

Paragraph 4.6.27 of the Plan states that “Development must also mitigate its traffic impacts, including its environmental impacts and impacts on amenity and health.” The significant level of development being proposed, particularly in the north east of the borough will lead to considerable further congestion, despite any attempts to mitigate this through travel plans. This will be particularly acute in built up residential areas and will only lead to greater levels of air pollution, which will have a detrimental effect on local residents and their health and can result in early death.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12923  Respondent: 8735873 / David and Gillian Allan  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to not protecting the Green Belt (Policy P2)

This policy does not sufficiently safeguard the Green Belt even though Green Belt constitutes 89% of the borough and should be the cornerstone of all local planning policy. The Green Belt is not the Council’s to give away and once it is gone it is gone forever. Sacrificing areas of the Green Belt to a developer influenced growth agenda is a betrayal of future generations and does not constitute sustainable development.

The Green Belt should be protected in perpetuity, but Policy P2 seeks to justify excessive development in supposedly protected areas. This is in breach of party manifesto commitments and contrary to previous responses to public consultation. It is disreputable to argue, as the Council does, that the Plan would involve the loss of “only” 1.6% of the borough’s Green Belt. Leaving aside the reliability of that statistic, the NPPF does not set an “acceptable” percentage. The
fact remains that the plan proposes that 65% of the housing plus industrial development be built on land to be taken out of the Green Belt.

Paragraph 4.3.16 is seriously deficient in simply stating that the Council considers that exceptional circumstances exist to justify amendment of Green Belt boundaries. The exceptional circumstances are not identified. It is clear from national guidance that unmet housing need is not on its own an exceptional circumstance. Even to the extent that exceptional circumstances exist, these have to be balanced against the harm to the Green Belt in the specific sites proposed to be taken out of the Green Belt. This balancing exercise appears not to have been done.

The Countryside Study which the Council may argue fulfilled the need to demonstrate the exceptional circumstances required to justify removal of areas from the Green Belt was a simplistic tick box exercise. Within limits it may have answered certain questions about different attributes of different areas of Green Belt but it did not carry out the balancing exercise needed to determine whether specific exceptional circumstances justified removal of specific areas of land from the Green Belt. I believe that each of the identified Green Belt site proposed to be removed from the Green Belt should be carefully assessed against any exceptional circumstances in deciding whether it should be removed from the Green Belt in the final plan. This exercise should bear in mind that housing need in itself is not an exceptional circumstance and nor is the Council’s growth aspiration. An important consideration is that more housing need could be met on urban sites than is currently planned. The Plan has fallen into the developers’ hands and developers prefer building on undeveloped land rather than brown field sites.

I note that the Summer 2016 edition of "About Guildford" (published by the Council) on page 5 states that "... the Plan rejects any schemes that would have a detrimental impact on the Green Belt." This is demonstrably untrue and I consider this to be a deliberate untruth which compromises the consultation process. I would ask that this untruth be corrected and the consultation period restarted after the correction has been given the same distribution as the original statement. (I assume the document was delivered to most houses in the Borough.) I reserve the right to argue before the inspector that the consultation process was flawed and ineffective because of this.

I object to the “insetting” of 14 villages from the Green Belt. Contrary to assertions made in the Plan process many of these villages do contribute to the openness of the Green Belt and there is no need to inset them.

I also object to the wholesale extensions to the settlement boundaries in many villages to allow for infilling and that infilling is also proposed outside the settlement boundaries of 11 further villages. Many Guildford villages are linear. It is all too easy to square off boundaries by including countryside bounded on only one or two sides by existing development, claiming it contributes nothing to the “openness” of the Green Belt, a term which neither the plan nor the NPPF defines. The NPPF’s other 4 tests of Green Belt status, including the prevention of urban sprawl, are ignored. Effectively, this policy makes all villages within the Green Belt vulnerable to large blocks of new development and seems almost calculated to secure the rejection of the plan as a whole.

To “inset” two-thirds of the borough’s rural villages on the grounds that they no longer contribute to the purposes of the Green Belt is extreme and inherently implausible, given the borough’s location on the edge of Metropolitan London. I cannot see how such extensive areas fail to contribute to the purposes of the Green Belt under the NPPF, but this could quickly be the case if the proposed “insetting” and boundary extensions go ahead.

This policy is wildly disproportionate in terms of any foreseeable development need and has caused tidal waves of opposition from residents. It flies in the face of NPPF paragraph 17’s aim of “empowering local people to shape their surroundings” and other NPPF provisions.

Paragraph 4.3.17 states that “the general extent of the Green Belt has been retained.” I believe this should be deleted as an untruth.

In addition I OBJECT to the proposals to remove from the Green Belt the so called ‘strategic sites’ of Wisley Airfield (A35), Gosden Hill Farm (A25) and Garlick’s Arch (A43) and all other strategic sites. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these sites and villages (as mere housing need does not constitute a ‘special circumstance’) to be taken from the Green Belt. Once taken from the green belt they will be lost forever.
There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached.

GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site.

Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

I OBJECT to all strategic sites proposed in the draft Plan to be built in the Green Belt.

1. I object to the identification and allocation of sites in this plan without regard to Green Belt, infrastructure or other constraints. The plan says that “allocating these sites does not grant planning permission for development.” However, each of the sites will be removed from the Green Belt and will be available in principle for development and non-Green Belt uses. The inclusion of these sites without detailed site by site justification shows contempt for the thousands of detailed comments the Council have received about individual sites ever since the Issues and Options consultation in 2013. The plan has hardly changed since the Council received 20,000 objections to its first draft plan in 2014. The Inspector considering the plan may conclude that the consultation has not been properly conducted.

2. The housing needs assessment is flawed in various respects and overstates housing need. In addition since it was produced, the referendum Brexit decision has almost certainly reduced future housing need and rendered the previous assessment seriously out of date. As a result any assessment of Green Belt sites which took place to consider whether “exceptional circumstances” existed to outweigh the harm to the Green Belt was based on false premises and should be reconsidered.

3. Having determined housing need the Council was entitled to consider constraints before determining the housing number. I believe that as III as being entitled to do this the Council was required to give proper consideration to constraints. The scarcity of sites outside the Green Belt as III as infrastructure (most notable roads) considerations all represented constraints which should have been taken into account in determining the final housing number. Accordingly in this regard our objection to the allocation of Green Belt sites is twofold. First I believe constraints should have been applied. Secondly I believe the Council did not properly consider constraints and that their decision making process was flawed and thus subject to being set aside by the Inspector.

4. Even if having properly applied constraints there is a need to develop in the Green Belt then specific Green Belt sites should not be included in the plan unless “exceptional circumstances” for development are proven in relation to that specific site, as stipulated repeatedly in the NPPF. The Green Belt should trump short-term considerations such as perceived housing need, as case law has established. There needs to be a specific balancing exercise conducted on each Green Belt site weighing the harm to the Green Belt against the very special circumstances which are argued in favour of development at that particular site. There is no evidence this has been done. Instead the council have appeared to say that having chosen a housing needs figure and decided it
cannot be met without building on Green Belt then there is no need for any further consideration and any convenient Green Belt site can be allocated for building at will.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to development in areas which are at risk of flooding (Policy P4)

National Planning Policy states that Local Plans should take account of climate change over the longer term, including factors such as flood risk. It goes on to say that new development should be planned to avoid increased vulnerability to the range of impacts arising from climate change.

The Plan states that in accordance with national planning practice guidance, the Level 1 SFRA has been used to guide development towards areas at the lowest risk of flooding and identify areas unsuitable for development. However, the document concludes that land outside of the area of flood risk is not capable of accommodating all of the borough’s identified development needs. A Level 2 SFRA has therefore also been produced and will help the Council apply the exceptions test (as described in the NPPG) as necessary to development proposals in areas at risk of flooding.

The site at Garlick’s Arch (A43) is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. Knowing the area well I am aware that this site often floods during the winter months and the flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I OBJECT to this Policy as the development proposed will not be sustainable (Policy S1)

The NPPF states that the presumption in favour of sustainable development “should be seen as a golden thread running through both plan-making and decision-taking.” As the first policy in the Plan, Policy S1 ought to set a clear framework. Instead, no definition of “sustainable development” is given. The policy also fails to set out any principles for applying sustainable development in practice to local planning decisions, which often have serious long-term impacts.

The policy states that it aims “to secure development that secures the economic, social and environmental conditions in the area”. This fails to recognize that economic growth, social justice and environmental protection often conflict. The policy does not say how each element is to be weighted or conflicts resolved. As a practical guide to the planning decision to be taken in the Plan period it is seriously deficient. The policy is likely to be used by developers to justify inappropriate developments on economic grounds. Under this policy, virtually any development will qualify as “sustainable”, in breach of the NPPF’s most important guideline.

Policy S1 is also seriously deficient in making no mention of the Green Belt. The Green Belt is a long term Government policy enshrined in primary legislation to protect green areas in perpetuity. The Green Belt is a living example of sustainable development in practice and is one of the most important factors affecting sustainable development in the area covered by the Plan and should be acknowledged in this policy. Policy S1 should include a commitment to protect the Green Belt from inappropriate development and to uphold Green Belt boundaries and protections. This would set at least one clear boundary to planning decisions. The Plan and the Council have treated the Green Belt as a developable land bank rather than as a constraint to development.

The commitment to approve planning applications “wherever possible” and “without delay” reveals the pro-development bias of the plan. Countervailing references to sustainability are so vague that the NPPF presumption in favour of sustainable development becomes a presumption in favour of any development at all.

This policy also ignores, as if they are inconvenient constraints, most of the 12 Core Planning Principles set out in NPPF paragraph 17.

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact on existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill Farm (A25) are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are also unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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I OBJECT to the Borough Wide Strategy (Policy S2)

The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

The housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.

The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guilford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

The assumptions and calculations in the SHMA are widely regarded as flawed and even before Brexit, produced an inflated housing needs number. The figure of 13,860 new homes is completely unsubstantiated. It has not been scrutinized by Councillors despite repeated requests for debate. The assumptions and calculations underlying the model are hidden, protected by a claim to intellectual property by a commercial sub-contractor used in preparing the SHMA. I have serious doubts about the objectivity of the SHMA because it has been produced by consultants whose website openly proclaims their pro-development agenda leading to reasonable suspicion that the figures are inflated. Guildford’s OAN is not transparent but has been taken on trust by the authors of the plan. Given that almost every element of the plan is predicated on this OAN, the plan as a whole cannot be considered “sound”.

The status of the 13,860 figure is ambiguous. The Council has said that the housing number and the OAN are identical because the OAN is “deliverable” and is by definition objective and cannot be contradicted. The OAN is only deliverable because of the Council’s cavalier approach to the Green Belt in contravention of the NPPF, ministerial statements and local and national Conservative Party manifesto commitments. The plan also states that infrastructure or other constraints may in due course affect deliverability. It is also unlikely that the number of houses can be built at the rate proposed. In recent years, housing starts have on average been less than half the proposed rate. This is not because developers do not have the land or cannot get planning permission. Constraints in the supply chain and maintaining profit levels have been more important.

The plan cannot be considered “deliverable”. In addition, the number of homes proposed, plus existing planning permissions, plus expected “windfall” sites, exceeds the total of 13,860. So how many homes (taking account of these adjustments) do the Council want built? The plan does not say. Without this figure it is hard to see how anything else can be planned. This undermines the validity of the whole consultation. It is unreasonable to ask the public to approve a
“plan” that fails to propose a target number that takes all the standard constraints and adjustments realistically into account, leaving the Council to set one without further consultation. Even if the OAN Ire not flawed, it is at best only a baseline figure and should not be passed off as a policy proposal.

It is unreasonable to embark on a radical transformation of the borough on the basis of an unclear housing target. Most of Guildford Borough is highly protected from development (89% Green Belt, 44% AONB and about 75% protected by SPA). Whether or not increasing the number of dwellings by up to a quarter is desirable, it would be a major and irreversible change, arguably turning a largely rural borough into a mainly urban or suburban one like Woking. The scale of the housing number increases the onus for it to be seen to be sound. A substantially lower number, on the other hand, would remove the need to build on Green Belt or open countryside, and instantly meet the single biggest public objection to the plan as a whole.

The Plan in general and this policy in particular does not address the point that Guildford exists as part of London's commuter belt. Any increase in supply of housing in Guildford, particularly if the increase is disproportionately greater than elsewhere in the commuter belt, will simply result in a shift of population into the area. It will not reduce prices or increase availability except imperceptibly. The Plan also ignores the point that many of those working in the area live elsewhere. Accordingly in considering the housing number the Plan should take into account that in this part of London’s commuter belt, demand for housing is, in practical terms, unlimited.

This policy does not take proper accounts of the constraints to development which exist, principally posed by the Green Belt and by infrastructure limitations. I believe the Council is under a duty to properly consider applying these constraints. It is clear the Council has failed to do this. This approach differs from all the other boroughs in Surrey. The Plan appears to have deliberately been manipulated towards a growth agenda without disclosing why this is being done. The housing that is needed should be concentrated on urban brown field sites and through increasing the housing density of existing built up urban areas.

The development of 13,860 homes in the Plan period with 65% in the Green Belt does not constitute sustainable development. It will have a permanently detrimental impact on the Borough in general and on West Clandon and surrounding area in particular. The developments at Garlick’s Arch and Gosden Hill Farm do not meet the needs of the local communities. The road infrastructure in and around West Clandon will be unable to cope with additional demand. The edge of urban Guildford will creep that much closer to West Clandon, thus negating the purposes of the Green Belt in the area which include safeguarding the countryside from encroachment, checking the unrestricted sprawl of large built up areas and preventing neighboring towns merging into one another.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill Farm (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

**Comment ID:** SQLP16/1531  **Respondent:** 8735873 / David and Gillian Allan  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I do not agree that the evidence used for the Proposed Submission Local Plan Strategy and Sites is adequate, up-to-date and relevant.

The fundamental driving forces for much of the development proposed in the Plan (particularly that on Green Belt land) are based on:

1. An excessive ambition to expand the local economy which is neither warranted nor wanted by the local population. Guildford is already one of the highest ‘value creation’ areas in the country and has one of the lowest unemployment rates. There is no evidence that massive and accelerated expansion is required.

2. SHMA figures which are neither transparent nor justifiable, especially in view of previous figures set. Independent assessments of the SHMA (eg from Guildford Residents’ Association and David Reeve) show it is set far too high and so cannot be said to be adequate, up to date or relevant.

In addition the recent vote to leave the EU and the impact this will have on the economy and migration have not been taken into account.

The Plan should be re-assessed and the methodology for arriving at housing need figures should be fully transparent.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/1533  Respondent: 8735873 / David and Gillian Allan  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (No)

I do not consider the Proposed Submission Local Plan: strategy and sites as a whole to be sound, because, but not limited to, the following reasons:

1. “Only sites that propose sustainable solutions have been included in the Plan and the Plan rejects any schemes that would have a detrimental effect on the green belt.” Summer 2016 edition of "About Guildford" (published by the Council) on page 5. This is demonstrably untrue and appears designed to bias the consultation process.

2. The housing OAN figure has been calculated by a process which is not transparent. It has not been properly examined by Councillors before being adopted.

3. The OAN has been adopted as the housing number without the application of any constraints to take account of Guildford's circumstances, including in particular the Green Belt, AONB and road infrastructure. National policy permits such constraints to be applied and it is inappropriate not to consider the need to do this.

4. The draft Plan does not accord with the NPPF policies on protecting the Green Belt.

Exceptional circumstances need to be shown to justify removing areas from the Green Belt and this has not been done. The housing need number is not justification in itself according to published ministerial statements Having properly calculated an OAN, constraints should be applied to it to reflect the Green Belt, AONB and infrastructure. Each proposed Green Belt site then needs to be justified on its own merits. The benefits of the proposed development need to be identified together with the harm to the Green Belt. Only if there are exceptional circumstances and following a proper balancing exercise demonstrating that these exceptional circumstances outweigh the harm to the Green Belt can the proposal proceed. The draft Plan does not demonstrate that this has been done. The housing number has been used as a blanket justification for all Green Belt sites-which amount to 65% of the proposed housing number.

1. Whatever the justification for the assumptions made in calculating the OAN, those assumptions are now almost certainly incorrect following the referendum.

2. The housing number is at least twice the achieved rate of building in the Borough over the last few years. There is no evidence in the Plan to show that this rate is achievable and sustainable.

3. Much of the infrastructure required to support the level of development proposed is outside the Council’s control. The Infrastructure Plan is long on possibilities and aspirations and very short on commitments. The infrastructure requirements placed on developers are supposed to be in place before development commences. This is utterly unrealistic and indicates a lack of knowledge of developer’s business models which depend on positive cash flow. It seems very clear that at best, infrastructure provision will seriously lag development and leave higher levels of congestion than now. This will reduce the quality of life for residents through congestion and disruption.

4. The 40-45% requirement for affordable homes together with infrastructure such as railway stations, park and ride facilities, schools and roads is highly likely to be challenged on a site by site basis by developers using the NPPF provision that Councils cannot impose conditions which make development non-viable.
1. GBC has not included details of its Town Centre Master Plan and urban development proposals in time for and as a part of the Guildford Local Plan consultation.

2. GBC has failed to provide an Infrastructure Report in time for and as a part of the Guildford Local Plan consultation.

3. GBC has proposed an OAN of 693 houses per annum in the GL Hearn West Surrey Strategic Housing Market Assessment (SHMA) which many, including independent assessors, consider unsound.

4. Highways England will not start to consider what it intends to do as regards the A3 in the vicinity of Guildford until 2018.

5. Network Rail have not made available for the public consultation any plans for a new railway station at Merrow with an adjacent Park & Ride for 1,000 cars.

6. The GBC proposals for Gosden Hill Farm do not appear to be in coordination with the Neighbourhood Plan for Burpham.

7. The draft Local Plan will cause further linear development along the A3 between Burpham and West Clandon PC and encroachment onto open Green Belt countryside in clear conflict with the National Planning Policy Framework.

8. The proposal for Garlick's Arch was added to the draft Local Plan without any prior consultation under Regulation 18.

9. The Land Availability Assessment (LAA) indicates a range of planning difficulties for Gosden Hill Farm and Burpham which have to be met by the developer involved. These include Electricity Grid supply problems and foul sewage and surface water issues that suggest the development proposed cannot easily be implemented both technically and financially.

10. No adequate explanation is given as to how the aspirational proposal for a tunnel will be used to overcome traffic issues relating to the quality of life and amenity of Burpham, West Clandon, Send and Ripley citizens.

11. In common with many others I do not believe the housing figure has been properly calculated and I believe it overstates housing need. The Council has prevented councilors or others from properly considering the SHMA by refusing to make public the basis on which it was drawn up.

12. The housing figure, when properly recalculated, should be subject to constraints to reflect Guildford's circumstances, including in particular the Green Belt and road infrastructure. National policy permits such constraints to be applied and it is inappropriate not to consider the need to do this.

13. Even once a housing number has been calculated it cannot be used to justify taking land out of the Green Belt on a wholesale basis.

14. Cast iron commitment should be included in the plan that development can only commence when required infrastructure improvements have been secured.

15. The status of the text which accompanies each policy box is not clear. If the accompanying text does not have the force of policy a number of the policies (i.e. the text in blue) are so vague and general that they commit the Council to very little.

The draft Plan should be re-assessed with housing on brownfield sites made a priority over commercial development and Greenfield sites and each of the above points addressed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: SQLP16/1534</th>
<th>Respondent: 8735873 / David and Gillian Allan</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 4: Duty to cooperate</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (No)
I do not consider the Proposed Submission Local Plan: strategy and sites as a whole has complied with the Duty to cooperate.

This 2016 draft of the Local Plan clearly demonstrates Guildford Borough Council’s refusal to co-operate with the wishes and requirements of the vast majority of the residents in its Borough.

The Council has failed to co-operate with the results of the consultation process for the 2014 draft Plan which was meant to inform and guide this 2016 draft Plan.

Despite campaigning on a clear statement ‘Conservatives Say Green Belt To Stay’, the ruling party on GBC is now intent on pushing through a Plan which will devastate Green Belt land and extend the Guildford Urban Area to further merge into surrounding rural villages.

This is not cooperation by any definition.

In addition the Council has failed to cooperate in providing any transparency to the housing need figures commissioned by the Council from GL Hearn.

The 2016 draft Local Plan should be reassessed with a reviewed and transparent SHMA and revised to reflect the views of the residents of the Borough, who pay for Guildford Borough Council to act in their interests, and not those of developers and central government.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/356  Respondent: 8736129 / E Stevens  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A21

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I support this policy of retaining this land for allotment use

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/3202  Respondent: 8736385 / Anthony O,too le  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A22

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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I am writing to object most strongly to the above building proposal, it would make the biggest traffic jam every morning and evening, that Guildford has ever seen, local services would not be able to sustain the increase in extra population surge, and who are these houses for? Because local people would not be able to afford them, unless of course you can give them a 100 per cent mortgage.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/384  Respondent: 8736737 / Jill Burrows  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A21

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I strongly support this policy of retaining the land for allotment use.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/1176  Respondent: 8737697 / Hazel Farris  Agent: Connectivity Associates Ltd (Mike Gibson)

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A23

Do you consider this section of the document; complies with the Duty to Cooperate? ( Yes ), is Sound? ( Yes ), is Legally Compliant? ( Yes )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Support the removal of this site from the Green Belt and its allocation for burial ground purposes.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Comment ID: PSLPA16/482  Respondent: 8740321 / J McClellan  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

DISPROPORTIONATE NUMBERS OF NEW HOUSING IN EAST HORSLEY I OBJECT to 533 new houses. This is a disproportionate number for this part of the borough. 23% of the Plan's new housing is in the area of the Horsleys, Ockham, Ripley and Send, a rural area that has only 0.3% of GBC population. The infrastructure will collapse under the strain and chaos will ensue.

SITES

1. SITES IN EAST AND WEST HORSLEY

I OBJECT to Sites A36 to 41 inclusive. They will effectively destroy these historic villages. New housing will put intolerable strain on facilities and infrastructure, including public transport, parking, schooling, medical facilities, sewerage and surface drainage to name but a few. The housing density is inappropriate and far greater than anywhere in the locale at present.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/671  Respondent: 8740321 / J McClellan  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
2. THREE FARMS MEADOWS SITE (Wisley Airfield) Policy A35 I STRONGLY OBJECT to the plonking down of a new town of some 2000 new houses in the middle of the greenbelt in the middle of nowhere. This planning application was unanimously rejected by the GBC planning committee recently on 14 separate grounds. The site is miles away from any public transport, is on a site that floods regularly and is surrounded by narrow, muddy, winding, unlit country lanes. The addition of at least 4000 cars will cause a constant gridlock throughout the area. An assumption that residents will walk or cycle to reach amenities is totally unrealistic. An infirm pensioner cannot be asked to walk along these narrow lanes to the doctor and to expect them to cycle is madness. There is no employment nearby which would result in a huge growth of commuter traffic on the A3 and nearby country lanes causing more pollution and traffic jams.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1332  Respondent: 8740321 / J McClellan  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E6

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

LEISURE AND VISITOR EXPERIENCE. Policy E6 I OBJECT to this policy, the Guildford area does not need "new" attractions, the whole point of the attraction of Guildford is its historic nature and quirkiness. The countryside, purely as it is, in its natural state is a big tourist attraction, to add "attractions" is completely missing the point, the countryside is what people want to enjoy, not some man made thing with a huge concrete car park.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1333  Respondent: 8740321 / J McClellan  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E7

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

GUILDFORD TOWN CENTRE? Policy E7

I OBJECT to this policy, more residential use of land should be provided within the town centre, which is where the young and less well off would much rather live - ease of access and no travel costs and existing infrastructure and facilities. The greenbelt should not be built on just because it's easier for developers to do that, regenerate and reuse in these times of being eco friendly.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Attached documents:

Comment ID: PSLPP16/1331  Respondent: 8740321 / J McClellan  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

DOCTORS AND SCHOOLS Policy I1, Infrastructure and delivery I OBJECT to the strain all the extra people will put on medical facilities. It is very difficult to get a doctor's appointment even now and all local schools are full to overflowing with "temporary"classrooms dotted around.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1334  Respondent: 8740321 / J McClellan  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

INFRASTRUCTURE AND DELIVERY. Policy 11

I OBJECT, infrastructure is already hopelessly congested and cannot cope with even organic growth. The policy does not seem to mention roads and traffic which is the major cause of congestion, anyone who drives either up or down the A3 at any time of day will tell you how congested it is. Adequate infrastructure MUST be a pre condition of sustainable development. Greenfield sites present huge infrastructure problems and brownfield sites already have it in place, so it is much more sensible to use brownfield sites.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1330  Respondent: 8740321 / J McClellan  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

SUSTAINABLE TRANSPORT FOR NEW DEVELOPMENTS. Policy 13 I OBJECT, as often the proposed sites are remote from existing bus stops, stations and even roads with pavements. This assumes that people will stop using cars as transport methods. This assumption is unrealistic as has been proved time and time again in new developments resulting in parking chaos around the developments as residents try and park near home and traffic snarl ups.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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PERCENTAGE OF NEW HOUSING ON GREENBELT Policy P2 I OBJECT to the large percentage of new Borough housing being built in the current greenbelt. There are more than enough brownfield sites and urban area that require re-development. Those should be used before destroying greenbelt which is an accessible amenity for all.

EAST AND WEST HORSLEY BEING REMOVED FROM THE GREENBELT Policy P2 I OBJECT to East and West Horsley being taken out of the greenbelt. These are green, rural villages with narrow country lanes running through them and contribute to the openness of the greenbelt.

GREENBELT Policy P2

I OBJECT to the wording and content of this policy which states "the general extent of the greenbelt has been retained" we are losing nearly 7% of the greenbelt when including insetting, my filling and increasing settlement boundaries.

VILLAGE BOUNDARIES Policy P2

I OBJECT to East and West Horsley's boundaries being greatly enlarged. This will ruin the rural nature of both villages and cause them to become soulless dormitory towns with no heart.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the number of planned houses rising from 652 to 693 over the next twenty years. The way this has been assessed and calculated is not at all transparent and is more than double figures used in previous plans.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/1286  Respondent: 8741377 / Lisanne Mealing  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

I object to the proposed Infrastructure Schedule (Appendix C)

There is no schedule for Garlicks Arch (A43); the plan takes no account of the infrastructure required for this site and therefore it is not fit for purpose

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/1285  Respondent: 8741377 / Lisanne Mealing  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

I object to the figure of 693 houses per annum in the borough being too high (Appendix D)

GBC has not published any details as to how this figure was arrived at, and has not applied any of the applicable constraints to it. This lack of transparency is not acceptable in a public consultation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Attached documents:

Comment ID: PSLPA16/4523  **Respondent**: 8741377 / Lisanne Mealing  **Agent**:

**Document**: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Ripley

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire)**: ()

I have lived in the Ripley area for over 20 years, we have a wonderful community that has absorbed small individual pockets of development - this use of brownfield land is acceptable development and its scale increases the chances of sustainability. Please do not ruin the future for our communities and villages.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

Comment ID: PSLPS16/2333  **Respondent**: 8741377 / Lisanne Mealing  **Agent**:

**Document**: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire)**: ()

I object to Site A43

The Environment Agency classifies the site at Garlicks Arch (A43) as being in a higher risk than the Council's own assessment. The plan does not take adequate account of the flood risk as required by National Planning Policy, especially as this area has flooded many times in recent years

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

Comment ID: PSLPS16/2335  **Respondent**: 8741377 / Lisanne Mealing  **Agent**:

**Document**: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the inclusion of the land at Garlicks Arch, Send Marsh/Burnt Common and Ripley (A43)
Garlick's Arch is Green Belt and has ancient woodland and has a thriving wildlife habitat, which should be protected. There is no infrastructure, it floods and the the Draft Local Plan Infrastructure schedule does not provide for this site at all.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/2334  Respondent: 8741377 / Lisanne Mealing  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the inclusion of the land for new on/off ramps at Burnt Common (A43a)
The increased volume of traffic will severely impact the local communities. The increased traffic from London (M25) to Woking would go through Burnt Common, Send and Old Woking, which currently cannot cope with the existing traffic. This is unsustainable

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/5111  Respondent: 8741377 / Lisanne Mealing  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to the damage to the historic environment as a result of the scale of the proposed development (Policy D3)

Damage will be caused to the ancient woodland of oak trees at Garlicks Arch site (A43) proposal, and the loss of green space and amenity

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5113  Respondent: 8741377 / Lisanne Mealing  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the employment strategy and impact on Garlicks Arch (A43)

The development will result in the loss of existing local successful businesses, which have been employing local people over many decades, and are therefore sustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5114  Respondent: 8741377 / Lisanne Mealing  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the lack of proper infrastructure planning for sites (Policy I1)

The current and existing services are over-stretched now, so where are the infrastructure improvements to support the enormous proposed developments, including medical, public transport, schools?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5115  Respondent: 8741377 / Lisanne Mealing  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the congestion that development will cause to the trunk roads A3/M25 (Policy12)

Both the A3 and M25 need improvements before any developments commence. This is clearly not going to happen in the timescales of the plan, so the proposed developments at Wisley Airfield (A35), Garlicks Arch (A43) and Gosden Hill (A25) should NOT take place.

Please record these objections individually against the relevant sections of the plan and ensure that they are submitted to the Planning Inspectorate.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5109  Respondent: 8741377 / Lisanne Mealing  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the congestion that development will cause to the trunk roads A3/M25 (Policy12)

Both the A3 and M25 need improvements before any developments commence. This is clearly not going to happen in the timescales of the plan, so the proposed developments at Wisley Airfield (A35), Garlicks Arch (A43) and Gosden Hill (A25) should NOT take place.

Please record these objections individually against the relevant sections of the plan and ensure that they are submitted to the Planning Inspectorate.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5112  Respondent: 8741377 / Lisanne Mealing  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the congestion that development will cause to the trunk roads A3/M25 (Policy12)

Both the A3 and M25 need improvements before any developments commence. This is clearly not going to happen in the timescales of the plan, so the proposed developments at Wisley Airfield (A35), Garlicks Arch (A43) and Gosden Hill (A25) should NOT take place.

Please record these objections individually against the relevant sections of the plan and ensure that they are submitted to the Planning Inspectorate.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to poor air quality concerns (Policy 13)

The increased congestion that will arise from the massive proposed developments will in turn lead to increased air pollution which will have damaging effect on local residents and their health.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

I object to not protecting the Green Belt (Policy P2)

I object to removing Ripley, Send and Clandon from the Green Belt, in addition to Wisley Airfield (site A35) and Garlicks Arch (site A43) There are no exceptional circumstances (as required by the National Planning Policy) for these villages and sites being removed. We are unique and sustainable villages and removal will serve to blur our identities and enable development which will be harmful for our futures and our legacy to future generations.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

I am disappointed to have to Object to the 2016 draft local plan, despite promises that the initial responses had been taken into account, for the following reasons:

I object to the local plan as the development proposed is not sustainable (Policy S1)

The scale of the proposed housing will damage local communities especially Ripley, Send and Clandon and is not sustainable due to lack of infrastructure. There are no rail stations near the proposed developments and no plans to improve the local roads. What about primary schools, doctors and dentists? Where are the thousands of extra cars going to go with no possibility of significant improvements to local roads? We already have problems with not being in the catchment area
of a single secondary school where children from our village can continue as a community to be together. There are waiting lists for all of our health services and our bus service is continually being cut.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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Comment ID: PSLPP16/5110  **Respondent:** 8741377 / Lisanne Mealing  **Agent:**

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ( )

**I object to the Borough Wide Strategy (Policy S2)**

There is too much proposed development in a small part of the borough in Wisley (A35) Ripley/Send (A43) and Clandon (A25). The plan is unbalanced with over 5,000 houses proposed between the M25 and Burpham, which will merge all the villages and their identities.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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Comment ID: pslp172/4733  **Respondent:** 8741761 / June Yorath  **Agent:**

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A25

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ( )

1. I object to the changed policy A25 Gosden Hill for the development of 1700 homes which is still far too much.
2. There is no need for housing on this site because the local plan housing target is incorrect and inflated and ignores constraints.
3. Gosden Hill is located entirely within the Green Belt. No exceptional circumstances have been demonstrated for building on this site and therefore development here does not meet paragraphs 87-89 of the NPPF. Furthermore, Gosden Hill performs all five functions of green belt,
4. The site has no provision for foul or surface water sewerage and adjoining sewerage is at capacity
5. The Green Belt at this point serves the important function of separating West Clandon from the edge of urban Guildford. Development here will cause the two to coalesce defeating one of the objectives of the Green Belt. If this development proceeds I believe the narrow strip of Green Belt remaining between Guildford and Clandon at this point will be too narrow and will come under further pressure. It will represent an undesirable ribbon development along the A3. It will be highly visible from the A3 when approaching Guildford and will, in
conjunction with A43a at Garlick's Arch give the appearance of almost continuous development from Send through to Guildford.

6. The development of this site cannot be sustainable and will cause massive congestion onto surrounding roads. The development will generate in the region of 6,000 vehicles which will exit straight on to the A3 which is stationary every day during rush hours. The linking of the A3100, B2215 and A247 would channel thousands of cars through the narrow, winding road through West Clandon.

7. I object to the proposal for a link road to bring traffic from the Gosden Hill development to the proposed 4 way junction at Burnt Common. This has the potential to generate large volumes of traffic (including commercial vehicles) on the A247 through Send and West Clandon - a road which is already under traffic stress (see below).

8. The volume of traffic will greatly increase air pollution which is particularly critical given the proposal to build two schools.

9. A new on-slip at Burpham would only be 1.8km from the on-slip at Burnt Common which is against Highway England’s requirement of 2km.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/4734  Respondent: 8741761 / June Yorath  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to the changed policy A43 Garlick’s Arch for 400 homes and 6 travelling show people pitches
2. It ignores all the thousands of previous objections made by local people
3. There is no need for putting houses on this site because the local plan housing target is incorrect and inflated and ignores constraints.
4. The allocation of 28.9 ha is an excessive land grab into the Green Belt. If we take a normal density of 30 homes per ha and it is at the end of the day proven that there is a need for 400 homes in this location the land requirement is 13 ha not 28.9 ha which is more than double. This replicates a similar over land grab at Burnt Common where the factor is 7 times the land required.
5. This confirms the worrying impression that GBC have a pre-determined policy of building on the Green Belt at every opportunity. The arithmetic does not stack up. One would have thought that they would as custodians of the green Belt be intent on conserving it rather than exploiting it.
6. The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.
7. Garlick’s Arch (A43) is in an unsustainable location. It does not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. The site is unsuitable due to lack of access to sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be dependent on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.
8. The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.
10. I object to the proposal to remove Garlick’s Arch from the Green Belt. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for this land to be taken from the Green Belt. Once taken the green belt is lost forever. There is a real danger that the loss of this Green Belt will result in urban sprawl and the neighbouring villages merging into one another. The significant development in West Clandon, Send and Ripley will result in the character of these villages being lost and the countryside encroached.

11. I object to the development at Garlick’s Arch because of flood risk. The site at Garlick’s Arch is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. Knowing the area well I am aware that this site often floods during the winter months and the flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.

12. I object to the loss of rural employment on the site. The development at Garlick’s Arch would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises.

13. I object to the potential loss of Ancient Woodland on the site. The proposed development at Garlick’s Arch will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees that existed in the year 1600.

14. I object due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1). Our villages are already suffering from severe congestion for much of the day, for example the Newark Road and Rose Lane junction in the centre of Ripley and the A247 through West Clandon. The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.

15. Furthermore, many of the country lanes around the villages of West Clandon, East Clandon, Ripley, and Send are narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition. I object to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces.

16. Many of the affected villages, such as West Clandon, East Clandon, Send and Ripley, already suffer from parking problems. Further development around these villages will only result in more traffic and more parking problems.

17. With some 5000 houses being proposed close to the villages of West Clandon, East Clandon, Send and Ripley, the roads serving the village will become even more congested. Cycling has become a popular past time, particularly at weekends hundreds of cyclists past through the village on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road accidents involving cyclists as a result of the development proposed under the local plan.

18. The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the roads becoming ever more dangerous for pedestrians.

19. I object to the lack of proper infrastructure planning for sites (Policy I1). Policy I1 requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.

20. Despite the Garlick’s Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents’ in the locality will see their quality of life significantly deteriorate in many ways.

21. Many of the utilities in the West Clandon, East Clandon, Burpham, Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers. No plans to improve these services should mean no development of the Garlick’s Arch site.

22. Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are already at capacity and suffering from funding cuts or freezes. Any further development without funding will place further stress upon existing health services.

23. I object due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2). There is no certainty that either the A3 or M25 in the borough will be improved to increase capacity and reduce congestion during the Plan period. Highways England has no plans to even examine improving the A3 before 2020. I have considerable concerns that development of the large residential sites identified at Wisley Airfield (A35),...
Garlick’s Arch (A43) and Gosden Hill (A25), will take place before any improvements are made to the trunk road network. The A3 & M25 are already at capacity during peak hours and any development prior to improvement of these roads will only make the situations worse.

24. I object to poor air quality concerns (Policy I3). Paragraph 4.6.27 of the Plan states that “Development must also mitigate its traffic impacts, including its environmental impacts and impacts on amenity and health.” The significant level of development being proposed, particularly in the north east of the borough will lead to considerable further congestion, despite any attempts to mitigate this through travel plans. This will be particularly acute in built up residential areas and will only lead to greater levels of air pollution, which will have a detrimental effect on local residents and their health.

25. I object to the inclusion of the land at Garlick’s Arch, Send Marsh/Burnt Common and Ripley (A43). Garlick’s Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8). There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).

26. It is clear that with this site being added at the eleventh hour and no infrastructure planning has been undertaken. The Infrastructure Schedule makes no provision for any infrastructure improvements for this site. How will the local services such as schools and doctors cope, many of which are already at capacity? (Policy I1)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/4736  Respondent: 8741761 / June Yorath  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A58

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to Policy A 58 at Burnt Common and to the proposed inclusion of Burnt Common as an Industrial Strategic Employment Site
2. This previous allocation for B1c, B2 and B8 development was removed from the 2014 draft due to all the objections made previously.
3. The word “minimum” is a change from the previous “maximum” in the 2016 plan and since that time there has been a decline in demand for industrial land. This change alone is unacceptable since even if there was a need to build 7,000 sq m at Burnt Common this development would only require 1.4 ha at a standard plot ratio density of 50% not 9.26 ha. There is no justification for zoning an additional 7.86 ha in the Green Belt.
4. There is in fact no justification for building any more industrial development in the borough particularly at Burnt Common. The current industrial pipeline of granted consents of 38,357sqm in B1c, B2 or B8 use class space is double the 19,000 sq m said to be needed by Aecom who justify the need for new space on top of the existing pipeline by a completely unsubstantiated suggestion that “there is the possibility that some pipeline developments may not come forward at all, or be developed in different quantities by use class than has been consented.”
5. There is no need to build industrial or warehouse development in the middle of the Green Belt when Slyfield and Guildford still have empty sites and industrial units.
6. The 2017 Employment Land Need Assessment shows a reduction in demand to 3.9 hectares for industrial land for the whole borough not a huge over allocation of 9.26 hectares at Send in the Green Belt.
7. The Employment Land Needs Assessment update 2017 (ELNA) states “that the pipeline for employment floorspace defined by planning permissions yet to be implemented and prior approvals suggests the potential for an additional 33,607sqm of B use class floorspace to come forward. This figure comprises a net loss of 4,750sqm of B1a use class floorspace and a net gain of 38,357sqm in B1c, B2 or B8 use class space.”
8. 38,357 sq m of B1c, B2 or B8 use class is quite sufficient supply for the plan period and is in fact more space than the 3.9 ha of industrial land that is said to be needed for the plan period by Aecom. Since if you were to develop 3.9 ha at a plot ratio of 50% it would provide new industrial development of 19,000 sq m approximately half of current planning permissions granted. This does not justify the need for new development of industrial space on the Green Belt in such areas as Burnt Common.

9. The reality of demand for industrial space is that it is both nationally and locally in decline and this is evidenced by old existing permissions that have not been taken up and developed. The ELNA alludes incorrectly to the poor quality of existing space being a “constraint” on supply and fails to acknowledge that this assertion cannot apply to potential newly developed space e.g. the undeveloped pipeline of 38,357sqm.

10. The impact on small surrounding roads will create traffic gridlock.

11. It will join up existing villages and defeat the purpose of the Green Belt.

12. The ongoing poor quality of the updated research undertaken by Aecom in the Employment Land Needs Assessment 2017 does not support industrial development on land in the Green Belt at Burnt Common.

13. The Aecom research is generally superficial and lacks sufficient detail and analysis between B1c, B2 and B8 use classes and no reliable individual analysis has been undertaken of the widely different supply and demand dynamics of light industrial, general industrial and warehousing and distribution floor space.

14. The potential inclusion of a waste management facility mentioned at paragraph 4.4.23a lacks enough detail for proper consultation and is completely inappropriate.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/3186  Respondent: 8741761 / June Yorath  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The Plan now states: “the presumption in favour of sustainable development will not automatically apply to policies relating to sites protected under the Birds and Habitats Directives and/or designated as Sites of Special Scientific Interest (SSSIs), land designated as Green Belt, Local Green Space, the Surrey Hills Area of Outstanding Natural Beauty, designated heritage assets and locations identified as at risk of flooding.”

Gosden Hill and Blackwell Farm (both currently in the green belt) are called “urban extensions” surely a euphemism for urban sprawl? Garlick’s Arch and Burnt Common developments take land from the green belt to extend Ripley/Send. One of the important specific purposes of the green belt is to prevent urban sprawl.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp17q/643  Respondent: 8741761 / June Yorath  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Question 4: Duty to cooperate
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The NPPF states para 155: “Early and meaningful engagement and collaboration with neighbourhoods, local organisations and businesses is essential. A wide section of the community should be proactively engaged, so that Local Plans, as far as possible, reflect a collective vision and a set of agreed priorities for the sustainable development of the area, including those contained in any neighbourhood plans that have been made.”

The changes in this latest version of the Guildford Local Plan show little or no willingness of Guildford Borough Council to reflect a collective vision. Despite the many thousands of responses to previous versions of the Plan which overwhelmingly rejected building on Green Belt land this latest version has as much, if not more, building on the Green Belt and increased problems of infrastructure and traffic which will bring increased noise and air pollution and danger to residents.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4493  Respondent: 8741921 / D W Hirst  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the very high number of homes required to be built year by year for the duration of the Local Plan.

My reasons are that for every home built there will inevitably be, at least one car per household, and the traffic congestion in this area will of consequence be increased to the point of standstill for long periods during the day, this has happened in the past years.

The increase in traffic congestion is also occasioned by an accident on the Farnham to Guildford road (The Hog's Back), and diverted traffic uses the A323 Aldershot to Guildford road, which runs past the fairlands Estate.

I object to the lack of information about the infrastructure necessary to accomodate the establishment of such a large volume of housing, surely, infrastructure should take priority.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/1588  Respondent: 8742369 / Evelynne Gunn  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26
We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/7463  Respondent: 8742657 / Michael Gilbert  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the proposed development of more than 2000 houses on the site of the former Wisley Airfield as the impact of this on the Horsleys which are less than 2 miles away would be completely unacceptable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp173/299  Respondent: 8742657 / Michael Gilbert  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Appendix H: Maps - East Horsley

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I have the following objections to the proposed local plan:-

1. I object to the proposal to remove East Horsley from the Green Belt.
2. I object to the proposed changes to the settlement boundaries in East Horsley.
3. I object to the proposed development of some 100 homes near Horsley station

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp171/834  Respondent: 8742657 / Michael Gilbert  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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I object to the proposal that more than half of all new housing is on the Green Belt land.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/348  Respondent: 8742689 / Keith Michel  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - East Horsley

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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As a consequence of the above we consider that the Site allocations proposed for East Horsley, including Policy A36 and A39, are inappropriate. We also adopt and endorse the submission made by the East Horsley Parish Council in their letter dated 13th June.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/1058  Respondent: 8742689 / Keith Michel  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

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We refer to our letter dated 23'd June and would ask you please to note our further objection/comment as follows -

1. We are of the view that the proposal to create the equivalent of a new town development on the former Wisley Airfield site (Paragraph 4.3.17 and Policy A35) and to remove the area from the Green Belt amounts to an unjustified incursion into the Metropolitan Green Belt and a contravention of the existing Green Belt regime. Kindly note our objection therefore to this item of the plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

| Comment ID: PSLPP16/1008 | Respondent: 8742689 / Keith Michel | Agent: |
|--------------------------|-----------------------------------|
| Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1 |

A further and related factor, we believe, is that even allowing for the target housebuilding programme proposed in the Plan, there seems to be insufficient infrastructure projects to support the increased population envisaged in way of schools, transport and health facilities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

| Comment ID: PSLPP16/997 | Respondent: 8742689 / Keith Michel | Agent: |
|-------------------------|-----------------------------------|
| Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2 |

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
The plan rightly endorses GBC’s stated support for the preservation of the Green Belt and the countryside within the Borough but makes no case for the serious encroachments into the Green Belt proposed by the removal of Green Belt status/ insetting of villages and the redefinition of existing Green Belt boundaries for which we see no need or justification.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/1010  **Respondent:** 8742689 / Keith Michel  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** (

We have as a consequence the following objections to/requests for the Proposed Local Plan-

1. We object to the insetting of villages and in particular to the insetting of East Horsley in the Green Belt (4.3.13) and request that East Horsley continue to be washed over by the Green Belt as at present.

2. We object to the Settlement Boundary changes proposed for East Horsley (4.3.16 and Proposals Map).

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/996  **Respondent:** 8742689 / Keith Michel  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** (

We have carefully considered the new version of the Local Plan and recognise the significant time and expense that has been incurred in preparing it for public consultation.

Having done so however, we take the view that the essential basis of the Plan is open to question because, it seems to us that the total number of new houses and dwellings stated as required during the period of the plan is seriously over estimated.

The immediate result of this over estimate is the need to locate numerous potential development sites in areas presently situate in the Green Belt.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We remain of the opinion previously expressed that the essential basis of the plan is open to question as there seem good grounds to consider that the number of new houses and dwellings stated to be required is seriously over estimated. One reason for this, as can be seen in East Horsley, is the increased willingness of GBC planners to permit the demolition of older smaller houses and bungalows in favour of larger modern houses that are frequently out of keeping with the local amenity and significantly reduce the opportunity for existing residents who wish to stay in the area. to "downsize".

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I am writing to support the Guildford Plan but feel that improvements need to be made to it before it is approved. I fully except that home need to be built and a certain amount of green belt land will need to be surrendered over the timespan of the plan to meet the housing numbers. It is important that Guildford Borough Council looks at all of the brownfield sites within the greenbelt that could be used before agricultural land is developed on. In Normandy a huge greenfield development is proposed that will substantially change the village for the worse. I feel it would better suit the village to build on our 10 acre brownfield land at Strawberry Farm. Our business has operated from this site in Normandy for - lover 50 years, but, because of the nature of the business with its many heavy lorry movements per day it has not always met with the approval of many of the residents. Removing this business from this site and replacing it with houses I am sure it would be viewed by villagers as a positive development.

So with this in mind I am proposing that this site be included in the plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
No evidence has been provided to justify the need for 14,000 new houses to be built in the Borough. Guildford Borough Council have refused to release the data on which this housing need is based and sought to withhold it from wider scrutiny under the premise that it is the intellectual property of a third party and is commercially sensitive. If GBC genuinely believes this housing figure is accurate then they should have the confidence to release the data upon which the figure is based. Not doing so is cowardly, deceitful and only increases the general public’s distrust of politicians.

The referendum result means the data used to derive the need for 14,000 new dwellings must be revisited. One of the assumptions behind whatever model has been used to arrive at a housing need of 14,000 dwellings must have been that the UK would remain in the European Union. Given the country has voted to leave the EU it must mean that any population growth or immigration forecast assumptions used are redundant and will continue to be so until such time as we get a better understanding of what leaving will actually mean vis-a-vis the principle of freedom of movement.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
The Wisley Airfield site should be removed from the Plan. It is astonishing that this site has been included in the proposed Plan given that its planning application was unanimously rejected by GBC’s Planning Committee. This site should remain in the Green Belt as it serves a vital role in protecting against urban sprawl from London. Again, there are no exceptional circumstances to justify its removal from the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/3475  Respondent: 8743073 / Darrell Howard  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

• The Wisley Airfield site should be removed from the Plan. It is astonishing that this site has been included in the proposed Plan given that its planning application was unanimously rejected by GBC’s Planning Committee. This site should remain in the Green Belt as it serves a vital role in protecting against urban sprawl from London. Again, there are no exceptional circumstances to justify its removal from the Green Belt.

To conclude, it is my opinion that the Local Plan is flawed, and is riddled with inaccuracies and unsubstantiated conclusions. It is a development-led, not needs based Plan, and has been devised using an overinflated housing target either by design or through incompetence. It is clear that the same type of errors and deceits are being repeated as with the 2014 Draft Local Plan despite the changes to the senior personnel responsible for the Plan.

I urge GBC to stop the current process and set about producing a Plan that is focused on housing need, not economic or commercial growth, and which is based on sound and transparent data.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7668  Respondent: 8743073 / Darrell Howard  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E7

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
• **Insufficient/inappropriate focus on developing Brown Field sites.** The expansion of urban areas to accommodate more commercial real estate indicates the Council is not interested in maximising Brown Field sites for housing purposes. For example, under Policy E7: Guildford Town Centre, it is suggested that 45,000 sq m of land at North Street should be assigned for retail uses not housing.

Online retail is set to account for 21.5% of total retail sales by 2018 from 12.7% in 2013, the highest online retail share in the world according to the Centre for Retail Research. In March 2016, online sales rose 12.3%, and it was the third consecutive month in which more than 20% of all non-food shopping took place online according to the British Retail Consortium and accounting firm KPMG. With such a high swing to online purchasing, retailers will need 70 high street stores to create a national presence compared to 250 in the mid 2000’s. An expansion on such a scale is negligent when the Council claims to be in such desperate need for housing. Retail is a declining industry and should not be invested in by the Borough at the expense of housing in the most sustainable urban locations, near employment and transport hubs.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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### Comment ID: PSLPP16/7080  
**Respondent:** 8743073 / Darrell Howard  
**Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

• The Plan fails to define the infrastructure requirements that will be needed to support the development of the proposed housing sites. As such it fails to comply with paragraph 157 ofthe NPPF guidelines, "Crucially, Local Plans should plan positively for the development and infrastructure required in the area to meet the objectives. principles and policies ofthe Framework ". Policy 13 -"Sustainable Transport for new developments” indicates that developers will be expected to propose and secure travel plans for their developments and contribute to the transport arrangements for the able and disabled. The words "will be expected" are pathetically weak and developers will do everything in their power to avoid or minimise such commitments. As with the 2014 draft Local Plan, it is deeply concerning that very little work has been done to quantify the infrastructure requirements that will need to be implemented to support the proposed increase in housing.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

---

### Comment ID: PSLPP16/7669  
**Respondent:** 8743073 / Darrell Howard  
**Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()
• The Plan fails to define the infrastructure requirements that will be needed to support the development of the proposed housing sites. As such it fails to comply with paragraph 157 of the NPPF guidelines, “Crucially, Local Plans should plan positively for the development and infrastructure required in the area to meet the objectives, principles and policies of the Framework”.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7671  Respondent: 8743073 / Darrell Howard  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (

• The proposed housing need is unsustainable. Overdevelopment will damage local communities, especially West Horsley, East Horsley, Normandy, Ockham, Ripley, Send and Clandon. These communities do not need the housing numbers proposed. The Key Evidence document "Guildford Borough Economic Strategy 2013 – 2031 makes no case for locating large numbers of dwellings in West and East Horsley or in neighbouring villages. Over 23% of the Plan’s new housing is proposed for the localities of Ripley, Ockham, Send and the Horsleys.

Development on the scale proposed in the Plan will require huge levels of investment to provide the infrastructure to support the resulting influx of thousands of new residents. Currently, the provision of primary and secondary education within the area is under considerable strain with local schools being oversubscribed for places. Children who are unfortunate enough to live outside the catchment areas for these schools must travel considerable distances to receive their education. There is only a vague reference to school provision in the Plan despite the potential for hundreds of new homes falling within its catchment areas. This raises the question as to where GBC thinks the thousands of new children will go to receive their education?

There is one GP surgery serving the Horsleys currently. The Infrastructure Delivery Plan suggests a possible extension to the Kingston Avenue Medical Practice. However, here is no evidence to suggest that development of the scale proposed in the Plan will lead to additional GP provision within the timescales of the new development. As such the existing surgery would quite literally be swamped and be unable to provide anything like an adequate service.

The construction of 2,500 homes in the Ockham and Horsleys area will substantially increase the congestion on what are poorly maintained “B” and “C” category roads. It is also fair to conclude that the accompanying increase in traffic volume from such a massive population increase will accelerate the speed that these roads deteriorate and therefore, the frequency and cost of maintaining them. In addition the knock on effect of having thousands of new traffic journeys per day will quite literally gridlock the area, and will directly impact on the traffic flow on both the north and southbound A3 carriageways, and quite probably the M25/A3 junction.

Whilst Horsley station has frequent trains to London and Guildford, it is highly unlikely that the current or future train service provider will improve its peak time service to accommodate the increase in commuters.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

The Greenbelt should be protected and its boundaries unchanged. There are no exceptional circumstances to justify building on the Green Belt or to change the boundaries of the Green Belt. As a reminder the purpose of the Green Belt is to:

- Check the unrestricted sprawl of large built up areas
- Prevent neighbouring towns merging into one another
- Assist in safeguarding the countryside from encroachment
- Preserve the setting and special character of historic towns
- Assist in urban regeneration by encouraging the cycling of derelict and other urban land.

To recommend that 70% of the proposed 14,000 houses should be built in the Green Belt is a seriously flawed policy and in no way complies with the legal principles by which the Green Belt is protected.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Answer (if comment is on questions 1-7 of the questionnaire): ()

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7672  Respondent: 8743073 / Darrell Howard  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

There are a number of areas within the Horsleys and Ockham environs which are subject to frequent flooding. Two of the most notable areas, Ockham Road North and the Ripley/A3 roundabout are not even mentioned in the Plan. Failure to address these locations as well as other sites that are prone to flooding is clearly unacceptable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7001  Respondent: 8743073 / Darrell Howard  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
No evidence has been provided to justify the need for 14,000 new houses to be built in the Borough. Guildford Borough Council have refused to release the data on which this housing need is based and sought to withhold it from wider scrutiny under the premise that it is the intellectual property of a third party and is commercially sensitive. If GBC genuinely believes this housing figure is accurate then they should have the confidence to release the data upon which the figure is based. Not doing so is cowardly, deceitful and only increases the general public's distrust of politicians.

- The referendum result means the data used to derive the need for 14,000 new dwellings must be revisited. One of the assumptions behind whatever model has been used to arrive at a housing need of 14,000 dwellings must have been that the UK would remain in the European Union. Given the country has voted to leave the EU it must mean that any population growth or immigration forecast assumptions used are redundant and will continue to be so until such time as we get a better understanding of what leaving will actually mean vis-a-vis the principle of freedom of movement.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7077  Respondent: 8743073 / Darrell Howard  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Insufficient/inappropriate focus on developing Brown Field sites. The expansion of urban areas to accommodate more commercial real estate indicates the Council is not interested in maximising Brown Field sites for housing purposes. For example, under Policy E7: Guildford Town Centre, it is suggested that 45,000 sq In of land at North Street should be assigned for retail uses not housing.

Online retail is set to account for 21.5% of total retail sales by 2018 from 12.7% in 2013, the highest online retail share in the world according to the Centre for Retail Research. In March 2016, online sales rose 12.3%, and it was the third consecutive month in which more than 20% of all non-food shopping took place online according to the British Retail Consortium and accounting firm KPMG. With such a high swing to online purchasing, retailers will need 70 high street stores to create a national presence compared to 250 in the mid 2000’s. An expansion on such a scale is negligent when the Council claims to be in such desperate need for housing. Retail is a declining industry and should not be invested in by the Borough at the expense of housing in the most sustainable urban locations, near employment and transport hubs.

The proposed housing need is unsustainable. Over development will damage local communities, especially West Horsley, East Horsley, Normandy, Ockham, Ripley, Send and Clandon. These communities do not need the housing numbers proposed. The Key Evidence document "Guildford Borough Economic Strategy 2013 -2031 makes no case for locating large numbers of dwellings in West and East Horsley or in neighbouring villages. Over 23% of the Plan's new housing is proposed for the localities of Ripley, Ockham, Send and the Horsleys.

Development on the scale proposed in the Plan will require huge levels of investment to provide the infrastructure to support the resulting influx of thousands of new residents. Currently, the provision of primary and secondary education within the area is under considerable strain with local schools being oversubscribed for places. Children who are unfortunate enough to live outside the catchment areas for these schools must travel considerable distances to receive their education. There is only a vague reference to school provision in the Plan despite the potential for hundreds of new homes falling within its catchment areas. This raises the question as to where GBC thinks the thousands of new children will go to receive their education?
There is one GP surgery serving the Horsleys currently. The Infrastructure Delivery Plan suggests a possible extension to the Kingston Avenue Medical Practice. However, there is no evidence to suggest that development of the scale proposed in the Plan will lead to additional GP provision within the timescales of the new development. As such the existing surgery would quite literally be swamped and be unable to provide anything like an adequate service.

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Whilst Horsley station has frequent trains to London and Guildford, it is highly unlikely that the current or future train service provider will improve its peak time service to accommodate the increase in commuters.

There are a number of areas within the Horsleys and Ockham environs which are subject to frequent flooding. Two of the most notable areas, Ockham Road North and the Ripley/A3 roundabout are not even mentioned in the Plan. Failure to address these locations as well as other sites that are prone to flooding is clearly unacceptable.

To conclude, it is my opinion that the Local Plan is flawed, and is riddled with inaccuracies and unsubstantiated conclusions. It is a development-led, not needs based Plan, and has been devised using an over inflated housing target either by design or through incompetence. It is clear that the same type of errors and deceits are being repeated as with the 2014 Draft Local Plan despite the changes to the senior personnel responsible for the Plan.

I urge GBC to stop the current process and set about producing a Plan that is focused on housing need, not economic or commercial growth, and which is based on sound and transparent data.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/427  Respondent: 8743073 / Darrell Howard  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

It is disappointing to see that the Council continues to persist with its misguided and unjustified approach towards housing development in the Borough. The latest draft of the Plan has changed very little from the previous version suggesting that Council officials have paid lip service to last year’s consultation process and that the Council is hell bent on ignoring the opposition of thousands of borough residents to the proposed plan.

Whilst the new plan has made some minor reductions to its proposed housing in the Green Belt as compared to its 2016 version, what remains is still excessive and unjustified housing development. The Council has still not justified its proposed housing figure and has shown no interest in protecting the Green Belt from excessive development. The new Plan’s “objectively” assessed housing target whilst lower than in last year’s plan, will still mean that by the end of the Plan’s period Guildford will be 25% bigger than it is today. This is nearly double the ONS forecast for the same period for Guildford. The Council continues to ignore retail marketing data indicating that online retail is the driving force, not
footfall in physical shops - Guildford Town centre does not need more shopping space, it requires more residential apartment type property.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<thead>
<tr>
<th>Comment ID: PSLPA16/3411</th>
<th>Respondent: 8743137 / Ben Woodford</th>
<th>Agent:</th>
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<tbody>
<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base</td>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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The housing numbers proposed are for nearly 14,000 homes over 15 years from 2016 to 2031. This number is too high. The model used to calculate the number has not been seen or the assumptions tested by the council or any of its officers. It has been, on numerous occasions shown to be flawed by various 3rd parties. This housing target will result in the borough’s permanent resident population increasing at **4.5 times the rate of population increase during the period 2001 to 2011**. This population growth, by definition, is excessive and unsustainable for a gap town with many environmental, physical and infrastructure constraints.

Over 70% of the proposed housing is planned for land currently in the Green Belt. Housing need is not a reason in law for protected green belt land being used. It is perverse for so much housing to be planned for the green belt. Clearly, the green belt has not been used as a constraint as clearly set out in Government advice, planning policy guidance, the NPPF, case law, election manifestos and Ministerial letters to MPs.

For the West Horsley this is reflected in a 35% increase in the number of houses within 3-5 years of a plan being adopted.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<tr>
<th>Comment ID: PSLPP16/13876</th>
<th>Respondent: 8743137 / Ben Woodford</th>
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<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy E7</td>
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There is no reliable evidence provided that the retail core of the Town Centre can support expansion of 45,000 sq m of additional retail space at North Street.

Online retail is set to account for 21.5% of total retail sales by 2018 from 12.7% in 2013, the highest online retail share in the world according to the Centre for Retail Research. March 2016, online sales rose 12.3%, and it was the third consecutive month in which more than 20% of all non-food shopping took place online, (British Retail Consortium and accounting firm KPMG) With such a high retailers will need just 70 high street stores to create a national presence compared to 250 in the mid 2000’s. An expansion on such a scale is negligent when the Council claims to be in such desperate need for housing.

Retail is a declining industry and should not be invested in by the Borough at the expense of housing in the most sustainable urban location, near employment and transport hubs.

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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1</td>
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Answer (if comment is on questions 1-7 of the questionnaire): ()

5,036 houses are proposed between the M25 and Burpham (about 5 miles) which will obviously lead to a merging urbanisation of identities the villages. There is too much traffic in our villages already and this plan will cause more congestion in West Horsley, East Horsley, Normandy, Ockham, Ripley, Send and Clandon, with no plan to improve that. The rural roads in this area are narrow, in poor condition and have no footpaths. 5000 more houses in such a small area means dangerous and unsustainable traffic.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<th>Comment ID: PSLPP16/13881</th>
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Answer (if comment is on questions 1-7 of the questionnaire): ()
Our drains, our water supply, our medical facilities and our roads cannot cope with the proposed
number of new homes. Building this number of homes will lead to flood risk here and downstream
(along the Wey and Thames). The planned development on Green Belt is therefore unsustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<th>Comment ID: PSLPP16/13875</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID2</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally
Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The A3 or M25 would have to be improved before any development is done. Highways England has no plans to even start
considering improving the A3 before 2020. Under the current economic climate post Brexit, it is unlikely any additional
funding will be made available for new capital projects. Clearly no real improvements are possible in the timeframe of this
Plan so the developments at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), should not take place

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<th>Comment ID: PSLPP16/13874</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3</td>
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Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The huge developments being proposed, particularly in the north east of the borough will lead to considerable further
congestion and to greater levels of air pollution, which will have a detrimental effect on local residents and their health. It
has been shown that Wisley already has NOX levels above the EU legal limits and by law a school cannot be located in this
area as a result.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

| Comment ID: PSLPP16/13872  | Respondent: 8743137 / Ben Woodford  | Agent: |
Our Green Belt is precious. It is what protects London from urban sprawl; it preserves air quality; it prevents flooding; it is the city’s playground. It is for us to conserve and protect it. There are 5 legal purposes for Green Belt, and it meets them all:

- To check the unrestricted sprawl of large built up areas
- To prevent neighbouring towns merging into one another
- To assist in safeguarding the countryside from encroachment
- To preserve the setting and special character of historic towns
- To assist in urban regeneration by encouraging the recycling of derelict and other urban land.

This policy is flawed and should have been amended. In the last consultation just six individuals, out of the c. 7,000 of those who took part in the consultation, supported the policy. Another 20 comments of support were from organisations such as: the University of Surrey, local councils (including Guildford), consultants (e.g. Savills) or landowners. But of the 1,371 who commented on the green belt policy 1,332 (97%) were against.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
13,860 new houses proposed is not sustainable – it will damage local communities by over development, especially West Horsley, East Horsley, Normandy, Ockham, Ripley, Send and Clandon. The local communities don’t need these houses. Wisley Airfield (A35) and Garlick’s Arch (A43) have no railway stations and inadequate bus services, so almost every adult will have to have a car.

The development should be in urban areas where there is sustainable transport. West Horsley for example will see the number of housing increased by 35% within 3-5 years of the plan being adopted. The number and density of housing is not in keeping with the local area and is therefore against policies within the NPPF.

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<tr>
<td>There is brownfield land available in the town centre which is being earmarked for commercial development rather than for housing. This is enough to meet our real needs for affordable local homes. There are enough vacant commercial sites to cope with genuine business need, and we have enough retail capacity already, so urban brownfield/derelict land should be used for housing.</td>
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What changes (2016)/further amendments (2017) do you suggest should be made to the document?
The schools are already full, visits to the surgery require a wait of many days, the station car park is full to bursting, the rush hour traffic is horrendous, the village halls have to limit entry on occasions and the car parking there is very inadequate. Our roads are full of potholes, electricity cables need renewing, as I know from personal experience, and the bus service is neither here nor there. I have no knowledge of the state of the gas or water supply, let alone the sewerage system but in view of the annual growth of population over recent years imagine it must already be under pressure.

To propose building another 500+ houses when current residents are already under strain from lack of the above facilities appears to be sheer folly. And I understand that there is still the possibility of adding to the chaos by developing Wisley airfield. The mind boggles and a great big red flag for danger should be waving over this part of the borough to alert the council, and anyone thinking of moving to this area.

More houses - yes, if really essential, but far less of them and with increased infrastructure to support them and us.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

I understand that more houses are needed in the South East - in my opinion a great deal more should be done to make the North East and other areas with comparatively low population growth, more attractive for expansion, but that's another story. However, I am dismayed at the proposed density and number of houses on the proposed sites. This is not only for aesthetic reasons but principally because it appears that absolutely no thought has been given to the impact this will have on the lives of those currently living in The Horsleys.
We, the residents, chose to live in a village, not a town and so we do not expect the facilities which a town has to offer. But what is proposed in terms of population growth is a town with none of the amenities. In fact the proposal will detract from those amenities which we do currently have.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
1. I OBJECT to the proposed Infrastructure Schedule (Appendix C)

The Infrastructure Schedule sets out the key infrastructure requirements on which the delivery of the plan depends. For each of the Key Allocated Sites in the borough it identifies infrastructure projects that are required, except for Garlick’s Arch (A43) which is not mentioned. It is clear that the Plan takes no account of the infrastructure required for this site and is therefore not fit for purpose.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/1091  Respondent: 8744161 / Michael Bridge  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)

   • The “objectively assessed need” figure of 693 homes a year is too high.
   • A professional review by NMSS has concluded that, even basing the calculations on a period of stronger economic and student growth, the housing need figure should be revised down to 510 homes a year and the method changed to consider student housing need separately due to the distorting effects.
   • The current SHMA inflates the proposed housing figure due to
     ◦ failure to correct for errors in the historical data for international migration flows,
     ◦ issues with the way it considers students and affordability and
     ◦ flaws in the method for estimating the number of homes needed to support job growth.
   • It is unacceptable that demographic and economic model assumptions have been withheld and cannot be checked making the process unaccountable.

The Plan’s proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the borough, it is over double the previous figure of 322 used in previous plans. The SHMA report methodology is I believe inaccurate; it inflates the needs of the borough by distorted student numbers. However, it is based on commercially confidential modelling assumptions that cannot be checked or reviewed. There is no transparency to this evidence base and it is therefore impossible to assess its accuracy. This is not democratic and is not appropriate for consultation of the Plan.

The National Planning Policy Framework allows the overall housing target to be reduced to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/1818  Respondent: 8744161 / Michael Bridge  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A25
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT to Gosden Hill development being in the Local Plan. The land in Gosden Hill does exactly what the Greenbelt was designed to achieve. It provides a green buffer between the Guildford Urban Area and West Clandon, gives Burpham a defined green boundary and breathing space and it hides Guildford town from visitors until they pass the off-slip to Burpham.

No exceptional circumstances have been demonstrated for building on this site and therefore it does not comply with paragraphs 87-89 of the NPPF. It stops the sprawl of Guildford town, assists in safeguarding the countryside from encroachment and assists in urban regeneration by encouraging the recycling of derelict and other urban land. All requirements of the NPPF.

The scale of Gosden Hill is out of proportion to West Clandon. It would have four times the amount of housing plus shops, offices/factories, GP surgery, schools. Development on this scale would blight a historic village with a history going back to the doomsday book and beyond.

Gosden Hill is the most obvious location for the north end of an A3 tunnel. It has rising ground and is situated just before the urban area. If it is built on, it will be very difficult to construct a tunnel.

The development will generate in the region of 6,000 vehicles which will pour on to the A3 which is stationary every day during rush hours. The linking of the A3100, B2215 and A247 would channel thousands of cars through the narrow, winding road through West Clandon, a road where large lorries mount the pavement virtually every day and through Send and Ripley which are also severely constrained.

The volume of traffic will greatly increase air pollution which is particularly critical given the proposal to build two schools.

Currently, a two way junction at the site would require vehicles wanting to go north on the A3 to go through Burpham which is grid-locked every day.

Burpham’s sewers are at capacity. Sewage would have to be pumped to Slyfield for processing, a project of enormous cost.

There is inadequate fresh water in Guildford and current supplies could not meet the needs of a development of this size.

Electricity supply is also inadequate and would require a big infrastructure development.

The railway station was rejected by Guildford Borough Council in 1984 because it feared Gosden Hill would become a dormitory estate for London.

The wording of the Local Plan with regard to Gosden Hill is so loose that the developer could virtually do whatever it wants.

The remaining agricultural land between Gosden Hill and West Clandon is so small that it is highly likely to be uneconomic and therefore a prime candidate for further development which would roll the Guildford Urban Area over West Clandon towards East Clandon and Wisley.

If the Strategic Sites are developed, the north of Guildford will deliver 36%, 5,036 houses towards the total of around 14,000. The infrastructures of the existing villages and the A3 will be overwhelmed by the scale of development.

A new on-slip at Burpham would only be 1.8km from the on-slip at Burnt Common which is against Highway England’s requirement of 2km.
Development of the A3 at best will not start until after 2020 and the building of a tunnel, which is only an “aspiration” in the Local Plan is likely to be many years after. In the meantime given that developers build houses to provide cash-flow for infrastructure, Gosden Hill will have a crippling effect on villages like West Clandon and the A3.

Gosden Hill already has surface water problems. Merrow Stream crosses the site. No hydrological survey has been carried out to assess the implications. Electricity pylons run through the centre of Gosden Hill which have health and safety issues.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/1819  Respondent: 8744161 / Michael Bridge  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT to the inclusion of the land at Garlick’s Arch, Send Marsh/Burnt Common and Ripley (A43)

Garlick’s Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8). There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).

The Plan states the preference is to making the best use of previously developed land. Yet at the 11th hour a perfectly acceptable brown field site at Burnt Common, capable of accommodating approximately 100 houses, was removed from the Plan and replaced with the Garlick’s Arch site. There was no proper consultation in relation to the inclusion of this site. Why was a brownfield site removed and replaced a Greenfield site? There is no evidence that Section 18 of the Planning and Compulsory Purchase Act 2004, which requires local planning authorities to produce a Statement of Community Involvement, has been complied with for this site. This only came to light for local residents following a Council meeting on 11th May 2016.

Moreover, Guildford Borough Council’s own Green Belt & Countryside Report does not address Garlick’s Arch at all, so there is no evidence base to support the inclusion of this site.

National Planning Policy promotes sustainable developments, with sustainable transport. With ever reducing bus services in the area and no train station within reasonable walking distance it is impossible for any development on this site to offer a sustainable transport solution. Development on this site is wholly inappropriate (Policy I3).

The stream, which runs through the site, is identified as having a high risk of flooding by the Environment Agency. There are other sites that do not flood that can be developed and therefore this site should be removed from the Plan (Policy P4).

This site is bordered by Ancient Woodland and within it a number of trees are protected by Tree Preservation Orders (Policy D3).

The site has an abundance of wildlife, some of which are protected. It is home to many types of owls and bats, with the woods having cuckoos and woodpeckers. In addition there are regular sightings of badgers, deer and red kites. The development of the site will result in the loss of habitat. No wildlife report has been conducted on the site. (Policy I4)
It is clear that with this site being added at the 11th hour no infrastructure planning has been undertaken. The Infrastructure Schedule makes no provision for any infrastructure improvements for this site. How will the local services such as schools and doctors cope, many of which are already at capacity? (Policy I1)

Furthermore, several electricity pylons run through the site, which will have the potential to be a health hazard for any residents.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

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<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a</td>
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<td><strong>Answer (if comment is on questions 1-7 of the questionnaire):</strong> ()</td>
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<tr>
<td>1. <strong>I OBJECT to the inclusion of the land for new on/off ramps at Burnt Common (A43a)</strong></td>
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<td>The addition north facing ramps to the A3 at Burnt Common would be a disaster for local communities. There is no requirement for local traffic to access the A3 to the north, but the addition will draw in a huge amount of ‘through’ traffic.</td>
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<td>The route from London/M25 to Woking or would now be through Burnt Common and Send. Equally traffic from the east of Guildford (Merrow etc) and the A25 will now go through West Clandon and Burnt Common. This will cause immense damage to those areas on small roads which cannot be improved.</td>
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<td>This Plan does not address the needs of local communities or the Borough in this regard. There has again been no Section 18 consultation on this.</td>
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<td><strong>Answer (if comment is on questions 1-7 of the questionnaire):</strong> ()</td>
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1. I OBJECT to the damage to the historic environment as a result of the scale of the proposed development (Policy D3)

I OBJECT to the local plan based on the impact it will have on the special countryside of the borough.

The proposed development at Garlick’s Arch (A43) will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/3914  Respondent: 8744161 / Michael Bridge  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT to the sustainable employment policy (Policy E1)

If developed, the new employment site at Garlick’s Arch, Send Marsh/Burnt Common (A43), would be treated as a Strategic Employment Site.

The proposed development of up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8) at Garlick’s Arch (A43) is in the scheme of industrial development relatively small. Just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m. The Garlick’s Arch site which is in the Green Belt should not be developed as a Strategic Employment Site when there is a suitable alternative brownfield site very close by, which is far more sustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/3915  Respondent: 8744161 / Michael Bridge  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
1. I OBJECT to the location for new employment floorspace at Garlick’s Arch – Site A43 (Policy E2)

Proposals for new industrial, warehousing and storage (use Class B1c, B2 and B8) floorspace will be directed to the Industrial Strategic Employment Sites.

There is no need for the new employment floorspace to be located at Garlick’s Arch, when just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3916  Respondent: 8744161 / Michael Bridge  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT to the loss of rural employment (Policy E5)

Policy E5 supports the retention and development of local services and community facilities in our inset and identified villages. Yet the development at Garlick’s Arch (A43) would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises. The Plan does not promote rural employment; rather it will result in the loss of existing local rural businesses.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3927  Respondent: 8744161 / Michael Bridge  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E6

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
1. POLICY E6 - The leisure and visitor experience

I OBJECT. Tourism and visitors do not depend on new visitor “attractions” and could actually be damaged by them, as compellingly argued in the current debate over Newlands Corner. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment/“Disneyfication”. Heritage sites and the Green Belt are particularly vulnerable to harm.

Guildford has many “leisure and visitor attractions” already. The case for creating more is not made and no examples are given. Instead, the plan’s explicit priorities should be:

1. To protect the borough’s prime leisure and tourism asset, its countryside, from inappropriate development. This is all the more valuable because of its accessibility from London, the rest of Britain and the Continent, in that order. Rural residents are its custodians and require no Council interference. Economically, the most valuable forms of tourism, such as walking and cycling, require no new development. In the overcrowded South-East of England, lack of development is a leisure and tourism asset, not a liability.

2. To help make Guildford’s river landscape less off-putting and support town-break packages for high-value tourists. To achieve this, the policy needs to define what leverage, if any, Council planners have to influence normal tourism market mechanisms.

3. To help private providers market local tourism. This need not involve extra spending. The Council could, for instance, help co-ordinate ready-made, local tourism packages under a distinctive brand at an all-in price. An “English town break” (including B&B accommodation, a walking tour of Guildford, a pub lunch in the Surrey Hills, a visit to Wisley Gardens and a National Trust property and a SouthWest Trains travelcard for a day out in London) would be highly attractive to many European visitors who currently by-pass Guildford to go to Bath, Oxford or Cambridge instead.

4. To rule out the redevelopment of scarce rural hotel sites (e.g. Thatchers, East Horsley, earmarked for 40 new houses under Site A37 of the plan yet just a short walk from the new opera house).

I trust that the objections made above are fully taken into consideration and that the Plan is amended accordingly.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3922  Respondent: 8744161 / Michael Bridge  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT (POLICY H1 – Homes for all) Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan period. It fails to set rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions.

The housing mix is based on out-of-date, pre-Brexit projections and on assumptions set out in a flawed SHMA that has not been scrutinised or evaluated.

I support higher density development in the urban area, without resorting to dehumanising, high-rise buildings that developers commonly claim are necessary for financial viability. Much of Guildford town could usefully be regenerated with 4-5 storey blocks with landscaping and underground parking, as often seen on the Continent and, recently, in London.
Student accommodation should be provided for 100% of new students and more than 60% of existing students, which would free up ideal family accommodation in the urban area. Other university cities (e.g. Oxford) insist on higher percentages than those proposed in the plan. In my view, the Council’s timidity is a case of “regulatory capture” by Surrey University, which has failed to use its existing planning permissions (dating from 2004) to accommodate 3,000 students or to improve the efficient development of its campus (e.g. by building on its extensive and under-used surface car parks). If all students were accommodated in this way, 2,000 homes would be freed up in town and there would be no need to build on the Hog’s Back.

Guildford borough has already a higher proportion of traveller sites than most comparable boroughs. Over-provision is inappropriate given other constraints.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3926  Respondent: 8744161 / Michael Bridge  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. POLICY H3 – Rural Exception Homes

I OBJECT This is a Trojan horse policy. It says that homes can be built anywhere near a settlement of any form (including agricultural land and the AONB). These homes are meant for people with a village connection, but they could be for anyone on the Guildford borough housing list. To make the housing viable, or to improve the “mix” this can include “market” housing (i.e. normal commercial development which in Guildford usually means large executive homes). This policy means building anywhere, and ignoring all historic planning restrictions.

The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove “exceptional circumstances.”

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3918  Respondent: 8744161 / Michael Bridge  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
1. I OBJECT, due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1)

Our villages are already suffering from severe congestion for much of the day, for example the Newark Road & Rose Lane junction in the centre of Ripley. The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.

Furthermore, many of the country lanes around the villages of Ripley, Send and Clandon are narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition.

I OBJECT to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces.

Many of the affected villages, such as West Clandon, already suffer from traffic congestion. Further development around these villages will only result in more traffic and more parking problems.

With some 5,000 houses being proposed close to the village of Ripley, the roads serving the village will become even more congested. Cycling has become an ever popular past time, particularly at weekends hundreds of cyclists past through the villages on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road accidents involving cyclists as a result of the development proposed under the local plan.

The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the road becoming ever more dangerous for pedestrians.

The council has a statutory obligation to protect the public and the additional traffic flows will bring added pollution and risk to injury of the public. In the case of West Clandon the Street often only has a narrow footpath on one side of the road making it very dangerous, especially when vehicles mount the pavements.

1. I OBJECT to the lack of proper infrastructure planning for sites (Policy I1)

Policy I1 requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.

Despite the Garlick’s Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents’ in the locality will see their quality of life significantly deteriorate in many ways.

Many of the utilities in the Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers. No plans to improve these services should mean no development of the Garlick’s Arch site.

Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are already at capacity and suffering from funding cuts or freezes. Any further development without funding will place further stress upon existing health services.

Police services are seeing funding reduced. The development of the proposed 13,860 homes during the plan period will stretch the police services further and is unsustainable.

There is no provision of the increased capacity of Guildford hospital, where is this assessed and remedied?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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1. I OBJECT due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2)

There is no certainty that either the A3 or M25 in the borough will be improved to increase capacity and reduce congestion during the Plan period. Highways England has no plans to even examine improving the A3 before 2020. I have considerable concerns that development of the large residential sites identified at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), will take place before any improvements are made to the trunk road network. The A3 & M25 are already at capacity during peak hours and any development prior to improvement of these roads will only make the situations worse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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1. I OBJECT to poor air quality concerns (Policy I3)

Paragraph 4.6.27 of the Plan states that “Development must also mitigate its traffic impacts, including its environmental impacts and impacts on amenity and health.” The significant level of development being proposed, particularly in the north east of the borough will lead to considerable further congestion, despite any attempts to mitigate this through travel plans. This will be particularly acute in built up residential areas and will only lead to greater levels of air pollution, which will have a detrimental effect on local residents and their health and can result in early death.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT to not protecting the Green Belt (Policy P2)

I OBJECT to the proposals to remove the villages of Ripley, Send and Clandon from the Green Belt, together with sites of Wisley Airfield (A35) and Garlick’s Arch (A43). National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these villages (as mere housing need does not constitute a ‘special circumstance’ and the land to be taken from the Green Belt. Once taken the green belt is lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached. GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site.

Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3912  Respondent: 8744161 / Michael Bridge  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT to development in areas which are at risk of flooding (Policy P4)

National Planning Policy states that Local Plans should take account of climate change over the longer term, including factors such as flood risk. It goes on to say that new development should be planned to avoid increased vulnerability to the range of impacts arising from climate change.

The Plan states that in accordance with national planning practice guidance, the Level 1 SFRA has been used to guide development towards areas at the lowest risk of flooding and identify areas unsuitable for development. However, the document concludes that land outside of the area of flood risk is not capable of accommodating all of the borough’s identified development needs. A Level 2 SFRA has therefore also been produced and will help the Council apply the exceptions test (as described in the NPPG) as necessary to development proposals in areas at risk of flooding.

The site at Garlick’s Arch (A43) is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. Knowing the area well I am aware that this site often floods during the winter months and the
flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
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<tr>
<th>Comment ID: PSLPP16/3909</th>
<th>Respondent: 8744161 / Michael Bridge</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Objections to Guildford Borough Proposed Submission Local Plan (June 2016)

I OBJECT in the strongest possible terms to the Guildford Borough Proposed Submission Local Plan (June 2016). This Plan is unsustainable, unworkable and, in many provisions, unnecessary.

I set out below my objections to specific policies and matters within the Plan.

1. I OBJECT to the Local Plan as the development proposed will not be sustainable (Policy S1)

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are just unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick’s Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<tr>
<th>Comment ID: PSLPP16/3910</th>
<th>Respondent: 8744161 / Michael Bridge</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
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</table>
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT to the Borough Wide Strategy (Policy S2)
   a. The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.
   b. The Housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.
   c. The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

   These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guilford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

   It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

   The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

   What changes (2016)/further amendments (2017) do you suggest should be made to the document?

   Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT to the proposed Infrastructure Schedule (Appendix C)

The Infrastructure Schedule sets out the key infrastructure requirements on which the delivery of the plan depends. For each of the Key Allocated Sites in the borough it identifies infrastructure projects that are required, except for Garlick’s Arch (A43) which is not mentioned. It is clear that the Plan takes no account of the infrastructure required for this site and is therefore not fit for purpose.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/1095  Respondent: 8744257 / Mary E Bridge  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)

- The “objectively assessed need” figure of 693 homes a year is too high.
- A professional review by NMSS has concluded that, even basing the calculations on a period of stronger economic and student growth, the housing need figure should be revised down to 510 homes a year and the method changed to consider student housing need separately due to the distorting effects.
- The current SHMA inflates the proposed housing figure due to
  - failure to correct for errors in the historical data for international migration flows,
  - issues with the way it considers students and affordability and
  - flaws in the method for estimating the number of homes needed to support job growth.
- It is unacceptable that demographic and economic model assumptions have been withheld and cannot be checked making the process unaccountable.

The Plan’s proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the borough, it is over double the previous figure of 322 used in previous plans. The SHMA report methodology is I believe inaccurate; it inflates the needs of the borough by distorted student numbers. However, it is based on commercially confidential modelling assumptions that cannot be checked or reviewed. There is no transparency to this evidence base and it is therefore impossible to assess its accuracy. This is not democratic and is not appropriate for consultation of the Plan.

The National Planning Policy Framework allows the overall housing target to be reduced to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPS16/1827  **Respondent:** 8744257 / Mary E Bridge  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A25

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

1. **I OBJECT** to Gosden Hill developement being in the Local Plan The land in Gosden Hill does exactly what the Greenbelt was designed to achieve. It provides a green buffer between the Guildford Urban Area and West Clandon, gives Burpham a defined green boundary and breathing space and it hides Guildford town from visitors until they pass the off-slip to Burpham.

No exceptional circumstances have been demonstrated for building on this site and therefore it does not comply with paragraphs 87-89 of the NPPF. It stops the sprawl of Guildford town, assists in safeguarding the countryside from encroachment and assists in urban regeneration by encouraging the recycling of derelict and other urban land. All requirements of the NPPF.

The scale of Gosden Hill is out of proportion to West Clandon. It would have four times the amount of housing plus shops, offices/factories, GP surgery, schools. Development on this scale would blight a historic village with a history going back to the doomsday book and beyond.

Gosden Hill is the most obvious location for the north end of an A3 tunnel. It has rising ground and is situated just before the urban area. If it is built on, it will be very difficult to construct a tunnel.

The development will generate in the region of 6,000 vehicles which will pour on to the A3 which is stationary every day during rush hours. The linking of the A3100, B2215 and A247 would channel thousands of cars through the narrow, winding road through West Clandon, a road where large lorries mount the pavement virtually every day and through Send and Ripley which are also severely constrained.

The volume of traffic will greatly increase air pollution which is particularly critical given the proposal to build two schools.

Currently, a two way junction at the site would require vehicles wanting to go north on the A3 to go through Burpham which is grid-locked every day.

Burpham’s sewers are at capacity. Sewage would have to be pumped to Slyfield for processing, a project of enormous cost.

There is inadequate fresh water in Guildford and current supplies could not meet the needs of a development of this size.

Electricity supply is also inadequate and would require a big infrastructure development.

The railway station was rejected by Guildford Borough Council in 1984 because it feared Gosden Hill would become a dormitory estate for London.
The wording of the Local Plan with regard to Gosden Hill is so loose that the developer could virtually do whatever it wants.

The remaining agricultural land between Gosden Hill and West Clandon is so small that it is highly likely to be uneconomic and therefore a prime candidate for further development which would roll the Guildford Urban Area over West Clandon towards East Clandon and Wisley.

If the Strategic Sites are developed, the north of Guildford will deliver 36%, 5,036 houses towards the total of around 14,000. The infrastructures of the existing villages and the A3 will be overwhelmed by the scale of development.

A new on-slip at Burpham would only be 1.8km from the on-slip at Burnt Common which is against Highway England’s requirement of 2km.

Development of the A3 at best will not start until after 2020 and the building of a tunnel, which is only an “aspiration” in the Local Plan is likely to be many years after. In the meantime given that developers build houses to provide cash-flow for infrastructure, Gosden Hill will have a crippling effect on villages like West Clandon and the A3.

Gosden Hill already has surface water problems. Merrow Stream crosses the site. No hydrological survey has been carried out to assess the implications. Electricity pylons run through the centre of Gosden Hill which have health and safety issues.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/1828  Respondent: 8744257 / Mary E Bridge  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT to the inclusion of the land at Garlick’s Arch, Send Marsh/Burnt Common and Ripley (A43)

Garlick’s Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8). There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).

The Plan states the preference is to making the best use of previously developed land. Yet at the 11th hour a perfectly acceptable brown field site at Burnt Common, capable of accommodating approximately 100 houses, was removed from the Plan and replaced with the Garlick’s Arch site. There was no proper consultation in relation to the inclusion of this site. Why was a brownfield site removed and replaced a Greenfield site? There is no evidence that Section 18 of the Planning and Compulsory Purchase Act 2004, which requires local planning authorities to produce a Statement of Community Involvement, has been complied with for this site. This only came to light for local residents following a Council meeting on 11th May 2016.

Moreover, Guildford Borough Council’s own Green Belt & Countryside Report does not address Garlick’s Arch at all, so there is no evidence base to support the inclusion of this site.
National Planning Policy promotes sustainable developments, with sustainable transport. With ever reducing bus services in the area and no train station within reasonable walking distance it is impossible for any development on this site to offer a sustainable transport solution. Development on this site is wholly inappropriate (Policy I3).

The stream, which runs through the site, is identified as having a high risk of flooding by the Environment Agency. There are other sites that do not flood that can be developed and therefore this site should be removed from the Plan (Policy P4).

This site is bordered by Ancient Woodland and within it a number of trees are protected by Tree Preservation Orders (Policy D3).

The site has an abundance of wildlife, some of which are protected. It is home to many types of owls and bats, with the woods having cuckoos and woodpeckers. In addition there are regular sightings of badgers, deer and red kites. The development of the site will result in the loss of habitat. No wildlife report has been conducted on the site. (Policy I4)

It is clear that with this site being added at the 11th hours no infrastructure planning has been undertaken. The Infrastructure Schedule makes no provision for any infrastructure improvements for this site. How will the local services such as schools and doctors cope, many of which are already at capacity? (Policy I1)

Furthermore, several electricity pylons run through the site, which will have the potential to be a health hazard for any residents.

Do you consider this section of the document complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT to the inclusion of the land for new on/off ramps at Burnt Common (A43a)

The addition north facing ramps to the A3 at Burnt Common would be a disaster for local communities. There is no requirement for local traffic to access the A3 to the north, but the addition will draw in a huge amount of ‘through’ traffic.

The route from London/M25 to Woking or would now be through Burnt Common and Send. Equally traffic from the east of Guildford (Merrow etc) and the A25 will now go through West Clandon and Burnt Common. This will cause immense damage to those areas on small roads which cannot be improved.

This Plan does not address the needs of local communities or the Borough in this regard. There has again been no Section 18 consultation on this.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT to the damage to the historic environment as a result of the scale of the proposed development (Policy D3)

I OBJECT to the local plan based on the impact it will have on the special countryside of the borough.

The proposed development at Garlick’s Arch (A43) will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

1. I OBJECT to the sustainable employment policy (Policy E1)

If developed, the new employment site at Garlick’s Arch, Send Marsh/Burnt Common (A43), would be treated as a Strategic Employment Site.

The proposed development of up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8) at Garlick’s Arch (A43) is in the scheme of industrial development relatively small. Just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m. The Garlick’s Arch site which is in the Green Belt should not be developed as a Strategic Employment Site when there is a suitable alternative brownfield site very close by, which is far more sustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT to the location for new employment floorspace at Garlick’s Arch – Site A43 (Policy E2)

Proposals for new industrial, warehousing and storage (use Class B1c, B2 and B8) floorspace will be directed to the Industrial Strategic Employment Sites.

There is no need for the new employment floorspace to be located at Garlick’s Arch, when just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3938  Respondent: 8744257 / Mary E Bridge  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT to the loss of rural employment (Policy E5)

Policy E5 supports the retention and development of local services and community facilities in our inset and identified villages. Yet the development at Garlick’s Arch (A43) would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises. The Plan does not promote rural employment; rather it will result in the loss of existing local rural businesses.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3948  Respondent: 8744257 / Mary E Bridge  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E6

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
1. POLICY E6 - The leisure and visitor experience

I OBJECT. Tourism and visitors do not depend on new visitor “attractions” and could actually be damaged by them, as compellingly argued in the current debate over Newlands Corner. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment/“Disneyfication”. Heritage sites and the Green Belt are particularly vulnerable to harm.

Guildford has many “leisure and visitor attractions” already. The case for creating more is not made and no examples are given. Instead, the plan’s explicit priorities should be:

1. To protect the borough’s prime leisure and tourism asset, its countryside, from inappropriate development. This is all the more valuable because of its accessibility from London, the rest of Britain and the Continent, in that order. Rural residents are its custodians and require no Council interference. Economically, the most valuable forms of tourism, such as walking and cycling, require no new development. In the overcrowded South-East of England, lack of development is a leisure and tourism asset, not a liability.

2. To help make Guildford’s river landscape less off-putting and support town-break packages for high-value tourists. To achieve this, the policy needs to define what leverage, if any, Council planners have to influence normal tourism market mechanisms.

3. To help private providers market local tourism. This need not involve extra spending. The Council could, for instance, help co-ordinate ready-made, local tourism packages under a distinctive brand at an all-in price. An “English town break” (including B&B accommodation, a walking tour of Guildford, a pub lunch in the Surrey Hills, a visit to Wisley Gardens and a National Trust property and a SouthWest Trains travelcard for a day out in London) would be highly attractive to many European visitors who currently by-pass Guildford to go to Bath, Oxford or Cambridge instead.

4. To rule out the redevelopment of scarce rural hotel sites (e.g. Thatchers, East Horsley, earmarked for 40 new houses under Site A37 of the plan yet just a short walk from the new opera house).

I trust that the objections made above are fully taken into consideration and that the Plan is amended accordingly.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Student accommodation should be provided for 100% of new students and more than 60% of existing students, which would free up ideal family accommodation in the urban area. Other university cities (e.g. Oxford) insist on higher percentages than those proposed in the plan. In my view, the Council’s timidity is a case of “regulatory capture” by Surrey University, which has failed to use its existing planning permissions (dating from 2004) to accommodate 3,000 students or to improve the efficient development of its campus (e.g. by building on its extensive and under-used surface car parks). If all students were accommodated in this way, 2,000 homes would be freed up in town and there would be no need to build on the Hog’s Back.

Guildford borough has already a higher proportion of traveller sites than most comparable boroughs. Over-provision is inappropriate given other constraints.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3947  Respondent: 8744257 / Mary E Bridge  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. POLICY H3 – Rural Exception Homes

I OBJECT This is a Trojan horse policy. It says that homes can be built anywhere near a settlement of any form (including agricultural land and the AONB). These homes are meant for people with a village connection, but they could be for anyone on the Guildford borough housing list. To make the housing viable, or to improve the “mix” this can include “market” housing (i.e. normal commercial development which in Guildford usually means large executive homes). This policy means building anywhere, and ignoring all historic planning restrictions.

The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove “exceptional circumstances.”

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3940  Respondent: 8744257 / Mary E Bridge  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
1. I OBJECT, due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1)

Our villages are already suffering from severe congestion for much of the day, for example the Newark Road & Rose Lane junction in the centre of Ripley. The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.

Furthermore, many of the country lanes around the villages of Ripley, Send and Clandon are narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition.

I OBJECT to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces.

Many of the affected villages, such as West Clandon, already suffer from traffic congestion. Further development around these villages will only result in more traffic and more parking problems.

With some 5,000 houses being proposed close to the village of Ripley, the roads serving the village will become even more congested. Cycling has become an ever popular past time, particularly at weekends hundreds of cyclists past through the villages on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road accidents involving cyclists as a result of the development proposed under the local plan.

The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the road becoming ever more dangerous for pedestrians.

The council has a statutory obligation to protect the public and the additional traffic flows will bring added pollution and risk to injury of the public. In the case of West Clandon the Street often only has a narrow footpath on one side of the road making it very dangerous, especially when vehicles mount the pavements.

1. I OBJECT to the lack of proper infrastructure planning for sites (Policy I1)

Policy I1 requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.

Despite the Garlick’s Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents’ in the locality will see their quality of life significantly deteriorate in many ways.

Many of the utilities in the Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers. No plans to improve these services should mean no development of the Garlick’s Arch site.

Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are already at capacity and suffering from funding cuts or freezes. Any further development without funding will place further stress upon existing health services.

Police services are seeing funding reduced. The development of the proposed 13,860 homes during the plan period will stretch the police services further and is unsustainable.

There is no provision of the increased capacity of Guildford hospital, where is this assessed and remedied?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: PSLPP16/3941  Respondent: 8744257 / Mary E Bridge  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2)

There is no certainty that either the A3 or M25 in the borough will be improved to increase capacity and reduce congestion during the Plan period. Highways England has no plans to even examine improving the A3 before 2020. I have considerable concerns that development of the large residential sites identified at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), will take place before any improvements are made to the trunk road network. The A3 & M25 are already at capacity during peak hours and any development prior to improvement of these roads will only make the situations worse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3942  Respondent: 8744257 / Mary E Bridge  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT to poor air quality concerns (Policy I3)

Paragraph 4.6.27 of the Plan states that “Development must also mitigate its traffic impacts, including its environmental impacts and impacts on amenity and health.” The significant level of development being proposed, particularly in the north east of the borough will lead to considerable further congestion, despite any attempts to mitigate this through travel plans. This will be particularly acute in built up residential areas and will only lead to greater levels of air pollution, which will have a detrimental effect on local residents and their health and can result in early death.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3934  Respondent: 8744257 / Mary E Bridge  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
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<td><strong>Answer (if comment is on questions 1-7 of the questionnaire):</strong> ()</td>
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<tr>
<td>1. <strong>I OBJECT to not protecting the Green Belt (Policy P2)</strong></td>
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<tr>
<td>I OBJECT to the proposals to remove the villages of Ripley, Send and Clandon from the Green Belt, together with sites of Wisley Airfield (A35) and Garlick’s Arch (A43). National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these villages (as mere housing need does not constitute a ‘special circumstance’ and the land to be taken from the Green Belt. Once taken the green belt is lost forever.</td>
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<tr>
<td>There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached. GBC’s Green Belt &amp; Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site.</td>
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<td>Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.</td>
</tr>
<tr>
<td><strong>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</strong></td>
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<tr>
<td><strong>Attached documents:</strong></td>
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<tr>
<td><strong>Comment ID:</strong> PSLPP16/3935  <strong>Respondent:</strong> 8744257 / Mary E Bridge  <strong>Agent:</strong></td>
</tr>
<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy P4</td>
</tr>
<tr>
<td><strong>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</strong></td>
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<tr>
<td><strong>Answer (if comment is on questions 1-7 of the questionnaire):</strong> ()</td>
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<tr>
<td>1. <strong>I OBJECT to development in areas which are at risk of flooding (Policy P4)</strong></td>
</tr>
<tr>
<td>National Planning Policy states that Local Plans should take account of climate change over the longer term, including factors such as flood risk. It goes on to say that new development should be planned to avoid increased vulnerability to the range of impacts arising from climate change.</td>
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<tr>
<td>The Plan states that in accordance with national planning practice guidance, the Level 1 SFRA has been used to guide development towards areas at the lowest risk of flooding and identify areas unsuitable for development. However, the document concludes that land outside of the area of flood risk is not capable of accommodating all of the borough’s identified development needs. A Level 2 SFRA has therefore also been produced and will help the Council apply the exceptions test (as described in the NPPG) as necessary to development proposals in areas at risk of flooding.</td>
</tr>
</tbody>
</table>
| The site at Garlick’s Arch (A43) is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. Knowing the area well I am aware that this site often floods during the winter months and the
flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3932  Respondent: 8744257 / Mary E Bridge  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Objections to Guildford Borough Proposed Submission Local Plan (June 2016)

I OBJECT in the strongest possible terms to the Guildford Borough Proposed Submission Local Plan (June 2016). This Plan is unsustainable, unworkable and, in many provisions, unnecessary.

I set out below my objections to specific policies and matters within the Plan.

1. I OBJECT to the Local Plan as the development proposed will not be sustainable (Policy S1)

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are just unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3933  Respondent: 8744257 / Mary E Bridge  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT to the Borough Wide Strategy (Policy S2)

   a. The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

   b. The Housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.

   c. The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

   These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guilford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

   It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

   The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

   What changes (2016)/further amendments (2017) do you suggest should be made to the document?

   Attached documents:

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Comment ID: PSLPA16/2201  Respondent: 8744417 / Mark & Gillie Hammersley  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule
I OBJECT to the proposed Infrastructure Schedule (Appendix C)

The Infrastructure Schedule sets out the key infrastructure requirements on which the delivery of the plan depends. For each of the Key Allocated Sites in the borough it identifies infrastructure projects that are required, except for Garlick’s Arch (A43) which is not mentioned. It is clear that the Plan takes no account of the infrastructure required for this site and is therefore not fit for purpose.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/2209  Respondent: 8744417 / Mark & Gillie Hammersley  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

I OBJECT to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)

- The “objectively assessed need” figure of 693 homes a year is too high.
- A professional review by NMSS has concluded that, even basing the calculations on a period of stronger economic and student growth, the housing need figure should be revised down to 510 homes a year and the method changed to consider student housing need separately due to the distorting effects.
- The current SHMA inflates the proposed housing figure due to
  - failure to correct for errors in the historical data for international migration flows,
  - issues with the way it considers students and affordability and
  - flaws in the method for estimating the number of homes needed to support job growth.
- It is unacceptable that demographic and economic model assumptions have been withheld and cannot be checked making the process unaccountable.

The Plan’s proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the borough, it is over double the previous figure of 322 used in previous plans. The SHMA report methodology is I believe inaccurate; it inflates the needs of the borough by distorted student numbers. However, it is based on commercially confidential modelling assumptions that cannot be checked or reviewed. There is no transparency to this evidence base and it is therefore impossible to assess its accuracy. This is not democratic and is not appropriate for consultation of the Plan.

The National Planning Policy Framework allows the overall housing target to be reduced to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors.
**Comment ID:** PSLPA16/2194  **Respondent:** 8744417 / Mark & Gillie Hammersley  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix F: Policies overview map

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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I OBJECT to all strategic sites proposed in the draft Plan to be built in the Green Belt.

1. I object to the identification and allocation of sites in this plan without regard to Green Belt, infrastructure or other constraints. **The plan says that “allocating these sites does not grant planning permission for development.”** However, each of the sites will be removed from the Green Belt and will be available in principle for development and non-Green Belt uses. The inclusion of these sites without detailed site by site justification shows contempt for the thousands of detailed comments the Council have received about individual sites ever since the Issues and Options consultation in 2013. The plan has hardly changed since the Council received 20,000 objections to its first draft plan in 2014. The Inspector considering the plan may conclude that the consultation has not been properly conducted.

2. The housing needs assessment is flawed in various respects and overstates housing need. In addition since it was produced, the referendum Brexit decision has almost certainly reduced future housing need and rendered the previous assessment seriously out of date. As a result any assessment of Green Belt sites which took place to consider whether “exceptional circumstances” existed to outweigh the harm to the Green Belt was based on false premises and should be reconsidered.

3. Having determined housing need the Council was entitled to consider constraints before determining the housing number. I believe that as Ill as being entitled to do this the Council was required to give proper consideration to constraints. The scarcity of sites outside the Green Belt as Ill as infrastructure (most notable roads) considerations all represented constraints which should have been taken into account in determining the final housing number. Accordingly in this regard our objection to the allocation of Green Belt sites is twofold. First I believe constraints should have been applied. Secondly I believe the Council did not properly consider constraints and that their decision making process was flawed and thus subject to being set aside by the Inspector.

4. Even if having properly applied constraints there is a need to develop in the Green Belt then specific Green Belt sites should not be included in the plan unless “exceptional circumstances” for development are proven in relation to that specific site, as stipulated repeatedly in the NPPF. The Green Belt should trump short-term considerations such as perceived housing need, as case law has established. There needs to be a specific balancing exercise conducted on each Green Belt site weighing the harm to the Green Belt against the very special circumstances which are argued in favour of development at that particular site. There is no evidence this has been done. Instead the council have appeared to say that having chosen a housing needs figure and decided it cannot be met without building on Green Belt then there is no need for any further consideration and any convenient Green Belt site can be allocated for building at will.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I OBJECT to Policy A25 with proposals for Gosden Hill Farm.

The Green Belt at this point serves the important function of separating West Clandon from the edge of urban Guildford. Development here will cause the two to coalesce defeating one of the objectives of the Green Belt. If this development proceeds I believe the narrow strip of Green Belt remaining between Guildford and Clandon at this point will be too narrow and will come under further pressure.

It will represent an undesirable ribbon development along the A3. It will be highly visible from the A3 when approaching Guildford and will, in conjunction with A43a at Garlick's Arch give the appearance of almost continuous development from Send through to Guildford.

The Plan does not put forward any evidence that exceptional circumstances exist to justify removing this site from the Green Belt.

The development will overburden the local road network and increase congestion on the A3 and A247 through the centre of West Clandon. This is already very heavily used whilst being unsuitable for designation as an A road. In places it is too narrow for two lorries to pass causing them to mount the pavement.

Note the following accident data:

2010 – 2014 from Crashmap data

- Clandon Cross Roads Area to Bulls Head - 17 incidents
- Bulls Heads Head to Bennett Way - 8 incidents
- Bennett Way to Highcotts Lane - 15 incidents
- Tithebarn Lane to Portsmouth Road Birch Close - 8 incidents

2015

- 21 Oct 2015 – A247 near shell garage - Three vehicles collided causing delays
Surrey Fire and Rescue deployed.

2016

- 15 April 2016 12 year old boy injured in The Street – A247 closed in both directions
- 28 April 2016 A3 West Clandon London bound between A247 Tythebarns Lane (Burntcommon and M25J10 (Wisley Interchange) congestion on A3 to A3100 Clay Lane Burpham
- 30 6 2016 Motorcyclists with injuries airlifted to hospital Send Marsh Road

Attempts have been made over many years to reduce traffic, traffic speeds and accident risks through West Clandon, however little has been achieved as the road cannot be widened and SCC is reluctant to impose further speed limits as congestion is already very high.
I object most strongly to the proposal for a link road to bring traffic from the Gosden Hill development to the proposed 4 way junction at Burnt Common. This has the potential to generate large volumes of traffic (including commercial vehicles) on the A247 through West Clandon - a road which is already under traffic stress (see below).

The land in Gosden Hill does exactly what the Greenbelt was designed to achieve. It provides a green buffer between the Guildford Urban Area and West Clandon, gives Burpham a defined green boundary and breathing space and it hides Guildford town from visitors until they pass the off-slip to Burpham.

No exceptional circumstances have been demonstrated for building on this site and therefore it does not comply with paragraphs 87-89 of the NPPF. It stops the sprawl of Guildford town, assists in safeguarding the countryside from encroachment and assists in urban regeneration by encouraging the recycling of derelict and other urban land. All of these are requirements of the NPPF.

The scale of Gosden Hill is out of proportion to West Clandon. It would have four times the amount of housing plus shops, offices/factories, GP surgery, schools. Development on this scale would blight a historic village with a history going back to the doomsday book and beyond.

Gosden Hill is the most obvious location for the north end of an A3 tunnel. It has rising ground and is situated just before the urban area. If it is built on, it will be very difficult to construct a tunnel.

The development will generate in the region of 6,000 vehicles which will pour on to the A3 which is stationary every day during rush hours. The linking of the A3100, B2215 and A247 would channel thousands of cars through the narrow, winding road through West Clandon, a road where large lorries mount the pavement virtually every day and through Send and Ripley which are also severely constrained.

The volume of traffic will greatly increase air pollution which is particularly critical given the proposal to build two schools.

Currently, a two way junction at the site would require vehicles wanting to go north on the A3 to go through Burpham which is grid-locked every day.

Burpham’s sewers are at capacity. Sewage would have to be pumped to Slyfield for processing, a project of enormous cost.

There is inadequate fresh water in Guildford and current supplies could not meet the needs of a development of this size.

Electricity supply is also inadequate and would require a big infrastructure development.

The railway station was rejected by Guildford Borough Council in 1984 because it feared Gosden Hill would become a dormitory estate for London.

The wording of the Local Plan with regard to Gosden Hill is so loose that the developer could virtually do whatever it wants.

The remaining agricultural land between Gosden Hill and West Clandon is so small that it is highly likely to be uneconomic and therefore a prime candidate for further development which would roll the Guildford Urban Area over West Clandon towards East Clandon and Wisley.

If the Strategic Sites are developed, the north of Guildford will deliver 36%, 5,036 houses towards the total of around 14,000. The infrastructures of the existing villages and the A3 will be overwhelmed by the scale of development.

A new on-slip at Burpham would only be 1.8km from the on-slip at Burnt Common which is against Highway England’s requirement of 2km.

Development of the A3 at best will not start until after 2020 and the building of a tunnel, which is only an “aspiration” in the Local Plan, is likely to be many years after. In the meantime given that developers build houses to provide cash-flow for infrastructure, Gosden Hill will have a crippling effect on villages like West Clandon and the A3.
Gosden Hill already has surface water problems. Merrow Stream crosses the site. No hydrological survey has been carried out to assess the implications. Electricity pylons run through the centre of Gosden Hill which have health and safety issues.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPS16/4314  **Respondent:** 8744417 / Mark & Gillie Hammersley  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy A43 and A43a on Garlick’s Arch.

The site was only inserted in the draft plan at a late stage just before publication of the consultation draft which is a shabby way for the Council to proceed. The site is not a sustainable site being far from any infrastructure facilities and transport links. The bus service is infrequent and it is almost certain any future residents will rely almost entirely on cars for journeys. Similarly any employees at the employment areas will almost undoubtedly arrive and leave by car.

The site is susceptible to flooding and will not make a suitable site.

The Green Belt at this point serves the important function of separating West Clandon from Send. Building here will cause the two to coalesce defeating one of the objectives of the Green Belt.

I have seen no evidence that exceptional circumstances exist to justify removing this site from the Green Belt or that this important issue has been addressed. The Green Belt and Countryside study did not even consider this site.

It is understood the Council's eyes may have been turned by the possibility of receiving for free the land which might be used for new A3 slip roads in return for allowing this development, thus justifying it as some form of enabling development. However the slip road land if needed could be safeguarded in the plan and acquired by compulsory purchase when required. Lack of current funding for the slip road is not a justification for allowing the development of this site. If the slip road is genuinely needed then government funding will be available for it. (One of the reasons for turning down the so called enabling development proposal intended to fund the rebuilding of the Howard of Effingham School was that the redevelopment of the school was not essential. As and when it became essential Government funding would become available. Accordingly enabling development was not necessary. The same principle applies here.)

The A247 running south past this site through the centre of West Clandon is already very heavily used whilst being unsuitable for designation as an A road. In places it is too narrow for two lorries to pass causing them to mount the pavement- often at speed. It has narrow bends with poor sight lines, an infants school and a hump-backed bridge concealing the entrance road to the station for southward traffic. In addition, there are no continuous footpaths which forces pedestrians to cross and re-cross the road. Development at Garlick’s Arch will only exacerbate the problem and make the road even more congested and unsafe for pedestrians.

The development will cause harm to the ancient woodland on and by the site.

Taken together with the Gosden Hill site, there will be a ribbon of development along the A3 in contrast to the current “soft” edge approach to Guildford.
Garlick’s Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8). There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).

The Plan states the preference is to making the best use of previously developed land. Yet at the 11th hour a perfectly acceptable brownfield site at Burnt Common, capable of accommodating approximately 100 houses, was removed from the Plan and replaced with the Garlick’s Arch site. There was no proper consultation in relation to the inclusion of this site. Why was a brownfield site removed and replaced with a Greenfield site? There is no evidence that Section 18 of the Planning and Compulsory Purchase Act 2004, which requires local planning authorities to produce a Statement of Community Involvement, has been complied with for this site. This only came to light for local residents following a Council meeting on 11th May 2016.

Moreover, Guildford Borough Council’s own Green Belt & Countryside Report does not address Garlick’s Arch at all, so there is no evidence base to support the inclusion of this site.

National Planning Policy promotes sustainable developments, with sustainable transport. With ever reducing bus services in the area and no train station within reasonable walking distance it is impossible for any development on this site to offer a sustainable transport solution. Development on this site is wholly inappropriate (Policy I3).

The stream, which runs through the site, is identified as having a high risk of flooding by the Environment Agency. There are other sites that do not flood that can be developed and therefore this site should be removed from the Plan (Policy P4).

This site is bordered by Ancient Woodland and within it a number of trees are protected by Tree Preservation Orders (Policy D3).

The site has an abundance of wildlife, some of which are protected. It is home to many types of owls and bats, with the woods having cuckoos and woodpeckers. In addition there are regular sightings of badgers, deer and red kites. The development of the site will result in the loss of habitat. No wildlife report has been conducted on the site. (Policy I4)

It is clear that with this site being added at the 11th hours no infrastructure planning has been undertaken. The Infrastructure Schedule makes no provision for any infrastructure improvements for this site. How will the local services such as schools and doctors cope, many of which are already at capacity? (Policy I1)

Furthermore, several electricity pylon runs through the site, which will have the potential to be a health hazard for any residents.

**I OBJECT** to the inclusion of the land for new on/off ramps at Burnt Common (A43a)

The addition north facing ramps to the A3 at Burnt Common would be a disaster for local communities. There is no requirement for local traffic to access the A3 to the north, but the addition will draw in a huge amount of ‘through’ traffic.

The route from London/M25 to Woking or would now be through Burnt Common and Send. Equally traffic from the east of Guildford (Merrow etc) and the A25 will now go through West Clandon and Burnt Common. This will cause immense damage to those areas on small roads which cannot be improved.

This Plan does not address the needs of local communities or the Borough in this regard. There has again been no Section 18 consultation on this.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
| Comment ID: PSLPP16/9340  Respondent: 8744417 / Mark & Gillie Hammersley  Agent: |
| Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3 |

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the damage to the historic environment as a result of the scale of the proposed development (Policy D3)

I OBJECT to the local plan based on the impact it will have on the special countryside of the borough.

The proposed development at Garlick’s Arch (A43) will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

| Comment ID: PSLPP16/9346  Respondent: 8744417 / Mark & Gillie Hammersley  Agent: |
| Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D4 |

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy D3 - Historic environment

I object to this policy as it is very weak and I do not think it is clear enough in its support for the conservation of the historic environment. It provides for development which will “enhance” heritage assets which I fear is a developer’s charter as it leaves plenty of room for abuse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I OBJECT to Policy D4 - Development in urban areas and inset villages

The policy should place much greater emphasis on residential development in the existing urban centres. In this way housing needs can be met without resorting to large developments in the Green Belt. There are urban areas in need of regeneration but these are ignored in favour of Green Belt development.

The policy should not be applied to the villages which should remain in the Green Belt. Unrestricted application of this policy to the villages intended to be inset will change their characters radically and for the worse. The development it encourages will increase traffic and congestion disproportionately.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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I OBJECT to the sustainable employment policy (Policy E1)

I object to the inclusion of a strategic employment site at Gosden Hill Farm. Employment sites should be concentrated on previously developed land in more sustainable locations with good transport links where the infrastructure can support development. Warehousing, distribution and industrial premises cause considerable commercial traffic, noise, pollution and general disruption. They are not good neighbours for schools and 2000 houses. Many of the jobs will be taken by people outside the area leading to additional congestion in Burpham and on the A3.

I object to the inclusion of a strategic employment site at Garlick’s Arch. It is in a non-sustainable location remote from any facilities of any kind and with poor public transport links. It is unlikely jobs there will be taken by local residents and it is likely all travel to and from work will be by car adding to local congestion. Employment sites should be concentrated on previously developed land in more sustainable location with good transport links where the infrastructure can support development.

The site is in any event subject to frequent flooding and unsuitable for development.

If developed, the new employment site at Garlick’s Arch, Send Marsh/Burnt Common (A43), would be treated as a Strategic Employment Site.

The proposed development of up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8) at Garlick’s Arch (A43) is in the scheme of industrial development relatively small. Just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m. The Garlick’s Arch site which is in the Green Belt should not be developed as a Strategic Employment Site when there is a suitable alternative brownfield site very close by, which is far more sustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to this policy. It would be more sensible to confine new office and research and development floor space to the urban Guildford area. I also oppose the policy of expanding the Research Park onto Blackwell Farm. No exceptional circumstances, as defined under the NPPF, have been advanced to justify incursion into this permanent and high-quality area of Green Belt.

Proposals for new industrial, warehousing and storage (use Class B1c, B2 and B8) floor space will be directed to the Industrial Strategic Employment Sites.

There is no need for the new employment floorspace to be located at Garlick’s Arch or Gosden Hill Farm, when near to these sites at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m.

I OBJECT to the location for new employment floorspace (Policy E2)

Policy E5 supports the retention and development of local services and community facilities in our inset and identified villages. Yet the development at Garlick’s Arch (A43) would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises. The Plan does not promote rural employment; rather it will result in the loss of existing local rural businesses.
I OBJECT to Policy E6 - The leisure and visitor experience.

The policy should acknowledge that whilst in some areas new and enhanced leisure facilities are valuable (for example the new Opera House at West Horsley Place Towers), much tourism depends on the undeveloped nature of Green Belt areas surrounding Guildford. Accordingly the policy should recognize that in many rural areas new and enhanced visitor facilities may be unnecessary and counterproductive, particularly away from existing buildings and development. For example the attraction of Newlands Corner is its undeveloped nature. Significant development of visitor facilities there is likely to diminish rather than increase its attractions. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment. Heritage sites and the Green Belt are particularly vulnerable to harm.

Tourism and visitors do not depend on new visitor “attractions” and could actually be damaged by them, as compellingly argued in the current debate over Newlands Corner. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment/“Disneyfication”. Heritage sites and the Green Belt are particularly vulnerable to harm.

Guildford has many “leisure and visitor attractions” already. The case for creating more is not made and no examples are given. Instead, the plan’s explicit priorities should be:

1. To protect the borough’s prime leisure and tourism asset, its countryside, from inappropriate development. This is all the more valuable because of its accessibility from London, the rest of Britain and the Continent, in that order. Rural residents are its custodians and require no Council interference. Economically, the most valuable forms of tourism, such as walking and cycling, require no new development. In the overcrowded South-East of England, lack of development is a leisure and tourism asset, not a liability.

2. To help make Guildford’s river landscape less off-putting and support town-break packages for high-value tourists. To achieve this, the policy needs to define what leverage, if any, Council planners have to influence normal tourism market mechanisms.

3. To help private providers market local tourism. This need not involve extra spending. The Council could, for instance, help co-ordinate ready-made, local tourism packages under a distinctive brand at an all-in price. An “English town break” (including B&B accommodation, a walking tour of Guildford, a pub lunch in the Surrey Hills, a visit to Wisley Gardens and a National Trust property and a Southwest Trains travelcard for a day out in London) would be highly attractive to many European visitors who currently by-pass Guildford to go to Bath, Oxford or Cambridge instead.

4. To rule out the redevelopment of scarce rural hotel sites (e.g. Thatchers, East Horsley, earmarked for 40 new houses under Site A37 of the plan yet just a short walk from the new opera house).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
### I OBJECT to Policy E7 Guildford Town Centre

The policy “vision” describes protecting the Guildford’s unique setting and historical character and sets out some of the ways this will be done. However none of this is included in the formal Policy wording in the blue box. I suspect the Vision wording is effectively of little or any force. These principles should be included in the formal policy.

There should be a much greater focus on residential use of the town centre where many people would like to live and where the necessary amenities and infrastructure exist. The policy misses the opportunity to propose forward looking sustainable residential development plans in, for example the Walnut Tree Close area, where very significant numbers of new homes could be provided. Such town centre sites could meet much of the housing need over the plan period without harming the countryside.

There is an urgent need for a strategy to focus on brownfield redevelopment before considering development outside the existing urban area.

The policy does not address any of the major issues raised by the Council’s own Town Centre Master Plan, the Guildford Vision Group’s proposal for new river and rail crossings or plans for the redevelopment of Guildford Station, all of which are already the subject of public discussion.

The policy also fails to provide guidance on design requirements, as required by the NPPF.

The policy and surrounding text concentrates too much on shopping without regard to its nature which risks a proliferation of dull high-street chain stores. The policy should seek to enhance Guildford’s character and encourage a wider variety of small shops including locally owned businesses and shops of use to consumers. (For example there is no butcher in Guildford.)

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>PSLPP16/9321</th>
<th>Respondent:</th>
<th>8744417 / Mark &amp; Gillie Hammersley</th>
<th>Agent:</th>
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<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy H1</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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I OBJECT to Policy H1 – Homes for all. Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan period. It fails to set rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions.

The housing mix is based on out-of-date, pre-Brexit projections and on assumptions set out in a flawed SHMA that has not been scrutinised or evaluated.
I support higher density development in the urban area, without resorting to dehumanising, high-rise buildings that developers commonly claim are necessary for financial viability. Much of Guildford town could usefully be regenerated with 4-5 storey blocks with landscaping and underground parking, as often seen on the Continent and, recently, in London. Student accommodation should be provided for 100% of new students and more than 60% of existing students, which would free up ideal family accommodation in the urban area. Other university cities (e.g. Oxford) insist on higher percentages than those proposed in the plan. In my view, the Council’s timidity is a case of “regulatory capture” by Surrey University, which has failed to use its existing planning permissions (dating from 2004) to accommodate 3,000 students or to improve the efficient development of its campus (e.g. by building on its extensive and under-used surface car parks). If all students were accommodated in this way, 2,000 homes would be freed up in town and there would be no need to build on the Hog’s Back.

It is not appropriate to release Green Belt land to house students who could be accommodated on the Surrey campus or other university sites. The plan should take account of the university's ability to house its own students and reduce the housing number accordingly.

Guildford borough has already a higher proportion of traveller sites than most comparable boroughs. Over-provision is inappropriate given other constraints.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9327  Respondent: 8744417 / Mark & Gillie Hammersley  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to this policy on affordable homes (Policy H2) on the grounds of feasibility and that it should be more firm and explicit on unviability in paragraph 4.2.40.

In particular a scheme is only unviable if the value of developing the land (including some allowance for development risk and a normal level of profit) falls below the sale value of the land for alternative non-premium uses such as agriculture. The price paid for the land is not relevant. The possibility of avoiding the affordable housing obligation through use of unviability arguments only serves to inflate land values. It will become clear that developments are unviable when developers start selling land for alternative non-development uses.

It should be noted in the plan that because of Guildford's relative popularity as a place to live combined with its location close to others towns and within the London Commuter belt no amount of building will meet demand. Similarly no amount of affordable housing will ever meet demand.

In addition the definition of an ‘affordable home’ is 80% of market value. With even a 2 bedroom flat in Guildford now having a market value of +£360,000 the discounted price is still not going to be affordable to anyone on a normal income.

And at what point will ‘affordable homes’ be able to go onto the market at full market price?

As we have seen with council houses it is not long before the discounted property is sold at full market value with the original owner simply pocketing the profit.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9352  Respondent: 8744417 / Mark & Gillie Hammersley  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy H3 – Rural Exception Homes as this Trojan horse policy. It says that homes can be built anywhere near a settlement of any form (including agricultural land and the AONB). These homes are meant for people with a village connection, but they could be for anyone on the Guildford borough housing list. To make the housing viable, or to improve the “mix” this can include “market” housing (i.e. normal commercial development which in Guildford usually means large executive homes). This policy means building anywhere, and ignoring all historic planning restrictions.

The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove “exceptional circumstances.”

The wording of the policy is far too wide and drives a coach and horses though all other aspects of planning policy. As drafted the planning authority could be obliged to grant permission for inappropriate and unsuitable developments.

The wording provides no ability to balance the desirability of the development against other considerations including harm to the Green Belt or the AONB. (If the housing would meet identified need and adjoins a settlement under this policy wording permission would have to be granted even in the most sensitive AONB location, even if more suitable locations were available.) The policy should include the need for a balancing exercise including consideration whether more suitable locations exist.

The policy wording should not allow market housing. The ability to include market housing is likely to inflate land values, leading to a self-perpetuating need to include market housing. It may lead to spurious developer led proposals which will be difficult to resist.

The policy wording should define small, either in land size or number of units. I am concerned that if small is left undefined the policy could be used to justify significant developments. In the context of the plan a development of 150 homes might be argued as small. (If Wisley at 2,500 homes is a big development then 500 homes might be a medium development and 150 could be small.)

The policy wording should be restricted to adjoining sites or define the concept of being “closely related”. In particular I believe adding the concept of safe and easy walking distance extends the potential radius within which sites will be argued to be “closely related” Many people would regard a mile or so as an easy walking distance. (School children are expected to walk further than that before being eligible for free school travel.)

The wording of the policy itself does not require the local connection requirement for tenants to be secured in perpetuity - only the affordability must be secured in perpetuity. (For example housing could be built for retired Cabinet Ministers under this policy so long as the first tenant was required to have a local connection.) The introduction to the policy mentions this point, but it is not part of the policy itself and may carry little weight at appeal.
The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove “exceptional circumstances.” The size and location of sites should be better defined and it should be clear that market housing cannot be included.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9303  Respondent: 8744417 / Mark & Gillie Hammersley  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT, due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1)

Our villages are already suffering from severe congestion for much of the day, for example the Newark Road & Rose Lane junction in the centre of Ripley and the A247 through West Clandon. The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.

Furthermore, many of the country lanes around the villages of Ripley, Send and Clandon are narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition.

I OBJECT to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces.

Many of the affected villages, such as West Clandon, already suffer from traffic congestion. Further development around these villages will only result in more traffic and more parking problems.

With some 5,000 houses being proposed close to the village of Ripley, the roads serving the village will become even more congested. Cycling has become an ever popular past time, particularly at weekends hundreds of cyclists past through the villages on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road accidents involving cyclists as a result of the development proposed under the local plan.

The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the road becoming ever more dangerous for pedestrians.

The council has a statutory obligation to protect the public and the additional traffic flows will bring added accidents, noise, pollution and injury of the public. In the case of West Clandon the Street often only has a narrow footpath on one side of the road making it very dangerous, especially when vehicles mount the pavements.

This policy as it is inappropriate and inadequate and fails to respond to the challenges raised by the proposed significant Green belt developments. The borough’s infrastructure is already heavily strained. However the plan’s determination to build large housing estates across the Guildford countryside significantly increases the need for infrastructure investment.
without securing the means for its provision. Placing housing in the established urban areas would reduce the need for enhanced infrastructure as would a more realistic housing number.

The policy wording says nothing about roads and traffic. The Council’s methodology for assessing traffic congestion - averaging it over periods of several hours and ignoring the effects of junctions - simply hides the problem, which will get worse as development proceeds. The schemes referred to in this policy will not solve existing congestion and the local road network has not been given sufficient consideration. Some proposed development locations would require highway schemes that are unlikely ever to happen.

Adequate infrastructure provision is a pre-condition of sustainable development. But in this plan it is an afterthought buried away in Policy I1. By prioritizing greenfield over urban, brownfield regeneration, the plan creates insurmountable (and unnecessary) obstacles for itself. Common sense suggests a local plan should first assess the borough’s infrastructure capacity for sustainable development, and then tailor development accordingly. This plan, however, assumes infrastructure will follow on the heels of housebuilding as if by magic. It makes implementation critically dependent on providers outside the Council’s control and on the vagaries of CIL income. Instead of recognizing this as a key constraint, the plan is based on hope. It is also highly likely that developers faced with the imposition of large infrastructure requirements will go to court to invoke the NPPF provision that prevents authorities from imposing conditions that make a development non-viable.

Policy I1 requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.

Despite the Garlick’s Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents’ in the locality will see their quality of life significantly deteriorate in many ways.

Many of the utilities in the Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers. No plans to improve these services should mean no development of the Garlick’s Arch site.

Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are already at capacity and suffering from funding cuts or freezes. Any further development without funding will place further stress upon existing health services.

Police services are seeing funding reduced. The development of the proposed 13,860 homes during the plan period will stretch the police services further and is unsustainable.

There is no provision of the increased capacity of Guildford hospital, where is this assessed and remedied?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I OBJECT due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2)

I object to this policy as it is too vague and optimistic. Significant improvements to the road infrastructure are like to be many years away even if they ever happen. The draft plan, however, commits to building massive housing estates in the countryside before any of these road improvements are in place. This is inappropriate and will lead to massive traffic disruption during the construction phase and will add permanently to an already congested network (about 3,000 private cars from the 2,100 new homes at Wisley Airfield alone).

Road infrastructure represents a major constraint that should have been applied to the housing target at a much earlier stage in the plan process and not left as an unresolved difficulty in the draft plan.

There is no certainty that either the A3 or M25 in the borough will be improved to increase capacity and reduce congestion during the Plan period. Highways England has no plans to even examine improving the A3 before 2020. I have considerable concerns that development of the large residential sites identified at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), will take place before any improvements are made to the trunk road network. The A3 & M25 are already at capacity during peak hours and any development prior to improvement of these roads will only make the situations worse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9315  Respondent: 8744417 / Mark & Gillie Hammersley  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to poor air quality concerns (Policy I3)

Paragraph 4.6.27 of the Plan states that “Development must also mitigate its traffic impacts, including its environmental impacts and impacts on amenity and health.” The significant level of development being proposed, particularly in the north east of the borough will lead to considerable further congestion, despite any attempts to mitigate this through travel plans. This will be particularly acute in built up residential areas and will only lead to greater levels of air pollution, which will have a detrimental effect on local residents and their health and can result in early death.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9267  Respondent: 8744417 / Mark & Gillie Hammersley  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I OBJECT to not protecting the Green Belt (Policy P2)

This policy does not sufficiently safeguard the Green Belt even though Green Belt constitutes 89% of the borough and should be the cornerstone of all local planning policy. The Green Belt is not the Council’s to give away and once it is gone it is gone forever. Sacrificing areas of the Green Belt to a developer influenced growth agenda is a betrayal of future generations and does not constitute sustainable development.

The Green Belt should be protected in perpetuity, but Policy P2 seeks to justify excessive development in supposedly protected areas. This is in breach of party manifesto commitments and contrary to previous responses to public consultation. It is disreputable to argue, as the Council does, that the Plan would involve the loss of “only” 1.6% of the borough’s Green Belt. Leaving aside the reliability of that statistic, the NPPF does not set an “acceptable” percentage. The fact remains that the plan proposes that 65% of the housing plus industrial development be built on land to be taken out of the Green Belt.

Paragraph 4.3.16 is seriously deficient in simply stating that the Council considers that exceptional circumstances exist to justify amendment of Green Belt boundaries. The exceptional circumstances are not identified. It is clear from national guidance that unmet housing need is not on its own an exceptional circumstance. Even to the extent that exceptional circumstances exist, these have to be balanced against the harm to the Green Belt in the specific sites proposed to be taken out of the Green Belt. This balancing exercise appears not to have been done.

The Countryside Study which the Council may argue fulfilled the need to demonstrate the exceptional circumstances required to justify removal of areas from the Green Belt was a simplistic tick box exercise. Within limits it may have answered certain questions about different attributes of different areas of Green Belt but it did not carry out the balancing exercise needed to determine whether specific exceptional circumstances justified removal of specific areas of land from the Green Belt. I believe that each of the identified Green Belt site proposed to be removed from the Green Belt should be carefully assessed against any exceptional circumstances in deciding whether it should be removed from the Green Belt in the final plan. This exercise should bear in mind that housing need in itself is not an exceptional circumstance and nor is the Council’s growth aspiration. An important consideration is that more housing need could be met on urban sites than is currently planned. The Plan has fallen into the developers’ hands and developers prefer building on undeveloped land rather than brown field sites.

I note that the Summer 2016 edition of "About Guildford" (published by the Council) on page 5 states that "... the Plan rejects any schemes that would have a detrimental impact on the Green Belt." This is demonstrably untrue and I consider this to be a deliberate untruth which compromises the consultation process. I would ask that this untruth be corrected and the consultation period restarted after the correction has been given the same distribution as the original statement. (I assume the document was delivered to most houses in the Borough.) I reserve the right to argue before the inspector that the consultation process was flawed and ineffective because of this.

I object to the “insetting” of 14 villages from the Green Belt. Contrary to assertions made in the Plan process many of these villages do contribute to the openness of the Green Belt and there is no need to inset them.

I also object to the wholesale extensions to the settlement boundaries in many villages to allow for infilling and that infilling is also proposed outside the settlement boundaries of 11 further villages. Many Guildford villages are linear. It is all too easy to square off boundaries by including countryside bounded on only one or two sides by existing development, claiming it contributes nothing to the “openness” of the Green Belt, a term which neither the plan nor the NPPF defines. The NPPF’s other 4 tests of Green Belt status, including the prevention of urban sprawl, are ignored. Effectively, this policy makes all villages within the Green Belt vulnerable to large blocks of new development and seems almost calculated to secure the rejection of the plan as a whole.

To “inset” two-thirds of the borough’s rural villages on the grounds that they no longer contribute to the purposes of the Green Belt is extreme and inherently implausible, given the borough’s location on the edge of Metropolitan London. I
cannot see how such extensive areas fail to contribute to the purposes of the Green Belt under the NPPF, but this could quickly be the case if the proposed “insetting” and boundary extensions go ahead.

This policy is wildly disproportionate in terms of any foreseeable development need and has caused tidal waves of opposition from residents. It flies in the face of NPPF paragraph 17’s aim of “empowering local people to shape their surroundings” and other NPPF provisions.

Paragraph 4.3.17 states that “the general extent of the Green Belt has been retained.” I believe this should be deleted as an untruth.

In addition I OBJECT to the proposals to remove from the Green Belt the so called ‘strategic sites’ of Wisley Airfield (A35), Gosden Hill Farm (A25) and Garlick’s Arch (A43) and all other strategic sites. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these sites and villages (as mere housing need does not constitute a ‘special circumstance’) to be taken from the Green Belt. Once taken from the green belt they will be lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached.

GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site.

Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/9273  Respondent: 8744417 / Mark & Gillie Hammersley  Agent:  

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to development in areas which are at risk of flooding (Policy P4)

National Planning Policy states that Local Plans should take account of climate change over the longer term, including factors such as flood risk. It goes on to say that new development should be planned to avoid increased vulnerability to the range of impacts arising from climate change.

The Plan states that in accordance with national planning practice guidance, the Level 1 SFRA has been used to guide development towards areas at the lowest risk of flooding and identify areas unsuitable for development. However, the document concludes that land outside of the area of flood risk is not capable of accommodating all of the borough’s identified development needs. A Level 2 SFRA has therefore also been produced and will help the Council apply the exceptions test (as described in the NPPG) as necessary to development proposals in areas at risk of flooding.

The site at Garlick’s Arch (A43) is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood
risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. Knowing the area well I am aware that this site often floods during the winter months and the flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9253  Respondent: 8744417 / Mark & Gillie Hammersley  Agent:  

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to this Policy as the development proposed will not be sustainable (Policy S1)

The NPPF states that the presumption in favour of sustainable development “should be seen as a golden thread running through both plan-making and decision-taking.” As the first policy in the Plan, Policy S1 ought to set a clear framework. Instead, no definition of “sustainable development” is given. The policy also fails to set out any principles for applying sustainable development in practice to local planning decisions, which often have serious long-term impacts.

The policy states that it aims “to secure development that secures the economic, social and environmental conditions in the area”. This fails to recognize that economic growth, social justice and environmental protection often conflict. The policy does not say how each element is to be weighted or conflicts resolved. As a practical guide to the planning decision to be taken in the Plan period it is seriously deficient. The policy is likely to be used by developers to justify inappropriate developments on economic grounds. Under this policy, virtually any development will qualify as “sustainable”, in breach of the NPPF’s most important guideline.

Policy S1 is also seriously deficient in making no mention of the Green Belt. The Green Belt is a long term Government policy enshrined in primary legislation to protect green areas in perpetuity. The Green Belt is a living example of sustainable development in practice and is one of the most important factors affecting sustainable development in the area covered by the Plan and should be acknowledged in this policy. Policy S1 should include a commitment to protect the Green Belt from inappropriate development and to uphold Green Belt boundaries and protections. This would set at least one clear boundary to planning decisions. The Plan and the Council have treated the Green Belt as a developable land bank rather than as a constraint to development.

The commitment to approve planning applications “wherever possible” and “without delay” reveals the pro-development bias of the plan. Countervailing references to sustainability are so vague that the NPPF presumption in favour of sustainable development becomes a presumption in favour of any development at all.

This policy also ignores, as if they are inconvenient constraints, most of the 12 Core Planning Principles set out in NPPF paragraph 17.

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact existing local communities by over-development, particularly for the villages between Guildford and the M25, including
Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill Farm (A25) are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are also unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9260  Respondent: 8744417 / Mark & Gillie Hammersley  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the Borough Wide Strategy (Policy S2)

The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

The housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.

The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”.

Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guilford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with
only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This
distribution is unbalanced.

The assumptions and calculations in the SHMA are widely regarded as flawed and even before Brexit, produced an inflated
housing needs number. The figure of 13,860 new homes is completely unsubstantiated. It has not been scrutinized by
Councillors despite repeated requests for debate. The assumptions and calculations underlying the model are hidden,
protected by a claim to intellectual property by a commercial sub-contractor used in preparing the SHMA. I have serious
doubts about the objectivity of the SHMA because it has been produced by consultants whose website openly proclaims
their pro-development agenda leading to reasonable suspicion that the figures are inflated. Guildford’s OAN is not
transparent but has been taken on trust by the authors of the plan. Given that almost every element of the plan is predicated
on this OAN, the plan as a whole cannot be considered “sound”.

The status of the 13,860 figure is ambiguous. The Council has said that the housing number and the OAN are identical
because the OAN is “deliverable” and is by definition objective and cannot be contradicted. The OAN is only deliverable
because of the Council’s cavalier approach to the Green Belt in contravention of the NPPF, ministerial statements and local
and national Conservative Party manifesto commitments. The plan also states that infrastructure or other constraints may in
due course affect deliverability. It is also unlikely that the number of houses can be built at the rate proposed. In recent
years, housing starts have on average been less than half the proposed rate. This is not because developers do not have the
land or cannot get planning permission. Constraints in the supply chain and maintaining profit levels have been more
important.

The plan cannot be considered “deliverable”. In addition, the number of homes proposed, plus existing planning
permissions, plus expected “windfall” sites, exceeds the total of 13,860. So how many homes (taking account of these
adjustments) do the Council want built? The plan does not say. Without this figure it is hard to see how anything else can be
planned. This undermines the validity of the whole consultation. It is unreasonable to ask the public to approve a “plan”
that fails to propose a target number that takes all the standard constraints and adjustments realistically into account,
leaving the Council to set one without further consultation. Even if the OAN is not flawed, it is at best only a baseline
figure and should not be passed off as a policy proposal.

It is unreasonable to embark on a radical transformation of the borough on the basis of an unclear housing target. Most of
Guildford Borough is highly protected from development (89% Green Belt, 44% AONB and about 75% protected by SPA).
Whether or not increasing the number of dwellings by up to a quarter is desirable, it would be a major and irreversible
change, arguably turning a largely rural borough into a mainly urban or suburban one like Woking. The scale of the
housing number increases the onus for it to be seen to be sound. A substantially lower number, on the other hand, would
remove the need to build on Green Belt or open countryside, and instantly meet the single biggest public objection to the
plan as a whole.

The Plan in general and this policy in particular does not address the point that Guildford exists as part of London's
commuter belt. Any increase in supply of housing in Guildford, particularly if the increase is proportionately greater than
elsewhere in the commuter belt, will simply result in a shift of population into the area. It will not reduce prices or increase
availability except imperceptibly. The Plan also ignores the point that many of those working in the area live elsewhere.
Accordingly in considering the housing number the Plan should take into account that in this part of London’s commuter
belt, demand for housing is, in practical terms, unlimited.

This policy does not take proper accounts of the constraints to development which exist, principally posed by the Green
Belt and by infrastructure limitations. I believe the Council is under a duty to properly consider applying these constraints.
It is clear the Council has failed to do this. This approach differs from all the other boroughs in Surrey. The Plan appears to
have deliberately been manipulated towards a growth agenda without disclosing why this is being done. The housing that is
needed should be concentrated on urban brown field sites and through increasing the housing density of existing built up
urban areas.

The development of 13,860 homes in the Plan period with 65% in the Green Belt does not constitute sustainable
development. It will have a permanently detrimental impact on the Borough in general and on West Clandon and
surrounding area in particular. The developments at Garlick’s Arch and Gosden Hill Farm do not meet the needs of the
local communities. The road infrastructure in and around West Clandon will be unable to cope with additional demand. The
edge of urban Guildford will creep that much closer to West Clandon, thus negating the purposes of the Green Belt in the
area which include safeguarding the countryside from encroachment, checking the unrestricted sprawl of large built up areas and preventing neighboring towns merging into one another.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill Farm (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/1266  Respondent: 8744417 / Mark & Gillie Hammersley  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I do not agree that the evidence used for the Proposed Submission Local Plan Strategy and Sites is adequate, up-to-date and relevant.

The fundamental driving forces for much of the development proposed in the Plan (particularly that on Green Belt land) are based on:

1. An excessive ambition to expand the local economy which is neither warranted nor wanted by the local population. Guildford is already one of the highest ‘value creation’ areas in the country and has one of the lowest unemployment rates. There is no evidence that massive and accelerated expansion is required.

1. SHMA figures which are neither transparent nor justifiable, especially in view of previous figures set. Independent assessments of the SHMA (eg from Guildford Residents’ Association and David Reeve) show it is set far too high and so cannot be said to be adequate, up to date or relevant.

In addition the recent vote to leave the EU and the impact this will have on the economy and migration have not been taken into account.

The Plan should be re-assessed and the methodology for arriving at housing need figures should be fully transparent.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I do not consider the Proposed Submission Local Plan: strategy and sites as a whole to be legally compliant because it mainly ignores the consultation process for the 2014 draft Plan it is claimed to be based on.

That consultation process was absolutely clear by some +20,000 responses that that Plan was flawed and no development should be carried out on Green Belt land.

Instead this 2016 draft Plan actually increases the number of dwellings being built on the Green Belt, in direct contradiction to the consultation process, yet is stated to be a Regulation 19 proposal.

As a result I do not see how the 2016 draft Plan can be Legally Compliant.

The 2016 draft Plan should be re-assessed and should take into account the views of the majority of responses from the consultation process for the 2014 draft Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

I do not consider the Proposed Submission Local Plan: strategy and sites as a whole to be sound, because, but not limited to, the following reasons:

1. “Only sites that propose sustainable solutions have been included in the Plan and the Plan rejects any schemes that would have a detrimental effect on the green belt.” Summer 2016 edition of "About Guildford" (published by the Council) on page 5. This is demonstrably untrue and appears designed to bias the consultation process.
2. The housing OAN figure has been calculated by a process which is not transparent. It has not been properly examined by Councillors before being adopted.
3. The OAN has been adopted as the housing number without the application of any constraints to take account of Guildford's circumstances, including in particular the Green Belt, AONB and road infrastructure. National policy permits such constraints to be applied and it is inappropriate not to consider the need to do this.
4. The draft Plan does not accord with the NPPF policies on protecting the Green Belt.

Exceptional circumstances need to be shown to justify removing areas from the Green Belt and this has not been done. The housing need number is not justification in itself according to published ministerial statements Having properly calculated...
an OAN, constraints should be applied to it to reflect the Green Belt, AONB and infrastructure. Each proposed Green Belt site then needs to be justified on its own merits. The benefits of the proposed development need to be identified together with the harm to the Green Belt. Only if there are exceptional circumstances and following a proper balancing exercise demonstrating that these exceptional circumstances outweigh the harm to the Green Belt can the proposal proceed. The draft Plan does not demonstrate that this has been done. The housing number has been used as a blanket justification for all Green Belt sites—which amount to 65% of the proposed housing number.

1. Whatever the justification for the assumptions made in calculating the OAN, those assumptions are now almost certainly incorrect following the referendum.
2. The housing number is at least twice the achieved rate of building in the Borough over the last few years. There is no evidence in the Plan to show that this rate is achievable and sustainable.
3. Much of the infrastructure required to support the level of development proposed is outside the Council’s control. The Infrastructure Plan is long on possibilities and aspirations and very short on commitments. The infrastructure requirements placed on developers are supposed to be in place before development commences. This is utterly unrealistic and indicates a lack of knowledge of developer’s business models which depend on positive cash flow. It seems very clear that at best, infrastructure provision will seriously lag development and leave higher levels of congestion than now. This will reduce the quality of life for residents through congestion and disruption.
4. The 40-45% requirement for affordable homes together with infrastructure such as railway stations, park and ride facilities, schools and roads is highly likely to be challenged on a site by site basis by developers using the NPPF provision that Councils cannot impose conditions which make development non-viable.

1. GBC has not included details of its Town Centre Master Plan and urban development proposals in time for and as a part of the Guildford Local Plan consultation
2. GBC has failed to provide an Infrastructure Report in time for and as a part of the Guildford Local Plan consultation
3. GBC has proposed an OAN of 693 houses per annum in the GL Hearn West Surrey Strategic Housing Market Assessment (SHMA) which many, including independent assessors, consider unsound
4. Highways England will not start to consider what it intends to do as regards the A3 in the vicinity of Guildford until 2018
5. Network Rail have not made available for the public consultation any plans for a new railway station at Merrow with an adjacent Park & Ride for 1,000 cars
6. The GBC proposals for Gosden Hill Farm do not appear to be in coordination with the Neighbourhood Plan for Burpham
7. The draft Local Plan will cause further linear development along the A3 between Burpham and West Clandon PC and encroachment onto open Green Belt countryside in clear conflict with the National Planning Policy Framework
8. The proposal for Garlick’s Arch was added to the draft Local Plan without any prior consultation under Regulation 18.
9. The Land Availability Assessment (LAA) indicates a range of planning difficulties for Gosden Hill Farm and Burpham which have to be met by the developer involved. These include Electricity Grid supply problems and foul sewage and surface water issues that suggest the development proposed cannot easily be implemented both technically and financially.
10. No adequate explanation is given as to how the aspirational proposal for a tunnel will be used to overcome traffic issues relating to the quality of life and amenity of Burpham, West Clandon, Send and Ripley citizens
11. In common with many others I do not believe the housing figure has been properly calculated and I believe it overstates housing need. The Council has prevented councillors or others from properly considering the SHMA by refusing to make public the basis on which it was drawn up.
12. The housing figure, when properly recalculated, should be subject to constraints to reflect Guildford's circumstances, including in particular the Green Belt and road infrastructure. National policy permits such constraints to be applied and it is inappropriate not to consider the need to do this.
13. Even once a housing number has been calculated it cannot be used to justify taking land out of the Green Belt on a wholesale basis.
14. Cast iron commitment should be included in the plan that development can only commence when required infrastructure improvements have been secured.
15. The status of the text which accompanies each policy box is not clear. If the accompanying text does not have the force of policy a number of the policies (i.e. the text in blue) are so vague and general that they commit the Council to very little.

The draft Plan should be re-assessed with housing on brownfield sites made a priority over commercial development and Greenfield sites and each of the above points addressed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** SQLP16/1284  **Respondent:** 8744417 / Mark & Gillie Hammersley  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 4: Duty to cooperate

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

I do not consider the Proposed Submission Local Plan: strategy and sites as a whole has complied with the Duty to cooperate.

This 2016 draft of the Local Plan clearly demonstrates Guildford Borough Council’s refusal to co-operate with the wishes and requirements of the vast majority of the residents in its Borough.

The Council has failed to co-operate with the results of the consultation process for the 2014 draft Plan which was meant to inform and guide this 2016 draft Plan.

Despite campaigning on a clear statement ‘Conservatives Say Green Belt To Stay’, the ruling party on GBC is now intent on pushing through a Plan which will devastate Green Belt land and extend the Guildford Urban Area to further merge into surrounding rural villages.

This is not cooperation by any definition.

In addition the Council has failed to cooperate in providing any transparency to the housing need figures commissioned by the Council from GL Hearn.

The 2016 draft Local Plan should be reassessed with a reviewed and transparent SHMA and revised to reflect the views of the residents of the Borough, who pay for Guildford Borough Council to act in their interests, and not those of developers and central government.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPA16/126  **Respondent:** 8746465 / Matthew Tipper  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North
Do you consider this section of the document: complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Site References A36, A37, A38, A39, A40, A41 (The Horsleys) and A35 (Wisley Airfield)
I object to the proposal to build some 2,600 homes at these locations for the reasons stated above.

I support those aspects of the Plan in favour of genuine Sustainable Development (S1), strong protection of Surrey Hills AONB (P1), and protection of the Green Belt (P2, provided it is protected in both the letter and spirit of the law).

However, I maintain my objections to the aspects of the revised plan that I believe are inaccurate, unnecessary and unwelcome. I urge the independent Planning Inspectorate to challenge the assumptions and proposals in the draft plan, and to insist on its revision which I consider to be in both the local and national interest.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/317  Respondent: 8746465 / Matthew Tipper  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North

Do you consider this section of the document: complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Site References A36, A37, A38, A39, A40, A41 (The Horsleys) and A35 (Wisley Airfield) I object to the proposal to build some 2,600 homes at these locations for the reasons stated above. I support those aspects of the Plan in favour of genuine Sustainable Development (S1), strong protection of Surrey Hills AONB (P1), and protection of the Green Belt (P2, provided it is protected in both the letter and spirit of the law). However, I maintain my objections to the aspects of the revised plan that I believe are inaccurate, unnecessary and unwelcome. I urge the independent Planning Inspectorate to challenge the assumptions and proposals in the draft plan, and to insist on its revision which I consider to be in both the local and national interest.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/919  Respondent: 8746465 / Matthew Tipper  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy H2 Affordable Homes
In the absence of a national plan to redistribute growth away from London I doubt whether the proposed homes can remain affordable, or will built where needed, for those who are genuinely in need. GBC has not taken account of the differences in need for low cost housing across the Borough. A significant amount of low cost housing is likely to built where it is not required. In East Horsley this is likely to result in their quick resale for profit and then being unaffordable to low income workers. We would be losing countryside for no social benefit. I object to this policy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/316  Respondent: 8746465 / Matthew Tipper  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policies I1, I2, I3: Infrastructure Policies
As a long term resident I believe the Borough's infrastructure is already stretched, and that the enormous building programme proposed by GBC would serve to worsen existing problems. East Horsley has country lanes not roads. These are unsuited to the volumes of traffic using them already.

Any commitment to a massive housing expansion ahead of a plan and finance for the required transport network would make our traffic congestion even worse. A very significant traffic constraint should be applied to the local plan.

Furthermore, there are insufficient school spaces already and the medical centre is already at capacity in terms of its number of patients. I object to the infrastructure proposals on the grounds that they fail to meet the needs of the proposed plan, which is it itself a product of inflated forecasts of immigration that are not accurate, necessary or welcome.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/921  Respondent: 8746465 / Matthew Tipper  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally
Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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programme proposed by GBC would serve to worsen existing problems. East Horsley has country lanes not roads. These
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and finance for the required transport network would make our traffic congestion even worse. A very significant traffic constraint should be applied to the local plan. Furthermore, there are insufficient school spaces already and the medical centre is already at capacity in terms of its number of patients. I object to the infrastructure proposals on the grounds that they fail to meet the needs of the proposed plan, which is it itself a product of inflated forecasts of immigration that are not accurate, necessary or welcome.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/312  Respondent: 8746465 / Matthew Tipper  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally
Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

As advised previously, my objections to the draft plan are that it would make our county and our village, an extension of
Greater London. This is based upon estimates of the need for housing, due to inflated forecasts of immigration rates that are probably inaccurate, and certainly unnecessary and unwelcome at this scale.

In prioritising the massive construction implied by these migration forecasts, the draft fails to protect the Green Belt and productive agricultural land and the rural landscapes and character of the county. It fails to address the road and rail congestion and demand for schools and public services should it be implemented. It all but ignores the environmental impacts, such as local air quality, noise and light pollution, road safety, biodiversity loss and climate change. These problems are all too apparent in those parts of the world where urbanisation is unchecked.

In the national context the draft is unable to address the need to promote economic growth in the rest of our country, away from the southeast. But without a national effort to redistribute growth and wealth, any additional housing provided in Surrey would not remain affordable for long, and its provision would only consolidate the economic dominance of London at the expense of our countryside. England has over 45,000 ha previously developed land, enough for at least 1 million homes, but mainly outside London and the southeast (CPRE 2014: From wasted space to living spaces).

Given this availability, no compelling case or "exceptional circumstance" for the sacrifice of the Metropolitan Green Belt is possible. Green Belts have protected our land from urban sprawl for seventy years, and there remains adequate brownfield land for housing nationally. Instead this draft implicitly accepts a high immigration rate as a given, without consideration of
ways to manage it. By catering to London's needs, it perpetuates problems of national importance with respect to immigration, the north-south divide, social mobility and environmental harm.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/315  Respondent: 8746465 / Matthew Tipper  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy P2 Green Belt
I fully support the statement that "we (GBC) will continue to support the Green Belt". However I object to this draft that shows 65% of the construction would take place on the Green Belt! I object strongly to the proposal to inset East Horsley from the Green Belt and request that this proposal be dropped. I also object to the proposed boundary changes for East Horsley. I am concerned that infilling will result. Green Belt rules make it clear that unfulfilled housing need is not considered to be an exceptional circumstance. If it were then the Green Belt would have been built over decades ago. The overriding requirements of the NPPF, especially NPPF 87, 88 and 89, must apply so that there is no harm to the Green Belt from housing development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/920  Respondent: 8746465 / Matthew Tipper  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/313  Respondent: 8746465 / Matthew Tipper  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the following proposals specifically:

Policy S2 Borough Wide Strategy
As stated above, I object to the enormous scale of the proposed building programme, which far exceeds the local housing needs. ONS forecast a sustained UK net immigration rate of 200,000 each year from 2014 to 2039. This is already high, and at least double the target, and will account for half of the UK's long term population growth. The current rate is higher still. The ONS also show that of Surrey's population forecast, some two thirds is due to net immigration. The draft plan seeks to build far in excess of local needs. It is not a local Borough plan but instead presents a threat to our county because of our national failure to manage our numbers sensibly. I believe two wrongs do not make a right.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/918  Respondent: 8746465 / Matthew Tipper  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

It appears to me that the draft plan is little changed in scope from the previous version of 2014. I believe local people should be consulted and heeded; but it seems instead our views are needed as a box ticking exercise in this process, and then ignored.

As advised previously, my objections to the draft plan are that it would make our county and our village, an extension of Greater London. This is based upon estimates of the need for housing, due to inflated forecasts of immigration rates that are probably inaccurate, and certainly unnecessary and unwelcome at this scale.
In prioritising the massive construction implied by these migration forecasts, the draft fails to protect the Green Belt and productive agricultural land and the rural landscapes and character of the county. It fails to address the road and rail congestion and demand for schools and public services should it be implemented. It all but ignores the environmental impacts, such as local air quality, noise and light pollution, road safety, biodiversity loss and climate change. These problems are all too apparent in those parts of the world where urbanisation is unchecked.

In the national context the draft is unable to address the need to promote economic growth in the rest of our country, away from the southeast. But without a national effort to redistribute growth and wealth, any additional housing provided in Surrey would not remain affordable for long, and its provision would only consolidate the economic dominance of London at the expense of our countryside. England has over 45,000 ha previously developed land, enough for at least 1 million homes, but mainly outside London and the southeast (CPRE 2014: From wasted space to living spaces).

Given this availability, no compelling case or "exceptional circumstance" for the sacrifice of the Metropolitan Green Belt is possible. Green Belts have protected our land from urban sprawl for seventy years, and there remains adequate brownfield land for housing nationally. Instead this draft implicitly accepts a high immigration rate as a given, without consideration of ways to manage it. By catering to London's needs, it perpetuates problems of national importance with respect to immigration, the north-south divide, social mobility and environmental harm.

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Attached documents:

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<th>Respondent:</th>
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What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Attached documents:
We object to the changes to Policies A36 to A41 (East and West Horsley)

1. The number of potential development sites has been reduced by two (A36 and A41, representing a total of 138 dwellings). This leaves four sites (A27-40) which still represent a total of 395 new dwellings.
2. Marginal changes such as these would still leave 70% of all new development in the borough built on Green Belt sites. No “exceptional circumstances” or any other justification is advanced for this strange imbalance.
3. The deletion of two Horsley sites fails to correct the issue of relative overdevelopment in East and West Horsley, which is both excessive in absolute terms and disproportionate in relation to the rest of the borough.
4. No attempt is made to assess the cumulative impact on the Horsleys – either of the four sites now proposed, or of Site A35 (Three Farms Meadow, alias “Wisley Airfield”), with over 2,000 new homes only 2 miles away. This piecemeal approach leaves the future of the Horsleys at the mercy of ad hoc planning applications, which is the opposite of what a Local Plan should intend.
5. The new plan Policies put greater emphasis on the need for adequate facilities and infrastructure to underpin development. But this is not reflected in any new wording on the Horsley sites, thus leaving most local objections unaddressed. Again, this defect curtails the plan’s usefulness as a practical planning tool at a site level and undermines its credibility among residents.
6. The plan fails to mention most of the known sustainability issues and infrastructure constraints affecting the Horsley sites, including public transport, traffic, road safety, parking, schooling, medical facilities, sewage, flooding/surface drainage and shops. These were fully set out in responses to last year’s public consultation.
7. The density of new housing on the four Horsley sites too is inappropriate, being greater than anywhere in the locality at present.
8. Sites situated on the periphery of existing development in the Horsleys encroach on surrounding open fields and require the extension of settlement boundaries. The plan presents no arguments for this which, contrary to NPPF paragraph 79, will contribute to creeping urbanisation by attenuating the Green Belt corridors separating the Horsleys from neighbouring settlements.
9. Collectively, the four Horsley sites breach NPPF paragraph 81’s encouragement of access to the Green Belt and its amenity and recreation value. This has been an outstanding success story in the Horsleys, as detailed in response to the last consultation. Assets include a dense public footpath network, parish parks, sports fields, a campsite of international standard, Britain’s newest rural opera theatre and the popular Olympic cycle route. These examples of positive planning depend on a Local Plan that protects the Green Belt, maintains its openness and beauty and avoids urbanisation and traffic congestion. Sites A35-41 are hostile to this.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Contrary to national trends, too much potential development land within the town centre is being allocated for retail or commercial development rather than housing. High added value businesses are welcome in the borough, but much of the employment land is designated for retail or low added value employment floorspace, which only exacerbates current issues such as lack of low cost housing and heavy traffic. Sites such as the Burnt Common Triangle, currently in the Green Belt, are inappropriate for heavy industry.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<tr>
<th>Comment ID: pslp171/1632</th>
<th>Respondent: 8746465 / Matthew Tipper</th>
<th>Agent:</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy H1</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ( )</td>
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The paragraphs relating to density in Policy H1 have been deleted. To ensure developments make optimal use of space there must be a policy to cover minimum and maximum densities. Without a policy to cover density, there is a risk that developers will use land inefficiently, putting additional pressure on the countryside and un-developed land. This deletion is inappropriate.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<tr>
<th>Comment ID: pslp171/1633</th>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ( )</td>
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The policy relating to AONB weakens the protections offered, and (unlike previously) does not have restrictions on non-major development. This is a move in the wrong direction. Previously all proposals were considered against the 5 key tests – now development in the AONB seems to be more acceptable. This is weaker, not stronger, and is contrary to huge responses from the public in previous consultations and the weight of protection given to AONB in the NPPF.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** pslp171/1634  **Respondent:** 8746465 / Matthew Tipper  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ( )**

Exceptional circumstances must be demonstrated in order to develop Greenbelt yet despite the weight of public opinion against weakening of this policy, 70% of new housing development will be in the countryside, of which, 58% will be in Greenbelt. By definition, this is not an exception and no attempt is made to demonstrate exceptional circumstances, in line with the requirements of the NPPF. Insetting villages is of concern since restrictions within the settlement boundary raises concerns over loss of character. The Rural Economic Strategy covered in 4.51a, promoting affordable homes everywhere in the countryside including the AONB as a main aim, is a mechanism for promoting overdevelopment in our countryside. It has not been subject to full public consultation and is based on data, which is not up-to-date.

Three major strategic sites – Blackwell Farm, Wisley Airfield and Gosden Hill Farm – are in the Green Belt. Previous consultations show that, in line with the NPPF, the public would prefer to use brownfield land in the urban area first.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** pslp171/1631  **Respondent:** 8746465 / Matthew Tipper  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy S2

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ( )**

The housing target proposed, of 12,426 is based on assumptions that have not been made public and includes flaws that have not been corrected in the modified SHMA (verified by professional analyst Neil MacDonald of NMSS who concluded that an annual housing figure of 400 per year would meet Guildford's overall need). The phased approach (more homes built towards the end of the plan period) is appropriate in order to permit necessary infrastructure but open-ended targets where an unknown figure is held back until after the plan period is not a reduction but a postponement and does not allow for optimal planning or transparency.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
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<th>Comment ID: pslp173/688</th>
<th>Respondent: 8746561 / Sarah Horsley</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2017 / Appendix H: Maps - Ash and Tongham</td>
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<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
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4.1.8 The inclusion of Ash and Tongham as 'countryside beyond the Green Belt' in the New Local Plan has the effect of changing a rural area into an urban one. I am referring in particular to Amendments 1-9 Ash and Tongham i.e. additional land parcels at A28 and A29. This means that Ash Green Road could potentially be surrounded by new developments on all sides. To the north, the development at Ash Manor would destroy a gap between Ash Green (historically a village in its own right separate from Ash) and to the south in Drovers Way, development would back on to properties on that road. Housing density would be exceptionally high and urban sprawl would spread from Ash Station up to the southern end of White Lane, taking into account existing developments in planning (at White Lane/Hazel Road). The creation of the Ash and Tongham Urban Area appears to be swamping us and it seems to me that small sites have been selected in an indiscriminate manner which does not protect and preserve the rural and historical character of Ash Green.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
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<th>Comment ID: PSLPS16/1317</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A42</td>
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I object to 45 houses at Clockbarn Nursery.

I object to this site because of the inadequate access and traffic volume. In one direction Tannery Lane is very narrow and twisty, being reduced to single lane traffic in many spots with passing places only; in the other junction onto Send Road is very dangerous and inadequate. Planning permission has already been given for a marina and 64 apartments which will increase the traffic greatly. I request that my comments are shown to the Planning inspector who will decide on the Plan and also please confirm that you have received my objections. Thank you.
I object to the 4-way intersection.

I object to the fact that the road infrastructure through Send has not been thought about and the consequences of putting a large interchange on this site would cause gridlock. The amount of traffic this will create through Send is unfeasible as there is only one two way street that goes through the centre of the village. The intersection would have to take traffic from the proposed 2000 new houses in Wisley Airfield, 2000 new houses in Gosden Hill and 1850 new houses at Blackwell Farm. The traffic form Woking heading to and from the A3 and M25 would come through Send. The traffic, congestion is one aspect but there other considerations such as noise pollution, air pollution levels, weight of traffic on country roads and the damage that will be caused not to mention the destruction of the village and the way of life here.

I object to the proposal to build 400 houses and 7000sqm of industrial space at Garlick's Arch.

This site was not included in the Regulation 18 Draft Local Plan so has not: had full consultation. The manor in which it has been slipped into the Plan is underhand and unfair. The site is subject to flooding and is covered by ancient woodland. The industrial space is not needed here and any extra space required should be included in the existing industrial site of Slyfield. The projected housing figures understand to have been exaggerated, so there is no need for this number of houses to be built in and around Send.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to the development of land west of Winds ridge and send hill.

This site was not included in the Regulation 18 draft local plan so has not had full consultation. The site to my knowledge contains documented unsafe landfill waste which was registered with Guildford borough council.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
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<tr>
<th>Comment ID: PSLPP16/2668</th>
<th>Respondent: 8746753 / Miles Hackett</th>
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I am writing to register my objections to the New Local Plan.

The Plan does not seem to have a clear design for the whole area. If it does it certainly is not making it clear. Firstly the Transport Plan has been produced very late in the day (only released on the day of publication) and without this infrastructure, none of the developments should take place. It seems that Guildford Borough Council is planning a series of large developments along the A3 corridor but has not thoroughly looked at the impact of the is for the surrounding villages. The villages on both sides of the A3 have very inadequate roads to cope with the anticipated amount of traffic and the roads available cannot be improved to the point that will ease the expected congestion. There are many other worries as well; such as environmental concerns, noise pollution, air pollution levels, flood risks, the sheer quantity of housing and industrial units supposedly required, the list goes on ...

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/2670</th>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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</table>
I object to Send being removed from the Green Belt.

The village Send provides a green buffer between Woking and Guildford. To develop in the Green Belt requires 'special circumstances' there are none to justify developing the land in and around Send so Guildford Borough Council have come up with another plan, to remove Send from the Green Belt therefore freeing up the and for development. Guildford Borough Council should not be allowed to abuse the Green Belt in this way in order to just suit themselves. The Green Belt was set up to control urban growth front unscrupulous Council's and Developers permanently. If this is is not protected then all of the land in and around the village will be vulnerable to development. This would destroy the character of the village of Send.

Guildford would merge with Woking through a series of urban estates.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2669  Respondent: 8746753 / Miles Hackett  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the Council not following due process.

Since the last draft Local Plan every site in the village of Send has been changed. Not only locations but also in housing numbers. Even as recently as 5th April 2016 there was a document. released giving information on the new local Plan with links to maps and now there are massive changes, even since the publication of this document. My understanding is that following the rejection of the Draft Local Plan the Council could only push forward under Regulation 19 if there was not significant changes. In Send, None of the 485 new homes was included, the site at Garlick's Arch was not included, the land west of Winds Ridge and send hill was not included and the removal Send from the Green Belt was not included. These are major changes to the plan for the village of Send. If this amount of change is to be proposed then we need to go back and have a full consultation under Regulation 18.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/2468  Respondent: 8746753 / Miles Hackett  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to the changes in Policy A42, Clockbarn Nursery, Tannery Lane, Send because the proposal is now for 60 homes instead of 45. Tannery Lane is not built to cope with a lot of traffic.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/3065  Respondent: 8746753 / Miles Hackett  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A42

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )

I object to the changes in Policy A43, Garlick’s Arch, Send Marsh because now in addition to the 400 homes, which now includes self build and custom plots, the proposal also includes 8 travelling/showpeople pitches where there is no proven demand for plots in this location.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the changes in Policy A43, Garlick's Arch, Send Marsh because now in addition to the 400 homes, which now includes self build and custom plots, the proposal also includes 8 travelling/showpeople pitches where there is no proven demand for plots in this location.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/2470  Respondent: 8746753 / Miles Hackett  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A58

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to Policy A58 for a minimum of 7,000 sq m of employment floorspace at Burnt Common, London Road. Originally this site was proposed for development in 2014, this was then replaced in 2016 by Garlick's Arch on the other side of the road so it could include a new road junction onto the A3. Now it is proposed that both sites are used. This is clearly overdevelopment in one area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/3067  Respondent: 8746753 / Miles Hackett  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A58

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to Policy A58 for a minimum of 7,000 sq m of employment floorspace at Burnt Common, London Road. Originally this site was proposed for development in 2014, this was then replaced in 2016 by Garlick's Arch on the other side of the road so it could include a new road junction onto the A3. Now it is proposed that both sites are used. This is clearly overdevelopment in one area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
It is proposed that around 40% of the new development in the Borough is to be in and around Send and bearing in mind that we represent only 11% of the Borough this seems to be excessive. The main reason for my objection is that it will destroy the Green Belt. Additionally, the layout, infrastructure, facilities and local requirements have not been planned which will potentially lead to an unstructured, chaotic new town and it seems that some high level local politicians have a vested interest in doing just this. This must be formally investigated by the Planning Inspectorate before any further Green Belt land is allowed to be destroyed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

I object to Policy 2 paragraph 4.3.15, Green Belt to inset Send Business Park from the Green Belt because as already stated above, Tannery Lane is a country lane which is unsuitable for heavy traffic.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT to the proposed Infrastructure Schedule (Appendix C)

The Infrastructure Schedule sets out the key infrastructure requirements on which the delivery of the plan depends. For each of the Key Allocated Sites in the borough it identifies infrastructure projects that are required, except for Garlick’s Arch (A43) which is not mentioned. It is clear that the Plan takes no account of the infrastructure required for this site and is therefore not fit for purpose.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID:</th>
<th>PSLPA16/367</th>
<th>Respondent: 8747169 / David Fassom</th>
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<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)

The Plan’s proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the borough, it is over double the previous figure of 322 used in previous plans. The SHMA report methodology is I believe inaccurate; it inflates the needs of the borough by distorted student numbers. However, it is based on commercially confidential modelling assumptions that cannot be checked or reviewed. There is no transparency to this evidence base and it is therefore impossible to assess its accuracy. This is not democratic and is not appropriate for consultation of the Plan.

The National Planning Policy Framework allows the overall housing target to be reduced to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<th>Comment ID:</th>
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<th>Respondent: 8747233 / Paul Tarry</th>
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<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy A46</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I wish to strongly object to site A46 Flexford/Normandy

This proposed development would cause traffic chaos. Westwood lane and Glaziers lane are small country roads. I live right next to the railway bridge in Westwood lane and already have to dice with death pulling out blind into fast oncoming traffic.

The additional vehicles 1100 houses, a school, shops and visitors will bring will cause a traffic funnel where the road is single lane under the bridge and residents accessing from beach lane will never get out without the increased chance of a lethal accident. To say that nothing will come this way from the north of the village is ridiculous. I understand that Surrey county councils own traffic simulations show that even present levels of traffic are above the capacity our roads were designed for.

The small Doctors surgery is straining under existing levels of need. Waiting times for appointments now are 3 weeks so this defiantly can't support 4 or 5 thousand more patients.

This development will exasperate the drain problem which the council know from the previous development in Beach lane planning process.

Building this development will deprive us of land that drains away rain water that the present sewer system can't cope with all ready resulting in flooding.

My bungalow's s drains back up in bad weather making it impossible to use the loo or washing machine till it subsides, documented by Thames water. This development cannot join the mains drains without devastating effects.

I understand the need for housing and small pockets were expected over the borough but this large proposal ion green belt land s not acceptable or sustainable. It wasn't in the 2014 plan in fact it was positively disregarded. What changed? Other options need exploring.

There is a proposal for a development not in the local plan which should be considered at land off Epsom road west Horsley adjacent to the A246. This land is surrounded by existing development, on a strategic highway route, is low quality green belt land, visually self contained all of which normandy is not.

The development is being "sold" by the developers if they build a school as a bribe. This development is developer driven and not local need driven and needs reassessing after the discussion to leave the E.U as demand will fall for housing in light if future reduced immigration.

This school is not required as plenty of capacity locally exists as proven by Surrey county councillor Kieth Witham so build it where it is required.

You cannot believe the proposals will not change the character, structure, nature wildlife, and openness separating the village. This green belt land separates different parts of the village and stops urban sprawl making it a town.

None of the village wants or needs such a large development. We don't want a park barn.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: pslp173/528  Respondent: 8747233 / Paul Tarry  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Appendix H: Maps - Normandy and Flexford

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I support the withdrawal of policies A46 and A47 for reasons already stated in my response to the last local plan.

I strongly object to any insitting of greenbelt land at Flexford and Normandy as that will make it easier for developers to gain planning permission to build on what is now greenbelt land.

This would make small islands in the greenbelt which is there to to stop built up area joining onto each other forming bigger built up areas.

There has been no proven case to inset this land and it should remain "washed over" by greenbelt. The basic character of this area needs to remain the same as I've seen the results if land being changed like this and built on in other areas.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/931  Respondent: 8747969 / Alan Burchett  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A46

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

STRATEGIC SITE A46 – NORMANDY/FLEXFORD

1. MAIN OBJECTION

I wish to object in the strongest possible terms to Strategic Site A46 (Normandy/Flexford) being taken out of the Green Belt in order to build 1,100 homes, together with a Secondary School and other facilities. This site was not one of the seven sites that were included in the Pegasus Planning Group’s ‘Green Belt and Countryside Study’ as a specified location for development. I understand that these other sites are still in the evidence base and I believe that they should now be reconsidered, in place of strategic site A46.

It appears that the developer, Taylor Wimpey, may have funded the reviews of flooding, drainage, ecology, landscape, transport and community infrastructure on this site and, if this is so, this clearly lacks any objectivity, which should not be allowed. The developer claims that this scheme for the land at Normandy provides the opportunity to create a more sustainable neighbourhood for the existing village as well as the new residents of the proposed development and yet I do not believe that these arguments will stand up to scrutiny without the empirical evidence from the ‘Green Belt and Countryside Study’. Also, the National Planning Policy Framework (NPPF) states that there should be early and
meaningful engagement and collaboration with neighbourhoods regarding the needs and priorities of the village. This has not happened in spite of the fact that at least two years ago the developer submitted documentation to Guildford Borough Council (GBC) regarding this site. The only ‘early and meaningful engagement and collaboration’ seems to have been between the developer and the Council. This surely is in breach of the NPFF.

The argument that this is an “enabling development” is circular as the claim that the school is needed rests on the argument for building additional houses on this and other sites. But the houses on this site can only be built if the school is allowed to be built. So it amounts to putting up houses to justify a school that would not be needed if the houses were not built. This becomes a circular argument and therefore the justification for development is considerably weakened. In any case, in the draft Plan, the need for the school is said to arise from the housing allocation, but GBC has not justified the development of the housing by reference to any “exceptional circumstances”.

My other reasons for objecting are related to the road network around the site, the inclusion of a school, sustainability & sensitivity, the Strategic Housing Market Assessment, infrastructure issues and the Thames Basin Heath Special Protection Area, as described below

1. **THE ROAD NETWORK**

The road network in Normandy will not be able to sustain the volume of traffic that a development with 1,100 homes would create and there are no highway improvements that can conceivably be made to these country lanes to convert them to the A-class roads needed to serve such a development. The proposed site is boxed in by an unclassified road (Glaziers Lane D60) on the east, a C-class road (Westwood Lane C16) on the west, a railway line to the south and the A323 to the north. Both Glaziers Lane and Westwood Lane struggle to cope with the existing volume of traffic, let alone the increased traffic from an 1,100 home development and road traffic to and from the proposed school. There is a narrow humpback bridge on Glaziers Lane to negotiate, which is on a deceptive double bend and has very limited sight lines, as well as a right angled bend where the Lane meets another unclassified road, Flexford Lane. There is also an extremely dangerous, single-lane chicane under a railway bridge on Westwood Lane which also has a deceptive double bend and a height limit of 14’-3” under which a double-decker bus is not able to pass. There are also dangerous junctions where these roads meet the A323 Guildford to Aldershot road at their northern ends. At rush hour this road is already congested and is identified in GBC’s ‘Options Growth Scenario Transport Assessment Report’ as being at full capacity already. The entry and exit from the A31 ‘Hogs Back’ on to the B3000 to travel to and from the development site via Wanborough Hill is a ‘bottle neck’ at most times of the day, and would be likely to ‘grid lock’ with the increased volume of traffic to and from the site and the school. No amount of improvements to the road system will enable these rural roads to cope with the increased volume of traffic, let alone the construction traffic that would disrupt this fragile infrastructure over possibly a fifteen year period. The ‘Infrastructure Schedule’ shows that just £2.8m has been earmarked to improve these dangerous junctions through developer contributions, but this amount would be totally inadequate.

**Glaziers Lane**

Glaziers Lane is an unclassified road (D60) and is unsuitable for the volume of traffic that the proposed development would generate together with additional traffic going to and from the school. The Lane is a rural, residential road, just 6 metres wide at the widest point, with a 30mph speed limit throughout its length. The Lane is a busy commuter route for cars, commercial vehicles, lorries, multi-axle heavy goods vehicles and articulated lorries cutting through between the A323 Guildford to Aldershot Road and the A3 and A31. Many of these vehicles fail to adhere to the speed limit. To my knowledge there have been two fatal road traffic accidents in the Lane.

Parked vehicles are mostly parked on the pavement owing to the narrowness of the rural Lane. This means that pedestrians, those in wheelchairs and parents/carers with pushchairs or prams, have to walk in the road and are at risk from passing vehicles. There is a nursery school close to the potential vehicular access point in Glaziers Lane shown on the developer’s concept masterplan, and at drop off and pick up times of the day parents’ parked cars reduce the Lane to a single track, with the added dangers of young children being taken from and secured into the vehicles.

The street lighting in Glaziers Lane is poor and could at best be described as footpath lighting. Towards the southern end of the Lane is a humpback road bridge over the railway line, which has a sharp incline and decline so that on approach there is no view of the other side of the bridge. The bridge is also on a slight, but deceptive, double bend in the road. At this point the Lane narrows to 5.5 metres, slightly under in places. This is an especially dangerous part of the Lane as cars speed
towards the bridge from both directions, with no view of the other side. The roadway of the bridge is badly sunken on both sides due to the weight of the heavy goods vehicles crossing the bridge. This bridge would be hazardous for cyclists travelling to and from the school and, because of the narrowness of the bridge, no dedicated cycle lane could be installed. At the northern end of the Lane is the junction with the A323 Guildford to Aldershot Road, where Glaziers Lane crosses over to Hunts Hill Road. This is a difficult junction to negotiate owing to the amount of traffic travelling along the main road, and also because there are cars turning right out of Glaziers Lane on to the main road, cutting across the path of cars coming across from Hunts Hill Road, with both sets of drivers attempting to find a gap in the main road traffic. There is often a tail-back of traffic in Glaziers Lane waiting to exit.

The single footpath along the Lane is not continuous, changing from side to side of the road along its length. This means that pedestrians have to cross the road at various points in order to remain on the footpath, with two exceptionally dangerous crossing points which are poorly maintained by Surrey County Council (SCC). One is by the stream just south of no. 35 Glaziers Lane, on a sharp bend, which means that pedestrians have a poor view of vehicles approaching in both directions along the Lane, and drivers of these vehicles cannot clearly see the pedestrians until the last moment. The other dangerous crossing point is on the north of the road bridge that crosses the railway line, as vehicles approaching from the south only have a short stopping distance after crossing the summit of the ‘blind’ bridge before arriving at the crossing point. These crossing points are especially dangerous for those in wheelchairs, the elderly and infirm, and parents/carers with pushchairs or prams, who require more time to cross the road. At some points the footpath is reduced to a width of much less than a metre, due to the outward growth of hedges meaning that passing pedestrians often have to walk in the road. A build-up of debris where the kerbs are lowered at the crossing points also means that pedestrians have to move on to the road to avoid the mud.

The railway station is situated close to the southern side of the humpback bridge and has a limited car park, which regularly floods, and which will be insufficient for the anticipated increase in vehicle numbers. Cars parked instead on Glaziers Lane would add to the hazards that already exist. Traffic exiting the station car park and turning north has a tight turning circle in order to keep on the correct side of the road and is vulnerable to vehicles speeding over the bridge south-bound with limited views of the approaching traffic. The increased volume of cars using the station car park would add considerably to the dangers.

**Westwood Lane**

Westwood Lane is classified as a C Class road (C16) and is unsuitable for the volume of traffic that the proposed development would generate as well as additional traffic going to and from the school. The Lane is a rural, residential road, with a 30mph speed limit along the southern residential part of the road up to the railway bridge, and a 40mph limit up to the northern end of the road along which there are no street lights. The Lane is a busy commuter route for cars, commercial vehicles, lorries, multi-axle heavy goods vehicles and articulated lorries travelling between the A323 Guildford to Aldershot Road and the A3 and A31. Many of these vehicles fail to adhere to the speed limits. The street lighting is poor and there is no street lighting on the long 40mph stretch of the road. There is a hill from Flexford Road (an unclassified road), at the southern end of Westwood Lane, to the railway bridge down which vehicles speed.

The road under the railway bridge is a single track chicane on a deceptive double bend, with priority given to vehicles travelling south. There has already been one fatality at this bridge and many accidents. There is a 14’ 3” height restriction on the bridge which means that a double decker bus would not be able to pass under (which would considerably restrict transporting pupils to and from the school). Immediately on the southern side of the bridge travelling north, on the nearside, is a road exit at Beech Lane. Vehicles turning left under the bridge travelling north cannot be seen by vehicles that have priority travelling south, and a greater volume of traffic will only increase the inherent dangers at this bridge. This bridge would be hazardous for cyclists travelling to and from the school, and a major congestion point for the increased traffic that an 1,100 housing development would bring.

At the northern end of the Lane is the junction with the A323 Guildford to Aldershot. This is an extremely dangerous junction with traffic from Westwood Lane attempting to turn both ways onto the busy A323, while traffic from the A323 is attempting to turn into Westwood Lane. There was a recent fatality very close to the junction with Westwood Lane. This junction is already a ‘bottle neck’ at busy times of the day. There is the added danger that only a few yards to the west is School Lane, along which Wyke Primary school is located. There is a nearby crossing point ‘island’ on the A323 which is hazardous for pupils and their parent to use and cars have already mounted this island demolishing the street sign. Many parents who drop off and meet their children park alongside the churchyard in Westwood Lane and negotiate this busy
crossing point ‘island’ to get to School Lane. This crossing point will become even more dangerous if an additional form of entry is added to the school, and there is increased traffic entering and exiting Westwood Lane to and from the 1,100 home development, and the secondary school.

The footpath is on both sides of Westwood Lane as far north as the railway bridge but from there to the northern end of the road there is a narrow path only on the east side, totally inadequate for the number of pupils at an 8FE secondary school to safely use.

**B3000 entry/exit to the A31 and Wanborough Hill**

The entry and exit from the A31 ‘Hogs Back’ on to the B3000 to travel to and from the development site via Wanborough Hill (C16) is a ‘bottle neck’ at most times of the day, and would be likely to ‘grid lock’ with the increased volume of traffic to and from the proposed development site and the school. There is no pavement nor street lighting from Wanborough Hill until the road reaches Normandy.

Because of the above points, I believe that the poor road infrastructure bordering the strategic site and beyond does not make it a suitable location for 1,100 homes, a secondary school, and the other planned facilities, and so I wish to object to the proposal on the grounds given.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents: LOCAL PLAN OBJECTION from Mr A J Burchett.docx (72 KB)

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**STRATEGIC SITE A46 – NORMANDY/FLEXFORD**

1. **SECONDARY SCHOOL**

There is no justification for a new secondary school in Normandy and I would question the decision-making process that has led GBC to eliminate other potential sites for a secondary school in West Guildford, for example the site at Roker’s Farm. The proposed school did not even feature in the 2014 version of the Local Plan but suddenly appeared in early 2016. This is strange given that SCC’s ‘School Organisation Plan’ of December 2015 contains no reference to the need for additional school places in the west of the Borough. It appears that the only reason that this school is proposed in Normandy is because the developer has managed to obtain an option on most of the land in question and has proposed to the Council that, in return for being allowed to build 1,100 homes, it will provide the serviced land to allow the Council to put a secondary school on the site. The inclusion of a secondary school on this site is merely a ‘Trojan horse’ provided by the developer to have this site taken out of the Green Belt. The Leader of GBC has stated publicly that the inclusion of a school on this site “trumps” any Green Belt protection, allowing a school to be built on this sensitive red Green Belt land but I cannot find any evidence that this is the case.

There appear to be double standards in use by GBC when deciding on the most appropriate site for a school and it seems that they are manipulating the criteria to suit the desired outcome. In the document “Secondary Schools Borough Wide Discounted Sites”, the site to the east of the Borough at Howard of Effingham is described as “zoned as ‘sensitive’ red Green Belt land and there are therefore preferable sites to this on which to accommodate future school needs.” It is

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perverse that in the document there is no mention of site A46 being ‘sensitive red Green Belt land’, which the Leader of the Council has declared it to be, but is instead found to be suitable because of the number of houses that can be built there and the fact that it has a station. It appears that there is no desire on the part of GBC to find more preferable sites for the secondary school in relation to site A46, because it suits their need to have a school on the site to justify the housing.

It is inconceivable that a decision would be taken to place a school anywhere without serious consideration being given to the most suitable location, and a location that is supported by a safe road network. However, in conversation with the School Commissioning Officer for SCC it is clear that only “informal discussions” have taken place between SCC and the developer with regard to this being a suitable site. Just as worrying, through a Freedom of Information (FOI) request, SCC has stated that they “have not undertaken any specific research on ... the ability of local roads to cope with traffic that may be associated with a new school”.

In its official response to GBC in July 2014 to the previous draft Local Plan, SCC said, “A site within the proposed urban extension at Blackwell Farm, with all necessary access infrastructure built in and a catchment surrounding the site, would be a more sustainable location in transport terms for a new secondary school to serve the western side of Guildford.” It is concerning that GBC has not heeded this advice.

GBC has to show that the provision of a school constitutes the “exceptional circumstances” that are required to redraw the boundary on this sensitive Green Belt site, thus removing the site from the Green Belt in advance of development. As is shown on the following pages there has been no serious pre-planning by GBC nor SCC (as the Commissioner for school places), to establish:

- the actual need for a new Secondary school to the west of Guildford
- if this is the most preferable site for a secondary school
- what the Published Admission Number (PAN) should be so that the intake can be established
- whether existing schools can be enlarged or the PAN of these schools increased
- whether the funding to build the school would be forthcoming from the Department for Education (DfE)
- if sponsors or proposers can be found for the school
- whether the road infrastructure can support a new school and is safe to do so
- whether there is the infrastructure to allow pupils to cycle or walk to the school safely from sites to the east and west

The FOI responses have basically stated that this will all be looked at as part of the planning application process. Therefore there is a presumption that the Local Plan will be accepted with a school on this site and that matters will proceed naturally as part of the planning process. So, if it is decided that there are insufficient reasons to place a school on site A46, the land will have been removed from the Green Belt without any justification whatsoever, allowing developers to build houses on what should have remained a Green Belt site.

Therefore I do not believe that the “exceptional circumstances” have been shown and certainly the ‘Sustainability Appraisal’ of the draft Plan does not explain any exceptional circumstance justifying release from the Green Belt. The only circumstance that has been exposed is that the developer wishes to make a huge profit with this ‘Trojan horse’ of a school. It is of great detrimental effect to the village to lose its Green Belt, but of enormous financial benefit to the developer.

Appendix C of the Local Plan, Infrastructure Schedule SED3, states the need for, “A 7-form entry (7FE) secondary school at the Normandy / Flexford strategic development site. Only 1 FE would be needed to serve the strategic development site itself, the remaining capacity would serve the wider area, including Blackwell Farm strategic site.”

It is clear, therefore, that there is no need for a secondary school simply to serve the proposed housing on this site, as a 1FE school would not be viable.

To support this, a FOI request to SCC (as the Commissioner of school places) shows that, without the demand created by the housing development, a new school is not needed.

SCC was asked:
What considerations have taken place with regard specifically to the need for a new secondary school in the area west of Guildford, taking into account projected housing completions but not taking into account any additional housing created by the Guildford Local Plan.

SCC responded:

“Without taking into account any additional housing created by the Guildford Local Plan, there are no proposals for a new secondary school in the area west of Guildford, therefore no such considerations have taken place.”

The GBC Local Plan: Strategy & Sites 2016 – Part 2: Sites, states that the site will include a secondary school up to 8 form entry. Yet when a FOI request was made to SCC:

What is the published admission number (PAN) of the proposed new school in Normandy, their response was:

“It is too early to define the admission number of the proposed school in Normandy. This would be largely dependent on the number of housing developments progressed for which a new school may serve, taking into consideration any capacity in existing schools closer to the time when the places are needed. The provisional size is up to 7FE in order to ensure sufficient provision is considered in line with possible housing.”

The GBC Local Plan: Strategy & Sites 2016 – Part 2: Sites, also states that “Secondary educational needs will be reassessed at the time a planning application is made at which time any recent new secondary school provision will be taken into account.”

These responses clearly shows that SCC has no idea of the number of pupils that will require a place at the school, nor if existing schools could accommodate the pupils instead of building a new school. If fewer developments are progressed than expected the PAN of the school may well fall below 150, which SCC has stated is the minimum number required to make a school viable. Therefore it does not make sense to progress with a school if there is a possibility that there will be insufficient pupils to make the school viable. The land will be removed prematurely from the Green Belt without any assurance that the school will ever be built.

Given the poor road links to and from the development site, it would be dangerous to transport in a further possible 840 children a day, with all the inherent dangers at drop off and pick up time. Alternatives should be looked at, such as enlarging Ash Manor school, or others, to take this 1FE (30 children), which would be a much cheaper option. The possibility of enlarging other secondary schools in Guildford should also be looked at as an alternative, as none of these schools is anywhere near approaching the PAN of 360 pupils, which the SCC School Organisation Plan states is the maximum in order to be viable. The overall PAN for all 7 secondary schools is only 1426, or an average of 204 (or 211 taking into account the proposed increased numbers at St Peter’s and Guildford County), whereas the School Organisation Plan states that the viable number is between 150 and 360. Alternatively, GBC should seek another site for the school that has safe transport links and does not destroy this sensitive red Green Belt site. Or approaches should be sought from Academies or Free Schools to sponsor new secondary school/schools in the Guildford borough. The ‘New Schools Network’ states, “Free schools are expected to open in existing buildings and it is unlikely that the Department for Education will allow schools to open in new buildings “, which is what is anticipated with the school on this site.

The expansion of existing schools would better keep pace with the demand from new housing, and also take account of the declining birth rate which has already been noted. If this development did take place, unless the school was built first, or in stages, children would have to go to a secondary school somewhere else, and this would reduce the PAN below what is viable (SCC has stated that this development would yield 157 pupils a year and that the minimum PAN needed to make a school viable is 150). Building a school in stages over a number of years is not practical as facilities such as PE, Science, Technology, Art etc. will be needed from day 1, as well as general teaching spaces, playgrounds, sports pitches etc. The idea of the concept masterplan is fine, but it shows the actual completed development, with the children from all the houses attending their local secondary school, and this may not be reality until 2033. It is especially concerning that in Appendix C, the Infrastructure Study, there is no delivery date against the completion of the school, which indicates that this school may not be constructed until after the housing is built. The developer will want to make as much profit as possible from the housing, before constructing the school. In the meantime the children of secondary school age will have been placed in secondary schools elsewhere, and the school will not be needed. If the school is not needed the Green Belt must be protected.
From responses to FOI requests (see below) it is clear that there has been no serious attempt by GBC nor SCC (as the Commissioner of school places), to establish the need for a new Secondary school to the west of Guildford, nor to ascertain whether the funding to build the school would be forthcoming from the DfE. To include a proposal in the Local Plan that seeks to justify building 1,100 houses in the Green Belt on the back of an unsubstantiated need for a school, rather than on an objective analysis, seems highly irresponsible. The land would be removed from the Green Belt without any assurance that the school would ever be built.

The Leader of GBC maintained that, before the Extraordinary Meeting of the Council on 24 May 2016, SCC had reaffirmed the need for a school in the west of Guildford, although it transpired that this was purely on the basis of “informal discussions”. These informal discussions were confirmed in a conversation I had with the School Commissioning Officer. In other words, a new strategic site, A46, which had not featured as such in the previous consultation, was included in the Submission Local Plan on the basis of nothing more than informal consultations about the likely future requirements for secondary school places. This hardly constitutes the serious decision making that would be expected to define the “exceptional circumstances” that are required to redraw the boundary on this sensitive Green Belt site.

Additional information relating to the secondary school

Ref. the document: “DfE Guidance for decision-makers”

Statutory guidance for decision-makers deciding prescribed alteration and establishment and discontinuance proposals

April 2016

“Demand v need

This states, “Where a Local Authority (LA) identifies the need for a new school, to meet basic need, section 6A of EIA 2006 places the LA under a duty to seek proposals to establish a free school via the ‘free school presumption’. However it is still possible to publish proposals for new maintained schools outside of the competitive arrangements, at any time, in order to meet demand for a specific type of place e.g. places to meet demand from those of a particular faith.”

FOI requests to GBC and SCC show that no approaches have been made to sponsors or proposers to set up a Free School.

SCC was asked:

With regard to the proposed new secondary school in Normandy, can you please tell me which Academy or Free School has approached the County Council proposing sponsorship arrangement for the new school. If neither has made the approach can you please advise me on what basis an approach has been made, and by whom, and how this fits with Government legislation regarding new schools

SCC responded:

“The County Council has not received any approaches regarding sponsorship arrangements for the new school. It has not invited any such approaches as it would be too early to do so at this stage. If and when the new school is progressed, the process to do so would be aligned with the Department for Education’s guidance on the establishment of new schools.”

So, SCC admits that no planning has yet taken place about approaching sponsors or proposers to set up a Free School and this would only happen when “the new school is progressed”. Therefore the land could be taken out of the Green Belt on the assumption that a sponsor or proposer may be found, but this may not happen. By then the land would have been removed from the Green Belt and the school may never be built.

As no sponsor or proposer has been sought I question the legality of the school being included in the proposal for the site.

The document “DfE Guidance for decision-makers” continues:

This states, “The decision-maker should take into account the quality and popularity of the schools in which spare capacity exists and evidence of parents’ aspirations for a new school or for places in a school proposed for expansion.”
I can find no evidence in the Local Plan that GBC or SCC have sought “evidence of parents’ aspirations for a new school”. FOI requests were made to GBC and SCC to ascertain what considerations had been given to enlarging existing schools.

SCC (GBC referred me to SCC) was asked:

**What consideration has been given to enlarging existing schools rather than building a new school?**

SCC responded (and with GBC’s knowledge):

“Excluding possible demand from the draft Local Plan, two expansions are planned to meet the existing demographic demand. 20 additional places per year are being provided at Guildford County and 30 places per year at St Peters from September 2017. Including demand from the draft Local Plan, further options to expand existing schools are limited, would not provide for the level of demand from the Local Plan and locations of existing schools would not necessarily serve the developments proposed in the Local Plan.”

In a conversation with the School Commissioning Officer for SCC I was told that “there is limited scope to enlarge existing schools or increase rolls”. SCC was asked:

**Please provide me with information that shows the published admission number of the proposed new school in Normandy (how many forms of entry), and how this has been calculated.**

SCC responded:

“It is too early to define the admission number of the proposed school in Normandy. This would be largely dependent on the number of housing developments progressed for which a new school may serve, taking into consideration any capacity in existing schools closer to the time when the places are needed.”

So they say that this “takes into consideration any capacity in existing schools closer to the time when places are needed”. This contradicts the earlier answer where they state “further options to expand existing schools are limited and would not provide for the level of demand from the Local Plan.” It appears that SCC does, in fact, accept that there is spare capacity in existing schools.

SCC was asked:

1. **What formal meetings or conversations have taken place between Councillors or Officers of Surrey County Council and Headteachers/Chairs of Governors of secondary schools in Guildford Borough, including those just over the County Boundary in Hampshire, regarding:**
   - strategies for increasing the intake, if their school is undersubscribed
   - increasing the published admission numbers for their school
   - enlarging their school premises to increase their admission number as opposed to building a new secondary school in the west of the Borough

1. **Any financial calculations that have been made to compare the cost of enlarging existing schools in Guildford Borough to cope with increased numbers of pupils arising from the local plan with the cost of building a new school at Normandy, assuming that the serviced land will be provided by the developer**
2. **The concern that Headteachers and Chairs of Governors have about a new school reducing the intake to their school**

The School Commissioning Officer for SCC told me that there are often discussions with schools regarding their intake and spare places. However, she was unable to confirm that any formal discussions on these issues had taken place related to the current draft Local Plan. She confirmed that, because SCC does not believe that it is possible to expand existing schools, no calculations have been made to compare the costs of enlarging existing schools with the cost of building a new school. It
was also clear that there have not been any discussions with Headteachers or Governors about the impact that a new school may have on the rolls of existing schools.

However, research by the village’s County Councillor has shown that the responses from SCC may not accurately reflect the situation, as many existing schools are actually undersubscribed and others would be happy to expand, with the existing capacity making a new school unnecessary, taking into account the planned expansions at Guildford County and St Peters. Headteachers and Governors of these other schools are concerned that a secondary school in Normandy would take pupils from their schools, reducing their numbers.

The County Councillor’s research shows:

- Kings College is currently 57% undersubscribed. The capacity at the school is 900 pupils, and there are only 389 on the school roll (43% utilised) with 511 vacancies. There is capacity on that site to further expand the school, to accommodate more pupils well into the 2020’s if then needed
- The Headteacher of Kings College says, "There is absolutely no need for another school in Guildford; its crystal clear"
- The New Guildford University Technical College, due to open in 2018, will take 240 pupils from the age of 14 in its first year, and that will double to 480 places, relieving pressure on other schools
- Christs College is already taking 30 more pupils a year than its admission number, because it has the space and capacity to do so, and is willing to take still more as it has further capacity
- Ash Manor, Ash, has a capacity of 1,050 and it has 940 pupils, so is undersubscribed by 110 places. The Governors are supportive of the school being expanded to take more pupils by 30 places a year (so a total of an extra 150).
- The Head and Governors of Ash Manor School have very strong concerns about a new school in Normandy, just three miles away, and the possible negative effects on their intake. Other Headteachers must have the same fears
- Connaught School, just over the County Boundary in Hampshire, is also undersubscribed by 90 places and is available to Surrey children
- Hoe Valley Free School, Woking, has an intake of 120 per year, with currently 95 pupils, so is undersubscribed in its first year by 25 and welcomes applications from Guildford parents. It will build up with 120 new places available every year for 7 years - making a total capacity of 840. It has no catchment area, and although it will mainly serve Woking, it will welcome applications from Guildford parents

So, there are currently 736 vacancies at the nearest secondary schools serving the western parishes - not accounting for the 480 extra at the new Technical College to open in 2018, and GBC is already providing 20 additional places a year at Guildford County and 30 places per year at St Peters from September 2017.

The above vacancies are the equivalent of more than a whole secondary school, which negates the need to build a new school at this strategic site. Coupled with this, the birth-rate in Guildford has fallen over the past two years, and whilst it is too early to know if that trend will continue, it is another factor to urge caution, and not to proceed to build a new secondary school at this time.

Appendix C of the Local Plan, Infrastructure Schedule SED3, states the need for, "A 7-form entry (7FE) secondary school at the Normandy / Flexford strategic development site. Only 1 FE would be needed to serve the strategic development site itself; the remaining capacity would serve the wider area, including Blackwell Farm strategic site."

The GBC Local Plan: Strategy & Sites 2016 – Part 2: Sites, shows that the Blackwell Farm site could potentially accommodate 1,800 houses and have a need for a 2FE Primary school. This would project into 2FE that would need secondary school accommodation from Year 7.

Therefore, there is a need shown between the Normandy/Flexford and Blackwell Farm sites for 3 forms of entry. This leaves 4 forms of entry to "serve the wider area".

A FOI response from SCC stated that "The proposed secondary school in Normandy would serve Normandy, Blackwell Farm and Ash, which could be around 4,366 homes. This number of dwellings could yield around 785 secondary aged children. This estimate is based on formulae that calculate the likely average yield from new developments."
If the Normandy/Flexford and Blackwell Farm sites produce 3 forms of entry from 2,900 homes, this means that the remaining 4 forms of entry would come from 1,466 homes, so somehow the maths does not add up here and shows yet again that GBC does not know the number of pupils that will require a place, but are happy to remove the land from the Green Belt without any assurance that the school will be built as the number of pupils requiring a place may not make the school viable.

The document “DfE Guidance for decision-makers” continues:

“Travel and accessibility”

This states, “Decision-makers should satisfy themselves that accessibility planning has been properly taken into account and the proposed changes should not adversely impact on disadvantaged groups.

The decision-maker should bear in mind that a proposal should not unreasonably extend journey times or increase transport costs, or result in too many children being prevented from travelling sustainably due to unsuitable walking or cycling routes.

A proposal should also be considered on the basis of how it will support and contribute to the LA’s duty to promote the use of sustainable travel and transport to school.”

Further information is available in the statutory “Home to school travel and transport guidance for LAs” dated July 2014. This makes it clear that the 1996 Education Act “places a general duty on local authorities to promote the use of sustainable travel and transport.” With regard to school travel plans the guidance states that “Effective plans (should) reduce car use .... reducing congestion caused by school runs”. It also states that “Specific school routes audits are considered good practice.”

The guidance stresses repeatedly the message that “Local walking, cycling and bus strategies should inform the local authority’s duty to promote sustainable school travel” and “the sustainable school travel should .... provide health benefits for children .... through active journeys, such as walking and cycling”.

Appendix C of the Local Plan, Infrastructure Schedule AM5, states the need for an “Off-site cycle network from the land to the south of Normandy and to north of Flexford site to key destinations including Wanborough railway station and to the Christmas Pie Trail, with improvements to a level that would be attractive and safe for the average cyclist.”

This will not be delivered until 2021/2033, is not costed and will be paid for by the developer. It could be that the cycle network is not completed until 2033, 17 years in the future, which would preclude its use as a means of getting to school for a generation of cyclists.

The Christmas Pie trail itself is not mentioned in the Infrastructure Schedule for improvement, and is a convoluted route both west and east, which is unlit, muddy, often flooded and passes through dense woodland and is most definitely not a child-safe route. A FOI response from GBC confirms that no planning has been carried out regarding the suitability and safety of this trail for schoolchildren who may wish to use this route.

The humpback bridge in Glaziers Lane would be hazardous for cyclists travelling to and from the school and, because of the narrowness of the bridge, no dedicated cycle lane could be installed. Similarly, the single track road under the railway bridge in Westwood Lane would be extremely dangerous for cyclists travelling to and from the school.

There is no information in the Draft Local Plan about any proposals for safe walking routes from the Blackwell Farm development or from the Ash direction to this strategic site.

As there will not be safe cycling and walking routes from either the west or the east of the site, parents will undoubtedly bring their children to school by car. No pre-planning has been carried out on the road infrastructure to ensure that these journeys will be safe, as shown below.

Under FOI GBC and SCC were asked (GBC referred me to SCC):
What research has taken place to see how the local rural roads will cope with the increase in traffic that the new school will bring, especially with regards to the railway bridge in Westwood Lane which only accepts one-way traffic and has a height limit, and the dangerous hump-back bridge in Glaziers Lane which has a weight limit

and:

What road safety issues concerning parents parking on Glaziers Lane and Westwood Lane to drop off and pick up their children have been considered?

SCC responded:

“As Surrey have not undertaken any specific research on either the ability of local roads to cope with traffic that may be associated with a new school, or on road safety issues specifically related to parents parking on Glaziers and Westwood Lanes, there is no information to provide on these two points. This would be looked at as part of the planning application process.”

In a conversation with the School Commissioning Officer for SCC it was confirmed that her department had not carried out any surveys to ensure that the supporting road infrastructure could safely service a large secondary school on this site.

So SCC (and with GBC’s knowledge) admits that no planning has taken place about whether the local roads provide a safe infrastructure for the school or could cope with the increased traffic that a new school would bring alongside the traffic from a new 1,100 home development. Neither have they considered the road safety issues of parents parking in the narrow country lanes around the development to drop off or collect their children from the school. Therefore, it could be decided at a later stage that the roads are not safe and are not able to cope with the increased traffic, but by then it would be too late to prevent the construction of 1,100 homes as the site would already have been taken out of the Green Belt.

FOI requests to GBC and SCC show that little or no consideration has been given to accessibility planning for a new school.

SCC was asked (GBC referred me to SCC):

*How will pupils be transported to this secondary school?*

SCC responded:

“This will be determined and planned in detail at a later stage. The draft local plan includes appropriate train routes.”

So SCC (and with GBC’s knowledge) admits that no planning has yet taken place about the transportation of pupils to the school. The response also indicates that the land could be taken out of the Green Belt before any decisions have been made about the safe transportation of pupils to the school. Therefore, it could be decided at a later stage that this would not be a safe site for a school, but by then the land would have been removed from the Green Belt.

The response above that “The draft local plan includes appropriate train routes” is misleading as the station from the Blackwell Farm development (Guildford West – Park Barn) may not be completed until 2029, 13 years in the future, although the school on the Normandy Flexford site would be expecting take 300 children from the Blackwell Farm development, without train, cycle or pedestrian links.

In the outline planning application for the site at Roker’s Farm, which includes a 5FE Secondary School, the “Framework School Travel Plan” and the “Transport Assessment” are models of good practice. Its action plan shows that much thought has been given to the travel plan strategy to ensure that the site has good accessibility by a range of safe transport modes, including on foot and by cycle, as well as roads and pavements that are safe for young people to use, and dedicated drop-off and pick-up spaces for parents to use. This is in contrast to the total lack of forethought or planning that has been given with regard to the school on the Normandy/Flexford site, where the rural roads and footpaths are totally inadequate to support a large school and there are no safe walking or cycling routes. SCC says that these issues will all be looked at as part of the planning application process. Therefore there is a presumption that the Local Plan will be accepted with a school on this site and that matters will proceed naturally as part of the planning process. So, if it is decided that there are
insufficient reasons to place a school on site A46, the land will have been removed from the Green Belt without any justification whatsoever, allowing developers to build houses on what should have remained a Green Belt site.

The document “DfE Guidance for decision-makers” continues:

“Funding”

This states, “The decision-maker should be satisfied that any land, premises or necessary funding required to implement the proposal will be available and that all relevant local parties (e.g. trustees or religious authority) have given their agreement. A proposal cannot be approved conditionally upon funding being made available.

Where proposers are relying on the department as the source of capital funding, there can be no assumption that the approval of a proposal will trigger the release of capital funds from the department, unless the department has previously confirmed in writing that such resources will be available; nor can any allocation ‘in principle’ be increased. In such circumstances the proposal should be rejected, or consideration deferred until it is clear that the capital necessary to implement the proposal will be provided.”

Ref. the document: “New Schools Network” (Newschoolsnetwork.org)

Premises – Finding the right school for you

“The DfE have said that they expect all Free Schools to open in existing buildings, which can be refurbished or extended in order for them to function as schools. The DfE will be unlikely to allow schools to open in a new building. They will only grant Free Schools a ‘new build’ where there is no other viable option in the local area but the advantages of the proposed school outweigh the cost of building. You should not assume that you will be able to open your Free School in a new building. Where Free Schools do occupy new premises, these will be built under much tighter financial constraints than previous government building programmes, such as ‘Building Schools for the Future’ and will most likely be of a modular construction.”

However, GBC has included a new-build school on the plans for this strategic site, in spite of the fact that the DfE may well not allow this to happen.

The LAA makes it clear that funding will be needed for the construction of the school as it is stated that “The site will provide land for a 7FE secondary school.” An FOI request to GBC and SCC shows that no consideration has been given to funding for a new school.

GBC and SCC were asked:

What capital funding is being provided by the Department for Education for a new Secondary School on the strategic site between Normandy and Flexford that is mentioned in the draft Guildford Local Plan. This is to include any confirmation in writing from the DfE that such resources will be available for the new school.

SCC responded (GBC claimed they did not hold the information requested):

“It is too early for considerations to have taken place with regard to this enquiry; therefore no such documents are available.”

So, if the proposal for the new school has to be rejected because capital funding for the construction has not been approved, or there is no confirmation that resources will be available, then surely the school shown on the strategic site has to be removed from the plans, as GBC and SCC have not confirmed that funding will be available. If the school is removed so are the “exceptional circumstances”, and so the Green Belt should be protected, otherwise the land will be removed from the Green Belt without any assurance that the school will ever be built.

As no funding for the school has been approved I question the legality of the school being included in the proposal for the site.
Because of the above points, I believe that GBC’s lack of planning, with regard to the provision of a new school on this sensitive site, has not shown that this is an “enabling development” nor that there any “exceptional circumstances” that would allow the site to be removed from the Green Belt, and I therefore wish to object to the proposal on the grounds given.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents: LOCAL_PLAN_OBJECTION_from_Mr_A_J_Burchett (1).docx (76 KB)

Comment ID: PSLPS16/8295  Respondent: 8747969 / Alan Burchett  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A46

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

STRATEGIC SITE A46 – NORMANDY/FLEXFORD

1. SUSTAINABILITY & SENSITIVITY

I believe that GBC has incorrectly used data to show the sustainability of Flexford and Normandy and therefore its suitability for development. My rationale is given below.

Two of the key concepts that underpin the local plan are ‘sustainability’ and ‘sensitivity’. Individual settlements are ranked on both counts, and development is favoured in the most ‘sustainable’ ones; conversely, the barrier is higher in the most ‘sensitive’ ones. What is significant is that for the purposes of assessing ‘sustainability’ Normandy and Flexford have been treated by GBC as one settlement, whereas for ‘sensitivity’ they have been treated separately. This could almost have been designed to give us the outcome we have, as in terms of ‘sustainability’ all the assets from the two settlements are aggregated - which maximises its score on this count – but in terms of Green Belt ‘sensitivity’ the open area between the two settlements is disregarded – which reduces our score there. GBC has not been consistent here.

Sustainability

With regard to the Briefing Note that the Councillors had at their meeting on 13 April, para 3.4 says that since the last version of the plan the Council had commissioned further work on the Green Belt and Countryside Study and on a new Green Belt Sensitivity Map. The Summary of the Briefing Note (para 8.2) states that while the new plan claims to give more protection to the Green Belt (one of the major strands of the consultation feedback last time) we are an exception to this approach. To quote from the paper:

“Three exceptions to this approach demonstrate it has not been slavishly followed. The new strategic site at Normandy and Flexford, which was previously safeguarded for future development, has been allocated for 1100 units and will contain a 7 form entry secondary school. The sustainability of the site is further increased through the rail station and the critical mass created to help the existing villages support day to day services and facilities.”

In other words, GBC has gone against its approach towards ‘sensitivity’ for reasons related to ‘sustainability’. That is why putting together Normandy and Flexford for the purposes of the latter, while keeping them separate for the purposes of assessing the former, is so significant.
The July 2013 document ‘Guildford Borough Settlement Profiles’, page 47 (section 16.0) states that Normandy and Flexford are treated jointly; the section is headed “Normandy and Flexford - the local community consider Flexford to be a part of Normandy” and, further on it is stated: “Normandy Parish Council considers Flexford and Normandy to be one village. We have therefore assessed and scored it on this basis.”

What this means is that, for example, the bus that serves Normandy is treated as an asset to Flexford, and the train that serves Flexford an asset to Normandy. All of this contributes to a conclusion (still in section 16) that includes the statement: “it is clear that more development here (i.e. Flexford) incorporating a mix of uses could improve the sustainability of the existing settlement and that of nearby Normandy.”

This thought is repeated in the May 2014 document “Guildford Borough Settlement Hierarchy”. In para 6.4 this states: “There are other settlements that have been identified through the evidence gathering such as...Flexford and Normandy which would benefit from future development and improved access to key services for local residents.”

In other words, Normandy and Flexford together are seen as a suitable site for future development. In this connection it is significant that the tender document produced by GBC regarding further work to be done on the Green Belt and Countryside Study includes the statement, under the heading “Significantly expand a village”, “An initial assessment based on previous consultation, desk-top research and our settlement hierarchy suggests that areas with greatest potential include the countryside such as land between the villages of Normandy and Flexford... Significantly expanding or merging villages would utilise more effectively the services and facilities that are already present there whilst at the same time be of sufficient scale to enable additional supporting infrastructure.”

So, as far back as a year ago at least, GBC was suggesting that a merged settlement of Normandy and Flexford was a prime candidate for ‘significant expansion’. I understand that the developer has been working on this proposal for quite some time, certainly since before the publication of the latest version of the plan, and at least as far back as 2014.

Sensitivity

However, another criterion that has to be met is that of ‘sensitivity’ in terms of the Green Belt, and here GBC commissioned a new document to consider which villages might be ‘inset’ from the Green Belt. With reference to the National Planning Policy Framework (NPPF) the document examines the case for either leaving individual villages within the Green Belt or taking them out. It quotes the relevant part of the NPPF as follows:

“NPPF paragraph 86 notes that if the open character of the village makes an important contribution to the openness of the Green Belt, the village should remain washed over by the Green Belt.”

I understand this to mean that if a village is bounded by natural or man-made features it is deemed not to have an ‘open’ character and therefore does not contribute to the openness of the Green Belt. The document considers – separately – the villages of Normandy and Flexford and concludes that they are both self-contained and therefore are not ‘open’ in the sense explained above.

In the case of Flexford the significant comment is: “In summary, it is considered that Flexford to the south of the railway line should be inset within the Green Belt due to: The difference in open character to the north and south of the railway line, with high density development and enclosure more evident to south of the railway line in comparison to the north”

There is a distinction between Flexford south of the railway line and Flexford to the north of it, and the explicit acknowledgement of the openness of the area to the north – which is now designated to accommodate 1100 homes plus a secondary school!

Nothing could demonstrate better the false logic of considering Normandy and Flexford as a single settlement for purposes of ‘sustainability’ but as separate ones for the purposes of Green Belt ‘sensitivity’. On the map in Appendix 8 – Village Insetting Boundaries Map, the green lines enclosing the two settlement areas that it is proposed to ‘inset’ from the Green Belt, separated by a vast area of open land, can be seen. In other words, if you treat Normandy and Flexford as a single settlement as per the ‘Settlement Hierarchy’ it is clear that the open spaces between the two parts of the settlement do “contribute significantly to the openness of the Green Belt” and that, as per the NPPF, the whole area should remain
So, what we have is one set of criteria applied to achieve one purpose (establishing the ‘sustainability’ of Normandy/Flexford and therefore its suitability for development) while a contradictory set of criteria is applied to achieve another (the disqualification of a ‘Green Belt’ defence against development). I believe that this demonstrates a major flaw in the GBC Local Plan, and so I wish to object to the proposal on the grounds given.

1. THE STRATEGIC HOUSING MARKET ASSESSMENT

I believe that the Strategic Housing Market Assessment (SHMA) is seriously flawed and overestimates the objectively assessed housing needs (OAN) in the borough up to 2033. It is of great concern that the analysis supporting the conclusions reached in the SHMA, which was published in September 2015, have not been made available for public review, nor has it been reviewed in detail by GBC, or by the Overview and Scrutiny Committee.

My main concerns regarding the SHMA are:

- The 2012 based Subnational Population Projection (SNPP), which G L Hearn claim is a robust starting point, is significantly distorted by an unusual increase in the number of overseas students attending the University of Surrey between 2006 and 2011.
- The 2012 based SNPP forecasts the population to decline by 1,800 by 2033. Therefore the overall projected increase in Guildford’s population to 161,300 is entirely due to the projected growth in net international migration of 23,000 of which, according to the ONS, 57% are foreign students who would normally be expected to move away from Guildford at the end of their studies. The Government has already announced that foreign students will no longer be counted as immigrants, as students come and go.
- Un-attributable Population Change (UPC) shows that between 2001 and 2011 the population of Guildford decreased by 717. It is assumed that this is because of foreign students returning home. However, G L Hearn has declined to make any adjustments for UPC.
- The 2011 Census measured the term time address of students as being their main place of residence, when in reality they will not become heads of households as most will move away at the end of their studies. This has a major and disproportionate effect on projecting household formations.
- GBC has included unoccupied houses in its housing targets. The NPPF states that this should not happen.
- There is no justification to include 25 houses a year to accommodate students as the University forecasts a much smaller increase in student population from 2013 to 2033.
- 120 houses per annum are included in the SHMA to support economic growth. This growth cannot be forecast with any degree of certainty as it depends on so many variables and it is not clear how this figure of 120 has been arrived at. Some of this growth will probably arise from construction work necessary to build homes for the workers who form part of the original economic growth. Serious consideration is required to avoid this “chicken and egg” situation.
- The impact of the European Referendum on projected migration up to 2033 should be assessed.
- GBC should investigate whether there has been any “policy on” intervention that has had the effect of promoting housing in Guildford in excess of the “policy off” needs, and should issue a specific statement accordingly. If applicable, housing need assessments should be repeated accordingly.

I wish to object to the Local Plan as I believe the SHMA is seriously flawed and the objectively assessed housing need is based on false information or information that is not up-to-date. The SHMA should be open to review by all parties and the housing needs assessment repeated using correct and up-to-date data.

1. INFRASTRUCTURE

Wastewater and flooding

Appendix C ‘Infrastructure Schedule’ WCT5 proposes an “upgrade to wastewater infrastructure if assessment (at developer’s cost) shows that additional capacity is needed to provide for Normandy/Flexford.” This to be delivered in years 1 – 15, by Thames Water, with the cost still to be decided, but paid for by the developer and Thames Water.
There has been sewer flooding in Glaziers Lane for decades. My own garden has been covered in sewage on two occasions during severe storm conditions, and other gardens locally have been similarly affected. In 2014 Glaziers Lane was closed for over 2 weeks when sewer reconstruction work took place owing to blockage problems. Last year sewer work was carried out for weeks along the main road in the village (A323) owing to the inability of the system to cope with the sewage from the homes. The current sewer at times cannot cope with sewage from the existing volume of homes without occasionally ‘backing up, and overflowing into gardens, let alone an additional 1,100 homes.

Surrey County Council is the Lead Flood Authority for Surrey, and as such keeps records of all reports made to it of localised flooding problems and they record a high concentration of flooding problems in the roads surrounding site A46. Over several years, the Normandy Flood Forum has been coordinating action with not only SCC and GBC, but the Environment Agency, Thames Water and other agencies to alleviate these issues. The proposed building of over 1,100 additional new homes and a secondary school would overshadow all previous issues in terms of potential flooding risks. Parts of Normandy, including the area next to the Hoe stream, have been and are subject to severe flooding problems, and the associated release of sewage into people’s properties and into the Hoe stream which would cut across the development. The Hoe stream also floods, which affects Glaziers Lane at the bridge crossing the stream, and sewage has been released into it, causing a health hazard.

The site currently allows natural drainage through the soil. If this area is built on the resultant run off of surface water would overwhelm the present system, causing even more flooding in the local area.

Thames Water is well aware of the problem of sewer flooding. In their response to a very recent planning application for just 30 homes in Glaziers Lane they stated “Thames Water has identified an inability of the existing waste water infrastructure to accommodate the needs of this application….. the development may lead to sewage flooding” and this could be for 15 years if the delivery date to upgrade the sewage system is delayed. Whatever any proposed solutions there may be, I am very concerned that it will not be possible to cope with the increased amount of water and resulting flooding and sewage if this site is developed with 1,100 homes.

It is clear, therefore, that the wastewater infrastructure already requires an “upgrade”, and this will be an extremely expensive undertaking for 1,100 homes, with the cost still unknown, but to be borne in part by the developer. I wish to object to the proposal to build 1,100 homes on strategic site A46 on the grounds that:

- the existing wastewater infrastructure will be unable to cope with 1,100 extra homes
- no costings have been carried out to upgrade the wastewater infrastructure to accommodate 1,100 extra homes, nor to ascertain if the developer will be able to meet these costs.

Electricity Supply

Appendix C ‘Infrastructure Schedule’ EG6 proposes to “upgrade electricity supply should capacity assessment conclude it necessary at Normandy/Flexford site.” This to be delivered in years 1 – 15, by UKPN, with the cost still to be decided, but paid for by the developer and UKPN.

The electricity supply in Normandy is notoriously unreliable and households suffer from frequent power cuts, especially in storm conditions. This situation could be exacerbated for 15 years if the delivery date to upgrade the system is delayed.

It is clear, therefore, that the electricity supply would need an “upgrade” and this will be an extremely expensive undertaking for 1,100 homes, with the cost still unknown, but to be borne in part by the developer. I wish to object to the proposal to build 1,100 homes on strategic site A46 on the grounds that:

- the existing electricity supply will be unable to cope with 1,100 extra homes
- no costings have been carried out to upgrade the electricity supply to accommodate 1,100 extra homes, nor to ascertain if the developer will be able to meet these costs.

Healthcare

Appendix C ‘Infrastructure Schedule’ does not include any improvements to Healthcare to go alongside the inclusion of 1,100 homes on strategic site A46 as well as a 60-bed nursing home.
The local doctors’ surgery is already overstretched and nationally it is accepted that the recruitment of GPs is extremely difficult. It is clear that no planning has taken place as to how the existing healthcare facilities in the village, or beyond, could cope with at least 2,500 extra residents, as well as the needy residents in a 60-bed nursing home.

I wish to object to the proposal to build 1,100 homes on strategic site A46 on the grounds that the existing healthcare facilities would be unable to cope with the increased population, and that no planning has taken place to ensure that acceptable medical care would be provided for the new residents.

The Village Green

The GBC Local Plan: Strategy & Sites 2016 – Part 2: Sites, states that “The village green will be in a central location within the development site and form a focus for the community.”

The NPPF states that there should be early and meaningful engagement and collaboration with neighbourhoods regarding the needs and priorities of the village. This has not happened with regard to the village green and other facilities. Had such engagement and collaboration occurred, GBC would have been told by villagers that we do not need another village green as we already have one on Manor Fruit Farm, which is the hub of the village for sport and leisure. Here there is the Village Hall and large car park, playground facilities, adult fitness “green gym”, a bowls club, an archery club, the Therapy Garden, and extensive green spaces for recreation and walking. Shortly there will also be a “trim trail” around the perimeter of Manor Fruit Farm to encourage villagers to exercise. It is planned for senior and junior football, baseball, rounders and softball teams to move to Manor Fruit farm in the future, and there are plans to build a new pavilion here with changing facilities. A little further away in Hunts Hill Road are play facilities for older children and the village’s tennis club. A new village green would divide the village, not “form a focus for the community”. Again, this is clearly a developer-led initiative, planned from a distant desk, without any understanding of what the village does or does not need.

I wish to object to the proposal to build 1,100 homes on strategic site A46 on the grounds that there has been no engagement or collaboration between GBC and the neighbourhood regarding an additional village green that is not required, nor for any of the other “facilities” that are planned, as required by the NPPF.

Developer’s contributions to improve the infrastructure

It is astonishing that developer contributions are allocated within the ‘Infrastructure Schedule’ without any idea of the cost of some of these, which include:

- Major road improvements £2.8m
- Improvements to the bus network TBD
- Improvements to the cycle network TBD
- Upgrade to the electricity supply TBD
- Upgrade to the water supply TBD
- Upgrade to the wastewater infrastructure TBD
- Provision of SANG TBD
- Serviced land for a 7FE secondary school (cost unknown)
- Expansion of Wyke secondary school TBD

It is of further concern that, since the vote to leave the European Union, shares in housebuilders, including Taylor Wimpey, have plummeted. There must be a concern at GBC that in the future this developer may be unable to fulfil its commitment to build the homes, provide the land for the school or make the developer contributions that are expected. Perhaps GBC should take a pragmatic view not to put all its eggs in one developer’s basket when maybe smaller developments are more viable for developers.

I wish to object to the proposal to build 1,100 homes on strategic site A46 on the grounds that the land could be removed prematurely from the Green Belt without any assurance that the developer will be able to meet these unspecified and cumulative costs, nor to provide the serviced land required for the school.

1. THE THAMES BASIN HEATH SPECIAL PROTECTION AREA (TBHSPA)
The strategic site A46 is situated only 800 metres away from the Thames Basin Heath Special Protection Area and so is within the 400m – 5km zone of protection. The TBHSPA contains a Site of Special Scientific Interest (SSSI) recognised as one of the key Natura 2000 European sites...

I wish to object to the Local Plan on the ground that the ecology and wildlife of the area will be threatened by the damaging impact of pollution from the increase in traffic that an 1,100 home development will bring, no matter what avoidance or mitigation measures are implemented.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

LOCAL PLAN OBJECTION from Mr A J Burchett (1).docx (76 KB)

Comment ID:  pslp173/118  Respondent:  8747969 / Alan Burchett  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Appendix H: Maps - Normandy and Flexford

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I am writing in support of Guildford Borough Council’s decision to remove Strategic Sites A46 (Land to the south of Normandy and north of Flexford) and A47 (Land to the east of the Paddocks, Flexford) from the Local Plan. My reasons are that the infrastructure would have been unable to cope with developments of the size previously planned, and that these sites are within the Green Belt and should remain washed over.

I am also writing to object to the insetting of parts of Normandy and Flexford as this land contributes to the openness of the Green Belt and should therefore remain washed over. There is evidence in past appeal decisions by Planning Inspectors that the land at Flexford and Normandy contributes to the openness of the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID:  PSLPA16/456  Respondent:  8748545 / Frank Webster  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Shalford (south)

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I am writing to object to the proposal in the latest version of the Guildford Local Plan to move the green belt boundary to exclude the fields behind Shalford Village Hall and to extend the village settlement boundary to include these fields. The existing boundaries have been in place for a long time and the only reason for moving them is to permit the development of the land in due course.

The reasons for my objections are

- This is the highest land in the local area and any housing built on it would tower over the village facilities as well as the surrounding area, damaging the open character of the village.
- Access to the site would be via Chinthurst Lane, which is already very congested at peak times, especially at its north end where it serves as a de facto car park for Shalford Station, as well as in the single lane parts to the south. I have seen cars drive across Shalford Common to escape gridlock in the Lane, and this sort of problem would become more frequent if more traffic was generated by development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
There are two railway bridges that constrain the free movement of traffic. One on Westwood Lane where traffic is limited to one lane to pass the bridge. Plus one on Glaziers Lane, there are two lanes here, but they are narrow and angled slightly from the main road direction. At some point a lorry or other large vehicle will cause a major accident here as they, due to the angle find it almost impossible to stay on the their side of the road as they cross the bridge. I’m sure we’d all prefer to avoid such an incident rather than perhaps an innocent pedestrian walking to the station being hit.

In addition there is a 90 degree right hand bend where Flexford Road and Glaziers Lane join, another narrow, dangerous, unsighted corner where larger vehicles can only get around it on the wrong side of the road.

The north end of Glaziers Lane is also very narrow, if you stood on the corner for 10 minutes at pretty much any time of the day you will witness cars unable to keep to their side of the road as they come around the corner. Worse still buses or lorries entering the road cannot turn the corner without veering onto the wrong side of the road as there is no room, many a time you have to stop in advance of the junction to let a large vehicle negotiate the road entrance. Something that will only get worse if the level of traffic increases.

The road cannot be expanded as there are houses on both sides of the corner, and it is also very close to two bus stops so pedestrians will also be on the pavement near these corners another unassessed risk.

At peak traffic times the road already has extensive queues which will only be exacerbated by adding in 1,100 houses and at a conservative level 1,500 cars. This will have a knock on impact on the Aldershot Road and traffic into and out of Guildford, as well as encouraging yet more traffic to clog the Northern and Southern access points of the village.

Adding a School will only bring more cars into the area causing even more chaos and further be compounded by the fact that Westwood and Glaziers Lane have no parking areas other than in the road and so just maintaining a flow of traffic is likely to be an issue, something we’ve seen here the last couple of months with a couple of small road works that have been in place, and the resulting traffic queues.

There appears to be no provision for expanded or additional roads to ease the congestion in this proposal, and even if there were it is likely that such improvements will encourage more drivers off of the Hogs Back and creates even more of an issue for the Aldershot Road.

- Our rural environment will be massively impacted by this, the last swathe of green between Guildford and Aldershot. We moved here to be in a more rural area, with a better quality of air, less noise and light pollution. As of today we can walk from our house in almost any direction into green fields. All of this will be irrevocably changed by such a proposal.

Noise and light pollution will increase significantly as will exhaust gasses damaging the countryside and therefore driving our wildlife away.

Wildlife in the area will be forced away by the building process and the loss of natural habit, once lost it will never return. We regularly get hedgehogs, bats, 2 different types of woodpecker, foxes to name but a few animals in garden, all of this will be changed by such a development. It is inevitably going to have an impact on them, not least the loss of their natural habitat.

The land in this area is supposed to be safeguarded, how can it now suddenly not be so?

As Grade 3 arable and pastoral land this should be protected.

It’s also an area where water naturally settles from the Hogs back and the North as Normandy is the low point of the area. Fields regularly get water logged and flooded in the winter. Adding yet more houses will have a knock on impact on not just this water table (forcing it into a smaller space and no doubt causing it to rise further as it has less space to occupy), but also overloading the local sewage system that is already stretched to capacity and issue for some houses in Glaziers Lane with one way valves needed to protect the houses at times of wetter weather.

There is increasing high density urbanisation around Ash and Pirbright Heath we need to protect our green space as supported by planning inspectors as our green fields contribute to the “openness” of the Green belt and from the Hogs back maintain the panoramic view of our green field, as a part of the Surrey Hills AONB.
On this basis I would urge you please to removal from the local plan the proposal to develop Normandy’s Green Belt. Please rather look to the conversion of empty offices in Guildford to flats, or develop brown field sites before green belt land is irrevocably lost.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp173/547  Respondent: 8748801 / N J Norton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Habits Regulations Assessment 2017
I object to all references to “Appropriate Assessment” being replaced by reference to “HRA” (Habits Regulations Assessment). Appropriate Assessment has a specific application in planning guidance and should be used appropriately in this document to avoid confusion now and in the future. I propose all references the HRA per site be replaced by the phrase “Appropriate Assessment”

2.5 Air Quality Impact Assessment
I object to this section of the HRA 2017 document. At no point is any evidence of actual measured levels of NOx or CO2 at the locations identified in Table 4: Location of Link Roads analysed within 200m of the Thames Basin Heaths SPA. There is total reliance on Surrey County Council Transport department modelling.

The modelled levels are then treated as if they are actual measurements in Table 5: The Critical Load for the Target Habitats of the Thames Basin Heaths SPA. This can form no rational measured basis of future assessment of policy failure or success. I propose that this section of the document should be rejected and can form no part of policy formation in relation to Appropriate Assessment of sites until actual monitoring data for NOx and CO2 deposition levels are presented in relation to the locations identified in Table 4.

3.3 Recreational pressure
I object to this section of the HRA 2017 document. In paragraphs 3.3.6 and 3.3.7 the authors make negative assertions regarding the validity of scientific studies of disturbance and predation without presenting contrasting evidence. Under these circumstances, such assertions are merely hearsay and can make no contribution to the veracity of the scientific evidence.

I propose paragraphs 3.3.6 and 3.3.7 are either withdrawn from the document or their assertions ignored. I object to paragraph 3.3.9. It fails to recognise and include reference to the Natural England follow-up study published in 2014 [Natural England Commissioned Report NECR136 Results of the 2012/13 visitor survey on the Thames Basin Heaths Special Protection Area (SPA) First published 13 February 2014] that shows a 10% increase in visitor numbers to the Thames Basin Heaths SPA. I propose that paragraph 3.3.9 should be treated with caution unless and until it is revised to carry a reference to the 2014 published NE follow up study [Natural England Commissioned Report NECR136 Results of the 2012/13 visitor survey on the Thames Basin Heaths Special Protection Area (SPA) First published 13 February 2014], I object to paragraph 3.3.4 and its simple-minded reliance on Dept of Transport generic presentation of deposition of roadside pollutants Figure 2: Traffic contribution to concentrations of pollutants at different distances from a road (Source: DfT). Once more illustrating a naïve acceptance rather than carrying out actual roadside measurements at provable sampling points around the TBHSPA perimeter where roads such as the A322 run directly alongside the land in question. I
propose that until such data from actual roadside measurement in the SPA is available paragraph 3.3.4 should be treated with caution.

4 HRA Screening of Policies within the Guildford Local Plan Strategy and Sites Submission Version from 2016
I object to the assessment of Policy H1 Homes for All as having no HRA implications in Table 7: HRA Screening of the Policies within Guildford Local Plan Strategy and Sites Submission Version for Effects on Thames Basin Heaths SPA. The whole local plan that is to provide homes for borough residents determines approximately 6,500 new homes will be built within the 400m-5km mitigation zone of TBHSPA. How can this be brushed aside simply on the basis that the Policy H1 makes no reference to a quantum of housing? I propose that this assessment of Policy H1 be disregarded.

9.4 SANG Provision Assessment
I object to the continued inclusion of “Policy A46: Land to the south of Normandy and north of Flexford” in para 9.4.6 p55. This site is no longer part of the Local Plan. I propose the removal of “Policy A46: Land to the south of Normandy and north of Flexford” from para 9.4.6

9.5 Summary of Recommendations
I object to the continued inclusion of “Policy A46: Land to the south of Normandy and north of Flexford” in Table 13: Table identifying recommendations relating to SANG provision I propose the removal of “Policy A46: Land to the south of Normandy and north of Flexford” from Table 13

11.4 Recommendations relating to SANG provision
I object to the continued inclusion of “Policy A46: Land to the south of Normandy and north of Flexford” in Table 16 Summary of recommendations relating to SANG provision. I propose the removal of “Policy A46: Land to the south of Normandy and north of Flexford” from Table 16

12.2 Update April 2017 Modifications: SANG Assessment
I object to the content of Para 12.2.3. The wording demonstrates the council has no answer to Natural England’s outstanding question regarding how financial contributions provided in Policy P5: Thames Basin Heath SPA would be secured.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp173/545  Respondent: 8748801 / N J Norton  Agent:  
Document:  Proposed Submission Local Plan: strategy and sites 2017 / Appendix H: Maps - Normandy and Flexford

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Appendix H Maps H-P, page 24 Normandy & Flexford amendments 3-8
I object to the boundary changes that insert Green Belt boundaries around Flexford and Normandy settlements and Walden Cottages (p24 Amendments 3-8), ‘insetting’ them from the Green Belt. At the detail presented, even when ‘zoomed in’ the new map boundaries are indistinct and provide no basis to distinguish in low-level detail between the 2003 Local Plan established settlement boundaries and where the proposed ‘inset’ boundaries will lie to reveal what new Green Belt land will be included within the ‘inset’ boundaries, for which proof of ‘exceptional circumstances’ (NPPF para 89) is required but not provided by the council in the Evidence Base.
I propose the Green Belt boundaries for Flexford, Normandy and Walden Cottages ‘inseting’ them from the Green Belt be removed from the map on page 24 and that the settlement areas remain “washed over” to contribute to the “openness” of the Green Belt preventing the coalescence of Ash South & Tongham with Normandy. Further, maintaining the “openness” of Flexford and Normandy contributes positively to views into and from the Surrey Hills Area of Outstanding Beauty from the Hogs Back.

I object to the assertion in Policy P2, para 4.3.13 that Normandy and Flexford “are now inset from the Green Belt”. To remove land from the Green Belt, effectively re-drawing the Green Belt boundary, the council must provide evidence of “exceptional circumstances” as required by NPPF para. 89. The council has provided no such evidence in the proposed submission documents or previous or new Evidence Base documents. No such decision has been taken by a Planning Inspector, therefore the settlements remain in the Green Belt.

I propose the words “are now inset from the Green Belt” in para 4.3.13 are removed and replaced by “are proposed to be inset from the Green Belt”. There is evidence in past appeal decisions by planning inspectors that Flexford and Normandy land contributes to the ‘openness’ of the Green Belt, a key test for remaining ‘washed over’. In particular, the final decision at North Wyke Farm [GBC Application 14/P/00779, PINS Appeal APP/Y3615/W/15/3002308] recognised that Normandy settlement land contributed to the ‘openness’ of the Green Belt. I require my previous comments to the first Regulation 19 consultation to be taken into account. This adds to comments supporting ‘openness’ made in the decisions to grant temporary planning permission for Gypsy pitches at Green Lane East [GBC Application 10/P/00507, PINS Appeal APP/Y3615/A/10/2140630] and Palm House Nurseries, Glaziers Lane [GBC Application 09/P/01851, PINS Appeal APP/Y3615/A/10/2131590].

I object to Sustainability Appraisal 2017 para 10.4.7, where it is asserted that Policy D4 (Character and design of new development), which refers specifically to design considerations within villages, and a new designation of Open Space (Policy ID4) “that policy is in place to protect open space and village character, which is known to be important to rural communities”. This is no substitute for being ‘washed over’ by the Green Belt and appears instead to knowingly be a sop to the impact of ‘inset’. I propose the removal of the text “that policy is in place to protect open space and village character, which is known to be important to rural communities” from Sustainability Appraisal 2017 para 10.4.7

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/2000  Respondent: 8748801 / N J Norton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

H1 Blue Policy Box

I object to the removal of the following paragraph, page 33 from the Policy statement box:

"Density
New residential development is required to make the most efficient use of land whilst responding to local character, context and distinctiveness. Residential densities will vary dependent upon the local area context and character and the sustainability of the location. Higher density development will be supported in Guildford town centre."

I propose the reinstatement of the following paragraph to the Policy H1 Policy Blue Box:
"Density
New residential development is required to make the most efficient use of land whilst responding to local character, context and distinctiveness. Residential densities will vary dependent upon the local area context and character and the sustainability of the location. Higher density development will be supported in Guildford town centre."

Para 4.2.8
I object to the removal of the following paragraph, page 38 para 4.2.8 as follows:

"Density
4.2.8 We have a responsibility to use our natural resources, such as land, wisely. Efficient use of land is essential. Housing density describes the number of homes developed within a particular site area. It is usually calculated by the number of dwellings per hectare (dph). Increasing densities can help to reduce the land needed for new homes and make development more sustainable. It can also support more facilities and services. Certain areas can accommodate higher densities provided there is no adverse impact on the character of the area and the infrastructure is able to cope. Planning applications will be assessed on a case-by-case basis having regard to the local context, character of the surrounding local area and the sustainability of the location. This will include consideration of established street patterns, plot sizes, spaces around buildings, and relationship with nearby buildings as well as form, massing, height of existing buildings and structures, and materials."

I propose this paragraph be re-instated. Without recognition of density requirements, Policy H1 will fail monitoring and any future assessment.

It is essential to recognise and state in Policy H1 that different sites will sustain different dwelling densities for effective use of land and local sustainability. Removal threatens inappropriate densities in smaller rural communities and under-delivery of high-density development in Guildford town centre. Lower densities in rural locations threatens to increase sprawl that is otherwise prevented by Green Belt protections, higher density would be inappropriate in rural locations; lower densities in Guildford town threatens to reverse the benefits of the emerging brownfield register requirement and failure to deliver the sought for "sustainable development" and "modal shift" by encouraging high density urban development within walking and cycling distance of major transport hubs and local services.

Para 4.2.21
Policy H1, Gypsy, Traveller & Travelling Showpeople pitches & plots
I object to the changes in paragraph 4.2.21, page 40, particularly the removal of a definition of site size where originally "We support small-scale traveller sites (up to nine pitches or plots)" has been changed to "Small-scale traveller sites are supported". I live within 600 metres of a 6-pitch private Gypsy & Traveller site. The traffic generated is of vehicle types from private cars to vans, 7.5 tonne trucks and civil engineering equipment, of high frequency and at all times of day and night. A site with a higher number of pitches would have the capacity to generate a level of traffic and disturbance unacceptable to any settled resident within a 500 metre radius.

I propose the reinstatement of the original sentence as below but with a lower number of pitches as this provides certainty for the settled community, removes the capacity of the council to vary its idea of "small" at any time, provides certainty to the gypsy & traveller community, [Response has been redacted due to statements being considered defamatory, derogatory, inflammatory or offensive in nature] and provide a simple incremental measurement of the success of this part of Policy H1.

"We support small-scale traveller sites (up to six pitches or plots)".

Para 4.2.24
I object to revised paragraph 4.2.24, page 40 which states "The loss of pitches or plots will be strongly resisted."

This council has been dilatory over the last 25 years I have been resident in Normandy in attempting to initiate new Gypsy & Traveller pitches due to political expediency. This statement is typical of a current "have cake and eat it" attitude. Should Gypsy & Traveller sites in the Green Belt have permanent planning permission rejected at appeal for legitimate planning reasons, local politicians and planning professionals in the council have only themselves to blame.

I propose this sentence "The loss of pitches or plots will be strongly resisted." should be removed from paragraph 4.2.24.
It is a hidden threat to the settled community and represents an attempt to manipulate the rights of the settled community in a negative way via planning policy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy H3 Blue Policy Box

I object to the insertion of the word "affordable" in all locations in the blue policy box. Planning guidance defines "affordable" as 80% of local rental levels or 80% of average house price. The latest South West Surrey SHMA for the Guildford housing market sets the average house price at approx £465,000 of which 80% is approx £365,000; this is not "affordable" to those essential service workers such as nurses, local authority employees, public transport employees, fire service employees. This will simply provide further opportunity to private housebuilders to flood local villages with more market homes under the guise of being "affordable".

I propose the removal of all references to "affordable" in the Policy H3 blue policy box.

Para 4.2.49

I object to the phrase "This includes a cascade approach to the allocation of rural exception housing." being removed from paragraph 4.2.49, page 49 as it links to provisions in the removed paragraph 4.2.54.

I propose the phrase "This includes a cascade approach to the allocation of rural exception housing." is reinstated in paragraph 4.2.49, page 49.

Para 4.2.54

I object to the removal of paragraph 4.2.54, page 49 as follows:

"To ensure that the housing is secured permanently to meet local affordable housing needs, we will require the affordable housing provider to enter into a planning obligation with cascade provisions. This requires the housing to be allocated to people with a local connection to the parish (through residence, employment or close family), followed by those with a local connection to adjacent parishes within the borough who meet the criteria, and finally those with a connection to the borough of Guildford in accordance with its published scheme Guildford Homechoice (or equivalent scheme)."

It is essential that housing delivered by Policy H3 is for those identified with loca connections. We have already suffered from the council pushing those from the general housing list into housing association properties built in Normandy under the auspices of being for those identified in a local housing needs survey.

I propose the re-instatement of paragraph 4.2.54, page 49 as follows:

"To ensure that the housing is secured permanently to meet local affordable housing needs, we will require the affordable
housing provider to enter into a planning obligation with cascade provisions. This requires the housing to be allocated to people with a local connection to the parish (through residence, employment or close family), followed by those with a local connection to adjacent parishes within the borough who meet the criteria, and finally those with a connection to the borough of Guildford in accordance with its published scheme Guildford Homechoice (or equivalent scheme)."

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy P1 Blue Policy Box
I object to all additions and removal of text from the Policy P1 blue policy box.

The Policies Map is an inadequate representation at all levels of detail of the protections required by the Surrey Hills AONB and locally designated AGLV land.
I propose the contents of the blue policy box for Policy P1 revert to their previous content as follows:

"(1) The Surrey Hills Area of Outstanding Natural Beauty (AONB) will be conserved and enhanced to maximise its special landscape qualities and protect it from inappropriate development. All proposals will be considered against whether they:

• conserve and/or enhance the setting and views of the AONB
• conserve wildlife, historic objects or natural phenomena within it
• promote its enjoyment by the community and visitors to the area
• support the rural economy of the Surrey Hills area
• provide or maintain public access to the AONB.

(2) In accordance with national planning policy, there will be a presumption against major development in the AONB except in exceptional circumstances and where it can be demonstrated to be in the public interest.

(3) High priority will be given to the conservation and enhancement of the natural beauty of the AONB and development proposals must have regard to protecting its setting.

(4) Development proposals will also be assessed against the provisions of the current Surrey Hills AONB Management Plan.

(5) The AGLV will be retained until such time as there has been a review of the AONB boundary. Development proposals within the AGLV will be required to demonstrate that they would not result in harm the setting of to the AONB or the distinctive character of the AGLV itself."

Para 4.3.5
I object to the removal of the text of paragraph 4.3.5, page 52
"As the local planning authority we have a duty and an opportunity to ensure that this is achieved." The removal of this text illustrates the complete abrogation of public duty encompassed by the current leadership of this council. I propose the sentence "As the local planning authority we have a duty and an opportunity to ensure that this is achieved." is returned to paragraph 4.3.5, page 52.

Para 4.3.6
I object to the removal of the text of paragraph 4.3.6, page 52 as follows:
"Applications for major development in the AONB will be refused unless exceptional circumstances are demonstrated and the development is proven to be in the public's interest."

Apart from illiterate use of the apostrophe, this is a further attempt by the council to avoid its statutory duty to protect the AONB from inappropriate development, leaving it open to any housing or commercial development.

I propose paragraph 4.3.6 is returned to its original content as follows:
"Applications for major development in the AONB will be refused unless exceptional circumstances are demonstrated and the development is proven to be in the public's interest. In considering major applications in the AONB, the Council will have regard to the principles outlined in Policy 8 and Paragraph 116 of the NPPF. Whilst there remains a lack of national guidance, the Council will define ‘major development’ on a case-by-case basis, taking into account relevant factors such as the size, scale and setting of the proposed development."

Para 4.3.8
I object to the changes to paragraph 4.3.8, page 53.
I propose the reinstatement of paragraph 4.3.8 to its original content as follows:
"4.3.8 Natural England has subsequently agreed to undertake a review of the AONB boundary and will consider further evidence presented to them. The review is not anticipated to commence until 2018 at the earliest. In the meantime, the candidate areas identified will retain their current status as AGLV."

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/2005  Respondent: 8748801 / N J Norton  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Para 4.3.18
I object to the changes to paragraph 4.3.18, page 56 as follows:
“The exceptions listed include development such as new buildings for agriculture and forestry, and the redevelopment of previously developed land subject to the impact on the openness of the Green Belt.” This wording weakens Green Belt protection.
I propose returning paragraph 4.3.18 to its original content as follows:
“The exceptions listed include development such as new buildings for agriculture and forestry, and the redevelopment of previously developed land where it would not have a greater impact on the openness of the Green Belt.”

Policy P2 Green Key Evidence Box
I object to the removal of the "National Policy Planning Framework" as a source of evidence in the green Key Evidence box, page 58.
I propose the reinstatement of "National Policy Planning Framework" as a source of evidence in the green Key Evidence box.
I object to the inclusion of the renamed document "Settlement Hierarchy (Guildford Borough Council, 2014)" in the green Key Evidence box.

The Settlement Hierarchy document has little if anything to do with Green Belt policy. It was castigated in all previous rounds of consultation as a flawed analysis based on specious presentation to parish councils as a community survey without explanation that it would have future use in the Local Plan process. Its ability to define the services and facilities
of communities of various sizes has no bearing on Green Belt policy development or delivery. I propose reference to the "Settlement Hierarchy" document should be removed from the green Key Evidence box of Policy P2. I propose the references in the green Key Evidence box for Policy P2 should appear as follows:

Key Evidence

National Planning Policy Framework
Green Belt and Countryside Study Volumes I – VI (Guildford Borough Council, 2011 and 2014)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/2006  Respondent: 8748801 / N J Norton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Paras 4.3.28 – 4.3.31

I object to all changes in Introduction, p59, paragraphs 4.3.28, 4.3.29, 4.3.30 and 4.3.31 as they ease the path to more intensive development rather than maintaining a degree of protection to countryside that contributes to views into and out of the Surrey Hills AONB area of the Hogs Back.

I propose paragraphs 4.3.28, 4.3.29, 4.3.30 and 4.3.31 revert to their original content as follows:

"4.3.28 The borough has areas of countryside near Ash and Tongham that is not designated Green Belt. Whilst this land does not carry the same weight in national planning policy as Green Belt in terms of resisting development, it is nevertheless important that we seek to manage change growth in this area. 4.3.29 Originally consisting of the three small rural villages of Ash, Ash Vale and Tongham, the Ash and Tongham urban area has grown considerably in size and now forms Guildford borough’s second urban area. The sustainability of this area combined with its preference in the spatial hierarchy means a further extension of the urban area, using some countryside, is allocated for development. 4.3.30 We do however wish to ensure that whilst accommodating this growth, we are able to protect the remaining countryside around it from inappropriate development in order to protect its intrinsic character and preserve the role it plays in maintaining the separate identify of Ash and Tongham.

4.3.31 The countryside lies immediately to the west and south of the urban area and forms the natural boundary of the Blackwater Valley. The Blackwater Valley contains the A331, which connects the A31 and Tongham in the south with Ash Vale in the north and Frimley beyond. It also provides an important open gap between Ash and Tongham, and the town of Aldershot to the west."

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/2007  Respondent: 8748801 / N J Norton  Agent:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy P5 Blue Policy Box

I object to all changes of text in the blue policy box of Policy P5. The changes set out to deliberately weaken assessment of development proposals within the mitigation zone of the Special Protection Area. The only remedy should be mitigation, not avoidance. Mitigation requires a commitment from the council and any applicant to provide either land as SANG or an S.106 payment. A programme of SAMM activity has no proven benefit. Natural England can provide no evidence that SAMM activity has any impact on visitor behaviour to the SPA, therefore it cannot support an avoidance strategy. The only protection therefore is mitigation.

I propose all references to “avoidance” and “SAMM” activity should be removed from Policy P5 and its Definitions in pp65-69.

I propose the text in the blue policy box for Policy P5 should be as follows:

“POLICY P5: Thames Basin Heaths Special Protection Areas

(1) Permission will not be granted for development proposals unless it can be demonstrated that doing so would not give rise to adverse effects on the ecological integrity of the Thames Basin Heaths Special Protection Area (SPA), whether alone or in combination with other development. Where one or more adverse effects on the SPA are likely, measures to avoid and mitigate these effects must be delivered and secured in perpetuity. These measures must be agreed with Natural England.

(2) The following principles apply:

(a) There is an “exclusion zone” set at 400m linear distance from the SPA boundary. Permission will not be granted for development that results in a net increase in residential units within this zone. Proposals for other types of development within this zone must undertake Appropriate Assessment to demonstrate that they will not harm the integrity of the SPA.

(b) There is a “zone of influence” between 400m and 5km linear distance from the SPA boundary. Where net new residential development is proposed within the zone of influence, mitigation measures must be delivered prior to occupation of new dwellings and in perpetuity. Measures must be based on the provision, improvement and/or maintenance of Suitable Alternative Natural Greenspace (SANG).

(c) Residential development of at least 50 net new dwellings that falls between five and seven kilometres from the SPA may be required to provide mitigation measures. This will be assessed on a case-by-case basis and agreed with Natural England.

(3) The following principles apply to the provision of SANG:

(a) A minimum of 8 hectares of SANG land (after discounting to account for current access and capacity) should be provided per 1,000 new occupants.

(b) Developments must fall within the catchment of the SANG that provides mitigation, except developments of fewer than 10 net new residential units.

(c) The Council will collect developer contributions towards mitigation measures, including SANG (unless bespoke SANG mitigation is provided).
(d) Developments may secure or provide bespoke SANG. Proposals for new SANGs will not be acceptable unless approved by Natural England. Large developments may be required to provide bespoke SANG mitigation.

(4) Where further evidence demonstrates that the integrity of the SPA can be protected using different linear thresholds or with alternative mitigation measures (including standards of SANG provision different to those set out in this policy) these must be agreed with Natural England.”

Para 4.3.50c

I object to the insertion of paragraph 4.3.50c, page 66. All proposed developments within the up-to-7km mitigation zones of the SPA should undergo Appropriate Assessment irrespective.

I propose the complete removal of paragraph 4.3.50c.

Para 4.3.52

I object to the change in paragraph 4.3.52, p67 where the word "impacts" is removed and replaces by the word "pressures". I propose the reversion to the word "impacts".

Para 4.3.53

I object to the removal of paragraph 4.3.53, page 67. This paragraph provides strong determination of the need for Appropriate Assessment of all applications for planning permission in the SPA exclusion zone.

I propose the reinsertion of paragraph 4.3.53 as follows:

"Applications for planning permission for all development in the exclusion zone should be subject to a full Appropriate Assessment to demonstrate no adverse effect on the SPA and/or the acceptability of any avoidance measures provided."

Para 4.3.54

I object to the removal of the following text from paragraph 4.3.54 "ensure that new residential development will not lead to increased recreational pressure on the SPA" and its replacement by "avoid this impact". The substitute text is weak and requires no assessment of impact by the council.

I object to the insertion of the following text into paragraph 4.3.54 "and other types of permanent accommodation not listed in paragraph 4.3.51" as this presents an open door for any type of housing development to be considered for the SPA exclusion zone that might have a severe impact via disturbance and invasion on the protected species and habitat. Paragraph 4.3.51 is now very specific as to the allowable accommodation types, intended to deliver close control over potential impacts on the SPA.

I object to the replacement of the word "mitigation" in paragraph 4.3.54 with the word "avoidance" for previously defined reasons. The word "avoidance" should be removed and revert to "mitigation".

I propose paragraph 4.3.54, page 67 should revert as follows:

"In the zone of influence, beyond the exclusion zone and up to 5km (linear) from the SPA, a net increase in the number of residential units is likely to lead to increased recreational use of the SPA visitor surveys produced by Natural England demonstrate that 70 per cent of visitors to the SPA come from within this distance. In order to ensure that new residential development will not lead to increased recreational pressure on the SPA, net new residential development must secure or provide Suitable Alternative Natural Greenspace (SANG). Proposals for student accommodation may not need to provide mitigation and mitigation measures. This will be assessed on a case by case basis."

Para 4.3.55 I object to the substitution of the phrase "at least" with the word "over" in paragraph 4.3.55, page 67. I propose the word "over" revert to the phrase "at least"
Para 4.3.56 I object to the replacement of the word "mitigation" in paragraph 4.3.56, page 67 with the word "avoidance" for previously defined reasons. I propose the word "avoidance" should be removed and revert to "mitigation".

Para 4.3.57 I object to the replacement of the word "mitigate" with the word "avoid" and the word "mitigation" with the word "avoidance" in paragraph 4.3.57 for previously defined reasons. I propose the words "avoid" and "avoidance" should be removed and revert to "mitigate" and "mitigation" respectively.

Para 4.3.58 I object to the replacement of the word "mitigation" in paragraph 4.3.58, page 68 with the word "avoidance" for previously defined reasons. I propose the word "avoidance" should be removed and revert to "mitigation".

Para 4.3.60 I object to the replacement of the word "mitigation" in paragraph 4.3.60, page 68 with the word "avoidance" for previously defined reasons. I propose the word "avoidance" should be removed and revert to "mitigation". I object to the word "agreed" in the same paragraph. I propose the word "agreed" should revert to "approved".

Para 4.3.64 I object to the replacement of the word "mitigation" in paragraph 4.3.64, page 68 with the word "avoidance" for previously defined reasons. I propose the word "avoidance" should be removed and reverted to "mitigation".

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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Comment ID: pslp171/1995  Respondent: 8748801 / N J Norton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy S1 Sustainable Development
Para 4.1.1
I object to the change in Policy S1, Introduction, page 27, para 4.1.1 where the text "unless any adverse impacts of doing so would significantly outweigh the benefits or specific policies in the NPPF suggest that development should be restricted." has been added. The final sentence is badly drafted and makes no literal sense; it is also devoid of detail and rigour that would enable positive future assessment of the policy impact. NPPF para 14 footnote 9 "including land designated as Green Belt" already positively permits development to be restricted, it does not "suggest that development should be restricted". Much of Guildford Borough lies within 5km of the Natura 2000/SAC/SSSI site Thames Basin Heaths Special Protection Area and requires mitigation under the Birds & Habitats Directives as enabled in UK law by The Conservation of Habitats and Species Regulations 2010. Furthermore, as recognised in this document, 89% of Guildford Borough land is designated as Metropolitan Green Belt. Both these designations of Guildford Borough land have widespread impact and the NPPF provides opportunity for the council to recognise opportunities to restrict or mitigate development. Failure to do so in Policy S1 flies in the face of the reality of such land designation in the borough. Guildford being defined as a "growth bub" in the Enterprise M3 LEP economic plan at the prompting of DBIS with no appropriate evidence brought forward, as is required in Local Plan development, is no basis on which to ignore such land designations (i.e. Green Belt) and in policy description.

I propose that the final sentence in para 4.1.1 should be amended as follows: "This means that Local Plans must positively seek opportunities that meet the area’s objectively assessed development needs and be flexible enough to adapt to rapid change unless the adverse impacts of doing so would significantly outweigh the benefits or specific policies in the NPPF where it suggests, as in NPPF para 14 footnote 9 'sites protected under the
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Birds and Habitats Directives (see NPPF para 119 where the presumption in favour of sustainable development (NPPF para 14) does not apply where development requiring appropriate assessment under the Birds or Habitats Directives is being considered, planned or determined) and/or designated as Sites of Special Scientific Interest; land designated as Green Belt, Local Green Space, an Area of Outstanding Natural Beauty; designated heritage assets; and locations at risk of flooding, that development should be restricted."

Para 4.1.4

I object to the additional wording added to page 28 para 4.1.4 "When implementing Policy S1, local circumstances will be taken into account to respond to different opportunities for achieving sustainable development." Once again, it is too flexible an interpretation of NPPF para 14 lacking the rigour that would enable positive future assessment of the impact of Policy S1.

I propose that the wording of the second sentence in para 4.1.4 should be amended as follows:

"When implementing Policy S1, local circumstances that match those described in NPPF para 14 footnote 9 and NPPF para 119 (see following) will be taken into account to restrict opportunities for sustainable development."

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/1811  Respondent: 8749089 / Anthony Hatton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We are clear that we do need a revised plan ready for implementation in the quickest possible time. However, we are deeply concerned with some of the basic flaws to date not least of which is that the SHMA is somewhat light weight and within that the impact of Student movement in our community has not been given the weight of consideration it requires. Additionally, and as identified above, we question the thinking concerning protection of the Green Belt and the characteristics of our Borough which make it eminently desirable to live in as well as the important considerations required to deal with transport traffic and general infrastructure now and into the future,

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: SQLP16/1164  Respondent: 8749089 / Anthony Hatton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
It is our view that this is not a robust piece of work. Some of the assumptions have been withheld and we would suggest key elements are missing or the assumptions flawed. A prime example heroes that we would suggest that the Housing Market Assumptions exaggerate the demand, The Greenbelt and Countryside Study approach is suspect and the Transport evidence is much too late and lacking in essential features to contribute to a sound and comprehensive local plan.

The OAN has also not been produced to the desired standard and we would suggest that in this regard a figure of 693 dwellings per annum is too high. Again, we would refer you to the work carried out by the GRA whose independent report came up with a figure if 500 dwellings pa which appears to be more realistic. This report also concludes that there were errors in the SHMA. For example the changes in population shift in Guildford are not the same as for other boroughs in Surrey given the student base and that it would be sensible for student movement to have been considered separately.

It is also extremely surprising and certainly disappointing that the current and increasingly poor traffic problems in Guildford, given the forecast population growth, has been given such scant regard in the Submission Plan. There is no doubt, in our mind, that failure to take a more meticulous and well thought through approach to our traffic issues will cause significant constraints in the growth of high skilled jobs and a boost to our economy in the high tech sector. In summary our town’s infrastructure as currently planned, will just not support the growth in future housing. Lastly, whilst on the subject of traffic, we find it hard to understand what, if any measures, are being taken to actively manage “pollution” problems both in terms of emissions and the noise level from the traffic on the A3 which has become an increasing blight to residents.

One of the reasons we chose to live in Guildford was not only the historic nature of the town but also its setting in the Surrey countryside. The plan as currently drawn up will certainly impinge on these desirable characteristics with the Green Belt boundaries being redrawn yet again and insufficient account has been taken of the “fundamental aim” of the Metropolitan Green Belt.

To our mind Guildford is more than adequately provided for in the provision of retail. It is our view that further development in this area should be scrapped in favour of more appropriate residential units in the town centre which would provide a more conducive environment for residents and visitors alike.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/1165  Respondent: 8749089 / Anthony Hatton  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Question 2: Legal compliance

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

In our opinion the Submission Plan development process has taken insufficient account national policy which we believe stresses the importance of the “openness” and “permanence” of the Green Belt. While we fully understand and empathise with the need to provide development for more dwellings, nevertheless we believe that the criteria adopted for “exceptional circumstances” has not been given the required level of consideration at a strategic level.

We would question the suggestion that the Green Belt is being treated as permanent when as recently as 2003 boundary changes were included as part of the Local Plan Review.

It is our understanding that the National Policy Framework requires that objectively assessed needs should be met unless “…any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the
policies in this Framework taken as a whole “ etc. Our interpretation of this suggests that there are a number of items which are of particular relevance to Guildford particularly with regards to the eco system relating to birds and wildlife, areas of outstanding local beauty, heritage sites and those areas particularly venerable to flood risk. We would have thought that the Appraisal must include these factors.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/1163  Respondent: 8749089 / Anthony Hatton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 7: Any other comments?

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

My wife and I have been residents of Guildford for over 25 years and in a variety of ways involved with local community activities. In this regard my wife was a founder Board Member of Abbotswood Residents Association and we have both maintained a keen interest in local developments particularly with regards to the “Local Pan.” Whilst our comments as appended below represent our joint views, it is worth emphasising here that to a great extent these have been shaped by the views and submissions made at various stages by the GRA and Guildford Society and residents who have been deeply involved in the community and its future for a significant amount of time and who are well versed in the subject matter.

Along with other residents with whom we have discussed the issues, we have regrettably come to the view that the standard of scrutiny applied to the Local Plan falls significantly short of the rigour which would be applied in the corporate sector and other large private and public entities. Clearly, the development of a a Local Plan for Guildford is of paramount importance, Equally, having one in place as soon as possible is essential if Guildford is to avoid inappropriate local development of which there are numerous examples

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/1738  Respondent: 8749121 / George Paton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Objections re evidence base especially Guildford and West Surrey Strategic Housing Market Assessments (SHMA)

Failure to disclose Justin Gardner demographic housing model

Failure to procure the SHMA on open and transparent terms in accordance with the Guildford Codes of Conduct

Objectively Assessed Housing Need (OAN) fails to meet the definition of objective because it cannot be replicated by third parties, because GBC has failed in its public duty to obtain a copy of the model and its assumptions and to test the assumptions for alternative scenarios

OAN

Paragraph 2.19 of the local plan states:

"The NPPF requires councils to identify the housing needs of their area and respond positively to wider opportunities for growth. The document instructs us to use our evidence base to ensure that our Local Plan meets the full, objectively assessed needs for market and affordable homes in the housing market area, as far as is consistent with the policies set out in the NPPF."

GBC has not explicitly set out the OAN in the Local Plan. Nor has it explicitly reconciled that OAN to the Housing Target. Instead it is implied that i) the Housing Target and the OAN are synonymous and ii) the Housing Target will diverge over time if constraints emerge which show that the OAN cannot be achieved. The figure of 693 houses per annum appears nowhere in the Local Plan.

This is not an open and transparent manner of proceeding. The OAN should be expressly set out and its consistency with the policies set out in the NPPF explicitly discussed and tested to arrive at a Housing Target. To imply that the OAN and the Housing Target are currently the same but may diverge over time is to set out a false and misleading prospectus. The public is entitled to know NOW what the constraints are. It is not satisfactory that the public should embark upon an open ended process during which constraints may or may not emerge. GBC was capable of completing Transport, Environment and Heritage studies before submitting a local plan but has not done so. The public consultation is therefore premature and the public is asked to form a view of a project that is still in course of construction. There are no grounds for trusting that GBC will gather the evidence impartially or undertake diligent and conscientious analysis in the future.

SHMA and OAN evidence basis is not sound

The NPPF requires a local planning authority to make estimates of its Objectively Assessed Housing Need (OAN). It further requires an authority to assess its Housing Target in relation to its OAN by taking into account constraints - such as environmental, transport and heritage constraints.

GBC commissioned GL Hearn to prepare a Strategic Housing Market Assessment for the borough. In July, 2014 I made a Freedom of Information request to obtain a copy of the demographic housing model which was the basis of the housing need identified in the SHMA. The sequence of events was as follows:

1. GL Hearn published their Guildford SHMA
2. July, 2014 I made a FOi request to GBC to see the housing projections model (attached)
3. GBC failed to respond. I complained to the Information commissioner. On 26 September GBC supplied a copy of the model - in which only values had been pasted into the cells and all of the formulae had been removed
4. I asked to see the formulae. I considered that the exclusion of the formulae was equivalent to redacting the model - which was wholly unjustified because it was a model for a public purpose and process required for public consultation.

5 On 2 October, 2014 GBC stated:

"As you are aware, the model was produced for Guildford Borough Council by a third party and is not held by the Council. The model is the intellectual property of that third party and is commercially sensitive. They do not want to make the model publicly available. On that basis, the information is exempt under the EIR and I am therefore upholding the decision to only provide the information that was originally supplied in the Council's response of 12 September." (see attached email)
I asked GBC to procure the model—since it had paid for it—responded that the model was not held by GL Hearn either (!). A subconsultant, Justin Gardner Consulting (JGC) created the model. GBC argued that JGC had intellectual property in the model which justified it not disclosing the model. It showed no evidence that it had even asked JGC for the model.

I appealed to the Information Commissioners' Office. It held, on the basis of discussions with GBC, that GBC did not hold the information.

I appealed to the First Tier Tribunal on the basis that ‘possession’ is not limited to physical possession but must include ownership and control. I submitted that the Council paid for the model, that its contract stated that it owned the copyright and that therefore it had the right to demand to have the model. The case was heard in my absence. GBC made private submissions to the Tribunal which were not disclosed to me. The Tribunal found that ‘on the balance of probabilities’ GBC did not hold the information.

On 11 January, 2016 following publication of the West Surrey SHMA I subsequently made a Freedom of Information request to see the model supporting the West Surrey SHMA. I was informed that GBC did not hold it. It did not offer to supply even the redacted version of the Excel spreadsheet. I made similar requests to Waverley and Woking Borough Councils—which jointly commissioned the West Surrey SHMA. They each replied that they did not hold the information as the work was commissioned by Guildford.

In January, 2016 I set up a public petition on Change.org to request the information. The Petition reads:

"Councils must publicly disclose housing need calculations in Guildford and across England"

To date the petition has collected over 1,000 signatures. The list of signatories is attached. The comments made are also attached.

Justin Gardner Consulting's website is here:

http://www.justingardnerconsulting.co.uk/index.php?page=test-page

The links to the Information Commissioner's decision are here

It speaks volumes that as soon as Mr Spooner was alerted to the existence of the petition GBC changed its petition rules so that petitions organized via Change.org (which had previously been accepted) were deemed no longer acceptable.

I wrote to the Surrey Advertiser concerning the petition on 16 May drawing attention to

- The report of the House of Commons Committee on Local Plans
- The report of the Local Plan Expert Group
- The Planning Advisory Service’s ‘10 Principles for Owning your Housing Number’

The Interim Director of Development of GBC later wrote a letter to the Surrey Advertiser to claim that GBC was ‘entirely reasonable’ in not supplying the information. He also claimed that I had asked for a copy of the algorithms which made the modelling tool work. I had not asked for such algorithms—only for the missing formulae in the Excel spreadsheet which had been deliberately omitted.

On 10 June I made a formal complaint to GBC concerning the factual inaccuracies in the Interim Director’s letter to the Surrey Advertiser.

Implications and inferences

It is a travesty that a model upon which the housing need forecast for this borough for the next 15 years cannot be seen by the public. The model was commissioned for a public purpose by a public body using public money as part of a process which explicitly is subject to public consultation. How then can it not be disclosable? It is all the more puzzling because Justin Gardner’s website stated that its model could be used by Council officials to change assumptions and look at...
different scenarios. Despite this GBC claims never to have received a copy. That claim is not credible - not least because it has been able to disclose the model in Excel formal without the formulae - which suggests that a) it holds a copy and whoever copied the model into Excel had the formulae.

The demographic projections for Guildford are known to contain anomalies caused, for example, by the presence of a university. This causes a bulge in the 18-23 age bracket. Ordinarily demographers project the growth of the population across time by moving the age cohorts forwards in time. A bulge in the 18-23 age range would imply that in ten year's time those people would be requiring additional housing. However, since these are university students - a very large proportion of whom do not originate in the borough - they are unlikely to cause a proportionate increase in demand for housing.

The housing projections imply a required growth in housing of some 20% of the housing stock in only 15 years. Unless this is broken down into the different components of demand it is impossible to challenge the projections except in the most general terms. The implication that GBC has no intention of opening itself up to scrutiny and debate is hard to escape.

There are two main drivers of the housing model: demographic change and economic growth. It is known that the raw ONS figures project a fall in the population of the borough if net international migration is excluded. It is known that the largest component of population growth is 'Unattributed Population change'. To embark on the greatest building boom in the history of the borough on the basis of statistics which are incomplete and unscrutinised is an abdication of responsibility. What is the Council for if not to scrutinize these figures?

The Scrutiny Cttee was persuaded not to scrutinize the SHMA on the basis of advice from Council Officials - including the Interim Director of Development. The Interim Director of Development, Mr Neil Taylor told the Scrutiny Committee on 15 March:

"The problem is that we cannot start tampering with the Objectively Assessed Need Evidence Base....The Objectively Assessed Need has already been signed off as an evidence base document. I don't think the SHMA is a matter for scrutiny. It's too late. And the opportunity is long, long gone."

He later told the committee:

"The Objectively Assessed need (OAN), the Housing Target, the local plan the allocation the whole lot is subject to market forces. If those houses are not needed and they are not going to sell the developers won't build them. And that's the way it is. They won't over build so that house prices come tumbling down.

The wont build houses that won't sell they're in the profit making business. If the whole thing turned out to be completely wrong and there was a property crash tomorrow they just wouldn't be built. The market will always dictate." (His comments can be seen on the Guildford Borough council webcast of the debate at 2hours and 7mins into the webcast http://www.guildford.public.tv/core/portal/webcast_interactive/215454)

Isn't that just an abdication of responsibility? If the market does it all why do we even need civil servants? Not even Margaret Thatcher believed the market was that perfect. It is ironic that Mr Taylor has now left GBC and so will never be held to account for the Local Plan which he promoted.

We the public are now asked to express an opinion on a Local Plan which does not even explicitly set out the Housing Requirement, or the arithmetic showing how it is derived from the Objectively Assessed Need. And the OAN itself has never been scrutinised by the Scrutiny Committee. NO ONE in the council has ever seen, let alone critically examined, the housing projections model. The Council is supposed to be subject to the rule of law - and part of the role of the civil service is to make sure that the politicians are not a law unto themselves.

The fact that neither Woking BC nor Waverley BC are able to scrutinise the housing projections model means that the projections for the whole of West Surrey are effectively a secret.

It appears that the Council has deliberately exaggerated the economic growth projections and projected population growth on the basis of a short unrepresentative period of international migration in order to maximize the housing need forecast. The motivation appears to have been driven by a desire to use housing as an 'exceptional circumstance ' to justify building on certain sensitive Green Belt sites.
The very close association of the GBC with certain developers - in particular Surrey University and Wisley Property Investments Ltd with whom it has collaborated extremely closely over the past three years - appears to be the motivation for GBC proceed on the basis of exaggerated housing need numbers in order to facilitate removing those developers's sites from the Green Belt.

The closeness of GBC to development interests is amply illustrated by the promotional video produced for the local plan which can currently be seen on the GBC website. Rarely have I seen a more one-sided presentation of an argument. The video features a succession of speakers for interested parties and vested interests - such as Surrey University - all speaking in favour of the local plan.

The proposition that house prices are a function of supply of houses is plainly false. The annual supply of houses has seldom approached as much as 2% of the housing stock. Supply is therefore not the major determinant of prices - which are more plausibly explained by factors such as

- international investment demand
- quantitative easing by the Bank of England and its effects on mortgage lending
- Bank of England interest rates at 0.5% - the lowest in centuries - if not ever

The evidence that there is a housing shortage is not self evident. The ratio of population to housing in the borough is very roughly two people for every house - which does not obviously demonstrate a housing shortage. The greatest shortage of housing is in fact in social housing. This is largely the creation of government policy. GBC had not built any council houses for twenty years until the past couple of years. And its rate of construction is still smaller than the quantity of council houses sold each year. The total number of council houses owned by GBC has fallen some 15% since 2000 and continues to fall. The shortage has not been taken up by Housing Associations.

The basis on which the Local Plan has been prepared is not even amateur. It is shoddy and unprofessional. The evidence base obviously suffers from selection bias. The analysis is so feeble it cannot for the most part be disclosed. It is a charter for developers such as Surrey University and Wisley Property Investments Ltd, the nature of whose relationship with GBC and its Councillor is a matter of concern. Blatant political bias is apparent in, for example, the desire to create new Green Belt near the ward of the Lead Councillor for the Local Plan whilst destroying its elsewhere. A Council which seeks to set off the biggest building boom in the borough's history has a duty to justify its proposals with proper evidence and reasoned argument. Instead it has sought to use its large majority to ignore real public concerns.

Enclosures:

- Freedom of Information request for Guildford SHMA /GL Hearn's housing projections model - July, 2014
- Response of GBC dated 2 October, 2014 claiming that the GL Hearn model is commercially sensitive and the intellectual property of a third party
- Woking BC response to FOI request for the West Surrey SHMA housing projections model
- Waverly BC response to FOI request for the West Surrey SHMA housing projections model
- 16 May, 2016 letter to Surrey Advertiser re petition
- Change.org petition comments
- Change.org petition signatories
- GB Paton letter to Surrey Advertiser
- PAS publication 10 key principles for owning your housing number
- GBC/Neil Taylor letter to Surrey Advertiser
- GB Paton complaint to GBC dated 10 June, 2016

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:  
- LP2016 Woking BC Responce GB_Paton.pdf (288 KB)
- LP2016 GBC Responce GB Paton.pdf (198 KB)
- LP2016 ChangeDotOrg Comments GB_Paton.pdf (5.5 MB)
Comment ID: PSLPS16/1405   Respondent: 8749121 / George Paton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. The legal requirements

The Planning and Compulsory Purchase Act 2004 (the Act) states at s39 regarding Sustainable development:

1. Statutory requirements regarding sustainability

2) The person or body must exercise the function with the objective of contributing to the achievement of sustainable development.

- For the purposes of subsection (2) the person or body must have regard to national policies and advice contained in guidance issued by-
- the secretary of State for the purposes of subsection (1)(a) and (b);
- The National Assembly for Wales for the purposes of subsection (1)(c).

National policies which the Act requires CBC to have regard include those set out in the National Planning Policy Framework (NPPF) at, for example, paras 10, 14, and 17.

Para 10 states "Plan s and decisions need to take local circumstances into account, so that they respond to the different opportunities for achieving sustainable development in different areas".

Para 14 states "Local Plans should meet objectively assessed needs... unless, any adverse impacts of doing so would significantly and demonstrably outweigh the benefits,

When assessed against the policies in this Framework taken as a whole; or - specific policies in this Framework indicate development should be restricted."

Para 17 sets out 12 core planning principles. These include

Be genuinely plan-led, empowering local people to shape their surroundings, with succinct local and neighbourhood plans setting out a positive vision for the future of the area.

Take account of the different roles and character of different areas,
promoting the vitality of our main urban areas, protecting the Green Belts around them, recognising the intrinsic character and beauty of the countryside and supporting thriving rural communities within it;

Contribute to conserving and enhancing the natural environment and reducing pollution. Allocations of land for development should prefer land of lesser environmental value, where consistent with other policies in this Framework;

conserve heritage assets in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of this and future generations;

actively manage patterns of growth to make the fullest possible use of public transport, walking and cycling, and focus significant development in locations which are or can be made sustainable; and

Take account of and support local strategies to improve health, social and cultural wellbeing for all, and deliver sufficient community and cultural facilities and services to meet local needs.

Support the transition to a low carbon future in a changing climate,

• Failure to apply or to apply properly the legal requirements concerning the conservation of the land at the former Wisley airfield, the Parish of Ockham and the Ward of
• The evidence base contains errors regarding this site.

For example, the settlement hierarchy gives a wholly inadequate and inaccurate description of the village of Ockham. Ockham is not a nuclear village with one village center. It is a collection of agricultural settlements distributed around the Parish.

This YouTube video provides a more accurate and fuller picture of the Parish of Ockham and the place of the land at the former Wisley airfield within it:–

http://youtu.beNVnUUDSxKJk

• No legal argument or relevant facts are produced to justify taking the land out of the Green Belt

GBC engaged Pegasus Consulting to carry out a 'Green Belt and Countryside Study'. However, the question of whether there exist 'exceptional circumstances' for changing the Green Belt boundaries as required by NPPF 83 is expressly not included in Pegasus's remit.

The Green Belt and Countryside Study therefore does not produce relevant evidence. It does not answer the logically prior question. Without first knowing the answer to the logically prior question, it cannot be known if Pegasus' work is required.

S 22 of Vol V of the Green Belt and Countryside study seeks to analyse whether or not this site meets the purposes of the Green Belt. However, this is not a relevant argument. There must logically be a presumption that the land satisfies the purposes otherwise it would not have been put into the Green Belt in the first place or have survived through successive local plans.

If no exceptional circumstances exist to justify removing this site from the Green Belt then the Pegasus report is a waste of public money. The various misdescriptions of the site would still be irrelevant even if they were accurate. For example, Pegasus states that the land is an Airfield. That is not correct. No planes have flown from this site since 1972. 75% of the site is countryside - either actively cultivated or wood and grassland. But even if the site were an airfield it would make no difference to its Green Belt status.

Pegasus purports to analyse whether the land meets the 'purposes' of the Green Belt. This analysis is motivated by a desire to show that the land should not be in the Green Belt. But Pegasus is applying the wrong test. The correct test is whether there are 'exceptional circumstances' - a test which Pegasus excludes from its remit.
The Judge in the COPPAS case stated: 'I would hold that the requisite necessity in a PPG 2 paragraph 2.7 case like the present - where the revision proposed is to increase the Green Belt - cannot be adjudged to arise unless some fundamental assumption which caused tile land initially to be excluded from the Green Belt is thereafter clearly and permanently falsified by a later event. Only then could the continuing exclusion of the land from the Green Belt properly be characterised as "an incongruous anomaly". The test applies symmetrically if the intention is to remove land from the Green Belt.

Nowhere docs the local plan makes the argument that some fundamental assumption has been clearly and permanently falsified or produces evidence to support it. Far from some fundamental assumption which caused this land to be included in the Green Belt being falsified - the subsequent development of the surrounding towns and cities has in fact fortified rather than weakened the original assumptions.

Pegasus uses the purposes of the Green Belt which are defined in the NPPF to test the Green Belt in the borough of Guildford. Pegasus makes a presupposition that the NPPF definition is the only determinant of the value of any particular part of the Green Belt. The definitions in the NPPF are necessarily general because they must apply to all Green Belts across the entire country. The tests chosen by Pegasus are not logically the only tests or even the most relevant tests. Apart from look ing at the most general definition of a Green Belt in the NPPF it is also legitimate, indeed essential, to consider the purposes of the specific Green Belt under consideration. The Green Belt in the borough of Guildford was not established to protect Guildford but to serve the Metropolis of London. A highly relevant consideration or test is whether part of that Green Belt serves the Metropolis. Pegasus fails to consider this at all. Whether the land serves the Metropolitan Green Belt is, nonetheless, the single most important consideration. Does the land at the former Wisley airfield serve the overriding purpose of the Metropolitan Green Belt? Any disinterested evaluation must conclude that it does.

Just to demonstrate how self-serving and prejudiced the Pegasus report is it is worth looking at its statements about whether this land meets the purposes of the Green Belt:

Purpose 1: to check the unrestricted sprawl of large built-up areas

Pegasus state: Due to the airfield site not adjoining the main urban areas within the borough, it does not offer the opportunity for such urban areas to sprawl with in it. As a result the Green Belt does not serve this purpose in this location.

This statement is not correct in several respects. The site is not, for the most part, even an 'airfield'. The land does not have to 'adjoin' an urban area to serve the purpose of separating urban areas. Nor are the only relevant 'urban areas' within the borough of Guildford. Adjoining boroughs are also relevant. Cobham, Woking/Pyrford, Byfleet, Ripley and Horsley are all 'large built up areas' and the land is centrally placed between all three developed areas. The logic of the argument is fallacious. Taken to its logical conclusion only the last blade of grass between two settlements would serve to separate them - a ludicrous proposition.

Moreover the land serves to separate London and its suburbs to the North from Guildford and its suburbs to the South.

Purpose 2: to prevent neighboring towns merging into one another

Pegasus state: Land parcel C 18 did not include any settlements, as a result there was not the potential for development within this part of the Green Belt to result in coalescence between existing neighboring towns, and the land parcel was not considered to serve this purpose accordingly in Volume II.

Rather than set out an argument Pegasus refers to another Volume of their study, which is hardly helpful. Only the most pedantic and literal of interpretations can deny that the land separates Ripley Cobham, Byfleet, Woking and the Horsley’s.

The map below from Surrey County Council shows how the land at the former Wisley airfield ('Three Farms Meadow') is strategically positioned on the watershed between two river valleys and separates Cobham, Horsley, Ripley, Woking and Byfleet:

The land preserves the setting of the ancient settlements of Ripley and Ockham and Cobham.

Purpose 3 to assist in safeguarding the countryside from encroachment
S22 concedes that the land serves this purpose. It could not do otherwise. The land *is* countryside.

Purpose 4: to preserve the setting and special character of historic towns;

S22 argues that there are no historic towns nearby. Ripley is nothing if not an historic town situated on the main route between London and the Royal Navy in Portsmouth. Ockham and Wisley are nothing if not historic villages.

Purpose 5: to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

Pegasus' comments are incoherent. All Green Belt land serves this purpose by obliging developers to look to brownfield land first.

In short the consultants employed by GBC seek to undermine the land's Green Belt status in order to remove its protections from development. This approach is a waste of time and money. The logically prior question of whether or not 'exceptional circumstances' exist should have been asked and answered first.

- the land is not a sustainable site for a new town

The site does not meet GBC's own criteria for sustainability. The s 22-report states

'At present the Wisley Airfield PMDA C18-A would score very poorly in sustainability terms because there are no facilities and services in place.'

- Infrastructure

The evidence base gives inadequate consideration to whether local infrastructure has any spare capacity for more houses - beyond what is needed to meet local demand. Para 162 of the N PPF is not properly complied with.

2.3.1 School capacity is in the area is already at capacity and the hypothetical capacity which is mooted for the site is insufficient

The s22 report conjectures that *provided* the site is sufficiently large and attracts a sufficiently large population the site may attract services and facilities:

"For these reasons it is not considered helpful to provide a specific potential sustainability score for the site, but instead provide a range of scoring that would appear feasible, the centre point of which is based upon the following assumptions."...

"In accordance with the IHT 'desirable' walking distances identified within Volume II, Table 5.3, the following could realistically be provided:

- Primary School - 500m or less
- Nursery - 500m or less
- Healthcare facility - 500m or less
- Local Centre - 200m or less
- Community Centre - 400m or less"

This analysis is completely arbitrary. An analysis which is limited to 'walking distances' is completely trivial. No serious examination of the existing school capacity in the rest of the ward and borough is made. Any new provision which might become available at a 'new town' is unlikely to be viable for many years. In the interim the residents of the new town would be completely dependent on facilities in other neighbouring settlements. At present there is a substantial shortage of available school capacity in the area. The main primary school, The Raleigh in West Horsley is overflowing to the extent that its playground is now completely filled with temporary classrooms. The nearest secondary school is in Effingham and is unable to cope with existing demand. The next nearest secondary schools are in Guildford and Woking. Travel times from this area to Guildford and Woking are not appropriate for school children.

- Road transport access is inadequate/nonexistent Access via Elm Corner
The site currently has an access via the hamlet of Elm Corner -which forms part of the Parish of Ockham. Elm Corner does have an access onto the A3. But it has no acceleration and deceleration lane. It is consequently very dangerous. The Highways authority tolerate this situation because a) it has been there since before the A3 was turned into a three-lane motorway b) the number of cars entering and leaving Elm Corner is very low -as there are so few houses. However the Highways Authority has in the past refused permission for filming projects to access this site from Elm Corner on the grounds that large flows of daily traffic would impede the flow of traffic on the A3 and cause a traffic hazard. Given this, it is absolutely inconceivable that the Highways Authority would ever permit access to a 'new town' of 2,500 houses via Elm Corner.

Access via a planned new road onto the roundabout at Ockham Road North/Stamford Brook

This roundabout provides an exit for southbound traffic on the A3 to Ripley and the Horsley’s. It also provides access to the northbound lane of the A3. It provides no access to the southbound carriageway of the A3 going to Guildford/Portsmouth.

Wharf Land , from which WPI purchased the site, received permission to use 17 out of 17ha of the site as a waste processing facility. They won this permission on appeal to a planning inspector. They got permission subject to over twenty different conditions and because the Inspector accepted that the Surrey Waste Plan was short of waste sites.

That permission cites as a condition the building of a new access from the southbound carriageway of the A3. Permission for an access for a waste site does NOT constitute 'permissioned access' for a new town. The new town and the waste disposal site are mutually exclusive projects: they cannot both proceed as the new town proposes to use the acreage set aside for the waste plant.

The permission to access the A3 is exclusively for a waste site. The permission is not transferable to a new town proposal. First WPI need permission from SCC to relinquish the 17ha now set aside for waste processing. That permission is not a foregone conclusion. Second, WPI needs to re-apply for permission to build an access for a 2,100-house new town. That is not a foregone conclusion either.

- Local roads already at capacity

The A3 is already at capacity. Every morning the A3 slows to a standstill or to a crawl between the Ripley turn off and the M25 on the northbound carriageway. Traffic through Cobham High Street (A245), Ockham Road North through East Horsley (B2039) and Byfleet Road (A245) are already at capacity during the rush hour. Everyone who uses these roads knows that very long tail back are already a regular occurrence.

SCC Options Growth Scenarios Transport Assessment Report confirms that a new town would take traffic conditions to a state of flow breakdowns

GBC has commissioned SCC to do a traffic analysis -of the impact of ALL of the proposals in the Local Plan.

This analysis is set out in the Local Plan 'Evidence Base'.

The WPI new town is a small part of the overall analysis -which itself is subject to some major provisos:

1. It is based on 'trip analysis' data derived from an out of date census in 2001 - at least 10 years
2. It is based on data provided by GBC -and not disclosed or It is understood this data is from 2009 - ie during a recession.
3. It is top down:
SCC wrote: 'This study was undertaken at a strategic scale and consequently not all impacts of developments have been identified. However, developments of, and above, a certain scale will require individual transport assessments to be commissioned ...'

**Projected Level of Service (LOS)**

SCC use LOS to measure road capacity. The scale runs from A to F.

A is 'Free Flow'.

F is 'Every vehicle moves in lock step with the vehicle in front of it, with frequent slowing required. Travel time cannot be predicted, with generally more demand than capacity.'

Is there sufficient spare capacity to accommodate a 'new town'? No. Under 'scenario 5' (the relevant scenario) 'A3 northbound between Ockham and Wisley is rated, guess what, F!'

**Ratio of Flow to Capacity (RFC)**

The other tool SCC uses to measure the performance of a stretch of road is RFC.

'An RFC value greater than 1 means that the stretch of road or turning movement has a higher level of traffic flow than its theoretical capacity. As a result flow breakdown and extensive queues can be expected'

What is the RFC value for the A3 between Ockham and Wisley under scenario 5?

It is 1.02.

Remember that is based on out of date census data.

**What is the traffic like now?**

Anyone who uses the A3 knows that between Ripley and Junction 10 of the M25 the A3 slows to a standstill EVERY MORNING. (Our children go to school in Guildford. We see this every morning.)

That is the situation today.

**Strategic thinking**

One of Guildford's strategic advantages is its location between London, Heathrow and Gatwick.

If the traffic on the M25 between Heathrow and Gatwick gets worse - or gets an RFC score of over 85% then Guildford will have shot itself in the foot and destroyed one of its present competitive advantages.

**Proposed road closures**

To enable a new town at A35 Surrey County Council has proposed the following measures:

- Closure of Ockham lane near Upton Farm
- Closure of Plough Lane
- Old Lane to be one way from the J3
- Guileshill Lane to be one way from Ripley

The closure of these ancient routes would have a devastating effect on the amenity of existing residents. Journey times from Martyr's Green to shop in Cobham or Ripley would double. Access to the A3 would take many times longer.
The drastic measures suggested illustrate perfectly that a new town on this site is not sustainable.

New works to facilitate a new town

The developer states that new works on the M25 and A3 would facilitate a new town on this site. They would not. They are required merely to relieve at least in some part the existing congestion. Plans to build a new lane on the M25 between J10 and J14 using the hard shoulder are mere speculation. Even if built a new lane would only supply much needed current capacity - not capacity for new towns.

- Public transport

WPI promote the site as having access to NINE mainline stations within 5 miles. As usual WPJ’s statements are at best promotional and at worst just false.

They are Woking, West Byfleet, Byfleet & New Haw and Weybridge on the Woking line and Clandon, East Horsley, Effingham Jnctn and Stoke D’Abemon on the Guildford branch line.

It is a stretch to call the Effingham line a 'main line'. It is a suburban stopping service. The Woking line is, indeed, a main line. But you’ll only get on a fast train in Woking or Weybridge.

The distance from Elm Corner at the former Wisley Airfield to Woking is shown as 6 miles on Google maps and over 11 miles for the return journey

Anyone who has ever made this journey will know that it is rare that the journey can be done in less than half an hour especially in rush hour when it can easily take 40 minutes or more.

The distance from Elm Corner to Weybridge is shown as 6.9 miles on Google maps. If you don't get stuck on Byfleet Road in the rush hour you'd be lucky to do the journey in less than 40 minutes.

WPI claims that buses will run with a 10-minute frequency. None currently exists in Ripley Horsley or Cobham. This is pure marketing puff.

- The site is too small to be sustainable on the basis of the evidence provided

Pegasus state that a site area of at least 110 ha is required to support a 'sustainable' site. GBC included neighbouring land in the site without consulting the landowners. That indicates a clear bias in favour of development.

When those landowners wrote to GBC to state that their land was not available and would not be sold, GBC continued to include their land in the site until challenged in writing with an opinion from Leading Counsel.

After receiving Leading Counsel’s opinion GBC reduced the size of the site to 69ha. The number of houses is reduced from 2,500 to 2,100. This represents a site density of 33 houses per hectares without allowing any land for the proposed facilities such as schools and shops and the necessary roads and car parking.

The Issues and Options paper stated that land opposite this site at the Royal Horticultural Society was NOT suitable for development as being a) reliant on car transport b) requiring inappropriate housing densities and c) being too close to the Special Protection Area (SPA) around Ockham Common. Identical arguments apply to this site. The failure to apply the same logical to sites within a few hundred metres of each other is yet another indication of prejudice.

- Environmental limits

The UK Sustainable Development Strategy 2005 states that development should have regard to ‘Living within environmental limits’. This local plan gives no consideration to these. The sustainability appraisal is not complete. The requirement of NPPF para 165 has not been met.

Habitats Regulations Assessment
When the consultation process for the first draft of the local plan began GBC did not have a Sustainability Assessment. The HRA was not completed until AFTER the draft local plan was sent out to consultation. The consideration given to A35 in the HRA is perfunctory. It merely 'parks' the issues:

Development of a new settlement could lead to effects on the Thames Basin Heaths SPA, through reduced air quality from associated transport movements and increased recreational pressure.

Other comments are wrong and/or banal:

Release and designation of Green Belt land in itself does not have HRA implications; however, a strategic approach to support the integrity of the Thames Basin Heaths management strategy would be beneficial.

The serious problems of attracting more visitors to the SPA/SSSI at Ockham Common are mentioned but not seriously addressed:

Increased access to the countryside needs to be managed in a way that does not lead to increased recreational pressures on the Thames Basin Heaths.

The evidence suggests that GBC could not be trusted to provide the necessary 'management'

Ockham is not discussed at all in the document. It appears in a list of 'Hamlets' and there is a statement that a 'settlement hierarchy' designation does not have HRA implications. That statement is not self-evidently true - especially in relation to creating a new town in the centre of Ockham which would be the third largest settlement in the entire borough.

SNCI

The available evidence for Sites of Nature Conservation Interest is nine years out of date. The whole of the land owned by Wisley Property Investments Ltd within AJ5 has been proposed as an SNCI:

If the new town comprises 2,100 houses and if their pet populations follow the national averages then the new town will bring approximately 350 new cats and some 500 new dogs to the area immediately adjacent to the SPA. It is not credible that it will be possible to exclude these from the SPA.

This site is too close to the SPA. Part of the site is an SNCI which the local plan proposes to build on. The SNCI is part of the 'living landscape' and forms an essential corridor through which wildlife can migrate to and from Ockham and Wisley Commons.

The local plan proposes using a substantial proportion of the site as a Suitable Alternative Natural Greenspace or SANG. The purpose of a SANG is to attract the public AWAY from the SPA. A SANG adjacent to the SPA is likely to have the opposite effect. The choice of location for the SANG is driven purely by expediency (for the developer) and is otherwise irrational.

Information about the wildlife on Ockham Common can be found in this YouTube video:


Heritage Assets

The evidence base for this is nonexistent. The Council has had years to consider this. It has carried out some Conservation Area Character appraisals. Unsurprisingly it has not done one for Ockham and Ripley. Without such an appraisal how can the Council claim seriously to have properly evaluated whether Ockham is a suitable and sustainable site for the third largest town in the borough?

There are several Conservation Areas in the ward - the largest being Ripley Village
itself. There are 49 Listed Buildings in Ripley, 29 in Ockham and 6 in Ripley. Despite this no assessment of the heritage assets in Ripley Ockham and Wisley has been completed. This is contrary to the requirements of The Listed Building and Conservation Areas Act 1990 and NPPF para 126 and 132.

Information about the Heritage of the Parish of Ockham can be found in this YouTube video:

http://youtu.be/Pb0I6Jgbst0

- Rural economy

It is a core principle of the NPPF (set out in para 17) that planning should support thriving rural communities. Ockham has thriving rural communities with several businesses based on agriculture and horse riding and stabling. The removal of up to 14ha of land which is currently actively farmed will cause irreparable harm to the local rural economy and is likely to result in permanent job destruction.

nowhere does the local plan make any consideration of this.

This local plan should be condemned for failing to follow the planning principles set out in NPPF para 17 and failing to set out all the required evidence and to justify its proposals. GBC is culpable for

- putting this site into the local plan without legal or factual This has wasted everyone’s time and money
- putting the site into the local plan before critical parts of the evidence base are available or complete - as described above
- seeking to draw conclusions about the development potential of the site which are not justified by the facts
- not taking account of public feedback from the Issues and Options consultation
- collusion with the developer - to the extent of ‘regulatory capture’

The attempt to take this site out of the Green Belt in collusion with the developer without relevant evidence or legal argument is a disgrace.

The definition most widely accepted globally is the 1987 United Nations one from the Brundtland Report: “Development that meets the needs of the present without compromising the ability of future generations to meet their own needs”. Developing this site is not consistent with the principle of sustainability.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:  
- [5.PNG](#) (529 KB)  
- [4.PNG](#) (400 KB)  
- [6.PNG](#) (231 KB)  
- [8.PNG](#) (4 KB)  
- [7.PNG](#) (272 KB)  
- [1.PNG](#) (358 KB)  
- [3.PNG](#) (353 KB)  
- [2.PNG](#) (292 KB)
OBJECTION

No legal argument or relevant evidence to support the development of this Green Belt site has been presented.

Development of the site contravenes the NPPF para 83 and para 89, inter alia.

1. The references to site allocation A35 in the local plan

There are a limited number of references to this site in the Local Plan Strategy and Sites document, specifically in

- section 3 (SpatialVision) where it is stated that a new settlement will be created at this site,
- Policy S2,
- para 3.17 where it states "Whilst the general extent of the Green Belt has been retained, land has been removed from the Green Belt in order to enable development around Guildford urban area, selected villages, and at the former Wisley airfield. The Green Belt boundary has also been extended between Ash Green village and the Ash and Tongham urban area in order to prevent coalescence."

- Appendix C on infrastructure.'

Policy P2 Green Belt

Policy P2 - inside the Blue Box does not mention site A35. The policy states, "We will continue to protect the Metropolitan Green Belt, as shown on the proposals map, against inappropriate development. In accordance with national planning policy, the construction of new development will be considered inappropriate and will not be permitted unless very special circumstances can be demonstrated."

Since the former Wisley airfield is designated Green Belt one might at first sight conclude that it was protected by Policy P2 which 'will continue to protect the Metropolitan Green Belt ....against inappropriate development. ...'.

However the promise is qualified by reference to the 'proposals map' - which one supposes must refer to the 'Policies Map'.

[1]

However the former Wisley airfield is mentioned in the supporting paragraphs to Policy P2:

4.3.16 National planning policy requires that Green Belt boundaries are only amended in exceptional circumstances and that this must be undertaken as part of the Local Plan process. We consider that exceptional circumstances exist to justify
the amendment of Green Belt boundaries in order to facilitate the development that is needed and promote sustainable patterns of development.

4.3.17 Whilst the general extent of the Green Belt has been retained, land has been removed from the Green Belt in order to enable development around Guildford urban area, selected villages, and at the former Wisley airfield. The Green Belt boundary has also been extended between Ash Green village and the Ash and Tongham urban area in order to prevent coalescence.

Site A35 is also mentioned in Policy 14 'Green and Blue Infrastructure' where it is mentioned as a previously developed site, and at Policy S2 'Borough wide strategy' where it is mentioned as contributing 2,000 houses.

A word search confirms that there are no other references to this site in the Strategies and Sites document.

2. The local plan is devoid of legal argument or relevant evidence to support the development of the former Wisley airfield

All the references to the former Wisley airfield in the Strategies and Sites document are cited in part or in full above. It is remarkable that not one legal argument and not one piece of relevant evidence is evinced to support the proposition that this Green Belt site should be developed.

The complete absence of any attempt to provide legal argument and relevant evidence is so remarkable as to be astonishing and extraordinary.

Far from providing positive legal argument and relevant evidence to support development nothing is advanced to counter objections arising from the obvious and multiple contraventions of the NPPF.

Since no positive legal arguments are advanced the public is unable to refute them. It is faced with the administrative injustice of being asked to respond to a consultation about a governmental decision that has not yet been made and a potential action that is contingent on future argument.

In case the argument is run that the legal justification for changing the Green Belt boundaries is set out elsewhere in the evidence base, it should be noted that the authors of the Green Belt and Countryside Study explicitly and expressly state that it was NOT part of their remit to consider whether exceptional circumstances exist. On page 3 of Vol V Pegasus expressly state that evaluation of exceptional circumstances is not within their remit:

18.4 Whether exceptional circumstances exist will depend not only on the site specific circumstances but the wider background also. For example, if it is established that suitable temporary appropriate locations can come forward to provide for the necessary level of housing for the borough, then it is possible that exceptional circumstances will exist subject to the assessment of other considerations put forward in paragraph 116 of the NPPF.

18.5 It is not within the remit of this Study to assess whether exceptional circumstances exist to enable major development, and there is clearly some uncertainty over what GUILDFORD BOROUGH GREEN BELT AND COUNTRYSIDE STUDY 4 should be classed as major development in such instances. As a result, any PDAs that are identified in this Study within the AONB would require closer scrutiny by the Cot.nnc1 prior to any allocation being made. This would take account of the latest information at the time before conclusions can be drawn on, firstly whether exceptional circumstances need to be demonstrated, and secondly if they can be.
In the absence of any positive legal case being presented for changing the Green Belt boundary at site A35 no further consideration should need to be given to this matter. The proposition is self evidently contrary to the NPPF and it is an abuse of administrative power to force this site into the draft local plan and oblige the public to consider a completely hypothetical and unsupported proposition.

3. Proposed development of site A35 would contravene the NPPF’s protection of the Green Belt -set out at para 83.

Most obviously the NPPF protects the Green Belt against inappropriate development. Since the former Wisley airfield is in the Green Belt all development of it is by definition inappropriate.

Para 83 NPPF states:

83. Local planning authorities with Green Belts in their area should establish Green Belt boundaries in their Local Plans which set the framework for Green Belt and settlement policy. Once estab Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan. At that time. authorities should consider the Green Belt boundaries having regard to their intended permanence in the long term, so that they should be capable of enduring beyond the plan period.

The local plan omits to mention ANY exceptional circumstances. GBC has not properly set out coherent legal argument and relevant evidence to show that exceptional circumstances justify altering the Green Belt boundaries to exclude this land from the Green Belt. I attach GBC’s disclosure of its understanding of the meaning of exceptional circumstances. This is not consistent with the more stringent definition of the meaning of the words set out in the legal precedents laid down by the courts, in particular the Court of Appeal. For the avoidance of any doubt, the courts have held that the mere process of creating a local plan does NOT itself constitute an 'exceptional circumstance'.

Advice given by Mr David Vickery (of the Planning Inspectorate) to St Albans in 2009 stated:

5) The numbers of houses presently needed on Green Belt land and their approximate locations should be stated. The exceptional circumstances that require this course of action should be stated. Any suggested location should be sustainable and have as little effect as possible on the Green Belt. If possible, the need for Green Belt release should be phased to the end of the plan period so that the detail of the sites and their boundaries could be devolved down later Site Allocatons DPD using regional and national guidance for selection, together with any local criteria that may be appropriate to state in the CS. The CS would also have to say (or delegate the task to a later DPD) what would be the mechanism or circumstances that would trigger the release of Green Belt land for housing.

I attach the full note of Mr Yickery's advice to St Albans.

GBC’s draft local plan does not adhere to this advice because this site (site A35) is in the Green Belt and the exceptional circumstances that require building on it have not been stated. Moreover the site is demonstrably NOT sustainable.
3. Proposed development of site A35 contravenes declared government policy.

Eric Pickles wrote to Sir Paul Beresford MP on 4 August, 2014 as follows:

Our National Planning Policy Framework asks local authorities to plan to meet locally assessed housing needs in full. It is up to each local authority to decide how best to meet its objectively assessed housing need (and other development needs), whether through a Green Belt review or not. However, there has been no weakening of policy in this area: the Framework is quite clear that permanence is one of the essential characteristics of Green Belt, and it emphasises that Green Belt boundaries may be altered only in exceptional circumstances. If a local authority considers that adjustments to such a boundary are essential, they can be taken forward only through the Local Plan process. We have also made clear that it must always be transparent that it is an authority itself that has proposed reviewing its Green Belt.

Nick Boles wrote to Sir Paul on 7 February, 2014:

Green Belt protection

My letter to you emphasised the importance we continue to attach to Green Belt as a way to prevent sprawl and encroachment on open countryside. The National Planning Policy framework provides strong protection: It states that permanence is an essential characteristic of Green Belt, that inappropriate development in Green Belt should not be approved except in very special circumstances, and that a Green Belt boundary may be adjusted only in exceptional circumstances, using the Local Plan process of consultation followed by independent examination.

4. Proposed development of site A35 is not eligible for any of the exceptions in NPPF para 89

GBC do not advance the argument that the site may be developed under any of the exceptions provided for in para 89 of the NPPF.

It is correct not to do so.

It is dubious whether much if any of the site meets the definition of 'previously developed land'.

The NPPF definition of previously developed land is:

Previously developed land: Land which is or was occupied by a permanent structure, including the curtilage of the developed land (although it should not be assumed that the whole of the curtilage should be developed) and any associated fixed surface infrastructure. This excludes: land that is or has been occupied by agricultural or forestry buildings; land that has been developed for minerals extraction or waste disposal by landfill purposes where provision for restoration has been made through development control procedures; land in built-up areas such as private residential gardens, parks, recreation grounds and allotments; and land that was previously-developed but where the remains of the permanent structure or fixed surface structure have blended into the landscape in the process of time.

The land was previously used for war-time purposes and 'provision for restoration was explicitly made'. War time purposes do not come into the NPPF definition of previously developed land. But in all justice they should - especially where provision for restoration was made by HM Government and then subsequently reneged upon.

Even if reliance is not placed on the implied exemption for land for which 'provision for restoration' was made, it is the case that the former Wisley airfield falls into the exclusion (to the exception) set out in the definition, namely 'the remains of the permanent structure or fixed surface have blended into the landscape in the process of time.'
The original structures were ALL removed when the land was sold back to its original owner under the Crichtel Down code provisions as agricultural land in 1980. The runway was not removed for reasons of cost. It is not accepted that the runway falls within the meaning of 'fixed surface structure'. But even were it to be accepted purely for the purpose of argument it has blended into the landscape in the process of time. The present development proposals envisage NO reuse of any part of the original structures.

Para 89 NPPF states

89. A local planning authority should regard the construction of new buildings as inappropriate in Green Belt Exceptions to this are:

- buildings for agriculture and forestry;
- provision of appropriate facilities for outdoor sport, outdoor recreation and for cemeteries, as long as it preserves the openness of the Green Belt and does not conflict with the purposes of including land within it;
- the extension or alteration of a building provided that it does not result in disproportionate additions over and above the size of the original building;
- the replacement of a building, provided the new building is in the same use and not materially larger than the one it replaces;
- limited infilling in villages, and limited affordable housing for local community needs under policies set out in the Local Plan; or
- limited infilling or the partial or complete redevelopment of previously developed sites (brownfield land), whether redundant or in continuing use (excluding temporary buildings) which would not have a greater impact on the openness of the Green Belt and the purpose of including land within it than the existing development.

Para 89 provides for previously developed sites in Green Belt to be redeveloped provided that the development ‘would not have a greater impact on the openness of the Green Belt and the purpose of including land within it than the existing development.’

There is no ‘existing development’. But even supposing for the sake of argument that the former runway were deemed to be development despite there being no structures, redevelopment as a ‘new settlement’ of 2,100 houses could not possibly be considered to have no greater impact than the existing runway.

No more than a very small part of the site could be considered ‘previously developed’ The developer's website describes the land as follows:

[2]

The majority of the land is agricultural and that land does not and never has met the definition of ‘previously developed’. So by definition development is inappropriate and no exceptions under para 89 are available.

On these figures less than 26% of the site is ‘concrete’. However the area of concrete exaggerates the extent of the land which could conceivably be considered ‘previously developed’, if any. This is because the only part of the concrete which had structures on it, namely the area of the aircraft hangars, is much smaller than 74 hectares. It may amount to less than 30 acres.
Moreover, that area which was formerly covered by aircraft hangars is already subject to a development proposal which has received planning permission for an 'In Vessel Composting Facility' covering some 17 hectares (c50 acres) out of the total land area of 114 hectares. That land is presently not available for house building. If that land is excluded then it appears that none of the land could conceivably be previously developed.

**Exceptional circumstances**

The Gallagher v Solihull case (April, 2014 High Court England & Wales) clarifies that the NPPF has not changed the previous definition of 'exceptional circumstances'. The judge stated:

'However it is not arguable that the mere process of preparing a new local plan could itself be regarded as an exceptional circumstance justifying an alteration to a Green Belt boundary. National guidance has always dealt with revisions of the Green Belt in the context of reviews of Local Plans ... and has always required 'exceptional circumstances'.

Whilst each case is fact-sensitive and the question of whether circumstances are exceptional for these purposes requires an exercise of planning judgment, what is capable of amounting to exceptional circumstances is a matter of law and the plan maker may err in law if he fails to adopt a lawful approach to exceptional circumstances. Once a Green Belt has been established and approved, it requires more than general planning concepts to justify an alteration.'

In Carpets of Worth v Wyre Forest District Council (1991) ('Carpets of Worth') March, 1991 (Court of Appeal) the judge stated:

'As it directly prejudices landowners in the otherwise proper development of their land, an extension to the green belt should not be brought into effect unless it can be justified directly by those purposes for which the green belt is designed. There must, therefore, be an inhibition in extending a green belt so as to avoid sterilising unnecessarily neighbouring land ... just as much as reduction in the boundaries of the green belt, which would prejudice the purposes of that green belt. must be made only in exceptional circumstances. On this basis I think that the general concept of the advice in the circulars is that once a green belt has been established and approved as a result of all the normal statutory processes it must require exceptional circumstances rather than general planning concepts to justify an alteration. Whichever way the boundary is altered there must be serious prejudice one way or the other to the parties involved.'

The Local Plan proposes to change the Green Belt boundary in Ockham. It does not set out this change clearly and unambiguously in prose. It is done by reference to a 'Policies Map' from which one is supposed to infer the change.

The change is to make my garden hedge the new Green Belt boundary. An organic feature such as a hedge is impermanent and is not therefore a 'defensible' Green Belt boundary. Moreover the change in the boundary is a serious prejudice to me as a neighbouring landowner. My property has been in the Green Belt for 50 years and my development rights have been restricted accordingly - as have the rights of all the neighbouring landowners. I have been obliged to maintain the open character of the Green Belt. But now my neighbour, Wisley Property Investments Ltd, is to be suddenly freed from the constraints of the Green Belt and to be allowed to construct the third largest town in the borough within metres of my property around some 240 yards of my hedge and utterly change forever the setting of my house, a Grade II fifteenth century farmhouse and garden laid out in 1975 by Russell Page.
GBC is proposing to make this change without making a proper demonstration that the agricultural land adjacent to my property is a sustainable site for a new town and without setting forth ANY exceptional circumstances. This procedural irregularity shows complete disregard for planning law.

Summary

This letter sets out only a few of the many valid objections to the development of the site. It is little short of astonishing that this site has been taken forward into the local plan despite the numerous legally argued and factually evidenced objections already received by GBC as part of the Issues and Options consultation process.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents: 

- 1.png (103 KB)
- 2.png (37 KB)

Comment ID: PSLPS16/1412  Respondent: 8749121 / George Paton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

OBJECTION: evidence base shows no sequential testing of alternative sites

Before selecting a site in the Green Belt for development the promoter, Wisley Property Investments Ltd, a Caymans company, and Guildford Borough Council have an obligation to establish that there are not other more suitable sites to develop outside the Green Belt. In other words, the developer and Guildford Borough Council should apply a 'sequential test'.

The evidence base does not evaluate alternative sites or show that agricultural land at the former Wisley airfield in the centre of the Parish of Ockham is suitable for development and 'sustainable'.

It is instructive to compare site 56, near Ash, with site 66 (agricultural land at the former Wisley airfield). Although the gross area of land at site 66 is much greater, on a net basis, after allowing for land which must be set aside for SANGS, for the Surrey Waste Plan allocation, and for roads and amenities it is in fact the same size or smaller than site 56. Despite the site being of comparable size when compared on a net basis the number of houses planned for at site 66 is over 2000 while only some 400 houses have been given permission at site 56. This illustrates both the potential for more housing at site 56 and the ridiculously high density of housing required at site 66 to cram over 2000 houses into such a small net area.

I set out below a comparison of the two sites. Any rational analysis of the two sites shows that site 56 is far more sustainable than site 66. For example site 56 is adjacent to a railway station, has existing access to several A and B roads. In addition there are a number of primary and secondary schools within walking or cycling distance of the site. This is one of many reasons for objecting to this local plan.
<table>
<thead>
<tr>
<th>Criteria</th>
<th>Land at Ash &amp; Tongham</th>
<th>Land at former Wisley airfield</th>
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<tbody>
<tr>
<td>1. Metropolitan Green Belt This is a nationally recognised protective designation</td>
<td>No</td>
<td>Green Belt</td>
</tr>
<tr>
<td>2. Special Protection Area (SPA)</td>
<td>No</td>
<td>SPA - immediately adjacent; less than 400m</td>
</tr>
<tr>
<td>In March 2005, the government designated areas of heathland within the Thames Valley as the Thames Basin Heaths Special 12 Protection Area (TBH SPA) under the European Commission Birds Directive. Natural England believes that recreational use of the heaths arising from housing developments near to a SPA will disturb rare bird populations. As a result, all housing developments within five kilometres of a SPA are subject to stringent tests and impact assessments and housing development with 400m is prohibited.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>3. Sites of Special Scientific Interest (SSSI)</td>
<td>No</td>
<td>SSSI</td>
</tr>
<tr>
<td>These are sites designated by Natural England which are considered to the best wildlife and geological sites</td>
<td></td>
<td></td>
</tr>
<tr>
<td>4 Conservation areas</td>
<td>[ ]</td>
<td>Ockham Mill Conservation Area (downstream from site on Stratford Brook) Bridge End Conservation Area {below site and subject to surface water runoff} Ripley Village Conservation Area (subject to traffic deterioration)</td>
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<tr>
<td>Areas designated for their special architectural and historic interest.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>5. AONB</td>
<td>No</td>
<td>No - but views to and from</td>
</tr>
<tr>
<td>6. Scheduled Ancient Monuments</td>
<td></td>
<td>Yarne Grade 2 listed 1470 farmhouse; garden laid out by Russell Page 1975; immediately adjacent Upton Farm, Grade 2 listed</td>
</tr>
<tr>
<td>Section</td>
<td>Details</td>
<td></td>
</tr>
<tr>
<td>---------</td>
<td>---------</td>
<td></td>
</tr>
<tr>
<td>7. Flooding</td>
<td>Flood Zone 1 (low risk) but surrounding areas vulnerable to surface water run-off</td>
<td></td>
</tr>
<tr>
<td>8. Scale</td>
<td>87ha gross&lt;br&gt;Less set aside for&lt;br&gt;* public footpaths&lt;br&gt;Net 8Sha est 36.8ha&lt;br&gt;114.7 gross&lt;br&gt;Less set aside for&lt;br&gt;* SANG: min 49.9ha&lt;br&gt;* Open spaces 21ha&lt;br&gt;* public footpaths 0.9ha&lt;br&gt;* new roadways 5.8ha&lt;br&gt;* traveller site, local centre, utilities etc 1.7ha&lt;br&gt;Net 36.8ha</td>
<td></td>
</tr>
<tr>
<td>9. Current use</td>
<td>Agriculture&lt;br&gt;Best &amp; most versatile&lt;br&gt;App 9.6 and ES vol 1 para 3.6.6&lt;br&gt;Applic no 15/p/00012:&lt;br&gt;Best &amp; most versatile land:&lt;br&gt;45.8 ha (40%)&lt;br&gt;Previously developed 16ha 14%&lt;br&gt;Countryside (grassland etc):&lt;br&gt;17.8ha (15%)</td>
<td></td>
</tr>
<tr>
<td>7. Sustainability Ranking (Settlement Hierarchy May 2014)</td>
<td>Ranked no 2/32&lt;br&gt;Ranked 31/32</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Sustainability score (Settlement Hierarchy May 2014)</td>
<td>Ash &amp; Tongham urban area total facilities: 17</td>
</tr>
<tr>
<td>---</td>
<td>---</td>
<td>---</td>
</tr>
<tr>
<td>8</td>
<td></td>
<td></td>
</tr>
<tr>
<td>9</td>
<td>Total public transport score</td>
<td>Ash &amp; Tongham: 9</td>
</tr>
<tr>
<td>10</td>
<td>Railway links</td>
<td></td>
</tr>
<tr>
<td>&quot;Stations that are over a km walk from the village settlement have been given a score of 0 as they do not add to the settlements sustainability.&quot;</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>Ash station</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Immediately adjacent to nearest part of site</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Effingham Junction</td>
<td></td>
</tr>
<tr>
<td></td>
<td>2.83km (1.76m) from nearest part of site</td>
<td></td>
</tr>
<tr>
<td></td>
<td>East Horsley S.Olkm (3.1Sm) from nearest part of site</td>
<td></td>
</tr>
<tr>
<td>10.</td>
<td>Schools (Settlement Hierarchy)</td>
<td>Ash &amp; Tongham Score: 9</td>
</tr>
<tr>
<td>11.</td>
<td>Employment total score</td>
<td>Ash: 9</td>
</tr>
</tbody>
</table>

**56 Land in Ash and Tongham**

<p>| Site address | Land to the east of Ash and Tongham |
| Location | Ash and Tongham urban area |
| Ward | Ash South and Tongham,Ash Wharf |
| Ownership | Private (multiple) |</p>
<table>
<thead>
<tr>
<th>Area (size)</th>
<th>87 ha</th>
</tr>
</thead>
<tbody>
<tr>
<td>Existing use</td>
<td>Fields</td>
</tr>
<tr>
<td>How was the site identified?</td>
<td>Green Belt and Countryside Study, SHLAA</td>
</tr>
</tbody>
</table>
| Considerations | • Currently Countryside beyond the Green Belt  
|                | • Greenfield  
|                | • Surface water flooding  
|                | • Flood zone 1 (low risk) |

There may be other constraints specific to smaller areas of land within this site area.

There are planning permissions for new homes within this area of land, including a planning permission for up to 400 new homes.

<table>
<thead>
<tr>
<th>Allocation</th>
<th>Housing (C3)</th>
</tr>
</thead>
<tbody>
<tr>
<td>timescales</td>
<td>1-5 and 6-10 years</td>
</tr>
</tbody>
</table>

Opportunities/commentary

Whilst this area of land is within multiple land ownership, and may come forward for development at different times within the plan period, we expect significant regard to be had to the impact of development on the existing character of the area, and the infrastructure needs. New homes could be provided in this area (of which 45% will be affordable homes*).

*The planning permission granted for up to 400 new homes in this area will contribute 40% affordable housing.
<table>
<thead>
<tr>
<th></th>
<th><strong>Land at the former Wisley airfield</strong></th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Site address</strong></td>
<td>Land between Ockham and Wisley common, Ockham</td>
</tr>
<tr>
<td><strong>Location</strong></td>
<td>New settlement</td>
</tr>
<tr>
<td><strong>Ward</strong></td>
<td>Lovelace</td>
</tr>
<tr>
<td><strong>Ownership</strong></td>
<td>Private</td>
</tr>
<tr>
<td><strong>Area (size)</strong></td>
<td>69 ha</td>
</tr>
<tr>
<td><strong>Existing use</strong></td>
<td>Former airfield</td>
</tr>
<tr>
<td><strong>How was the site identified?</strong></td>
<td>Green Belt and Countryside Study (volume 5, C18)</td>
</tr>
<tr>
<td><strong>Considerations</strong></td>
<td>• Currently Green Belt</td>
</tr>
<tr>
<td></td>
<td>• Within 400m to 5km of the Thames Basin Heaths SPA, where the impact of development can be avoided</td>
</tr>
<tr>
<td></td>
<td>• 16.98ha in the north west corner of the site is allocated for waste use in Surrey Waste Plan 2008, and has an existing planning permission for an in vessel composter with associated highways and other improvements.</td>
</tr>
<tr>
<td></td>
<td>• Flood zone 1(low risk)</td>
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<tr>
<td></td>
<td>• Majority is greenfield (partially previously developed land - see Inspector's decision application reference 200810104)</td>
</tr>
<tr>
<td></td>
<td>• Interventions will be required which address the potential highway performance issues which could otherwise result from the</td>
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development. The Infrastructure Delivery Schedule identifies the locations on the local Highway Network and the Strategic Highway Network which could be expected to experience the most significant potential highway performance issues, in the absence of mitigating interventions, from development of this site.

• Other supporting infrastructure must be provided on the site, including
  - a new two-form entry primary school, local retail centre, community, and faith building, healthcare building incorporating a GPs surgery,
  - leisure and recreation facilities, local retail centre, open space including playgrounds, playing fields and allotments, Suitable Alternative Natural Green Space (SANG), high speed Broadband upgrades, drainage and any flood mitigation measures needed.

• Appropriate assessment required at project level to consider impact on the Thames Basin Heath Special Protection Area (SPA) and Environmental Impact Assessment to consider impact on the Site of Nature Conservation Interest.

<table>
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<tr>
<th>Allocation</th>
<th>Housing (C3), Traveller pitches (sui generis), Employment use (as a designated strategic employment site) - Offices (Bla), Research and development (B1b), Light industrial (B1c), general industrial (B2), storage and distribution (BB), education, community and health services buildings (D1), open space. 16.98ha in the north west corner of the site is allocated for waste use In Surrey Waste Plan 2008</th>
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<tr>
<td>Timescales</td>
<td>1-5, 6-10 and 11-15 years</td>
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<tr>
<td>Opportunities /commentary</td>
<td>This is a strategic development site that can accommodate a mix of uses, primarily residential (up to 2,100 homes, including at least 40-45% affordable homes, and eight Traveller pitches), creating a mixed sustainable community. Part of the site will be designated as a strategic employment site and is expected to deliver a significant amount of employment use.</td>
</tr>
</tbody>
</table>

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
- 4.png (627 KB)
- 1.png (275 KB)
- 3.png (620 KB)
- 2.png (209 KB)
OBJECTION Site allocation A35: 'land at former Wisley Airfield'

- Failure to comply with GBC's Probit in Planning Code of Conduct and the Nolan Principles
- Regulatory Capture: colluding with the owner of this site in order to change local planning law by including this site in the draft local plan without justification on the basis of sound planning principles, in contravention of planning law, and in contravention of GBC's Probit in Planning Code
- Misrepresentation of the facts concerning this site
- Predetermination of the decision to promote this site in the Local Plan and to remove it from the Green Belt

1. Failure to comply with GBC's Probit in Planning Code of Conduct and the Nolan Principles

During the compilation of the draft local plan there have been multiple and serious breaches of GBC's Codes of Conduct.

It is astonishing that a developer has managed to achieve pride of place for its site in both the Issues and Options paper and in the local plan as a site for a new town - despite relevant evidence and legal argument in support of that site being against inclusion.

The owner of Site A35 is a Cayman Islands Company called Wisley Properties investments - which is a holding company for various subsidiaries. [Response has been redacted due to statements being considered potentially defamatory, derogatory, inflammatory or offensive in nature.] WPI is fronted by a conservative Councilor from the Vale of White Horse called Michael Murray.

The Probit in Planning Code of Conduct can be found here:

The Code deals explicitly with 'Pre-Application Discussions (page 4)'. The first three bullets define a clear process.

Councilors will only be involved (primarily for fact-finding) in pre-application discussions on major schemes when a specific forum has been arranged by officers for that purpose.

- In complex or contentious cases, at least one planning officer will be

- A meeting note will be taken by planning officers and placed on the relevant file. In some cases, this might be a previous planning file, in others it might be the general file for the area. Some pre-application discussions are undertaken on a confidential basis and these will be placed in a confidential envelope on the appropriate file.

- It will be made clear that the planning officers are giving provisional views (based on the development plan and up-to-date government guidance) ; that no decisions are being made and that decision-making rests with councilors at Planning Committee or by the relevant officer under delegated powers.

- Similar issues apply to the development of planning policy. There may be occasions where owners, developers or other interested parties will wish to discuss with councilors aspects of emerging policy in the development plan and other policy
In July, 2014 I requested disclosure of the minutes of meetings between GBC and WP! pursuant to the GBC's Probity in Planning Code of Conduct. No response was forthcoming. I therefore complained to the Information Commissioner. Following that complaint, I received a response over six months later dated 17 February, 2015 (attached). The council chose to use a public interest defense in order not to disclose the information. It appears that GBC officials themselves took minutes of the meetings - as required by the Probity Code.

There remains no explanation of how the Council managed the conflicts of interest involved in providing pre-application advice and also in acting at a statutory planning authority with quasi-judicial powers. For example, no information has been given as to whether the same personnel were involved in giving the applicant advice and also involved in making recommendations concerning whether the application site was sustainable or whether a subsequent planning application should be refused or recommended.

The Probity in Planning Code of Conduct states that Councilors should 'restrict pre-application advice to procedures and policies only'. It is clear that Council officials went far beyond restricting pre-application advice to procedures and policies only.

At best I suspect procedural irregularities and at worst breaches of the Codes of Conduct. Subsequent to the publication of planning application 15/P/00012 I requested copies of the minutes of the meetings attended by Savills on behalf of WP! as detailed in the planning application. Pursuant to that request I received copies of some but not all of the relevant minutes. Those minutes show that GBC and WP! engaged in a joint strategy to include the site in the local plan with a view to making development possible. GBC officials also advised on where to hold public consultations (in Guildford rather than in Ockham) and how to approach other public bodies such as Natural England.

1. Regulatory capture: colluding with the owner of this site in order to change local planning law by including this site in the draft local plan without justification on the basis of sound planning principles, in contravention of planning law, and in contravention of GBC's Probity in Planning Code.

A35 has been promoted as, inter alia, the 'only' site in the Guildford Green Belt which does not satisfy the criteria for inclusion in the Green Belt and the only sustainable site for a new town in the entire borough. The basis for these statements is not set out in the draft local plan and the evidence base is not consistent with these statements.

GBC has neither maintained a proper distance between itself and the developer nor adopted a critical attitude to the developer's promotional claims.

The objectivity and impartiality of the planning department in relation to this site is in question. I am reliably informed by a local resident who was present that when the Local Plan proposals were 'road showed' to the public that Mr Michael Murray was allowed to promote the concept of a new settlement on the site to the public. The blatant conflicts of interest between the developer as promoter and GBC as regulator were not disclosed to participants.

GBC's conduct appears to be a classic example of 'regulatory capture'. The quote below from Wikipedia regarding 'regulatory capture' and 'captured agencies' is relevant:

Regulatory capture

From Wikipedia the free encyclopedia

Regulatory capture is a form of political corruption that occurs when a regulatory agency, created to act in the public interest, instead acts in favor of certain organizations that have the means to dominate the industry or sector it is charged with regulating. Regulatory capture creates an opening for firms to behave in ways injurious to the public (e.g., producing negative externalities). The agencies are called "captured agencies".

The planning dept of GBC appears to be colluding with the developer to have this site included in the local plan without any proper analysis of a) the need for a new town b) the relative suitability of other sites in the borough c) the sustainability of this site d) the effect on the SPA at Ockham Common e) the effect on the Heritage of Ockham.

3. Deliberate misrepresentation of the facts concerning this site.
The facts about this site have not been accurately presented. Important elements have not been subject to proper analysis.

The effect of the proposed 'new town' on the environment and natural environment has either not been considered at all or adequately. This is contrary to the requirements of paras 109 to 125 of the NPPF.

The effect on the Heritage and Heritage assets of Ripley Ockham and Wisley has either not been considered at all or adequately. This is contrary to the requirements of The Listed Building and Conservation Areas Act 1990 and NPPF para 126 and 132.

The effect on local infrastructure has either not been considered at all or adequately. The evidence base gives inadequate consideration to whether local infrastructure has any spare capacity for more houses - beyond what is needed to meet local demand. Para 162 of the NPPF is not properly complied with.

4. Predetermination

On 12 May, 2016 the Leader of the Council, Mr Paul Spooner, was directly quoted in an article in the Surrey Advertiser headed 'Encouragement for developer working to clear airfield hurdles' as follows:

"for us it is simple. Do we, during the plan period of twenty years 2013 to 2033 believe that a sustainable community can be delivered in Wisley? If the answer is yes it will stay in the local plan, if the answer is no it has to come out. I am convinced subject to a whole bunch of things coming together we should be able to deliver a sustainable community at that site to assist in terms of the objectively assessed need. The application that came forward from Wisley (WPI) clearly for me and all the other members did not deliver on that aspiration and hence, as an application, it failed. If they come back with one or two tweaks, it would fail again. So I think there is a fundamental need in terms of improvement to that application, but will they do that during the plan period? If they don't, I believe someone else will."

That article appeared after 15/P/00012 was unanimously refused by the Planning Committee on 6 April. In the same edition of the Surrey Advertiser the developer took out double full page advertisements promoting a new town on the site.

The Probity in Planning Code of Conduct states that 'Council/ ors should avoid making it known in advance of the Committee or similar meeting whether they support or oppose the proposal'.

Mr Spooner's comments express a strong opinion that the obstacles to developing a new town on this site can be overcome and will be overcome over the next twenty years. That strong expression of opinion is clearly contrary to the recommendations of the Probity in Planning Code of Conduct. The use of the pronoun 'we' in the sentence 'we will be able to deliver a sustainable community' and the use of the word 'aspiration' suggesting that it is GBC's aspiration - at best shows an inappropriate lack of impartiality and at worst a clear desire as Leader or the Council and Lead Member for the Local Plan to promote development on the site.

Of the 'whole bunch of things coming together' one critical pre-condition is the removal of the site from the Green Belt - which was one of the reasons for refusing application 15/P/00012. The statements follow the clear collaboration shown in the minutes of the meetings between Savills and GBC to use the local plan process and the OAN as the necessary 'exceptional circumstances' required to justify removing the site from the Green Belt.

Taken together with GBC's conduct over the past three years the statements are further evidence that GBC has predetermined that this site should be removed from the Green Belt and deliberately commissioned consultants to produce reports which could be used as evidence to further that objective.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Local Plan Consultation

Site allocation A35 formerly referenced as site no 66: 'land at former Wisley Airfield'

OBJECTION: Evidence base shows no sequential testing of alternative sites

Before selecting a site in the Green Belt for development the promoter, Wisley Property Investments Ltd, a Caymans company, and Guildford Borough Council have an obligation to establish that there are not other more suitable sites to develop outside the Green Belt. In other words, the developer and Guildford Borough Council should apply a 'sequential test'.

The evidence base does not evaluate alternative sites or show that agricultural land at the former Wisley airfield in the centre of the Parish of Ockham is suitable for development and 'sustainable'.

It is instructive to compare site 56, near Ash, with site 66 (agricultural land at the former Wisley airfield). Although the gross area of land at site 66 is much greater, on a net basis, after allowing for land which must be set aside for SANGS, for the Surrey Waste Plan allocation, and for roads and amenities it is in fact the same size or smaller than site 56. Despite the site being of comparable size when compared on a net basis the number of houses planned for at site 66 is over 2000 while only some 400 houses have been given permission at site 56. This illustrates both the potential for more housing at site 56 and the ridiculously high density of housing required at site 66 to cram over 2000 houses into such a small net area.

I set out below a comparison of the two sites. Any rational analysis of the two sites shows that site 56 is far more sustainable than site 66. For example site 56 is adjacent to a railway station, has existing access to several A and B roads. In addition there are a number of primary and secondary schools within walking or cycling distance of the site. This is one of many reasons for objecting to this local plan.

Comparison of sites 56 and 66: Land in Ash & Tongham vs Land at former Wisley Airfield

<table>
<thead>
<tr>
<th>Criteria</th>
<th>Land at Ash &amp; Tongham</th>
<th>Land at former Wisley airfield</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. Metropolitan Green Belt This is a nationally recognised protective designation</td>
<td>No</td>
<td>Green Belt</td>
</tr>
<tr>
<td>2. Special Protection Area (SPA)</td>
<td>No</td>
<td>SPA - immediately adjacent, less than 400m</td>
</tr>
<tr>
<td>In March 2005, the government designated areas of heathland within the Thames Valley as the Thames Basin Heaths Special Protection Area (TBH SPA) under the European Commission Birds Directive. Natural England</td>
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believes that recreational use of the heaths arising from housing developments near to a SPA will disturb rare bird populations. As a result, all housing developments within five kilometres of a SPA are subject to stringent tests and impact assessments and housing development with 400m is prohibited.

3. Sites of Special Scientific Interest (SSSI)
These are sites designated by Natural England which are considered to be the best wildlife and geological sites

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Areas designated for their special architectural and historic interest.

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<th>[ ]</th>
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<td>Ripley Village Conservation Area (subject to traffic deterioration)</td>
</tr>
</tbody>
</table>

5. AONB
Areas of Outstanding Natural Beauty

| No | No - but views to and from |

6. Scheduled Ancient Monuments

| Yarne Grade 2 listed 1470 farmhouse; garden laid out by Russell Page 1975; immediately adjacent Upton Farm, Grade 2 listed 1st century farm; adjacent |

| 66 | Land at the former Wisley airfield |

Site address | Land between Ockham and Wisley common, Ockham |
Location | New settlement |
<table>
<thead>
<tr>
<th>Ward</th>
<th>Lovelace</th>
</tr>
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<tbody>
<tr>
<td>Ownership</td>
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<td>How was the site identified?</td>
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<td>Considerations</td>
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<td>- a new two-form entry primary school, local retail centre, community, and faith building, healthcare building incorporating a GPs surgery, leisure and recreation facilities, local retail centre, open space including playgrounds, playing fields and allotments, Suitable Alternative Natural Green Space (SANG), high speed Broadband upgrades, drainage and any flood mitigation measures needed.</td>
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• Appropriate assessment required at project level to consider impact on the Thames Basin Heath Special Protection Area (SPA) and Environmental Impact Assessment to consider impact on the Site of Nature Conservation Interest.

### Allocation
- Housing (C3), Traveller pitches (sui generis), Employment use (as a designated strategic employment site)
  - Offices (B1a), Research and development (B1b), Light industrial (B1c), General industrial (B2), Storage and distribution (B3), Education, community and health services buildings (D1), Open space.
- 16.98ha in the northwest corner of the site is allocated for waste use in Surrey Waste Plan 2008.

### Timescales
- 1-5, 6-10 and 11-15 years

### Opportunities / commentary
This is a strategic development site that can accommodate a mix of uses, primarily residential (up to 2,100 homes, including at least 40-45% affordable homes, and eight Traveller pitches), creating a mixed sustainable community.

Part of the site will be designated as a strategic employment site and is expected to deliver a significant amount of employment use.

### What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
- capture9.JPG (116 KB)
- capture11.JPG (189 KB)
- capture10.JPG (155 KB)

Comment ID: PSLPS16/3436  Respondent: 8749121 / George Paton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Complaint
I am writing to draw your attention to this double page advertisement in the Surrey Advertiser and to complain that

- The advertisement headline is misleading
- many of the written statements are factually inaccurate or false
• the diagrams/graphics/photos are false and/or misleading
• overall, the advertisement presents a false and misleading impression of i) the existing site

ii) proposed new development

• the sustainability of the new

1. Timing and context of the advertisement

The advertisement has been placed in the interval between the unanimous rejection of the advertiser's application for planning consent by Guildford Borough Council's (GBC) Planning Committee on 6 April this year and the issue of a new draft local plan by the Council.

GBC's reference number for the planning application is 15/p/00012. The application documents and well in excess of 2,000 objections can be found on GBC's planning website: http://www2.guildford.gov.uk/publicaccess/

The applicant is now seeking to persuade Councillors to retain its site within the draft local plan. The advertisement is clearly an attempt to influence decision makers (ie borough councilors) by means outside the regulated planning process at a particularly sensitive time.

1. Factual inaccuracies

The following written statements in the advertisement are factually wrong and/or misleading:

- "It has a consented direct connection to the A311 [this is the advertiser's bold lettering - in green in the advert]

Planning application 15/p/00012 applied for permission to access the A3. That application was unanimously rejected by the planning committee.

The only vehicular access to the site at present is via an entrance on Ockham Lane. That entrance was created primarily for farm vehicles for farming purposes. There are no buildings or premises on the site. That entrance is kept locked. Ockham Lane is an HGV restricted minor road.

The former vehicular access at Elm Lane - which leads from the A3 has been permanently closed with a bund for many years.

Access via Elm Lane to and from the A3 for large volumes of traffic has consistently been refused by the Highways Agency because of the dangers caused by traffic emerging onto the fast flowing three lane strategic road network. In short there is currently NO access the site to or from the A3 via Elm Lane. This can be verified by visiting the site and viewing the bund and by asking Highways England.

So the only 'consented direct connection to the A3' that the advertisement can relate to is that in the report of the Planning Inspectorate in 2010 granting permission to use some 16ha of the site for a waste composting facility. The Inspectors report is attached for your information. The permission was subject to the 37 conditions set out in Annex 3 of the attached document. Relevant parts of the document are highlighted in yellow. Note in particular conditions 10-15 concerning highways and access. These conditions explicitly state that the waste composting development may not proceed unless and until an access to the A3 via the Ockham interchange has been built. Neither the development in question nor its road access have ever been built.

The statement in the advertisement is that 'it', meaning in the context of the advertisement the whole of 'Wisley Airfield', "has a consented direct connection with the A3". That is false and misleading. The whole site does not have any consented direct connection:

1. The consented connection is exclusively for a waste composting facility - covering at most some 16ha out of a total of 115ha
2. The consented connection is not "direct". It is a connection via a new road connected in the first instance to the roundabout below the That roundabout affords access to ONLY the northbound carriageway of the A3, not to the whole A3 ie both the northbound and southbound carriageways

- The consented connection is for a very limited number of vehicles. These are specifically HGVs serving the facilities and the movements must not exceed 36 two way movements per day. The planning application, by contrast, proposed to build 2,068 dwellings.

It is reasonable to assume an average of two cars per household. If further traffic is added to the total for access two and from two schools and still further traffic caused by the closure of four local lanes the volume of traffic ensuing from this development is very material. It is highly misleading to imply that the whole site has 'consented direction connection to the A3' for in excess of 5,000 cars when currently there is no access whatsoever and the only permission is to access a small part of the site for a specific purpose by no more than 36 HGV's per day. The statement in the advertisement is therefore false and misleading.

The advertiser's website (to which readers are drawn by the advertisement) makes further exaggerated or false claims regarding the transport links to this site:

The Airfield is very well connected. It's got a direct, consented connection to the A3 and is within five miles of nine mainline railway stations. Effingham junction is just a six minute cycle away.

As set out above, the airfield, which is not an airfield and has not been since 1980, has NOT "got a direct consented connection to the A3".

Nor is it "within five miles of nine mainline railway stations". The only mainline railway stations are Woking and Guildford.

Elm Lane to Woking railway station via A367: distance by road Gmiles; return distance by road via A367 8.8m (All distances from Google maps)

Elm Lane to Guildford railway station via A3:8.8m; return journey 11.1m

Secondary railway stations for slow, stopping trains are Effingham Junction, Stoke D'Abernon, East Horsley and Clandon - all on the same branch line; and Worplesdon and West Byfleet on the Woking line.

Elm Lane to Effingham Junction by car: 3.4m Elm Lane to Stoke D'Abernon by car:6.3m Elm Lane to East Horsley by car: 3.8m

The statement about the site's distance from nine mainline stations or any stations at all is false and misleading. In fact, given the number of suburban railway stations in this part of Surrey it is not legitimate to argue that it is located any closer to railway stations in general than thousands of other sites.

Nor is the site a 6 minute bicycle ride away from Effingham Junction - the nearest station. The site is at least 2.8miles from the nearest railway station, Effingham Junction. The route has a significant hill and takes at least 19 minutes by bicycle. Below I attach a screen print from the Surrey Interactive Map website. The relevant distance is 2.87 miles.

If one cycled at an average of 6mph it would take 29 minutes to cycle to Effingham Junction station:

2.87/6 mph x 60mins = 29 minutes
Supposing one cycled it at Omph - it would still take 17 minutes. To do it in 6 minutes one would have to go an average speed of 28.7mph. It is not credible for an ordinary or average cyclist to make that journey in normal conditions in just six minutes. I attach an article written by the Surrey Advertiser. For that article the Surrey Advertiser sent its photographer to the site and he followed me from the middle of the site to Effingham Junction station and verified a) that I did not stop or diverge from the route b) bicycle slowly c) take less than the stated time.

3.2 The site is described as containing the "biggest brownfield site in the Guildford Green Belt". The analysis of the area of the site in a brochure produced by the advertiser is as follows:

Note that the total area of the site is over 283 acres or some 114.7ha. The area of concrete and hardstanding is therefore only 24% of the total. The planning application contains expert reports on the quality of the agricultural land which I state conclusively that it is all good quality land of Grade 3 and above, most of it being Grade 3a and Grade 2.

It is misleading to describe the totality of the site by reference to only 24% of it - when the remainder of the site comprises 45 ha (112 acres) of 'Best and Most Versatile' agricultural land which has never been developed and which has been farmed continuously for hundreds of years.

"Brownfield" is a synonym in planning terminology for 'previously developed land', a term defined in the National Planning Policy Framework.

The advertiser's website states:

Wisley Airfield has a long and distinguished past as a fully operational military and civilian airfield.

This is misleading. It has never been a civilian airfield. Throughout its period of operation it was leased by Vickers/British Aircraft Corporation/Bae for the purposes of testing and transporting planes from its factories near Weybridge. In 1980 there was a public enquiry to decide whether the runway could be used as a civilian airfield. The proposal was decisively rejected.

Even the statement that it was a 'fully operational military airfield' is misleading because the airfield was never an RAF base or used directly by the armed forces. It was an airfield used by a military aerospace contractor - Vickers - an aircraft manufacturer not an operator of a military capability.

The land at the former Wisley airfield was requisitioned in 1942 for 'wartime purposes' on condition it was restored to its prewar agricultural use after the war. (My grandmother was among the leaseholders who gave up part of the land within her lease.) The wartime purpose was to serve as a grass airstrip for Vickers to use to fly out aeroplanes it was building near Weybridge. Agriculture around the grass airstrip continued throughout the remainder of the war. After the War the land was not immediately relinquished and Vickers continued to use it to test and fly out planes it was building, building a concrete runway in 1950. All flying ceased in 1972 and the site was sold back to its pre-war owner - the Ockham Park Estate - in 1980. It was never an RAF base. It was never a public airfield. It is not correct to describe the land as a 'derelict' airfield. The use of the land for aerospace purposes by Vickers and its successor companies (finally British Aerospace) ended in 1972. When it was sold to its pre-war owner in 1980 it was totally decommissioned. All the hangars were removed. No buildings remain. The runway should have been removed but was allowed to remain solely to save HM Government the cost of removing it.

The remaining runway is crisscrossed by multiple public rights of way - all restored when the airfield was decommissioned. These could not exist if the runway served any remaining aerospace use.

3.3 "[the site] ...is just minutes from local train stations using one of the planned frequent bus services" bold lettering used by the advertiser - in green in the advert.

The nearest train station is at Effingham Junction, which is 2.6 miles from the centre of the site. There are no public footpaths and no bus services along any of the road connecting the site and the railway station.
The site is described as 'just minutes from local railway stations'. In fact the site is 2.6 miles from the nearest railway station, Effingham Junction. Evidence to support the viability of a planned frequent bus service does not exist. No bus operator has agreed to operate any such route on a current or prospective basis.

The statement that the site is 'just minutes away from local railway stations' is at best a gross exaggeration. At worst it is completely misleading - because there is currently no spare parking capacity at any local railway stations and current services to London are at or near capacity.

3.4 "Over 50% of the site will be green space"

This statement is especially misleading. 'Over 50% of the site will be green space' creates the misleading impression that this will be a low density development. In fact because half the site is within 400m of a Special Protection A rea for endangered species, half the site must be set aside for a Site of Alternative Natural Greenspace or SANG. The number of dwellings per hectare on the remainder of the site is extremely high at up to 100 dwellings per hectare, similar to those found in the most densely populated parts of London like Islington.

The green space proposed for the development is described as

"a huge new parkland bigger than the County Showground, Stoke Park". The advertisement states:

"Creates the biggest park in Guildford Borough". [Bold lettering used by the advertiser.]

This is a highly misleading statement. A SANG is a defined term. It is defined in the legislation creating the SPA. Attached is a Natural England document setting out SANG guidelines. There are material constraints on the use of a SANG which do not apply to an ordinary public park in a town. It is highly misleading to describe a SANG as a park and to compare it to a park in central Guildford surrounded on all sides by development.

Compare the plan in the advertisement with the plan shown on the linked website and proposed to GBC:

The plan in the advertisement is cut in vertically in half (roughly but not exactly by area). However the actual development is divided roughly horizontally ie from West to East. The horizontal division of the site is caused by the northern half of the site being adjacent to the SPA. The narrow shape of the develop-able site together with the density of dwellings was expressly mentioned as one of the factors in refusing planning consent for 15/p/00012.

The diagram presented in the advertisement is particularly misleading because the northern half of the site cannot be developed at all.

• The Advertisement headline states:

"A sustainable new community for Surrey"

This headline is also misleading. It presents the development as 'sustainable'. However planning permission for a development on the site has just been unanimously refused in large part because the proposal was NOT sustainable. For example Highways England stated that the development was likely to have a severe negative impact on the Strategic Road Network.
The entire site is situated exclusively within the Parish of Ockham. The site is not in or part of Wisley and does not communicate with Wisley in any way. The Settlement Hierarchy in the Guildford draft local plan lists Ockham as the second least sustainable site for a new development in the whole borough. Ockham does not have a shop or any significant facilities. A new development in the centre of Ockham would be completely dependent on car transport - yet the local roads are entirely unsuitable for a development of this size - which would be third largest in the borough after Guildford and Ash & Tongham.

3.7 The advertisement states:
"Delivers more than 2,000 new homes, fast" [bold lettering as used by the advertiser - in green in the advert]

It is incorrect and misleading to state that 'more than 2000 new homes' can or will be delivered "fast". Thames Water, for example has stated (its letter is on the GBC website) that there is insufficient sewage processing capacity, that up to three years' lead time would be required and that all works would be subject to funding. It is also likely that development could not begin until road access to the A3 had been completed. All these factors make it extremely unlikely that houses could be provided quickly or at all within a 5 year horizon. It is certain that the entire figure of 2,000 homes would not be developed 'fast' because the plans attaching to 15/p/00012 proposed to spread the development over 15 years. The use of the adjective 'fast' in relation to all 2,000 homes is highly misleading in the context of a development which might not start for five years and might not complete in less than 15 years.

It shows that cumulative housing delivery by 2020 is only 377 houses. That figure itself is aspirational rather than realistic or contracted. No planning permission has been achieved and is unlikely to be achieved before the Local Plan process is complete - which is unlikely to be before the end of 2017.

Political influence

This development is promoted by a local politician called Mr Michael Murray, who is borough councillor in Oxfordshire. His details can be found on the Vale of White Horse website which shows that he is responsible for its Local Plan. Mr Murray is also an officer of Causeway land - the promoter of the development.

The purpose of the advertisement is clearly to influence the political process of adopting a new local plan in Guildford. As such it was important that the public and Guildford Borough Councillors should have been given accurate facts in the advertisement presented in a fair manner taking full account of the context and the constraints on the site. Instead the advertisement shows a casual disregard for the true facts.

The photographs of the site are deliberately unflattering. The main photographs are taken from a very considerable height in the air. These give a misleading impression of the site - because the runway cannot be seen from any of the adjacent land - except from a small area on Hatchford Hill. The photos give no indication of the designations of the adjacent land. They do not mark the Special Protection Area, The Site of Special Scientific Interest, The Sites of Nature Conservation Interest or the Conservation Areas and Listed Building adjacent or near to the site. They do not show the part of the site which has planning permission for a waste composting facility and which is set aside for the Surrey Waste plan. The photos imply that the whole site could be built on. The advertisement implies that the developer is somehow generously electing, out of its innate sense of public service and beneficence, to dedicate half the site to the purpose of providing the lucky citizens of Surrey with the biggest 'park' in the county. Nothing could be further from the truth. In fact the developer is not creating a 'park' at all. It is creating a SANG as a legal obligation in order to comply with environmental legislation.

This map (below), taken from the Surrey Interactive Maps website, shows relevant features which the advertiser has chosen to ignore. Note in particular the proportion of the site allocated to the Surrey Waste Plan, which cannot be used for housing, and the SSSI and the footpaths.
Note that no access to the A3 exists or is shown on the map. This land is no different in terms of access to the A3 from any other farmland adjacent to the A3 along its length from London to Portsmouth - except of course for the fact that it is designated as part of London's Green Belt.

2. Conclusions

The advertisement contains a number of false and misleading statements regarding the access of the site to and from the A3. It describes the whole site as derelict and brownfield when at the very most 24% of the land could be so described. It gives the impression that all of the 'brownfield' land could be developed for housing. In fact some 15% out of 24% is some 60% of it is already allocated for the Surrey Waste Plan - and so is not available for housing. And a significant proportion of that is in any case within 400m of the SPA and so by Jaw impossible to develop for housing. The advertisement states that half the land will be turned into a public park - when in fact it will be land used to create a SANG to protect the SPA to the north. It states that the site will create a 'sustainable community' when in fact the site is far from sustainable, has no community and will not have a meaningful community for several decades.

The editorial department of the Surrey Advertiser is well aware of the issues surrounding the description of the site. It has published many articles and letters on the subject over the last two years. It would appear that the commercial interests of taking advertising revenue have over ridden an obligation to fair and accurate information. In view of this the Surrey Advertiser should make available space for Ockham Parish Council and other local interest groups to correct the false and misleading impression created by this advertisement.

Enclosures:

- Double full page spread advert in Surrey Advertiser, 13 May, 2016
- 2010 Inspectors' Report on Waste Composting facility on former Wisley airfield
- GBC Officer's report recommending refusal of planning permission - 6 April, 2016
- Guidelines for the creation of SANGs
- Surrey Ad article on cycle times to Effingham Junction railway station
- Letter from Thames Water to GBC
- Surrey Advertiser articles concerning the advertiser's claims

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
- Capture4.JPG (201 KB)
- Capture5.JPG (116 KB)
- Capture2.JPG (100 KB)
- Capture3.JPG (116 KB)
- Capture1.JPG (166 KB)
- LP2016 Wisley 1979 G B Paton.pdf (1.2 MB)
- LP2016 Inspectors report G B Paton.pdf (5.0 MB)
- LP2016 Surrey Ad Article G B Paton.pdf (1.1 MB)
- LP2016 Wisley Airfield Article G B Paton.pdf (2.3 MB)
- LP2016 Fraud Article G B Paton.pdf (1.5 MB)

Comment ID: PSLPS16/3932  Respondent: 8749121 / George Paton  Agent: 8749121 / George Paton

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35
### Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire): ()**

<table>
<thead>
<tr>
<th>1. The obligations of GBC to regulate development</th>
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<td>◦ requirements of the National Planning Policy Framework (NPPF)</td>
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Conservation of heritage assets 'in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of this and future generations' is a 'Core Planning Principle' set out in NPPF para 17. 'Housing should be located where it will enhance or maintain the vitality of rural communities' - NPPF para 55. The LPA 'should require an applicant to describe the significance of any heritage assets affected, including any contribution made to their setting' (NPPF 128). The LPA should 'avoid or minimize conflict between the heritage asset's conservation and any aspect of the proposal (NPPF 129). 'Substantial harm to or loss of a grade II listed building, park or garden should be exceptional' (NPPF 132).

#### 1.1 English Heritage Guidance: The Setting of Heritage Assets

English Heritage has published guidance on the setting of Heritage Assets from which the extracts below are taken:

2. **Physical setting and context**

The designation of site A35 as a strategic development site has profound implications for the character, setting and context of Ockharn, itself a heritage asset, and for the individual heritage assets within it. The proposed development would do the parish and its heritage assets substantial and permanent harm. There are no measures significantly to reduce that harm.

The designation implies that development on this site is 'sustainable'. The principal argument made for its sustainability is its size. The planning statement for the planning application 15/P/000 12 states at para 1.14 "to demonstrate the critical mass created, on completion, the new village settlement **will be the third largest settlement in the borough**, exceeded only by Ash/Tongham and Guildford Town."

However the size of the development is the factor that causes most of the harm to the parish and its heritage assets. The imperative for size, without which the development is unsustainable on GBCs criteria (see s22 of Vol. V of the Green Belt and Countryside Study), causes the development to encroach on most of the constituent settlements that make up the parish of Ockham - especially Martyr's Green, Elm Corner and Bridge End. Rather than address this issue the proposal merely denies the existence of the problem. In a sense it has no choice but to ignore the problem because it can provide no remedy apart from making the development smaller which, in turn, would make it unsustainable. The developer cannot acknowledge that the site is too small because that invalidates the core hypothesis that the development is 'sustainable'. The developer cannot acknowledge that the development is too large because that validates the harm that the development causes to the heritage of Ockham and the Special Protection Area (SPA). The facts conflict with the application thesis and the exegesis is intellectually dishonest. The site is too small for development to be sustainable and allows no possible scope for future expansion.
2.2 The setting of Ockham and its parish

Rather than address the historical and geographical reality of Ockham as an integrated whole, the planning application seeks to split it into small units and then to claim that the units are either not part of or connected with Ockham (e.g. Martyr's Green) or that the effect on various of the parts has no effect on the whole (e.g. the Ockham Conservation areas). This false picture is accentuated by the constant repetition of various claims that present a misleading picture of the site. It is constantly repeated that the site is in Wisley whereas all of it stands in the parish of Ockham, that it is an 'airfield' (although all flying ceased in 1972 over forty years ago) and that it is 'brownfield' (even though only a small part (c27ha of which 7ha is already set aside for the Surrey Waste Plan) of it meets that definition). Other so-called facts are presented in a misleading way. It is claimed on the one hand that there is 'permissioned access' for the development onto the A3 while on the other hand such permission as exists is for a completely different project (a waste processing project) and this application expressly states that the applicant will seek to cancel the historic permission. Real facts such as the existence of the historic bridle ways and footpaths are distorted into justifying tenuous claims to sustainability. The fact that the footpaths mainly link the settlements of Ockham with each other and with their Common and that the proposed new 'urban feature' between all the settlements will do them great violence are all ignored.

The historic landscape characterisation is not considered [by Savills] to be of intrinsic significance or to contribute to the significance of the heritage assets with which it is associated:

Historic Landscape Characterisation

- The Application Site lies in an Historic Landscape Character area which is characterised by the Surrey Historic Landscape Characterisation survey as lying mainly within disused airfield with small parts of the south-western area lying within miscellaneous valley floor fields and pastures and medium to large regular fields with wavy boundaries (late medieval to 17th/18th century enclosure). The historic landscape character of the Application Site and its surroundings is not considered to be of intrinsic significance, or to contribute to the significance of the heritage assets with which it is associated.

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This assessment ignores multiple elements of the Landscape including:

- The public footpaths which exist in order to connect the various settlements of Ockham with each other and with their Common
  - There is a very good reason why the historic settlements of Ockham are located south of the Application It is that the Application Site is high ground and extremely exposed to the prevailing south westerly winds. Historic settlers have therefore sought the shelter of lower ground or tree cover.
  - The interconnectedness of the Heritage Assets with the land which has been shaped by the people who lived in these farm houses over the centuries
  - The fact that the former runway (which is considered to 'degrade' the site) has no visual impact on the heritage assets and cannot be seen from outside the airfield except from the
  - The fact that the runway is a small part of the overall land parcel - as little as 15% of the
  - The description of the former airfield land is self-contradictory:

11.3.43. Due to the historic use of the Application Site, the existing land use does not relate to the other rural pressures, however there is some evidence of fragmentation and subd1vs1on of fields for equestrian use immediately south of the Application Site.

11.3.46 The setting of Ockham end its relationship to the surrounding countryside should be retained.
The long open character of the airfield contrasts with the surrounding parkland and agricultural landscape as result of the removal of all traditional boundary hedges and trees during the airfield construction. The Application Site subsequently has few of the key characteristic features of the Ockham and Clandon Wooded Rolling Claylands Character. The linear Application Site is well enclosed by woodland across its north, west and southwest boundaries. with weaker hedges bordering the east and southeast boundaries with Old Lane and Ockham Lane. Its scale, linear and featureless characteristics contrast with the typical smaller scale enclosed field patterns of the surrounding countryside.

- The application as a whole seeks to represent the airfield land as disconnected from the adjacent This misrepresents the reality
- The cause of the dilapidations of the hedges around the land at the former airfield is the direct responsibility of the developer and its predecessors in title which have failed to maintain them.

Ockham does not have one central nucleus like many villages. It is a dispersed group of farming settlements historically unified by the Ockham Park Estate and Ockham Church.

1. The setting of Yarne and Ockham End in Martyr's Green

- Historical geography of the property

Yarne, like Upton Farm, is a fifteenth century farm house. For many years until its sale at auction in 1958 Yarne formed part of the Ockham Park Estate. Until 1900 the property was a farm known as Lara Farm working the adjacent land which formed part of the Estate. Around 1905 the property was extensively modernised by the Estate: a northern extension was added and the southern front was substantially modified on plans thought to have been drawn up by Lutyens.

The historical setting of Yarne and the other farmhouses at Martyr's Green - Upton Farm, Pound Farm and Blackmoor Farm - is rural and agricultural. Farming and common historical ownership within the Ockham Park Estate over many centuries is an integrating and unifying factor creating a common setting for all these heritage assets.

Martyr's Green and May's Green have formed part of the parish of Ockham for many centuries. Closure of Ockham Lane and the introduction of the third largest urban concentration of houses in the borough will destroy Ockham's heritage and geographical integrity.

The geographical and cultural setting of the property is closely tied to the land. The current curtilage and much of the garden was established before WW 1. The house is positioned with its narrow end facing the southwest. The first builders oriented the house like this to minimise exposure to the strong south westerly winds blowing across the open landscape to the west. The predominant feature of the setting and the garden is its openness with views of the western horizon extending across twenty miles over and beyond Woking. These views have existed since the land was first cleared for farming - before the Norman Conquest. This extensive east-west aspect formed by a sandy ridge and the fortuitous crash landing of a bomber in WW2 were the reason it was chosen as the location of a grass airstrip in WW2.

Before WW2 the property was let by Ockham Park Estate with adjacent land to the West as shown by the pink shaded area on the 1927 lease plan:

My grandmother took over the lease of the property in 1932 and continued to hold the field to the west until it was commandeered with other parts of the Ockham Park Estate to form the grass runway along the ridge of the land several hundred metres further west. It was a condition of the requisition of the land that it would be restored to its previous agricultural use after the war.
I have known this agricultural land all my life and to my certain knowledge the adjacent agricultural has never been 'previously developed'.

When the airfield was sold under the provisions of the Crichel Down Code in 1980 to the heir of the original freeholder (the Ockham Park Estate) the leaseholders did not recover their leases.

In 1975 the garden at Yarne was re-designed by Russel Page, perhaps the most renowned twentieth century British garden designers. The back (North) garden was designed with a Westward facing aspect - directly towards the application site. The uninterrupted Westerly views across the application site towards Little Upton, Bridge End Farm and Woking would be completely obliterated by the creation of a new town.

- **Assessment of the setting of Yarne in planning application 15/P/00012**

Sections 10 and 11 of Environmental Statement (prepared by Savills) attached to the planning application refer to the setting of Yarne and to the impact of the development on Yarne.

In para 10.3.62 it is stated that, 'The application site is considered to make a minor contribution to the setting of Grade II listed Yarne...'. The consideration given to the setting of Yarne is wholly inadequate and misleading.

1. The western boundary of Yarne is *immediately* alongside the development site. The western boundary with the site is some 200 yards long. The northern boundary is 40 yards long. This may be the longest boundary of curtilage of any heritage asset with the development site. *Nowhere* is this set out in planning application S/P/00012. This was drawn to the attention of the developer's representative, Mr Michael MmTay, a conservative councillor, at the roadshow on the runway intended to promote the development. He offered to provide screening for any properties along the northern edge of the Application Site but refused to give any explanation as to why no screening was proposed for Yarne.

The planning application seeks to minimise the effect of the development on Yarne and Martyr's Green. For example at para 11.3.28 it states:

11.3.28. The northern extents of Martyr's Green lie o further 400m east.

This is a blatant falsehood. Yarne's curtilage is right next to the development. The property itself is within 30 yards of the development. The field known as Martyr's Green is less than 100 yards from the development.

1. There are extensive views across the whole of the development site from Yarne from the ground floor, from first floor and from the

1. The development property will commence immediately beside Yarne with a path/roadway within metres of the

No attempt has been made to separate the development from the heritage asset.

1. No attempt has been made to form a realistic view of effect of the development on the setting of Yarne and its

Architects drawings are included in the application showing the line of sight between various heritage assets and the proposed building in the development:

No line of site drawings are included in respect of Yarne. This is extraordinary given that Yarne is the heritage asset closest to the development and has the longest boundary with the development. It amounts to deliberate adverse selection of the facts in a blatant attempt to misrepresent the effect of the development on Yarne.
3.3 Views from Yarne onto and across the Application Site

The views to and from Yarne are described in section 11 of the Environment Statement Vol 1. While it is claimed in para 11.3.216 that 'hedgerows ...screen ground floor views' the reality is that 240 yards of housing on the development site will front the western and northern boundaries of Yarne. It is further stated that 'Upper storey views are directed along the southern boundary of the site with some additional filtering by boundary trees.' That is misleading.

A defining characteristic of the house is its position in open countryside near the top of a long incline with panoramic views to the west.

The contour map from the planning application confirms that Yarne stands at the highest point of the Application Site. The only higher ground nearby is at the top of Hatchford Hill about 400m to the east.

In para 11.4.63 it is stated, 'Views towards the Application site are restricted to upper storeys'. [That is a blatant falsehood.] 'Construction impacts will be notable from Neighbourhood 2 increasing in significance to major/moderate as Neighbourhood 4 is completed adjacent to the properties boundaries. Once completed, the impact will reduce slightly due to the reduction in movement and construction activities within the view, however the outlook will change considerable from an open, albeit degraded, landscape to close distance urban frontage.'

The statement in 11.4.65 concerning the views from Ratchford Cottage and Forge Cottage are also false. These cottages stand near the crest of Hatchford Hill. They therefore enjoy panoramic views over the Application Site to and beyond Woking and all a long the North Downs.

The application alleges that the runway 'degrades' the view from Yarne. The statement is manifestly false. It is impossible by definition for something which has zero height to 'degrade' a view. Something of no height cannot obstruct any line of sight. The claim is just another of the many false and misleading claims made by the developer. The runway is not visible from Yarne except from the most northerly part of the garden and it makes no impact there because it has no height. It is also alleged that the navigation beacon 'degrades' the view. This is an absurd statement. It applies completely asymmetrical tests to the factors which run against the development and those that run for it. The beacon is a structure which is not much more than one storey high. It is built as a steel frame and it is possible to see through the framework. Yet this tiny structure 'degrades' the landscape view whereas the highest density development in the borough enhances the environment ! Perfectionism is required for Yarne to be worthy of protection and any standard can be applied in order to justify development. The consultant to my knowledge has never looked at the view from Yarne - at least not from within the property with the owner's permission. The statement that the view is degraded by the runway impugns the professionalism and integrity of the consultancy which made it. You could say with as much justice that Sophia Loren's face was degraded by her lips because they are imperfectly large.

The development immediately beside Yarne will start some 10m or so from the boundary and will be up to three storeys high. The houses will therefore be visible from every part of the property, from within the ground floor, from the first floor and from every part of the garden. Taller five storey buildings will be situated further from the boundary. A townscape will be substituted for a landscape. This will destroy the setting of the Parish of Ockham and its heritage assets including this fifteenth century farmhouse.

3.4 Inter visibility

The houses along the southern side of the Application Site are all situated along a spring line. All these houses sourced water from their own wells and it is believed they were not connected to the water mains by the East Surrey Water Company until after 1900.
Yarne, Little Upton, Old Farm and Bridge End Fann all enjoy indivisibility. There is also indivisibility of Yarne with the dwellings at the top of Ratchford Hill (Forge and Hatchford Cottages, inter alia). The reciprocal views would be permanently destroyed by the new town.

- Connected, living landscape

The open countryside forms a connected landscape between the SPA to the north and the land to the south. Deer, other mammals, birds and insects continuously travel between the SPA and woodlands to the south (Tanner's Copse and the woods at Effingham and Beckham down to the North Downs). The introduction of an alien 'urban feature' will cut off the ancient conduits used by these insects and fauna. It will destroy the habitats which support many endangered bird species, especially the ground nesting Skylarks. The building of an urban settlement along the crest of the sandstone ridge will cut off the SPA from the land to the south causing permanent and irreparable harm to the ecological setting of the parish. It is ridiculous to suggest that a few bird boxes on a housing estate will satisfactorily compensate for a lost landscape.

3.5 Relationship of Ockham with Ockham Common

Ockham and its common form an integrated historical and ecological whole. The interaction of human beings, animals and geology have created the rare lowland heath on Ockham Common, which Surrey Wildlife Trust describes as 'rarer than rainforest'.

The many miles of interconnecting local footpaths testify to the connectedness of the settlements of Ockham with their Common.

The creation of a new urban settlement, described as 'garden city' in style, is harmful to the fragile local ecology and to the local rural economy which depends on horse riding, arable farming, and pheasant shooting.

The application alleges that the agricultural land on the Application Site is poor grade 4 land or non-agricultural land. During the Summer of 2014 the agricultural Land Agent for the land (Knight Frank Rural Consultancy in Hungerford) advertised the land as Grade 3 land i.e. as good agricultural land.

3.7 Closure of Ockham Lane

The application proposes to close Ockham Lane and Plough Lane and to make Old Lane and Guiles Hill Lane one way.

Closing Ockham Lane, a public right of way for hundreds of years, will cut Martyr's Green, May's Green and Hatchford End off from the rest of Ockham.

The proposal made in the application that Ockham Lane should become a pedestrian route from the new town to the Black Swan public house will adversely affect the setting of Yame, Oakmead and Red and White Rose Cottages which can be expected to suffer from increases in littering and antisocial behavior.

Conclusions

The developer has fundamentally misrepresented the heritage of Ockham, its ecology and economy.

It is stated for example, that the land 'contains the largest previously developed site within the GB part of the Metropolitan Green Belt'. The previously developed element of the land is a fraction of the whole. It is a misrepresentation to propose that all the surrounding farmland is part of the previously developed element.

It is stated 'The land is subject to recommended release from the Green Belt as part of the emerging Guildford Borough Local Plan'. That is clearly false. The draft local plan makes no such recommendation, nor does any of the evidence base.

It is stated 'the principle of a new settlement at Wisley attracts local policy support. The site has been identified as a new settlement and hence removed from the Green Belt within the emerging GBLP, as justified by the Borough Council's evidence base.' The land has NOT been removed from the Green Belt. Nor does inclusion in the draft local plan without
any proper evaluation or sequential testing amount to 'local policy support'. It amounts to a procedural irregularity which calls in question whether a proper professional and arm 's length relationship exists between Guildford Borough Council and the developer.

It is stated: 'The housing situation in Guildford Borough ...points to a critical situation which requires redress via the most suitable, available and sustainable sites.' The statement is one of opinion and not fact. The Objectively Assessed Housing Need has not been publicly scrutinised. So far as local housing need is concerned, the Royal Horticultural Society at Wisley owns some seventy properties -almost all of the village. Of these some fifty houses stand empty. That suggests that there is no shortage of houses in this ward. While there is a shortage of social housing that is a direct result of council policy. It has not built any council houses for twenty years. The average number of persons per house in the borough stands at approximately 2.4. That does not indicate a 'critical' situation. If the situation were truly critical then the average per house would be significantly higher.

The proposal does great violence to the heritage of Ockham and its heritage assets and to the local ecology of Ockham Common. The site is completely inappropriate for a 'new urban feature'. City and urban features are wholly out of place in this geographically constrained and ecologically threatened corner of Surrey.

While the proposal pays lip service to the requirements of planning regulations it does not seek to understand Ockham or its historical context. Rather than consider the parish as an integrated geographic, economic, ecological and legal whole it prefers to focus on the 30 or so hectares of disused runway to the neglect of all other elements.

Rather than acknowledge the consequential harm caused by the proposal, the application seeks merely to deny the existence of harm and/or its extent by claiming falsely that the development site is discrete and disconnected from the rest of the parish. Since the premises of connectedness and harm are denied the proposal contains no meaningful mitigation measures. Indeed since the proposal is so fundamentally incompatible with the parish and its surroundings there are no possible mitigations. This is all the more the case because the core thesis supporting the proposal is that it is 'sustainable'. The logic supporting this hypothesis is that the project is sufficiently large to be able to stand alone and that as a result of its size it will attract sufficient facilities to make it sustainable. This logic flies in the face of the fact that there are no existing facilities at site which justify its selection as a suitable site for development. In short the logic is self serving, intellectually dishonest, and completely at variance with the facts.

The reality is that an outsized development of some 2,100 dwellings is being shoehorned into a site scarcely bigger than half a square kilometre or roughly 700m x 700m. This development is described as the third largest concentration of housing in the borough behind only Guildford Town itself and Ash and Tongham. Whereas Guildford Town and Ash and Tongham have extensive facilities and are not immediately affected by Special Protection Areas, Ockham has no facilities and its ecology is already threatened.

The harm caused to Ockham is substantial, adverse and permanent. The so-called mitigation measures are an undersized sticking plaster which do not begin to cover the gaping wound which this development would leave. If allowed the development will devastate the parish of Ockham and its surrounding villages.

The proposed new town is many orders of magnitude greater in its impact on the Green Belt that the existing 'development' (the disused runway). It is therefore incomprehensible why the planning application should have proceeded this far.

The map below demonstrates that the Application Site is slap bang in the middle of the Green Belt separating Woking, Byfleet, Cobham, Effingham, the Horsleys, Ripley and Send. Development of this site is a dagger pointed at the heart of the Green Belt. If the applicant succeeds the future of the Green Belt in this area will be fatally jeopardised.

Regulatory Capture, lack of transparency and disclosure

There is no evidence that any 'sequential tests' were carried out to try to identify the most suitable sites for new towns in the borough. This creates the suspicion that the inclusion of the site in the local plan was highly improper and the result of the 'regulatory capture' of the local authority by the developer. Inclusion within the draft local plan should not pre-determine the outcome of the planning argument.
There is also a risk that the planning department has a grave conflict of interest insofar as it has provided very extensive (and undisclosed) pre-application advice to the developer on how to present its application. The public has no assurance that GBC has implemented proper 'Chinese walls' between those officials advising the developer and those officials responsible for preparing the local plan.

This may be still another example of the confusion between GBC's role as planning regulator and its role as adviser to the applicant. The public has reason to believe that the regulator has been captured by the applicant. Application 15/P/00012 was held open for a year to enable the applicant to amend it.

It is of particular and grave concern that this site remains in the local plan despite Application 15/P/00012 being unanimously refused by the planning committee of GBC.

This was no doubt the purpose of the previous application was to build an in-vessel composting facility. That facility was granted permission on the basis that the Surrey Waste Plan constituted a 'very special circumstance'. Despite the purported 'specialness' of the circumstance the applicant has not lifted a finger to build the facility in the subsequent years. And in Application 15/P/00012 it says that the waste plant is no longer required by the Waste Plan. So the circumstances are now considered by the applicant itself to be no longer special. This reveals the cynicism of the applicant which is prepared to make any claim, regardless of whether it intends to act on it and regard less of the long term plausibility or reality of the claims made in order to achieve permission. The public was duped by the waste plant application. Part of the Green Belt was intended to be permanently sacrificed in the interests of a proposal for a waste plant. But the viability of the waste plant has not endured beyond six or so years. The Inspector was clearly taken in. The waste plant proposal was so much 'vapour ware'. And the applicant suffers no sanction for making misleading claims. It is ridiculous to claim that the site has 'permissioned' access when the permission was granted for a very different development and developer states in 15/P/00012 that it is seeking to revoke the very same permission: 'the applicant proposes to commit to not deliver the extant consent for a Waste Facility'.

Indefensible Green Belt boundary

The NPPF states that the Green Belt should be permanent. Para 83 states:

"Local planning authorities with Green Belts in the ir area should establish Green Belt boundaries in their Local Plans which set the framework for Green Belt and settlement policy. Once established, Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan. At that time, authorities should consider the Green Belt boundaries having regard to their intended permanence in the long term, so that they should be capable of enduring beyond the plan period."

The new local plan seeks to establish the garden of Yarne as the Green Belt boundary. It is an arbitrary line marked by a hedge. It is not indefensible. A road or a railway line would be indefensible. But an organic feature marking the edge of a garden hardly qualifies as a 'defensible' boundary. It is an example of the inconsistent and arbitrary manner in which GBC applies the planning rules. There is one interpretation for residents and another entirely for developers that propose to build whole new towns.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Objection to the removal of Three Farms Meadow in Ockham from the Metropolitan Green Belt

Objection to the systematic promotion of this site for development by the owners and Guildford Borough Council on the basis of false information

Policy A35 proposes Land at the former Wisley airfield in Ockham as a Strategic Development Site for a new town. The town is to comprise some 2,000 houses and would be the third biggest settlement in the borough.

In order to develop this site the owner has persuaded Guildford Borough Council (GBC) to propose the removal of the land from the Green Belt. It has pursued this policy of courting GBC since 2007 when the current owner purchased the site for some £23m.

History of the site

The site has been farmed for many centuries by tenants of the Ockham Park Estate- which was originally owned by the King family. During WW2 the site was acquired by HM Government for ‘war time purposes’ on the understanding that it would be returned to its former agricultural use after the war. During the war in 1943 a grass airstrip was created on the land which was used to fly out aeroplanes being built by Vickers in its factories at Brooklands. Agriculture continued
around the grass airstrip during the war. After the war Vickers continued to build aeroplanes at Brooklands and requested an extension of the lease. Aeroplanes propelled by jet engines caused the grass runway to catch fire and so in about 1952 a concrete runway was put down. Vickers was subsequently subsumed within what is now BAe and all flying ceased in 1972. In 1980 the government sold the land back to the inheritor of the Ockham Park Estate for its agricultural land value (some £300,000). Permission to re-use the aircraft hangars for intensive farming purposes was refused. Later an application to create a private airport was the subject of a long public enquiry[2] and was also refused. GBC and SCC both opposed all applications to develop the land. All the buildings were removed prior to the sale back to the pre-war owner. The whole site is within the Metropolitan Green Belt. The original lessees whose leases were annulled during the war never recovered the land which they had formerly leased.

Current ownership

In 2007 a Jersey company called Wharf Land Investments Ltd purchased the land from Legal and General. The land parcel comprised some 114.7ha. Of that area some 63ha is good quality agricultural land – of which some 45.4ha is ‘Best and Most Versatile’ land. Some 24.6ha is non agricultural land – comprising scrub, woodland and grass. Some 27.1ha comprises the concrete runway and former hangar area. Of the 27.1ha of concrete some 17ha has been set aside for the Surrey Waste Plan. Therefore only 10ha of the concrete area within the site can be considered to be ‘brownfield’ or previously developed. 10ha out of 114.7ha constitutes less than 10% of the total area. Moreover of that 10ha a significant proportion stands within 400m of the Special Protection Area for endangered species at Ockham and Wisley Commons and therefore may not be used for new residential housing.

The new owners were well aware of the land’s Green Belt and agricultural land designations when they purchased. An Agricultural Land Classification was carried out in August 1979 and is filed at Natural England. It shows all the agricultural land as Grade 3a and 3b. A more recent classification filed with planning application 15/P/00012 provides more detail and shows a proportion of the land as Grade 2.

Once it acquired the land Wharf Land, owned by Douglas Maggs and David Mellor (the former Conservative Cabinet Minister), set about achieving a change of use of the land. It applied for planning permission to build a waste composting facility, which was granted on appeal in 2010 subject to a list of 23 conditions which included limiting the maximum tonnage of waste per annum, the number of lorry movements and the hours of use. This development was never actioned by Wharf Land but was not allowed to lapse after some soil was imported to the site in the week before expiry of the permission.

Wharf Land was sued in Jersey[3] by one of its investors for making ten payments amounting to some £1.5 million to persons unknown without providing any details. The largest payment exceeded £1 million and was paid to a Gibraltar company called Shoehorn Ltd. Disclosure of the parties to whom the payments were made were never disclosed after shareholders voted to approve the transactions. Whether any of these payments were ultimately received as inducements for working towards a change of use of the land is not known.

In 2013 Wharf Land was sued in the High Court[4] in England by a Russian investor called Lisitsin. The court awarded Lisitsin some £1.4 million in damages and the judge said the defendants were ‘knowingly complicit in fraudulent misrepresentation’.

Before the trial had concluded Douglas Maggs put Wharf Land into administration. Its assets were acquired by a new Caymans company called Wisley Property Investments Ltd, (WPIL) the current owners. The ownership of WPIL is not disclosed but is thought to include Lisitsin and RAB Capital Special Situations Fund, a hedge fund. GBC has refused to exercise its right to enquire into the ownership. WPIL is represented in England by Mr Michael Murray, a Conservative Councillor at the Vale of White Horse in Oxfordshire, where he is responsible for their local plan.

WPIL has put in a number of planning applications. Two planning applications sought permission to use the land to make films. One was withdrawn by the applicant after very considerable public protest. The second was refused, appealed and refused again on appeal. The latest application, in December 2014 was for a new town of 2,100 houses. The application was held open for an entire year while further information was collected and finally submitted in December, 2015. The application was finally heard by the planning committee in March, 2015 and unanimously rejected.

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WPIL has consistently repeated a number of gross factual inaccuracies regarding this site. It has claimed that the site is poor quality agricultural land. Application 15/P/00012 states that the agricultural land is Grade 4, whereas it is in fact all Grade 3 and above. The application states that the site has ‘permissioned access to the A3’. At best that is misleading and at worst it is a deliberate lie. The site has no access to the A3 for a new town of 2,100 houses. Such permission as it has for a waste processing facility is hedged by 23 conditions which limit hours of access and numbers of lorries per day. The applicant has claimed that the site has good connections to railways, whereas it is about as far from railways as it is possible to get in this part of Surrey. The claim that it is possible to cycle to Effingham Junction station in six minutes is demonstrably false. These and other bogus claims are made in planning application 15/P/00012 despite the application containing a statement as to the truth and accuracy of its details.

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There is evidence which suggests that GBC has sought to predetermine the outcome of any enquiry into whether the site could be developed by advising the applicant on the timing of its application and by including it in the draft local plan as a site for removal from the Green Belt without showing any exceptional circumstances justifying its removal. The applicant in 15/P/00012 cites the inclusion of the site in the draft local plan as itself being an exceptional circumstance. It would appear the GBC also believed that the mere inclusion of the site in the local plan was a sufficient exceptional circumstance.

**Advertising campaign**

Subsequent to the refusal of 15/P/00012 WPIL has run an advertising campaign in the local press in particular in the Surrey Advertiser. It has also run trailers in local cinemas (eg The Ambassador Cinema in Woking) promoting development the site for a new town. The same false and misleading information which WPIL used in planning application 15/P/0012 and on its website is repeated. The advertising campaign is intended to sway public opinion and presumably to influence borough councilors and the planning committee which may in the future be required to adjudicate another planning application.

**Complaint**

The factual basis on which this site has been promoted for inclusion in the local plan as set out by the applicant in its promotional material and its website is materially false in a number of very important respects. GBC has done nothing to insist that these errors of fact are corrected. Its impartiality as a planning authority is in doubt. I attach my recent complaint to the Advertising Standards Authority about the advertisements appearing in the Surrey Advertiser (attached). I am concerned that GBC has been swayed by a number of these false claims. In particular it has gone from a longstanding position that the site was not suitable for development to seeking to assist the developer have the site removed from the Green Belt. My complaint to the ASA would not have been necessary if GBC had upheld the standards of probity in planning applications and planning matters generally that the public has a right to expect.

[1] See Attached History of former Wisley Airfield


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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/466  Respondent: 8749121 / George Paton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (Yes)
The evidence base is in many respects out of date. The SNCI and Landscape Character Assessments both date from 2007. Neither address the critical strategic sites in this local plan. They are therefore almost useless. The HRA was commenced after the first draft was issued and remains superficial and incomplete. Again it does not address the critical strategic sites in the local plan. It sweeps these aside with *ex cathedra* comments that the HRA is not relevant to issues such as the Green Belt. The Thames Basin Heaths document had actually expired - running out in 2014. Instead of re-visiting the issues the Council simply re-dated it. The engagement with Natural England has been superficial - and simply seeks NE's endorsement rather than seeking to form an authentically evidenced and reasoned perspective.

The Green Belt and Countryside Study is out of date. Moreover it was commissioned with an explicit intention to roll back the Green Belt to facilitate the political intention to turn Guildford into a 'growth hub'. The underlying workings for the demographic growth projections are not included - ie the model is not disclosed. This non disclosure has been justified on the grounds that the information is 'commercially sensitive' (to the consultant) and that the consultant has 'intellectual property' in the model. Neither statement is evidenced, challenged or tested - despite being so implausible as to have no credibility whatsoever.

Such evidence as has been produced has typically been produced by third party consultants as a 'box-ticking' exercise. Councillors themselves do not appear to have got to grips with the issues - they merely wish to be advised by so-called 'experts' so they can have an easy life and enjoy power without responsibility.

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1. The Council's choice of certain strategic sites was determined several years ago. In the interval it has sought only to justify the choices it made then. This amounts to predetermination. The developer purchase pre-application advice. Over the course of the advisory period (several years) GBC succumbed to 'regulatory capture': [https://en.wikipedia.org/wiki/Regulatory_capture](https://en.wikipedia.org/wiki/Regulatory_capture)

2. Changing Green Belt boundaries prejudices the property rights of property owners whose property is 're-allocated'. Instead of addressing this serious issue in a professional and disinterested manner, GBC has acted to promote the interests of developers and shown complete disregard for anyone whose property rights have been prejudiced. This is evidenced by a complete failure to i) write to the property owners affected, explain the significance of the proposed changes and seek comment/opinion ii) set out the exceptional circumstances which justify the Green Belt changes iii) justify the new Green Belt boundaries. The local plan does not explicitly address these issues. Instead it merely refers readers to a large scale and rather inaccurate map.

3. Rather than put together the evidence in advance of public consultation and reach a properly documented conclusion GBC has gone ahead without gathering all the necessary information -such as a Transport Plan. It has left itself the opportunity of changing the local plan as new evidence comes in. That makes a mockery of the consultation.

4. [Response has been redacted due to statements being considered defamatory, derogatory, inflammatory or offensive in nature] This proposal appears to run contrary to established legal precedent eg the COPAS and Carpets of Worth cases.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: SQLP16/468  Respondent: 8749121 / George Paton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (Yes)

NOT sound

1) out of date or irrelevant evidence base
2) secret undisclosed evidence eg model behind the OAN workings
3) failure to set out the proposals clearly in terms the public can understand eg no summary of how the OAN was arrived at
4) failure to apply ANY constraints to the OAN
5) political predetermination outcomes ie selection of certain sites several years ago under the Mansbridge/Juneja leadership
6) failure to set out the exceptional circumstances justifying removal of sites from the Green Belt

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: SQLP16/469  Respondent: 8749121 / George Paton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 4: Duty to cooperate

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (Yes)
NON COMPLIANCE

1. failure to collaborate with Elmbridge regarding the implications of choosing site A35 which stands on the Elmbridge border

2. failure to complete traffic studies in collaboration with SCC and HE

3. failure to disclose details of collaboration with SCC and HE over highways matters - the so-called 'mitigation' for the effects of the exaggerated housing proposals

4. failure to collaborate with Woking and Waverley on the SHMA. Neither Woking nor Waverley have a copy of the demographic housing model prepared by Justin Gardner Consulting. Without the model there can be no meaningful dialogue let alone 'collaboration' 

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/471  Respondent: 8749121 / George Paton  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (Yes)

1. Why has the demographic model commissioned using public money from Justin Gardner Consulting for the SHMA not been FULLY disclosed to the public. Without it the manner in which the OAN has been arrived at is opaque. The SHMA model is a black box and the calculations are incapable of replication by third parties. It therefore fails to meet the most basic test of objectivity.

2. Why has the sustainability of the strategic development sites in the local plan not been publicly examined, scrutinised, challenged and tested? Why in particular has a site in the middle of the parish of Ockham - the second least sustainable parish in the borough according to the settlement hierarchy - been selected for the site of a new town which will be the third largest settlement in the borough?

3. Why have the exceptional circumstances justifying the moving of Green Belt boundaries - in particular in Ockham - not been properly set out and justified in the local plan?

4. Why has my garden hedge been chosen as the new Green Belt boundary in Ockham? How is it a defensible Green Belt boundary? How does it satisfy the requirement to be permanent and defensible?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/472  Respondent: 8749121 / George Paton  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 7: Any other comments?
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (Yes)

The propaganda video on the GBC website promoting the local plan is a disgrace. It would never pass any test of impartiality. It is flagrantly biased. Like the local plan the video is a developer's charter.

The Green Belt and Countryside Study is likewise completely unprofessional. The evidence base is a collection of consultants' reports many of which the Council has never scrutinised. The supporting models in many of these reports - eg the SHMA and Transport Assessment have not even been properly appraised by council officials.

The conduct of the local plan has been directed to serve the narrow interests of the Executive of the Council which has extraordinarily proposed a new Green Belt in Ash whilst destroying Green Belt elsewhere.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/3914  Respondent: 8749409 / Mrs Randall  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Ash and Tongham

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Ash Vale is full. Apart from the Keogh barracks site, which is brownfield anyway, there is no more room in Ash Vale for any further developments.

Unfortunately the proposals put forward in the plan indicate that any remaining green area in the Ash Wharf ward (which isn’t much) is designated to be built over with great swathes of Ash South and Tongham going the same way. The only saving grace is the proposal at policy P2 (4.3.17) to extend the Green Belt boundary between Ash Green village and the Ash South and Tongham urban area to prevent coalescence. However disappointingly there is nothing proposed to prevent further coalescence of Ash South and Tongham, the latter until recently having been an entirely separate village. In fact it still retains its own Parish Council. It would have been pleasing to have some attempt made to allow Tongham to retain its own individual identity and not just for Ash South and Tongham to be amalgamated as part of the urban sprawl which the area is fast becoming. It appears that what the plan is indicating is that the urban area of Ash South and Tongham (which includes the fast dwindling green space remaining in Ash Wharf ward) will ultimately begin from Harpers Road and extend right through Ash and Tongham almost as far as the Blackwater Valley relief road.

Specifically with reference to Harpers Road there has until now been a small community of residences which are part of Ash but which are somewhat separate from the main urban area – a sort of tiny “village” on the outskirts of the Parish. It would appear that this small pocket of individuality will ultimately be lost if this part of the strategic site at A29 remains as it stands. Whilst it could be argued that this should not stand in the way of development it is disheartening that this housing microcosm could not be protected to some degree.
Until the advent of the NPPF the Ash area maintained some protection from development having been designated as Countryside beyond the Green Belt. Once the NPPF came into existence the protection ceased to have any meaningful application and Ash and Tongham became the target for a multitude of development applications (see below).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16310  Respondent: 8749409 / Mrs Randall  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Reference Policy 11 – Infrastructure, page 108 et seq

Also with regard to sustainability it should be mentioned that of the homes which have already received approval no CIL contributions have been received due to the lack of an up to date plan. Consequently no funds have been made available to provide/maintain necessary infrastructure. Policy 11 at 4.6.1 of the Plan states “We will use CIL receipts towards providing infrastructure to support development and will facilitate the spending of up to one quarter of CIL receipts originating from each Parish........on local priorities to support development”. It seems that to a greater or lesser extent - no doubt the former – Ash and Tongham will already have been disadvantaged in this respect due to the recent wave of planning applications received and approved. Obviously no retrospection would be available but it does seem grossly unfair that by taking an early hit with developments the area is not benefiting in any meaningful way. However there may be scope for redressing the balance somewhat with the implementation of the provisions of 4.6.7 regarding the use of CIL contributions by GBC “to increase the capacity of existing infrastructure or to repair failing existing infrastructure, if that is necessary to support development”. Further details of how this would work out in practice will no doubt follow in due course. Hopefully Ash and Tongham area will receive favourable consideration in this area when future developments come forward as they surely will. Presumably any such use of CIL contributions by GBC under these particular provisions will be additional to the allocation to the Parish Council of the “neighbourhood” portion referred to at 4.6.10.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16308  Respondent: 8749409 / Mrs Randall  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Reference Policy P3 – Countryside, page 52 et seq

At 4.3.29 it states that due to “the sustainability of the area......... a further extension of the urban area, using some countryside (my emphasis), is allocated for development”. It is not some countryside – it is a substantial part of the countryside remaining in the area which is being earmarked for potential development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16309  Respondent: 8749409 / Mrs Randall  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Reference Policy P4 – Flood risk and water source protection zones, page 55 et seq

With regard to the provision of SuDS paragraph 4.3.48 states that “to ensure effective use over their life course, the Council will require appropriate management and maintenance requirements to be put in place”. It would be reassuring to know what robust arrangements the Council has to enforce this requirement and who would actually be responsible for the management and maintenance once the developments have been completed and the properties sold. This is of particular importance in the Ash area where the potential flooding issue has been raised time and again as of great concern when planning applications have been considered.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16307  Respondent: 8749409 / Mrs Randall  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Reference page 28 Table 1 (Planned Delivery between 2018 and 2033)

The table shows the following increase in homes in the area over the period of the plan:

- Ash and Tongham
- Ash and Tongham Strategic location of growth
- Village extensions (including Ash Green southern site)

2418
Since 2013 the following residential developments have been approved:

03/11/15  26 dwellings Spoil Lane
16/07/15  55 dwellings at Grange Farm
21/04/16  56 dwellings at Guildford Road
18/12/13  39 dwellings at The Croft
30/12/13  26 dwellings at Foreman Road
30/12/13  35 dwellings at Poyle Road
30/04/13  60 dwellings at Ash Green Lane West
20/03/14  400 dwellings at Ash Lodge Drive
15/06/16  55 dwellings at Spoil Lane
14/06/16  21 dwellings at South Lane
May 2016  7 dwellings at Wandle Close

Possible and, no doubt, probable:

Under immediate consideration and recommended for approval by GBC:

58 dwellings at Warren Farm
11 dwellings at rear of 57 Manor Road, Tongham

Currently under appeal with the Planning Inspector:

6 dwellings at South Lane

It is possible that not all of the developments approved in recent years have been included above but if just those shown are added up a grand total of 849 dwellings is achieved (this excludes the application at South Lane currently with the Planning Inspector).

If this inordinate amount of development already agreed for the area is considered against the numbers put forward in the draft plan, Ash and Tongham is already well on the way to satisfying their allocation and the Plan hasn’t even been finally agreed yet! This comment is of course based on the premise that the figures mooted in the Plan do actually take into account the developments, or at least some of the developments, mentioned above and that the area will not be expected to absorb a further 1,300+ dwellings up to 2033.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the proposed Infrastructure Schedule (Appendix C)

The Infrastructure Schedule sets out the key infrastructure requirements on which the delivery of the plan depends. For each of the Key Allocated Sites in the borough it identifies infrastructure projects that are required, except for Garlick’s Arch (A43) which is not mentioned. It is clear that the Plan takes no account of the infrastructure required for this site and is therefore not fit for purpose.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>PSLPS16/6025</th>
<th>Respondent:</th>
<th>8749473 / Charlotte Beckett</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy A25</td>
<td></td>
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</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy A25 with proposals for Gosden Hill Farm.

The Green Belt at this point serves the important function of separating West Clandon from the edge of urban Guildford. Development here will cause the two to coalesce defeating one of the objectives of the Green Belt. If this development proceeds I believe the narrow strip of Green Belt remaining between Guildford and Clandon at this point will be too narrow and will come under further pressure.

It will represent an undesirable ribbon development along the A3. It will be highly visible from the A3 when approaching Guildford and will, in conjunction with A43a at Garlick’s Arch give the appearance of almost continuous development from Send through to Guildford.

The Plan does not put forward any evidence that exceptional circumstances exist to justify removing this site from the Green Belt.

The development will overburden the local road network and increase congestion on the A3 and A247 through the centre of West Clandon. This is already very heavily used whilst being unsuitable for designation as an A road. In places it is too narrow for two lorries to pass causing them to mount the pavement.

Note the following accident data:

2010 –2014 from Crashmap data

- Clandon Cross Roads Area to Bulls Head - 17 incidents
- Bulls Heads Head to Bennett Way - 8 incidents
- Bennett Way to Highcotts Lane - 15 incidents
• Tithebarn Lane to Portsmouth Road Birch Close - 8 incidents

2015
• 21 Oct 2015 – A247 near shell garage - Three vehicles collided causing delays

Surrey Fire and Rescue deployed.

2016
• 15 April 2016 12 year old boy injured in The Street – A247 closed in both directions
• 28 April 2016 A3 West Clandon London bound between A247 Tythebarns Lane (Burntcommon and M25J10 (Wisley Interchange) congestion on A3 to A3100 Clay Lane Burpham
• 30 6 2016 Motorcyclists with injuries airlifted to hospital Send Marsh Road

Attempts have been made over many years to reduce traffic, traffic speeds and accident risks through West Clandon, however little has been achieved as the road cannot be widened and SCC is reluctant to impose further speed limits as congestion is already very high.

I object most strongly to the proposal for a link road to bring traffic from the Gosden Hill development to the proposed 4 way junction at Burnt Common. This has the potential to generate large volumes of traffic (including commercial vehicles) on the A247 through West Clandon - a road which is already under traffic stress (see below).

The land in Gosden Hill does exactly what the Greenbelt was designed to achieve. It provides a green buffer between the Guildford Urban Area and West Clandon, gives Burpham a defined green boundary and breathing space and it hides Guildford town from visitors until they pass the off-slip to Burpham.

No exceptional circumstances have been demonstrated for building on this site and therefore it does not comply with paragraphs 87-89 of the NPPF. It stops the sprawl of Guildford town, assists in safeguarding the countryside from encroachment and assists in urban regeneration by encouraging the recycling of derelict and other urban land. All of these are requirements of the NPPF.

The scale of Gosden Hill is out of proportion to West Clandon. It would have four times the amount of housing plus shops, offices/factories, GP surgery, schools. Development on this scale would blight a historic village with a history going back to the doomsday book and beyond.

Gosden Hill is the most obvious location for the north end of an A3 tunnel. It has rising ground and is situated just before the urban area. If it is built on, it will be very difficult to construct a tunnel.

The development will generate in the region of 6,000 vehicles which will pour on to the A3 which is stationary every day during rush hours. The linking of the A3100, B2215 and A247 would channel thousands of cars through the narrow, winding road through West Clandon, a road where large lorries mount the pavement virtually every day and through Send and Ripley which are also severely constrained.

The volume of traffic will greatly increase air pollution which is particularly critical given the proposal to build two schools.

Currently, a two way junction at the site would require vehicles wanting to go north on the A3 to go through Burpham which is grid-locked every day.

Burpham’s sewers are at capacity. Sewage would have to be pumped to Slyfield for processing, a project of enormous cost.

There is inadequate fresh water in Guildford and current supplies could not meet the needs of a development of this size. Electricity supply is also inadequate and would require a big infrastructure development.
The railway station was rejected by Guildford Borough Council in 1984 because it feared Gosden Hill would become a dormitory estate for London.

The wording of the Local Plan with regard to Gosden Hill is so loose that the developer could virtually do whatever it wants.

The remaining agricultural land between Gosden Hill and West Clandon is so small that it is highly likely to be uneconomic and therefore a prime candidate for further development which would roll the Guildford Urban Area over West Clandon towards East Clandon and Wisley.

If the Strategic Sites are developed, the north of Guildford will deliver 36%, 5,036 houses towards the total of around 14,000. The infrastructures of the existing villages and the A3 will be overwhelmed by the scale of development.

A new on-slip at Burpham would only be 1.8km from the on-slip at Burnt Common which is against Highway England’s requirement of 2km.

Development of the A3 at best will not start until after 2020 and the building of a tunnel, which is only an “aspiration” in the Local Plan, is likely to be many years after. In the meantime given that developers build houses to provide cash-flow for infrastructure, Gosden Hill will have a crippling effect on villages like West Clandon and the A3.

Gosden Hill already has surface water problems. Merrow Stream crosses the site. No hydrological survey has been carried out to assess the implications. Electricity pylons run through the centre of Gosden Hill which have health and safety issues.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** PSLPS16/8248  **Respondent:** 8749473 / Charlotte Beckett  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. **POLICY A43 AND A43a – Garlick’s Arch**

I OBJECT to Policy A43 and A43a on Garlick’s Arch.

The site was only inserted in the draft plan at a late stage just before publication of the consultation draft which is a shabby way for the Council to proceed. The site is not a sustainable site being far from any infrastructure facilities and transport links. The bus service is infrequent and it is almost certain any future residents will rely almost entirely on cars for journeys. Similarly any employees at the employment areas will almost undoubtedly arrive and leave by car.

The site is susceptible to flooding and will not make a suitable site.

The Green Belt at this point serves the important function of separating West Clandon from Send. Building here will cause the two to coalesce defeating one of the objectives of the Green Belt.
I have seen no evidence that exceptional circumstances exist to justify removing this site from the Green Belt or that this important issue has been addressed. The Green Belt and Countryside study did not even consider this site.

It is understood the Council's eyes may have been turned by the possibility of receiving for free the land which might be used for new A3 slip roads in return for allowing this development, thus justifying it as some form of enabling development. However the slip road land if needed could be safeguarded in the plan and acquired by compulsory purchase when required. Lack of current funding for the slip road is not a justification for allowing the development of this site. If the slip road is genuinely needed then government funding will be available for it. (One of the reasons for turning down the so called enabling development proposal intended to fund the rebuilding of the Howard of Effingham School was that the redevelopment of the school was not essential. As and when it became essential Government funding would become available. Accordingly enabling development was not necessary. The same principle applies here.)

The A247 running south past this site through the centre of West Clandon is already very heavily used whilst being unsuitable for designation as an A road. In places it is too narrow for two lorries to pass causing them to mount the pavement- often at speed. It has narrow bends with poor sight lines, an infants school and a hump-backed bridge concealing the entrance road to the station for southward traffic. In addition, there are no continuous footpaths which forces pedestrians to cross and re-cross the road. Development at Garlick’s Arch will only exacerbate the problem and make the road even more congested and unsafe for pedestrians.

The development will cause harm to the ancient woodland on and by the site.

Taken together with the Gosden Hill site, there will be a ribbon of development along the A3 in contrast to the current “soft” edge approach to Guildford.

Garlick’s Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8). There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).

The Plan states the preference is to making the best use of previously developed land. Yet at the 11th hour a perfectly acceptable brown field site at Burnt Common, capable of accommodating approximately 100 houses, was removed from the Plan and replaced with the Garlick’s Arch site. There was no proper consultation in relation to the inclusion of this site. Why was a brownfield site removed and replaced with a Greenfield site? There is no evidence that Section 18 of the Planning and Compulsory Purchase Act 2004, which requires local planning authorities to produce a Statement of Community Involvement, has been complied with for this site. This only came to light for local residents following a Council meeting on 11th May 2016.

Moreover, Guildford Borough Council’s own Green Belt & Countryside Report does not address Garlick’s Arch at all, so there is no evidence base to support the inclusion of this site.

National Planning Policy promotes sustainable developments, with sustainable transport. With ever reducing bus services in the area and no train station within reasonable walking distance it is impossible for any development on this site to offer a sustainable transport solution. Development on this site is wholly inappropriate (Policy I3).

The stream, which runs through the site, is identified as having a high risk of flooding by the Environment Agency. There are other sites that do not flood that can be developed and therefore this site should be removed from the Plan (Policy P4).

This site is bordered by Ancient Woodland and within it a number of trees are protected by Tree Preservation Orders (Policy D3).

The site has an abundance of wildlife, some of which are protected. It is home to many types of owls and bats, with the woods having cuckoos and woodpeckers. In addition there are regular sightings of badgers, deer and red kites. The development of the site will result in the loss of habitat. No wildlife report has been conducted on the site. (Policy I4)

It is clear that with this site being added at the 11th hours no infrastructure planning has been undertaken. The Infrastructure Schedule makes no provision for any infrastructure improvements for this site. How will the local services such as schools and doctors cope, many of which are already at capacity? (Policy I1)
Furthermore, several electricity pylon runs through the site, which will have the potential to be a health hazard for any residents.

I OBJECT to the inclusion of the land for new on/off ramps at Burnt Common (A43a)

The addition north facing ramps to the A3 at Burnt Common would be a disaster for local communities. There is no requirement for local traffic to access the A3 to the north, but the addition will draw in a huge amount of ‘through’ traffic.

The route from London/M25 to Woking or would now be through Burnt Common and Send. Equally traffic from the east of Guildford (Merrow etc) and the A25 will now go through West Clandon and Burnt Common. This will cause immense damage to those areas on small roads which cannot be improved.

This Plan does not address the needs of local communities or the Borough in this regard. There has again been no Section 18 consultation on this.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

| Comment ID:  | PSLPP16/12308 | Respondent: 8749473 / Charlotte Beckett | Agent: |
| Docuement:   | Proposed Submission Local Plan: strategy and sites 2016 / Policy D3 |
| Do you consider this section of the document; complies with the Duty to Cooperate? ( ) | |
| is Sound? ( ) | | is Legally Compliant? ( ) |
| Answer (if comment is on questions 1-7 of the questionnaire): () |

I OBJECT to the damage to the historic environment as a result of the scale of the proposed development (Policy D3)

I OBJECT to the local plan based on the impact it will have on the special countryside of the borough.

The proposed development at Garlick’s Arch (A43) will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

| Comment ID:  | PSLPP16/12320 | Respondent: 8749473 / Charlotte Beckett | Agent: |
| Docuement:   | Proposed Submission Local Plan: strategy and sites 2016 / Policy D3 |
| Do you consider this section of the document; complies with the Duty to Cooperate? ( ) | |
| is Sound? ( ) | | is Legally Compliant? ( ) |
| Answer (if comment is on questions 1-7 of the questionnaire): () |
I OBJECT to Policy D3 - Historic environment

I object to this policy as it is very weak and I do not think it is clear enough in its support for the conservation of the historic environment. It provides for development which will “enhance” heritage assets which I fear is a developer’s charter as it leaves plenty of room for abuse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPP16/12322  **Respondent:** 8749473 / Charlotte Beckett  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy D4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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I OBJECT to Policy D4 - Development in urban areas and inset villages

The policy should place much greater emphasis on residential development in the existing urban centres. In this way housing needs can be met without resorting to large developments in the Green Belt. There are urban areas in need of regeneration but these are ignored in favour of Green Belt development.

The policy should not be applied to the villages which should remain in the Green Belt. Unrestricted application of this policy to the villages intended to be inset will change their characters radically and for the worse. The development it encourages will increase traffic and congestion disproportionately.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPP16/12303  **Respondent:** 8749473 / Charlotte Beckett  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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I OBJECT to the sustainable employment policy (Policy E1)

I object to the inclusion of a strategic employment site at Gosden Hill Farm. Employment sites should be concentrated on previously developed land in more sustainable locations with good transport links where the infrastructure can support development. Warehousing, distribution and industrial premises cause considerable commercial traffic, noise, pollution and
general disruption. They are not good neighbours for schools and 2000 houses. Many of the jobs will be taken by people outside the area leading to additional congestion in Burpham and on the A3.

I object to the inclusion of a strategic employment site at Garlick’s Arch. It is in a non-sustainable location remote from any facilities of any kind and with poor public transport links. It is unlikely jobs there will be taken by local residents and it is likely all travel to and from work will be by car adding to local congestion. Employment sites should be concentrated on previously developed land in more sustainable location with good transport links where the infrastructure can support development.

The site is in any event subject to frequent flooding and unsuitable for development.

If developed, the new employment site at Garlick’s Arch, Send Marsh/Burnt Common (A43), would be treated as a Strategic Employment Site.

The proposed development of up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8) at Garlick’s Arch (A43) is in the scheme of industrial development relatively small. Just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m. The Garlick’s Arch site which is in the Green Belt should not be developed as a Strategic Employment Site when there is a suitable alternative brownfield site very close by, which is far more sustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12304  Respondent: 8749473 / Charlotte Beckett  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the location for new employment floorspace (Policy E2)

I object to this policy. It would be more sensible to confine new office and research and development floor space to the urban Guildford area. I also oppose the policy of expanding the Research Park onto Blackwell Farm. No exceptional circumstances, as defined under the NPPF, have been advanced to justify incursion into this permanent and high-quality area of Green Belt.

Proposals for new industrial, warehousing and storage (use Class B1c, B2 and B8) floorspace will be directed to the Industrial Strategic Employment Sites.

There is no need for the new employment floorspace to be located at Garlick’s Arch or Gosden Hill Farm, when near to these sites at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I OBJECT to Policy E5 - The leisure and visitor experience.

The policy should acknowledge that whilst in some areas new and enhanced leisure facilities are valuable (for example the new Opera House at West Horsley Place Towers), much tourism depends on the undeveloped nature of Green Belt areas surrounding Guildford. Accordingly the policy should recognize that in many rural areas new and enhanced visitor facilities may be unnecessary and counterproductive, particularly away from existing buildings and development. For example the attraction of Newlands Corner is its undeveloped nature. Significant development of visitor facilities there is likely to diminish rather than increase its attractions. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment. Heritage sites and the Green Belt are particularly vulnerable to harm.

Tourism and visitors do not depend on new visitor “attractions” and could actually be damaged by them, as compellingly argued in the current debate over Newlands Corner. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment/“Disneyfication”. Heritage sites and the Green Belt are particularly vulnerable to harm.

Guildford has many “leisure and visitor attractions” already. The case for creating more is not made and no examples are given. Instead, the plan’s explicit priorities should be:

1. To protect the borough’s prime leisure and tourism asset, its countryside, from inappropriate development. This is all the more valuable because of its accessibility from London, the rest of Britain and the Continent, in that order. Rural residents are its custodians and require no Council interference. Economically, the most valuable
forms of tourism, such as walking and cycling, require no new development. In the overcrowded South-East of England, lack of development is a leisure and tourism asset, not a liability.

2. To help make Guildford’s river landscape less off-putting and support town-break packages for high-value tourists. To achieve this, the policy needs to define what leverage, if any, Council planners have to influence normal tourism market mechanisms.

3. To help private providers market local tourism. This need not involve extra spending. The Council could, for instance, help co-ordinate ready-made, local tourism packages under a distinctive brand at an all-in price. An “English town break” (including B&B accommodation, a walking tour of Guildford, a pub lunch in the Surrey Hills, a visit to Wisley Gardens and a National Trust property and a Southwest Trains travelcard for a day out in London) would be highly attractive to many European visitors who currently by-pass Guildford to go to Bath, Oxford or Cambridge instead.

4. To rule out the redevelopment of scarce rural hotel sites (e.g. Thatchers, East Horsley, earmarked for 40 new houses under Site A37 of the plan yet just a short walk from the new opera house).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12318  Respondent: 8749473 / Charlotte Beckett  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E7

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy E7 Guildford Town Centre

The policy “vision” describes protecting the Guildford’s unique setting and historical character and sets out some of the ways this will be done. However none of this is included in the formal Policy wording in the blue box. I suspect the Vision wording is effectively of little or any force. These principles should be included in the formal policy.

There should be a much greater focus on residential use of the town centre where many people would like to live and where the necessary amenities and infrastructure exist. The policy misses the opportunity to propose forward looking sustainable residential development plans in, for example the Walnut Tree Close area, where very significant numbers of new homes could be provided. Such town centre sites could meet much of the housing need over the plan period without harming the countryside.

There is an urgent need for a strategy to focus on brownfield redevelopment before considering development outside the existing urban area.

The policy does not address any of the major issues raised by the Council’s own Town Centre Master Plan, the Guildford Vision Group’s proposal for new river and rail crossings or plans for the redevelopment of Guildford Station, all of which are already the subject of public discussion.

The policy also fails to provide guidance on design requirements, as required by the NPPF.

The policy and surrounding text concentrates too much on shopping without regard to its nature which risks a proliferation of dull high-street chain stores. The policy should seek to enhance Guildford’s character and encourage a wider variety of small shops including locally owned businesses and shops of use to consumers. (For example there is no butcher in Guildford.)
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: PSLPP16/12314</th>
<th>Respondent: 8749473 / Charlotte Beckett</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )

I OBJECT to Policy H1 – Homes for all. Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan period. It fails to set rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions.

The housing mix is based on out-of-date, pre-Brexit projections and on assumptions set out in a flawed SHMA that has not been scrutinised or evaluated.

I support higher density development in the urban area, without resorting to dehumanising, high-rise buildings that developers commonly claim are necessary for financial viability. Much of Guildford town could usefully be regenerated with 4-5 storey blocks with landscaping and underground parking, as often seen on the Continent and, recently, in London.

Student accommodation should provided for 100% of new students and more than 60% of existing students, which would free up ideal family accommodation in the urban area. Other university cities (e.g. Oxford) insist on higher percentages than those proposed in the plan. In my view, the Council’s timidity is a case of “regulatory capture” by Surrey University, which has failed to use its existing planning permissions (dating from 2004) to accommodate 3,000 students or to improve the efficient development of its campus (e.g. by building on its extensive and under-used surface car parks). If all students were accommodated in this way, 2,000 homes would be freed up in town and there would be no need to build on the Hog’s Back.

It is not appropriate to release Green Belt land to house students who could be accommodated on the Surrey campus or other university sites. The plan should take account of the university's ability to house its own students and reduce the housing number accordingly.

Guildford borough has already a higher proportion of traveller sites than most comparable boroughs. Over-provision is inappropriate given other constraints.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<th>Comment ID: PSLPP16/12316</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H2</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to this policy on affordable homes (Policy H2) on the grounds of feasibility and that it should be more firm and explicit on unviability in paragraph 4.2.40.

In particular a scheme is only unviable if the value of developing the land (including some allowance for development risk and a normal level of profit) falls below the sale vale of the land for alternative non-premium uses such as agriculture. The price paid for the land is not relevant. The possibility of avoiding the affordable housing obligation through use of unviability arguments only serves to inflate land values. It will become clear that developments are unviable when developers start selling land for alternative non-development uses.

It should be noted in the plan that because of Guildford's relative popularity as a place to live combined with its location close to others towns and within the London Commuter belt no amount of building will meet demand. Similarly no amount of affordable housing will ever meet demand.

In addition the definition of an ‘affordable home’ is 80% of market value. With even a 2 bedroom flat in Guildford now having a market value of +£360,000 the discounted price is still not going to be affordable to anyone on a normal income.

And at what point will ‘affordable homes’ be able to go onto the market at full market price?

As we have seen with council houses it is not long before the discounted property is sold at full market value with the original owner simply pocketing the profit.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12324  Respondent: 8749473 / Charlotte Beckett  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy H3 – Rural Exception Homes as this Trojan horse policy. It says that homes can be built anywhere near a settlement of any form (including agricultural land and the AONB). These homes are meant for people with a village connection, but they could be for anyone on the Guildford borough housing list. To make the housing viable, or to improve the “mix” this can include “market” housing (i.e. normal commercial development which in Guildford usually means large executive homes). This policy means building anywhere, and ignoring all historic planning restrictions.

The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove “exceptional circumstances.”
The wording of the policy is far too wide and drives a coach and horses through all other aspects of planning policy. As drafted the planning authority could be obliged to grant permission for inappropriate and unsuitable developments.

The wording provides no ability to balance the desirability of the development against other considerations including harm to the Green Belt or the AONB. (If the housing would meet identified need and adjoins a settlement under this policy wording permission would have to be granted even in the most sensitive AONB location, even if more suitable locations were available.) The policy should include the need for a balancing exercise including consideration whether more suitable locations exist.

The policy wording should not allow market housing. The ability to include market housing is likely to inflate land values, leading to a self-perpetuating need to include market housing. It may lead to spurious developer led proposals which will be difficult to resist.

The policy wording should define small, either in land size or number of units. I am concerned that if small is left undefined the policy could be used to justify significant developments. In the context of the plan a development of 150 homes might be argued as small. (If Wisley at 2,500 homes is a big development then 500 homes might be a medium development and 150 could be small.)

The policy wording should be restricted to adjoining sites or define the concept of being "closely related". In particular I believe adding the concept of safe and easy walking distance extends the potential radius within which sites will be argued to be “closely related” Many people would regard a mile or so as an easy walking distance. (School children are expected to walk further than that before being eligible for free school travel.)

The wording of the policy itself does not require the local connection requirement for tenants to be secured in perpetuity - only the affordability must be secured in perpetuity. (For example housing could be built for retired Cabinet Ministers under this policy so long as the first tenant was required to have a local connection.) The introduction to the policy mentions this point, but it is not part of the policy itself and may carry little weight at appeal.

The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove “exceptional circumstances.” The size and location of sites should be better defined and it should be clear market housing cannot be included.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12309  Respondent: 8749473 / Charlotte Beckett  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT, due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1)

Our villages are already suffering from severe congestion for much of the day, for example the Newark Road & Rose Lane junction in the centre of Ripley and the A247 through West Clandon. The proposed development under the plan will cause...
greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.

Furthermore, many of the country lanes around the villages of Ripley, Send and Clandon are narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition.

I OBJECT to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces.

Many of the affected villages, such as West Clandon, already suffer from traffic congestion. Further development around these villages will only result in more traffic and more parking problems.

With some 5,000 houses being proposed close to the village of Ripley, the roads serving the village will become even more congested. Cycling has become an ever popular past time, particularly at weekends hundreds of cyclists past through the villages on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road accidents involving cyclists as a result of the development proposed under the local plan.

The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the road becoming ever more dangerous for pedestrians.

The council has a statutory obligation to protect the public and the additional traffic flows will bring added accidents, noise, pollution and injury of the public. In the case of West Clandon the Street often only has a narrow footpath on one side of the road making it very dangerous, especially when vehicles mount the pavements.

This policy as it is inappropriate and inadequate and fails to respond to the challenges raised by the proposed significant Green belt developments. The borough’s infrastructure is already heavily strained. However the plan’s determination to build large housing estates across the Guildford countryside significantly increases the need for infrastructure investment without securing the means for its provision. Placing housing in the established urban areas would reduce the need for enhanced infrastructure as would a more realistic housing number.

The policy wording says nothing about roads and traffic. The Council’s methodology for assessing traffic congestion - averaging it over periods of several hours and ignoring the effects of junctions - simply hides the problem, which will get worse as development proceeds. The schemes referred to in this policy will not solve existing congestion and the local road network has not been given sufficient consideration. Some proposed development locations would require highway schemes that are unlikely ever to happen.

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Adequate infrastructure provision is a pre-condition of sustainable development. But in this plan it is an afterthought buried away in Policy I1. By prioritizing greenfield over urban, brownfield regeneration, the plan creates insurmountable (and unnecessary) obstacles for itself. Common sense suggests a local plan should first assess the borough’s infrastructure capacity for sustainable development, and then tailor development accordingly. This plan, however, assumes infrastructure will follow on the heels of housebuilding as if by magic. It makes implementation critically dependent on providers outside the Council’s control and on the vagaries of CIL income. Instead of recognizing this as a key constraint, the plan is based on hope. It is also highly likely that developers faced with the imposition of large infrastructure requirements will go to court to invoke the NPPF provision that prevents authorities from imposing conditions that make a development non-viable.

Policy I1 requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.

Despite the Garlick’s Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents’ in the locality will see their quality of life significantly deteriorate in many ways.

Many of the utilities in the Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers. No plans to improve these services should mean no development of the Garlick’s Arch site.
Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are already at capacity and suffering from funding cuts or freezes. Any further development without funding will place further stress upon existing health services.

Police services are seeing funding reduced. The development of the proposed 13,860 homes during the plan period will stretch the police services further and is unsustainable.

There is no provision of the increased capacity of Guildford hospital, where is this assessed and remedied?

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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<th>Respondent: 8749473 / Charlotte Beckett</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID2</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

I OBJECT due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2)

I object to this policy as it is too vague and optimistic. Significant improvements to the road infrastructure are like to be many years away even if they ever happen. The draft plan, however, commits to building massive housing estates in the countryside before any of these road improvements are in place. This is inappropriate and will lead to massive traffic disruption during the construction phase and will add permanently to an already congested network (about 3,000 private cars from the 2,100 new homes at Wisley Airfield alone).

Road infrastructure represents a major constraint that should have been applied to the housing target at a much earlier stage in the plan process and not left as an unresolved difficulty in the draft plan.

There is no certainty that either the A3 or M25 in the borough will be improved to increase capacity and reduce congestion during the Plan period. Highways England has no plans to even examine improving the A3 before 2020. I have considerable concerns that development of the large residential sites identified at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), will take place before any improvements are made to the trunk road network. The A3 & M25 are already at capacity during peak hours and any development prior to improvement of these roads will only make the situations worse.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to poor air quality concerns (Policy I3)

Paragraph 4.6.27 of the Plan states that “Development must also mitigate its traffic impacts, including its environmental impacts and impacts on amenity and health.” The significant level of development being proposed, particularly in the north east of the borough will lead to considerable further congestion, despite any attempts to mitigate this through travel plans. This will be particularly acute in built up residential areas and will only lead to greater levels of air pollution, which will have a detrimental effect on local residents and their health and can result in early death.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12301  Respondent: 8749473 / Charlotte Beckett  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to not protecting the Green Belt (Policy P2)

This policy does not sufficiently safeguard the Green Belt even though Green Belt constitutes 89% of the borough and should be the cornerstone of all local planning policy. The Green Belt is not the Council’s to give away and once it is gone it is gone forever. Sacrificing areas of the Green Belt to a developer influenced growth agenda is a betrayal of future generations and does not constitute sustainable development.

The Green Belt should be protected in perpetuity, but Policy P2 seeks to justify excessive development in supposedly protected areas. This is in breach of party manifesto commitments and contrary to previous responses to public consultation. It is disreputable to argue, as the Council does, that the Plan would involve the loss of “only” 1.6% of the borough’s Green Belt. Leaving aside the reliability of that statistic, the NPPF does not set an “acceptable” percentage. The fact remains that the plan proposes that 65% of the housing plus industrial development be built on land to be taken out of the Green Belt.

Paragraph 4.3.16 is seriously deficient in simply stating that the Council considers that exceptional circumstances exist to justify amendment of Green Belt boundaries. The exceptional circumstances are not identified. It is clear from national guidance that unmet housing need is not on its own an exceptional circumstance. Even to the extent that exceptional circumstances exist, these have to be balanced against the harm to the Green Belt in the specific sites proposed to be taken out of the Green Belt. This balancing exercise appears not to have been done.

The Countryside Study which the Council may argue fulfilled the need to demonstrate the exceptional circumstances required to justify removal of areas from the Green Belt was a simplistic tick box exercise. Within limits it may have answered certain questions about different attributes of different areas of Green Belt but it did not carry out the balancing exercise needed to determine whether specific exceptional circumstances justified removal of specific areas of land from...
the Green Belt. I believe that each of the identified Green Belt site proposed to be removed from the Green Belt should be carefully assessed against any exceptional circumstances in deciding whether it should be removed from the Green Belt in the final plan. This exercise should bear in mind that housing need in itself is not an exceptional circumstance and nor is the Council’s growth aspiration. An important consideration is that more housing need could be met on urban sites than is currently planned. The Plan has fallen into the developers’ hands and developers prefer building on undeveloped land rather than brown field sites.

I note that the Summer 2016 edition of "About Guildford" (published by the Council) on page 5 states that "... the Plan rejects any schemes that would have a detrimental impact on the Green Belt." This is demonstrably untrue and I consider this to be a deliberate untruth which compromises the consultation process. I would ask that this untruth be corrected and the consultation period restarted after the correction has been given the same distribution as the original statement. (I assume the document was delivered to most houses in the Borough.) I reserve the right to argue before the inspector that the consultation process was flawed and ineffective because of this.

I object to the “insetting” of 14 villages from the Green Belt. Contrary to assertions made in the Plan process many of these villages do contribute to the openness of the Green Belt and there is no need to inset them.

I also object to the wholesale extensions to the settlement boundaries in many villages to allow for infilling and that infilling is also proposed outside the settlement boundaries of 11 further villages. Many Guildford villages are linear. It is too easy to square off boundaries by including countryside bounded on only one or two sides by existing development, claiming it contributes nothing to the “openness” of the Green Belt, a term which neither the plan nor the NPPF defines. The NPPF’s other 4 tests of Green Belt status, including the prevention of urban sprawl, are ignored. Effectively, this policy makes all villages within the Green Belt vulnerable to large blocks of new development and seems almost calculated to secure the rejection of the plan as a whole.

To “inset” two-thirds of the borough’s rural villages on the grounds that they no longer contribute to the purposes of the Green Belt is extreme and inherently implausible, given the borough’s location on the edge of Metropolitan London. I cannot see how such extensive areas fail to contribute to the purposes of the Green Belt under the NPPF, but this could quickly be the case if the proposed “insetting” and boundary extensions go ahead.

This policy is wildly disproportionate in terms of any foreseeable development need and has caused tidal waves of opposition from residents. It flies in the face of NPPF paragraph 17’s aim of “empowering local people to shape their surroundings” and other NPPF provisions.

Paragraph 4.3.17 states that “the general extent of the Green Belt has been retained.” I believe this should be deleted as an untruth.

In addition I OBJECT to the proposals to remove from the Green Belt the so called ‘strategic sites’ of Wisley Airfield (A35), Gosden Hill Farm (A25) and Garlick’s Arch (A43) and all other strategic sites. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these sites and villages (as mere housing need does not constitute a ‘special circumstance’) to be taken from the Green Belt. Once taken from the green belt they will be lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached.

GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site.

Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
Comment ID: PSLPP16/12302  Respondent: 8749473 / Charlotte Beckett  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to development in areas which are at risk of flooding (Policy P4)

National Planning Policy states that Local Plans should take account of climate change over the longer term, including factors such as flood risk. It goes on to say that new development should be planned to avoid increased vulnerability to the range of impacts arising from climate change.

The Plan states that in accordance with national planning practice guidance, the Level 1 SFRA has been used to guide development towards areas at the lowest risk of flooding and identify areas unsuitable for development. However, the document concludes that land outside of the area of flood risk is not capable of accommodating all of the borough’s identified development needs. A Level 2 SFRA has therefore also been produced and will help the Council apply the exceptions test (as described in the NPPG) as necessary to development proposals in areas at risk of flooding.

The site at Garlick’s Arch (A43) is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. Knowing the area well I am aware that this site often floods during the winter months and the flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12299  Respondent: 8749473 / Charlotte Beckett  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to this Policy as the development proposed will not be sustainable (Policy S1)

The NPPF states that the presumption in favour of sustainable development “should be seen as a golden thread running through both plan-making and decision-taking.” As the first policy in the Plan, Policy S1 ought to set a clear framework. Instead, no definition of “sustainable development” is given. The policy also fails to set out any principles for applying sustainable development in practice to local planning decisions, which often have serious long-term impacts.

The policy states that it aims “to secure development that secures the economic, social and environmental conditions in the area”. This fails to recognize that economic growth, social justice and environmental protection often conflict. The policy does not say how each element is to be weighted or conflicts resolved. As a practical guide to the planning decision to be
taken in the Plan period it is seriously deficient. The policy is likely to be used by developers to justify inappropriate developments on economic grounds. Under this policy, virtually any development will qualify as “sustainable”, in breach of the NPPF’s most important guideline.

Policy S1 is also seriously deficient in making no mention of the Green Belt. The Green Belt is a long term Government policy enshrined in primary legislation to protect green areas in perpetuity. The Green Belt is a living example of sustainable development in practice and is one of the most important factors affecting sustainable development in the area covered by the Plan and should be acknowledged in this policy. Policy S1 should include a commitment to protect the Green Belt from inappropriate development and to uphold Green Belt boundaries and protections. This would set at least one clear boundary to planning decisions. The Plan and the Council have treated the Green Belt as a developable land bank rather than as a constraint to development.

The commitment to approve planning applications “wherever possible” and “without delay” reveals the pro-development bias of the plan. Countervailing references to sustainability are so vague that the NPPF presumption in favour of sustainable development becomes a presumption in favour of any development at all.

This policy also ignores, as if they are inconvenient constraints, most of the 12 Core Planning Principles set out in NPPF paragraph 17.

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill Farm (A25) are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are also unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12300  Respondent: 8749473 / Charlotte Beckett  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )
I OBJECT to the Borough Wide Strategy (Policy S2)

The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

The housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.

The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guildford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

The assumptions and calculations in the SHMA are widely regarded as flawed and even before Brexit, produced an inflated housing needs number. The figure of 13,860 new homes is completely unsubstantiated. It has not been scrutinized by Councillors despite repeated requests for debate. The assumptions and calculations underlying the model are hidden, protected by a claim to intellectual property by a commercial sub-contractor used in preparing the SHMA. I have serious doubts about the objectivity of the SHMA because it has been produced by consultants whose website openly proclaims their pro-development agenda leading to reasonable suspicion that the figures are inflated. Guildford’s OAN is not transparent but has been taken on trust by the authors of the plan. Given that almost every element of the plan is predicated on this OAN, the plan as a whole cannot be considered “sound”.

The status of the 13,860 figure is ambiguous. The Council has said that the housing number and the OAN are identical because the OAN is “deliverable” and is by definition objective and cannot be contradicted. The OAN is only deliverable because of the Council’s cavalier approach to the Green Belt in contravention of the NPPF, ministerial statements and local and national Conservative Party manifesto commitments. The plan also states that infrastructure or other constraints may in due course affect deliverability. It is also unlikely that the number of houses can be built at the rate proposed. In recent years, housing starts have on average been less than half the proposed rate. This is not because developers do not have the land or cannot get planning permission. Constraints in the supply chain and maintaining profit levels have been more important.

The plan cannot be considered “deliverable”. In addition, the number of homes proposed, plus existing planning permissions, plus expected “windfall” sites, exceeds the total of 13,860. So how many homes (taking account of these adjustments) do the Council want built? The plan does not say. Without this figure it is hard to see how anything else can be planned. This undermines the validity of the whole consultation. It is unreasonable to ask the public to approve a “plan” that fails to propose a target number that takes all the standard constraints and adjustments realistically into account, leaving the Council to set one without further consultation. Even if the OAN is not flawed, it is at best only a baseline figure and should not be passed off as a policy proposal.

It is unreasonable to embark on a radical transformation of the borough on the basis of an unclear housing target. Most of Guildford Borough is highly protected from development (89% Green Belt, 44% AONB and about 75% protected by SPA). Whether or not increasing the number of dwellings by up to a quarter is desirable, it would be a major and irreversible
change, arguably turning a largely rural borough into a mainly urban or suburban one like Woking. The scale of the housing number increases the onus for it to be seen to be sound. A substantially lower number, on the other hand, would remove the need to build on Green Belt or open countryside, and instantly meet the single biggest public objection to the plan as a whole.

The Plan in general and this policy in particular does not address the point that Guildford exists as part of London's commuter belt. Any increase in supply of housing in Guildford, particularly if the increase is proportionately greater than elsewhere in the commuter belt, will simply result in a shift of population into the area. It will not reduce prices or increase availability except imperceptibly. The Plan also ignores the point that many of those working in the area live elsewhere. Accordingly in considering the housing number the Plan should take into account that in this part of London’s commuter belt, demand for housing is, in practical terms, unlimited.

This policy does not take proper accounts of the constraints to development which exist, principally posed by the Green Belt and by infrastructure limitations. I believe the Council is under a duty to properly consider applying these constraints. It is clear the Council has failed to do this. This approach differs from all the other boroughs in Surrey. The Plan appears to have deliberately been manipulated towards a growth agenda without disclosing why this is being done. The housing that is needed should be concentrated on urban brownfield sites and through increasing the housing density of existing built up urban areas.

The development of 13,860 homes in the Plan period with 65% in the Green Belt does not constitute sustainable development. It will have a permanently detrimental impact on the Borough in general and on West Clandon and surrounding area in particular. The developments at Garlick’s Arch and Gosden Hill Farm do not meet the needs of the local communities. The road infrastructure in and around West Clandon will be unable to cope with additional demand. The edge of urban Guildford will creep that much closer to West Clandon, thus negating the purposes of the Green Belt in the area which include safeguarding the countryside from encroachment, checking the unrestricted sprawl of large built up areas and preventing neighboring towns merging into one another.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill Farm (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: PSLPP16/12327</th>
<th>Respondent: 8749473 / Charlotte Beckett</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
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I OBJECT to all strategic sites proposed in the draft Plan to be built in the Green Belt.

1. I object to the identification and allocation of sites in this plan without regard to Green Belt, infrastructure or other constraints. The plan says that “allocating these sites does not grant planning permission for development.” However, each of the sites will be removed from the Green Belt and will be available in principle for development and non-Green Belt uses. The inclusion of these sites without detailed site by site justification shows contempt for the thousands of detailed comments the Council have received about individual sites ever since the Issues and Options consultation in 2013. The plan has hardly changed since the Council received 20,000 objections to its first draft plan in 2014. The Inspector considering the plan may conclude that the consultation has not been properly conducted.

2. The housing needs assessment is flawed in various respects and overstates housing need. In addition since it was produced, the referendum Brexit decision has almost certainly reduced future housing need and rendered the previous assessment seriously out of date. As a result any assessment of Green Belt sites which took place to consider whether “exceptional circumstances” existed to outweigh the harm to the Green Belt was based on false premises and should be reconsidered.

3. Having determined housing need the Council was entitled to consider constraints before determining the housing number. I believe that as III as being entitled to do this the Council was required to give proper consideration to constraints. The scarcity of sites outside the Green Belt as III as infrastructure (most notable roads) considerations all represented constraints which should have been taken into account in determining the final housing number. Accordingly in this regard our objection to the allocation of Green Belt sites is twofold. First I believe constraints should have been applied. Secondly I believe the Council did not properly consider constraints and that their decision making process was flawed and thus subject to being set aside by the Inspector.

4. Even if having properly applied constraints there is a need to develop in the Green Belt then specific Green Belt sites should not be included in the plan unless “exceptional circumstances” for development are proven in relation to that specific site, as stipulated repeatedly in the NPPF. The Green Belt should trump short-term considerations such as perceived housing need, as case law has established. There needs to be a specific balancing exercise conducted on each Green Belt site weighing the harm to the Green Belt against the very special circumstances which are argued in favour of development at that particular site. There is no evidence this has been done. Instead the council have appeared to say that having chosen a housing needs figure and decided it cannot be met without building on Green Belt then there is no need for any further consideration and any convenient Green Belt site can be allocated for building at will.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/1456  Respondent: 8749473 / Charlotte Beckett  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (No)

I do not agree that the evidence used for the Proposed Submission Local Plan Strategy and Sites is adequate, up-to-date and relevant.

The fundamental driving forces for much of the development proposed in the Plan (particularly that on Green Belt land) are based on:
1. An excessive ambition to expand the local economy which is neither warranted nor wanted by the local population. Guildford is already one of the highest ‘value creation’ areas in the country and has one of the lowest unemployment rates. There is no evidence that massive and accelerated expansion is required.

1. SHMA figures which are neither transparent nor justifiable, especially in view of previous figures set. Independent assessments of the SHMA (eg from Guildford Residents’ Association and David Reeve) show it is set far too high and so cannot be said to be adequate, up to date or relevant.

In addition the recent vote to leave the EU and the impact this will have on the economy and migration have not been taken into account.

The Plan should be re-assessed and the methodology for arriving at housing need figures should be fully transparent.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/1458  Respondent: 8749473 / Charlotte Beckett  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 2: Legal compliance

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (No)

I do not consider the Proposed Submission Local Plan: strategy and sites as a whole to be legally compliant because it mainly ignores the consultation process for the 2014 draft Plan it is claimed to be based on.

That consultation process was absolutely clear by some +20,000 responses that that Plan was flawed and no development should be carried out on Green Belt land.

Instead this 2016 draft Plan actually increases the number of dwellings being built on the Green Belt, in direct contradiction to the consultation process, yet is stated to be a Regulation 19 proposal.

As a result I do not see how the 2016 draft Plan can be Legally Compliant.

The 2016 draft Plan should be re-assessed and should take into account the views of the majority of responses from the consultation process for the 2014 draft Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/1459  Respondent: 8749473 / Charlotte Beckett  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (No)

I do not consider the Proposed Submission Local Plan: strategy and sites as a whole to be sound, because, but not limited to, the following reasons:

1. “Only sites that propose sustainable solutions have been included in the Plan and the Plan rejects any schemes that would have a detrimental effect on the green belt.” Summer 2016 edition of "About Guildford" (published by the Council) on page 5. This is demonstrably untrue and appears designed to bias the consultation process.

1. The housing OAN figure has been calculated by a process which is not transparent. It has not been properly examined by Councillors before being adopted.

2. The OAN has been adopted as the housing number without the application of any constraints to take account of Guildford's circumstances, including in particular the Green Belt, AONB and road infrastructure. National policy permits such constraints to be applied and it is inappropriate not to consider the need to do this.

3. The draft Plan does not accord with the NPPF policies on protecting the Green Belt.

Exceptional circumstances need to be shown to justify removing areas from the Green Belt and this has not been done. The housing need number is not justification in itself according to published ministerial statements. Having properly calculated an OAN, constraints should be applied to it to reflect the Green Belt, AONB and infrastructure. Each proposed Green Belt site then needs to be justified on its own merits. The benefits of the proposed development need to be identified together with the harm to the Green Belt. Only if there are exceptional circumstances and following a proper balancing exercise demonstrating that these exceptional circumstances outweigh the harm to the Green Belt can the proposal proceed. The draft Plan does not demonstrate that this has been done. The housing number has been used as a blanket justification for all Green Belt sites—which amount to 65% of the proposed housing number.

1. Whatever the justification for the assumptions made in calculating the OAN, those assumptions are now almost certainly incorrect following the referendum.

1. The housing number is at least twice the achieved rate of building in the Borough over the last few years. There is no evidence in the Plan to show that this rate is achievable and sustainable.

2. Much of the infrastructure required to support the level of development proposed is outside the Council’s control. The Infrastructure Plan is long on possibilities and aspirations and very short on commitments. The infrastructure requirements placed on developers are supposed to be in place before development commences. This is utterly unrealistic and indicates a lack of knowledge of developer’s business models which depend on positive cash flow. It seems very clear that at best, infrastructure provision will seriously lag development and leave higher levels of congestion than now. This will reduce the quality of life for residents through congestion and disruption.

3. The 40-45% requirement for affordable homes together with infrastructure such as railway stations, park and ride facilities, schools and roads is highly likely to be challenged on a site by site basis by developers using the NPPF provision that Councils cannot impose conditions which make development non-viable.

1. GBC has not included details of its Town Centre Master Plan and urban development proposals in time for and as part of the Guildford Local Plan consultation
2. GBC has failed to provide an Infrastructure Report in time for and as a part of the Guildford Local Plan consultation
3. GBC has proposed an OAN of 693 houses per annum in the GL Hearn West Surrey Strategic Housing Market Assessment (SHMA) which many, including independent assessors, consider unsound
4. Highways England will not start to consider what it intends to do as regards the A3 in the vicinity of Guildford until 2018
5. Network Rail have not made available for the public consultation any plans for a new railway station at Merrow with an adjacent Park & Ride for 1,000 cars

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6. The GBC proposals for Gosden Hill Farm do not appear to be in coordination with the Neighbourhood Plan for Burpham.

7. The draft Local Plan will cause further linear development along the A3 between Burpham and West Clandon PC and encroachment onto open Green Belt countryside in clear conflict with the National Planning Policy Framework.

8. The proposal for Garlick’s Arch was added to the draft Local Plan without any prior consultation under Regulation 18.

9. The Land Availability Assessment (LAA) indicates a range of planning difficulties for Gosden Hill Farm and Burpham which have to be met by the developer involved. These include Electricity Grid supply problems and foul sewage and surface water issues that suggest the development proposed cannot easily be implemented both technically and financially.

10. No adequate explanation is given as to how the aspirational proposal for a tunnel will be used to overcome traffic issues relating to the quality of life and amenity of Burpham, West Clandon, Send and Ripley citizens.

11. In common with many others I do not believe the housing figure has been properly calculated and I believe it overstates housing need. The Council has prevented councilors or others from properly considering the SHMA by refusing to make public the basis on which it was drawn up.

12. The housing figure, when properly recalculated, should be subject to constraints to reflect Guildford’s circumstances, including in particular the Green Belt and road infrastructure. National policy permits such constraints to be applied and it is inappropriate not to consider the need to do this.

13. Even once a housing number has been calculated it cannot be used to justify taking land out of the Green Belt on a wholesale basis.

14. Cast iron commitment should be included in the plan that development can only commence when required infrastructure improvements have been secured.

15. The status of the text which accompanies each policy box is not clear. If the accompanying text does not have the force of policy a number of the policies (i.e. the text in blue) are so vague and general that they commit the Council to very little.

The draft Plan should be re-assessed with housing on brownfield sites made a priority over commercial development and Greenfield sites and each of the above points addressed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: SQLP16/1460  Respondent: 8749473 / Charlotte Beckett  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 4: Duty to cooperate

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (No)

I do not consider the Proposed Submission Local Plan: strategy and sites as a whole has complied with the Duty to cooperate.

This 2016 draft of the Local Plan clearly demonstrates Guildford Borough Council’s refusal to co-operate with the wishes and requirements of the vast majority of the residents in its Borough.

The Council has failed to co-operate with the results of the consultation process for the 2014 draft Plan which was meant to inform and guide this 2016 draft Plan.
Despite campaigning on a clear statement ‘Conservatives Say Green Belt To Stay’, the ruling party on GBC is now intent on pushing through a Plan which will devastate Green Belt land and extend the Guildford Urban Area to further merge into surrounding rural villages.

This is not cooperation by any definition.

In addition the Council has failed to cooperate in providing any transparency to the housing need figures commissioned by the Council from GL Hearn.

The 2016 draft Local Plan should be reassessed with a reviewed and transparent SHMA and revised to reflect the views of the residents of the Borough, who pay for Guildford Borough Council to act in their interests, and not those of developers and central government.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: PSLPA16/95</th>
<th>Respondent: 8749697 / Chris Tailby</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I am writing to OBJECT to the Local Plan which is currently out for consultation. I will be writing to OBJECT to various sites but my attention has been drawn to one aspect of the New Local Plan which I find particularly insidious. That is the re drawing of the Green belt around East and West Horsley villages. I believe that the intention of redrawing the boundary is so that more housing can be built within the villages so it cannot be said (by developers etc) that the building is within the Green belt. In my opinion this is verging on the dishonest. There is absolutely no need to change the boundaries in the way proposed.

Please record my objection.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Re: Guildford Borough Proposed Submission Local Plan (“Draft Local Plan”) – reply to consultation

I am writing to OBJECT to the Draft Local Plan (DLP). I OBJECT to many of the proposals in the latest Plan but the fact that I have not specifically objected to a policy set out in the Plan should not be taken as my agreement to that policy.

General observations

As a resident of West Horsley my over-arching objection to the DLP is the fact that if the DLP is adopted it will result in houses being built on land which is part of the Green Belt. In my view this negates all that the Green Belt represents, namely an area around London designed to prevent over development. The Green Belt was instituted precisely to prevent the kind of development being proposed by the DLP.

I draw your attention to the letter dated 18th June 2014 from Nick Boles MP (Parliamentary Under Secretary of State (Planning) to our MP, Sir Paul Beresford, in which the Minister states that the Government has an on-going commitment to national Green Belt protection, reflecting what Ministers have regularly told Parliament. The letter states that the national policy on the Green Belt is set out in the National Planning Policy Framework (NPPF). The NPPF makes clear that “most development in the Green Belt is inappropriate and should be approved only in very special circumstances. Planning guidance, updated in March 2014, also states that “unmet housing need (including traveller sites) is unlikely to outweigh the harm to the Green Belt to constitute the very special circumstances justifying inappropriate development in the Green Belt”.

I also commend to your attention the paragraphs from the NPPF referred to in that letter which state that when plan-making, Local Plans should meet objectively assessed needs, unless specific policies in this Framework indicate development should be restricted; these policies include the Green Belt and AONB. My emphasis.

Furthermore Paragraph 17 of the NPPF notes that “the core planning principles that underpin plan-making include both protecting the Green Belts and recognising the intrinsic character and beauty of the countryside”.

There are other paragraphs referred to in the letter which point to the need to retain the Green Belt as currently defined. Paragraph 80 notes the various purposes of the Green Belt in particular assisting in safeguarding the countryside from encroachment.

I am happy to provide a copy of this letter in the (unlikely) event you have not had the opportunity to peruse it.

Insofar as the DLP proposals involve building additional houses on greenfield sites within the Green Belt they drive a coach and horses through the objectives of the Green Belt.

OBJECTION: Insetting of villages and moving of greenbelt boundaries

The removal of the village of West Horsley from the protection of the greenbelt is to be deplored and I OBJECT to this proposed action. Furthermore I object to the moving of the existing green belt boundaries to take land outside the greenbelt when currently it enjoys green belt protection. In my view the latter proposal borders on deceitful being intended to facilitate development in the existing greenbelt as it frees what is currently protected greenbelt land from protection. I can see that in some limited cases it is sensible to move the boundary to ensure that part of a person’s garden is either wholly inside or wholly outside the boundary but I do not agree that whole fields should be taken outside the greenbelt boundary as they then become targets for developers. Accordingly, if one takes Silkmore Lane as an example, the existing greenbelt boundary protects all the green fields to the west of the Lane but if the greenbelt boundary is moved as proposed, a large area of the fields will lose their greenbelt protection. That is also the case behind allocated site A37 where the effect of moving the greenbelt boundary is to open up more of site A37 to development.

OBJECTION: The GLP Housing proposals lack proportionality.
Research by West Horsley Parish Council indicates that the majority (about 75%) of housebuilding proposed by GBC will take place on Greenbelt land in the Eastern and Western rural areas of the Borough. The remaining 25% of building will take place on brownfield and urban land in Ash and Tongham together with Guildford town centre. This use of greenfield land instead of using brownfield land is disproportionate. I object to this “skewing” of building on previously greenfield sites when it is not clear that brownfield sites in rural areas have been given sufficient prominence. It is well known that developers prefer to build on greenfield land and I suggest that GBC are deliberately choosing greenfield sites (in the greenbelt) in order to facilitate developers at the expense of the lives of residents.

A further OBJECTION on the grounds of proportionality is that the proposals from GBC will involve an increase of 35% of new homes in the village of West Horsley. A huge increase in itself but again disproportionate when compared with the much smaller increase in housing in Ash & Tongham (16%) and Guildford Town (11%). Putting those percentages into figures, it is worth noting the enormity of GBC’s plan – 533 houses on large sites in the Horsleys, 60 houses on small sites in the Horsleys, 2000 houses on Wisley Airfield, 400 houses on Burnt Common and 2000 houses at Gosden Hill Farm (on the A3 this side of Burpham).

This makes a total of 4,993 houses within a 5-mile radius of Horsley, not including many smaller sites in nearby villages!!! At the moment there are 2808 houses in the Horsleys (EH 1697, WH 1111). The implications of these numbers are staggering and in my view show the lack of proportionality in the proposals. As a former lawyer I suggest that these numbers alone make the proposals in the plan capable of being challenged in Court.

OBJECTION: The housing numbers put forward by GBC are not accurate and are far in excess of what may be required, especially in a “post-Brexit” environment.

It seems to me that the starting point for deciding how many houses should be built is the figure determined by the objectively agreed housing need (OAN). Work carried out by GL Hearn on behalf of GBC to calculate the OAN came up with a figure of a housing need of 693 houses per annum over the period of the Plan. However the work by the Consultancy, NMSS, commissioned by the Guildford Residents Association has come up with a figure of 510 houses per annum. This figure is significantly less than the figure advanced by GBC. If the NMSS figure is more robust than the GL Hearn figure, I suggest that further work needs to be done by GBC to arrive at a figure for OAN on which we can all agree.

The housing figures being used by GBC have never been the subject of proper debate by Councillors nor “stress-tested” by other independent consultants. The Leader of the Council does not appear to countenance the fact that the GL Hearn figure is wrong or indeed needs review.

Such work that has been done (see Councillor David Reeves letter with attached report) to Councillor Paul Spooner of 4th July 2016, indicates that a much lower figure for new houses than GBC propose, is required. This work is consistent with the work done by NMSS.

OBJECTION: Roads and Transport Infrastructure: Sustainable transport for new developments

The expansion of the houses in the village of West Horsley by a figure of 35% is not sustainable. There is only one shop, no post office and a very limited bus service through the village on weekdays only – the village cannot accept high volumes of new housing development of the scale of that proposed.

Even with the present levels of housing there is excessive traffic travelling through the village at peak times. The areas around the schools (Raleigh, Glenesk and Cranmore) are particularly busy with the “school run”. The proposed increase in development will put even more pressure on schools and medical services which are already stretched.

There is no mention of the provision of additional schools, roads and transport for West Horsley which development on the scale proposed requires.
Whilst Horsley station has frequent trains to London and Guildford 7 days a week there is an inadequate number of parking spaces at the station with the car park often being full during the week. An increase of housing in the villages of East and West Horsley will increase pressure on station parking and traffic movements to and from the station. Getting to the station is difficult at the best of times as Glenesk school is on the main road leading to the station and people dropping off children at the school frequently block the road thereby adding to the traffic congestion. An increase in development will only make this situation worse.

The number of extra cars on the roads which would result also means an increase in undesirable exhaust emissions.

**Affordable homes**

The proposed development of 385 homes on the allocated Green Belt sites at much higher densities than currently exist in the village settlement would be totally out of character with the existing mix of different housing styles and layout of the village.

The so-called need for new houses in West Horsley is not proven – the 2014 Housing Survey carried out by the West Horsley Parish Council showed a limited need for up to 20 affordable homes for local people who want to remain in the village. Those are young people and also older people who want to downsize to a smaller property. The definition of “affordable housing” is that the price of an “affordable house” should be 80% of the market value. Given that the average price for houses in the Horsleys must be close to £1 million, it is difficult to see how building even “affordable housing” in the Horsleys is going to solve the housing shortage.

**Where are the jobs?**

I note that GBC has not identified any jobs for West Horsley. When I looked at GBC’s maps at the Horsley Cricket Club event in 2014, I noticed that the jobs were west of Guildford. It seems to me that housing should be concentrated in the areas where there are jobs. Building houses in West Horsley will exacerbate the traffic congestion and pollution as workers will need to drive from the villages to get to work. Furthermore, residents who work away from their homes will create dormitory clusters which will be of little value to the village.

**Jobs – chicken and egg**

As I understand the reasoning behind the need for more housing and what drives the housing numbers, is the quest for more economic growth. But there is a fundamental flaw in the GBC thinking which is that a proportion of the jobs identified by GBC comes from the construction of the new houses. And it is these jobs which are responsible for increasing the figures quoted as Objectively Assessed Housing Need. A true “chicken and egg” situation.

**Who gets the benefit of these proposals?**

It is not clear to me why this plan has been drawn up in the way it has. It is difficult to see a more destructive approach to our countryside. I suggest that the only people who will benefit from the developments proposed by GBC are the developers!

No one in the villages will benefit one iota! Quite the contrary – our lives will be made a misery both while the development takes place and when it is finished. There is nothing in the DLP which gives me or my family any benefit whatsoever. I am left with the clear impression that this whole exercise is being done for the glorification of the Council and to help developers make money. Indeed, the whole thrust of the Council’s policy is wrong – we should be developing business and jobs in areas of the country which require regeneration and whose infrastructure can handle increased development.

**Conclusion**

I very much hope that you will take my objections into account when you consider why and whether it is necessary to build on green field sites which will break up the Green Belt as it is currently drawn.

I am not opposed to all development but I feel strongly that if you build on the countryside as we know it, future generations will no longer have it to enjoy. Once it is built on it is gone forever.
Please let me know if I can be of further assistance.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** pslp173/433  **Respondent:** 8749697 / Chris Tailby  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Appendix H: Maps - West Horsley North

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):**

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It is proposed that the village of West Horsley will be inset into the Green Belt thereby leading to development within the village which will affect the character of the village and mean more building within what is presently Green Belt. Such developments are unlikely to lead to homes which young people will be able to afford to buy as builders want to build “executive” homes. Such houses will simply encourage more overspill from London.

I object to the village of West Horsley being inset in the way proposed by the draft Local Plan.

I also object to the “straightening” of the boundary behind the houses on the west side of Silkmore Lane. This will take out of the protection of the Green Belt all the paddocks behind the houses on the west side of Silkmore Lane and open up this area for development. Such development will spoil the rural character of the area and impinge on the environs of Hatchlands, a National Trust property. It will have a deleterious effect on the view from Ripley Road and ruin the landscape for no good and valid reason.

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**Comment ID:** pslp172/2140  **Respondent:** 8749697 / Chris Tailby  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):**

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I continue to object to the inclusion of policy A35, Three Farms Meadows in the draft Local Plan for many reasons including:

1. It is the least sustainable strategic site identified in both this version and in previous versions of the plan because of the constraints on the site and the physical location.
2. It is further from railway stations than any other identified strategic site.
3. It is adjacent to the most congested stretch of strategic road network in the county and close to one the most congested junction in the country (J10)
4. Local roads are at capacity particularly when the SRN is not free-flowing (accidents, diversions, roadworks etc)
5. Any public transport provision such as bus services to/from Guildford will have to negotiate the over-crowded SRN and will therefore be unreliable and subject to frequent delays.
6. Any public transport (bus services) provision to Horsley will impact the safety of the local road network as the lanes are not wide enough to accommodate PSVs, particularly as sustainable methods of travel such as cycling and walking are being promoted at the same time. This is totally unrealistic and unsafe.
7. It is adjacent to the most popular visitor attraction in the south-east, the RHS at Wisley where visitor numbers will increase by 500,000/annum.
   - The associated traffic increase from the RHS has not been taken into account.
   - The regular events at the RHS which attract 1000’s more visitors several times a year and the resultant traffic has not been taken into account
8. There is insufficient employment available onsite or nearby so that almost all residents will have to travel to work. It is unrealistic and unsafe to assume people will walk/cycle on narrow unlit local roads on a regular basis.
9. The identified mitigation to address the impact of increased traffic will not address the commuters travelling to Woking rail station.
10. The changed “Opportunities” listed in this policy reinforce why this site is totally inappropriate talking of “good urban design”
11. Opportunity (3) should be common to all sites and is not unique to this site
12. I object to the increased area of the site as this now abuts another heritage asset, Upton Farm, negatively impacting the setting of this building.
13. I object to the fact that the increased area, being on the south of the site facing the Surrey Hills AONB will increase the negative impact of the views from the AONB.
14. I object to the change of site boundaries as these are not identified correctly on the plan (Appendix H p16)
15. I object to the removal of additional 3.1 ha from the green belt without any justification
16. I object to the change in green belt boundary to the eastern end of the site as this now encloses an area of high archaeological impact
17. I object to para 21 which “limits” development in flood zone 2 and 3. Development should be excluded in flood zone 2 and 3
18. I object to para 22 as this does not reflect the impact of the buildings on the surrounding area.
19. I object to the fact that the council has failed to remove this site from the local plan despite receiving 1000’s of objection from local residents and statutory consultees. It is outrageous that local public opinion is being ignored in this way.
20. I object to the proposed Submission Local Plan because the significant modifications made to the plan mean that this should not be a Regulation 19 consultation. A regulation 19 consultation needs to be on the totality of the plan rather than the proposed changes.
21. I object to the fact that there is no clear justification for the removal of one strategic site over site A35.
22. I object to the inclusion of A35 as it will not contribute to the 5-year housing projection due to constraints notably in the provision of sewerage capacity.
23. I object to the extension of the plan period by 1 year as it has not been identified as a major change
24. I object to the fact that the Council have not explained why the Plan is unsound within the original time frame.
25. I object to the Council wasting tax payers and residents’ time and money not following due process and indeed ignoring previous representations.
26. I object to the inclusion of a 10% buffer in the housing number over the plan period. This is unnecessary.
27. I object to the evidence base especially the West Surrey SHMA and the Guildford addendum 2017 which is not transparent and has been challenged by other experts including NMSS.
28. I object to the transport evidence base including the SHAR 2016 Highways assessment report which has been criticised by Mouchel for using out of date modelling software and is therefore unreliable.
29. I object to the fact that the Council appear to have directed the transport assessment to use prescribed vehicle movements from this site with no justification.
30. I object to the housing number and particularly the fact that the Council have not, as required used any constraints such as green belt, infrastructure, air quality, AONB, TBHSPA etc. I believe that the housing number is unsound and open to legal challenge.
31. I object to the apparent disregard for the impact of in-combination development on the TBHSPA, particularly the damage caused by nitrogen deposition and high pollution levels.
32. I object to policy S2 where it states “the figures set out in the Annual Housing Target table sum to a total of 12,426” yet the figures in the table add up to 9,810 – what is the significance of the missing 2,616? This is one of a number of glaring examples of why the plan is not sound.

33. I object to the quantity of space allocated for retail in the town centre. This could be much better used for residential development. I particularly object to the reliance on the Carter Jonas study update 2017 which includes “demand” for retail space from companies already in administration.

I consider for the reasons listed above and numerous other reasons that this plan is unsound and not fit for purpose. All in all I object to this development as I believe that there is is no justification for a development of this size in the Green Belt. There are no exceptional circumstances which justify the development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Respondent: 8749761 / Matthew Darby</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the proposed redevelopment of the Howard of Effingham and the proposal to build 445 houses in order to fund that redevelopment.

- A new school building should not be contingent on the wholesale loss of the greenbelt that was specifically designed to halt villages becoming joined into an urban sprawl. This development will effectively merge Effingham and Bookham into an urban conurbation.
- Schools should be funded through taxation and not used as a vehicle for profit
- The plan calls for the demolition of St Lawrence to allow for more houses - this school is a vital part of the village; its destruction in the name of profit would be shameful. GBC should remember that it represents the residents of the borough and not the interests of the private sector.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to the new draft local plan inclusion of the Wisley Airfield development:

- The proposed scale of the site is out of all proportion to the surrounding area. It will in effect create a new town that will dwarf the existing village of Ripley.
- The impact on local roads of the additional traffic will be significant and negative in terms of congestion and pollution; the existing road network will not be able to cope. The impact on public transport will also be significant; the carpark at Effingham Junction is already full and will not be able to absorb the inevitable increase in demand.
- Residents of this new town will be situated adjacent to the A3 which means placing schools and houses in an area that will inevitably have poor air quality.
- This is clearly an attempt by GBC to meet a significant proportion of their designated building target in a single hit rather than organically place houses in a more sensitive manner.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/182  Respondent: 8749793 / David Worsfold  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I strongly object to the Draft Local Plan for the following reasons

1/ The SHMAA is set at too high a figure for the needs of the Borough. The methodology used to arrive at this figure of 693 houses per year has not been revealed to public scrutiny and so cannot be a checked or even considered as a valid figure. Especially considering the previous house building figure which was half. Furthermore insufficient consideration has be made of constraints such as the high percentage of green belt within the Borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/578  Respondent: 8749793 / David Worsfold  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
4/ I object to the size of the allocated sites in small rural hamlets, their housing density, the paucity of social housing, and their reliance on car use.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/579  Respondent: 8749793 / David Worsfold  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

5/ I object to the lack of infrastructure planning and funding. There are no committed funds to support healthcare, policing, road building or public transport in the rural areas proposed for new communities in the Plan.

6/ For the above reasons I object in particular to

a) allocation A35 Three Farm Meadows

b) allocation A43 Garlicks Arch

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/576  Respondent: 8749793 / David Worsfold  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

3/ I object to the targeted development of the protected Green Belt (70% of house building has been allocated to Green Belt sites). This has a further detrimental effect of areas with elevated protection such as the TBHA special protection area, the SSI's and conservation areas.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/580  Respondent: 8749793 / David Worsfold  Agent:
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<td>7/ I object to the insetting of villages from the Green Belt and the proposal to reallocate Green Belt areas to Ash and Tongham</td>
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<td>2/ I object to the allocation of the proposed house building. It is disproportionate in allocating the majority to the Green Belt open space in the North East of the Borough rather than the eminently more sustainable urban environment in other parts of the Borough.</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<td>9/ I object to the total lack of consideration given to the air quality issues the proposed developments would cause given that several of the proposed sites are close to areas which already exceed EU limits. The air quality problem is both relevant to humans and Flora and fauna and there is no reference to the grievous effect increased nitrate deposits would have on the Wisley SPA.</td>
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</table>
10/ I object to the obvious lack of sustainability of the proposed sites. Poor access to public transport and non-existent cycle or even pedestrian pathways will cause a heavy reliance on car use for everyday tasks such as shopping, commuting, school runs and social activities. The nature of the rural roads and the already overstretched main highways will lead to even greater congestion with the resultant increase in pollution and accidents. No consideration has been made as to the supply of utilities to these distant sites and the necessary installation of these utilities will give rise to further pressures on the traffic infrastructure and local life over a considerable period of time.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/218  Respondent: 8749793 / David Worsfold  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

8/ I object to the lack of definition between this draft and the previous, withdrawn, draft. There is no clear indication of the changes to accommodate the 20,000 comments. The inadequate and often subjective documents tendered are full of inconsistencies such as the Green Belt and Countryside Study. We are given only weeks to study and comment on a huge amount of documents which GBC have had 2 years to prepare.

In summary this local plan takes no account of local needs (especially housing), local responses to the previous plan and disregards the imperatives of the Green Belt policies, the NPPF and Government advise on transparency and clarity. The fundamental premises upon which it is founded are factually incorrect, based on mysterious modelling and do not include any policies which do not fit its solution. To build an effective Local Plan on such poor foundations will ensure its collapse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/853  Respondent: 8750593 / Nigel Tyler  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Shalford (south)

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to the proposal, by Guildford Borough Council in the latest version of the Local Plan, to move the Green Belt boundary to exclude the fields behind Shalford Village Hall from the Green Belt. Under this proposal these fields would be included within the village settlement boundary. My reasons for objecting to this proposal are.

1. The expressed views of the local residents is to protect these fields from development and consequently they should remain within the Green Belt and outside the village settlement boundary. The Green Belt boundary has been in place for a long time and there is no valid reason to change it. Over 700 residents signed a petition last year objecting to the proposed settlement boundary change.
2. The land on which these fields are situated contributes to the open character of the village. Any housing development built on this land would tower over the village community facilities, as it is the highest point in the local area.
3. Access to this land is via Chinthurst Lane which is an already heavily congested, and in certain places single track, road.

I look forward to hearing from you and very much hope that there is no change to the Green Belt boundary and these fields remain within the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
1. I OBJECT to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)

- The “objectively assessed need” figure of 693 homes a year is too high.
- A professional review by NMSS has concluded that, even basing the calculations on a period of stronger economic and student growth, the housing need figure should be revised down to 510 homes a year and the method changed to consider student housing need separately due to the distorting effects.
- The current SHMA inflates the proposed housing figure due to
  - failure to correct for errors in the historical data for international migration flows,
  - issues with the way it considers students and affordability and
  - flaws in the method for estimating the number of homes needed to support job growth.
- It is unacceptable that demographic and economic model assumptions have been withheld and cannot be checked making the process unaccountable.

The Plan’s proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the borough, it is over double the previous figure of 322 used in previous plans. The SHMA report methodology is I believe inaccurate; it inflates the needs of the borough by distorted student numbers. However, it is based on commercially confidential modelling assumptions that cannot be checked or reviewed. There is no transparency to this evidence base and it is therefore impossible to assess its accuracy. This is not democratic and is not appropriate for consultation of the Plan.

The National Planning Policy Framework allows the overall housing target to be reduced to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/4074  Respondent: 8751105 / Amanda Harris  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A25

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT to Gosden Hill developement being in the Local Plan The land in Gosden Hill does exactly what the Greenbelt was designed to achieve. It provides a green buffer between the Guildford Urban Area and West Clandon, gives Burpham a defined green boundary and breathing space and it hides Guildford town from visitors until they pass the off-slip to Burpham.

No exceptional circumstances have been demonstrated for building on this site and therefore it does not comply with paragraphs 87-89 of the NPPF. It stops the sprawl of Guildford town, assists in safeguarding the countryside from encroachment and assists in urban regeneration by encouraging the recycling of derelict and other urban land. All requirements of the NPPF.

The scale of Gosden Hill is out of proportion to West Clandon. It would have four times the amount of housing plus shops, offices/factories, GP surgery, schools. Development on this scale would blight a historic village with a history going back to the doomsday book and beyond.
Gosden Hill is the most obvious location for the north end of an A3 tunnel. It has rising ground and is situated just before the urban area. If it is built on, it will be very difficult to construct a tunnel.

The development will generate in the region of 6,000 vehicles which will pour on to the A3 which is stationary every day during rush hours. The linking of the A3100, B2215 and A247 would channel thousands of cars through the narrow, winding road through West Clandon, a road where large lorries mount the pavement virtually every day and through Send and Ripley which are also severely constrained.

The volume of traffic will greatly increase air pollution which is particularly critical given the proposal to build two schools.

Currently, a two way junction at the site would require vehicles wanting to go north on the A3 to go through Burpham which is grid-locked every day.

Burpham’s sewers are at capacity. Sewage would have to be pumped to Slyfield for processing, a project of enormous cost.

There is inadequate fresh water in Guildford and current supplies could not meet the needs of a development of this size.

Electricity supply is also inadequate and would require a big infrastructure development.

The railway station was rejected by Guildford Borough Council in 1984 because it feared Gosden Hill would become a dormitory estate for London.

The wording of the Local Plan with regard to Gosden Hill is so loose that the developer could virtually do whatever it wants.

The remaining agricultural land between Gosden Hill and West Clandon is so small that it is highly likely to be uneconomic and therefore a prime candidate for further development which would roll the Guildford Urban Area over West Clandon towards East Clandon and Wisley.

If the Strategic Sites are developed, the north of Guildford will deliver 36%, 5,036 houses towards the total of around 14,000. The infrastructures of the existing villages and the A3 will be overwhelmed by the scale of development.

A new on-slip at Burpham would only be 1.8km from the on-slip at Burnt Common which is against Highway England’s requirement of 2km.

Development of the A3 at best will not start until after 2020 and the building of a tunnel, which is only an “aspiration” in the Local Plan is likely to be many years after. In the meantime given that developers build houses to provide cash-flow for infrastructure, Gosden Hill will have a crippling effect on villages like West Clandon and the A3.

Gosden Hill already has surface water problems. Merrow Stream crosses the site. No hydrological survey has been carried out to assess the implications. Electricity pylons run through the centre of Gosden Hill which have health and safety issues.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/4075  Respondent: 8751105 / Amanda Harris  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
1. I OBJECT to the inclusion of the land at Garlick’s Arch, Send Marsh/Burnt Common and Ripley (A43)

Garlick’s Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8). There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).

The Plan states the preference is to making the best use of previously developed land. Yet at the 11th hour a perfectly acceptable brownfield site at Burnt Common, capable of accommodating approximately 100 houses, was removed from the Plan and replaced with the Garlick’s Arch site. There was no proper consultation in relation to the inclusion of this site. Why was a brownfield site removed and replaced a Greenfield site? There is no evidence that Section 18 of the Planning and Compulsory Purchase Act 2004, which requires local planning authorities to produce a Statement of Community Involvement, has been complied with for this site. This only came to light for local residents following a Council meeting on 11th May 2016.

Moreover, Guildford Borough Council’s own Green Belt & Countryside Report does not address Garlick’s Arch at all, so there is no evidence base to support the inclusion of this site.

National Planning Policy promotes sustainable developments, with sustainable transport. With ever reducing bus services in the area and no train station within reasonable walking distance it is impossible for any development on this site to offer a sustainable transport solution. Development on this site is wholly inappropriate (Policy I3).

The stream, which runs through the site, is identified as having a high risk of flooding by the Environment Agency. There are other sites that do not flood that can be developed and therefore this site should be removed from the Plan (Policy P4).

This site is bordered by Ancient Woodland and within it a number of trees are protected by Tree Preservation Orders (Policy D3).

The site has an abundance of wildlife, some of which are protected. It is home to many types of owls and bats, with the woods having cuckoos and woodpeckers. In addition there are regular sightings of badgers, deer and red kites. The development of the site will result in the loss of habitat. No wildlife report has been conducted on the site. (Policy I4)

It is clear that with this site being added at the 11th hours no infrastructure planning has been undertaken. The Infrastructure Schedule makes no provision for any infrastructure improvements for this site. How will the local services such as schools and doctors cope, many of which are already at capacity? (Policy I1)

Furthermore, several electricity pylon runs through the site, which will have the potential to be a health hazard for any residents.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT to the inclusion of the land for new on/off ramps at Burnt Common (A43a)

The addition north facing ramps to the A3 at Burnt Common would be a disaster for local communities. There is no requirement for local traffic to access the A3 to the north, but the addition will draw in a huge amount of ‘through’ traffic.

The route from London/M25 to Woking would now be through Burnt Common and Send. Equally traffic from the east of Guildford (Merrow etc) and the A25 will now go through West Clandon and Burnt Common. This will cause immense damage to those areas on small roads which cannot be improved.

This Plan does not address the needs of local communities or the Borough in this regard. There has again been no Section 18 consultation on this.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8585  Respondent: 8751105 / Amanda Harris  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT to the damage to the historic environment as a result of the scale of the proposed development (Policy D3)

I OBJECT to the local plan based on the impact it will have on the special countryside of the borough.

The proposed development at Garlick’s Arch (A43) will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8582  Respondent: 8751105 / Amanda Harris  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT to the sustainable employment policy (Policy E1)

If developed, the new employment site at Garlick’s Arch, Send Marsh/Burnt Common (A43), would be treated as a Strategic Employment Site.

The proposed development of up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8) at Garlick’s Arch (A43) is in the scheme of industrial development relatively small. Just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m. The Garlick’s Arch site which is in the Green Belt should not be developed as a Strategic Employment Site when there is a suitable alternative brownfield site very close by, which is far more sustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8583  Respondent: 8751105 / Amanda Harris  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT to the location for new employment floorspace at Garlick’s Arch – Site A43 (Policy E2)

Proposals for new industrial, warehousing and storage (use Class B1c, B2 and B8) floorspace will be directed to the Industrial Strategic Employment Sites.

There is no need for the new employment floorspace to be located at Garlick’s Arch, when just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8584  Respondent: 8751105 / Amanda Harris  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E5
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT to the loss of rural employment (Policy E5)

Policy E5 supports the retention and development of local services and community facilities in our inset and identified villages. Yet the development at Garlick’s Arch (A43) would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises. The Plan does not promote rural employment; rather it will result in the loss of existing local rural businesses.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8591  Respondent: 8751105 / Amanda Harris  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E6

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. POLICY E6 - The leisure and visitor experience

I OBJECT. Tourism and visitors do not depend on new visitor “attractions” and could actually be damaged by them, as compellingly argued in the current debate over Newlands Corner. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment. Heritage sites and the Green Belt are particularly vulnerable to harm.

Guildford has many “leisure and visitor attractions” already. The case for creating more is not made and no examples are given. Instead, the plan’s explicit priorities should be:

1. To protect the borough’s prime leisure and tourism asset, its countryside, from inappropriate development. This is all the more valuable because of its accessibility from London, the rest of Britain and the Continent, in that order. Rural residents are its custodians and require no Council interference. Economically, the most valuable forms of tourism, such as walking and cycling, require no new development. In the overcrowded South-East of England, lack of development is a leisure and tourism asset, not a liability.

2. To help make Guildford’s river landscape less off-putting and support town-break packages for high-value tourists. To achieve this, the policy needs to define what leverage, if any, Council planners have to influence normal tourism market mechanisms.

3. To help private providers market local tourism. This need not involve extra spending. The Council could, for instance, help co-ordinate ready-made, local tourism packages under a distinctive brand at an all-in price. An “English town break” (including B&B accommodation, a walking tour of Guildford, a pub lunch in the Surrey Hills, a visit to Wisley Gardens and a National Trust property and a SouthWest Trains travelcard for a day out in London) would be highly attractive to many European visitors who currently by-pass Guildford to go to Bath, Oxford or Cambridge instead.
4. To rule out the redevelopment of scarce rural hotel sites (e.g. Thatchers, East Horsley, earmarked for 40 new houses under Site A37 of the plan yet just a short walk from the new opera house).

I trust that the objections made above are fully taken into consideration and that the Plan is amended accordingly.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID:  PSLPP16/8589  Respondent:  8751105 / Amanda Harris  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT (POLICY H1 – Homes for all) Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan period. It fails to set rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions.

The housing mix is based on out-of-date, pre-Brexit projections and on assumptions set out in a flawed SHMA that has not been scrutinised or evaluated.

I support higher density development in the urban area, without resorting to dehumanising, high-rise buildings that developers commonly claim are necessary for financial viability. Much of Guildford town could usefully be regenerated with 4-5 storey blocks with landscaping and underground parking, as often seen on the Continent and, recently, in London.

Student accommodation should provided for 100% of new students and more than 60% of existing students, which would free up ideal family accommodation in the urban area. Other university cities (e.g. Oxford) insist on higher percentages than those proposed in the plan. In my view, the Council’s timidity is a case of “regulatory capture” by Surrey University, which has failed to use its existing planning permissions (dating from 2004) to accommodate 3,000 students or to improve the efficient development of its campus (e.g. by building on its extensive and under-used surface car parks). If all students were accommodated in this way, 2,000 homes would be freed up in town and there would be no need to build on the Hog’s Back.

Guildford borough has already a higher proportion of traveller sites than most comparable boroughs. Over-provision is inappropriate given other constraints.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID:  PSLPP16/8590  Respondent:  8751105 / Amanda Harris  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy H3
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<th>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</th>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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1. POLICY H3 – Rural Exception Homes

I OBJECT This is a Trojan horse policy. It says that homes can be built anywhere near a settlement of any form (including agricultural land and the AONB). These homes are meant for people with a village connection, but they could be for anyone on the Guildford borough housing list. To make the housing viable, or to improve the “mix” this can include “market” housing (i.e. normal commercial development which in Guildford usually means large executive homes). This policy means building anywhere, and ignoring all historic planning restrictions.

The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove “exceptional circumstances.”

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: PSLPP16/8586</th>
<th>Respondent: 8751105 / Amanda Harris</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT, due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1)

Our villages are already suffering from severe congestion for much of the day, for example the Newark Road & Rose Lane junction in the centre of Ripley. The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.

Furthermore, many of the country lanes around the villages of Ripley, Send and Clandon are narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition.

I OBJECT to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces.

Many of the affected villages, such as West Clandon, already suffer from traffic congestion. Further development around these villages will only result in more traffic and more parking problems.

With some 5,000 houses being proposed close to the village of Ripley, the roads serving the village will become even more congested. Cycling has become an ever popular past time, particularly at weekends hundreds of cyclists past through the villages on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and
with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road accidents involving cyclists as a result of the development proposed under the local plan.

The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the road becoming ever more dangerous for pedestrians.

The council has a statutory obligation to protect the public and the additional traffic flows will bring added pollution and risk to injury of the public. In the case of West Clandon the Street often only has a narrow footpath on one side of the road making it very dangerous, especially when vehicles mount the pavements.

1. I OBJECT to the lack of proper infrastructure planning for sites (Policy I1)

Policy I1 requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.

Despite the Garlick’s Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents’ in the locality will see their quality of life significantly deteriorate in many ways.

Many of the utilities in the Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers. No plans to improve these services should mean no development of the Garlick’s Arch site.

Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are already at capacity and suffering from funding cuts or freezes. Any further development without funding will place further stress upon existing health services.

Police services are seeing funding reduced. The development of the proposed 13,860 homes during the plan period will stretch the police services further and is unsustainable.

There is no provision of the increased capacity of Guildford hospital, where is this assessed and remedied?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8587  Respondent: 8751105 / Amanda Harris  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2)

There is no certainty that either the A3 or M25 in the borough will be improved to increase capacity and reduce congestion during the Plan period. Highways England has no plans to even examine improving the A3 before 2020. I have considerable concerns that development of the large residential sites identified at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), will take place before any improvements are made to the trunk road network. The A3 &
M25 are already at capacity during peak hours and any development prior to improvement of these roads will only make the situations worse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8588  Respondent: 8751105 / Amanda Harris  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT to poor air quality concerns (Policy I3)

Paragraph 4.6.27 of the Plan states that “Development must also mitigate its traffic impacts, including its environmental impacts and impacts on amenity and health.” The significant level of development being proposed, particularly in the north east of the borough will lead to considerable further congestion, despite any attempts to mitigate this through travel plans. This will be particularly acute in built up residential areas and will only lead to greater levels of air pollution, which will have a detrimental effect on local residents and their health and can result in early death.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8580  Respondent: 8751105 / Amanda Harris  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT to not protecting the Green Belt (Policy P2)

I OBJECT to the proposals to remove the villages of Ripley, Send and Clandon from the Green Belt, together with sites of Wisley Airfield (A35) and Garlick’s Arch (A43). National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these villages (as mere housing need does not constitute a ‘special circumstance’ and the land to be taken from the Green Belt. Once taken the green belt is lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and
the countryside encroached. GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site.

Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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<th>Comment ID: PSLPP16/8581</th>
<th>Respondent: 8751105 / Amanda Harris</th>
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<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy P4</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire): ()**

1. **I OBJECT to development in areas which are at risk of flooding (Policy P4)**

National Planning Policy states that Local Plans should take account of climate change over the longer term, including factors such as flood risk. It goes on to say that new development should be planned to avoid increased vulnerability to the range of impacts arising from climate change.

The Plan states that in accordance with national planning practice guidance, the Level 1 SFRA has been used to guide development towards areas at the lowest risk of flooding and identify areas unsuitable for development. However, the document concludes that land outside of the area of flood risk is not capable of accommodating all of the borough’s identified development needs. A Level 2 SFRA has therefore also been produced and will help the Council apply the exceptions test (as described in the NPPG) as necessary to development proposals in areas at risk of flooding.

The site at Garlick’s Arch (A43) is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. Knowing the area well I am aware that this site often floods during the winter months and the flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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<th>Comment ID: PSLPP16/8578</th>
<th>Respondent: 8751105 / Amanda Harris</th>
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<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy S1</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire): ()**
Objections to Guildford Borough Proposed Submission Local Plan (June 2016)

I OBJECT in the strongest possible terms to the Guildford Borough Proposed Submission Local Plan (June 2016). This Plan is unsustainable, unworkable and, in many provisions, unnecessary.

I set out below my objection to specific policies and matters within the Plan.

1. I OBJECT to the Local Plan as the development proposed will not be sustainable (Policy S1)

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are just unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick’s Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8579  Respondent: 8751105 / Amanda Harris  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

2. I OBJECT to the Borough Wide Strategy (Policy S2)

a. The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

b. The Housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.

c. The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or
study. On any common sense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guildford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

**Comment ID:** PSLPA16/2035  **Respondent:** 8751169 / Nicholas Howe  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ()**

I have lived in Horsley for 20 years and I write to strongly object to the above proposed new local plan and in particular to the proposals to take land out of the green belt for future housing development in the villages East and West of Horsley.

This is completely unacceptable to everyone that lives in East and West Horsley, we treasure our village environment and it is completely unnecessary to seek to increase our village, by over 500 residential units against an existing supply of circa 1,000 residential units.

I have not met anyone in these villages who are in agreement with amending the green belt and it is simply unacceptable that this is even being considered.
It will have a devastating effect on our homes and our lives. Any consultations on these plans and the objection of local people should not be ignored.

You will be quite aware that the Horsley villages do not have the infrastructure or facilities for its population to be doubled. The one school is oversubscribed and it is already impossible to get an appointment at the medical centre.

The identification of the various sites has been undertaken in an incredibly unprofessional way with little thought to access/egress, topography or risks of flooding.

I therefore strongly object to your proposals. I would also stress the following:-

• Exceptional circumstances are required for any changes to Green Belt boundaries;
• Unmet housing need is not such a circumstance;
• Green Belt and AONB are reasons for not meeting objectively assessed housing need;
• These issues have been drawn to the Planning Inspectorate's attention.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/6544  Respondent: 8752097 / Lucy Meade-King  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Chinthurst Lane is not wide enough to accommodate more traffic. It is already busy and if we are to preserve the character of the roads and lanes that form the boundaries of this area we must avoid erosion of the private verges and common land which would be inevitable if attempts were made to widen it. Upgrading, widening and imposition of formal highways, street lighting and fences would suburbanise a rural part of the Village.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/6542  Respondent: 8752097 / Lucy Meade-King  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
The fields were intended to be left for the benefit of the people of Shalford and the Local Community and were subject to covenants to that effect. It is believed these covenants were released by the parish council in the belief that Green Belt and AGLV status and that they were outside the settlement boundary would afford the requisite protection against development.

We have been informed that the intention is to designate the fields as “Open Space” however there is no definition of what this means and therefore it is impossible to consult on something where the consequences are unknown.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6540  Respondent: 8752097 / Lucy Meade-King  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I am writing to object to the proposed changes to the Green Belt and the change to the Shalford Settlement Boundary with regard to the fields behind the Shalford Village Hall.

It is my view that the proposal to alter the Shalford settlement boundary to include this area is inappropriate and it would be better to retain the current boundary which follows clearly defined boundaries and ensure that this land and other open land is excluded from the settlement area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6541  Respondent: 8752097 / Lucy Meade-King  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I strongly oppose any development on these fields and am concerned that the proposed changes to their status would open the door to developers who might wish to build on them. These fields contribute to the open character of the Village. Due to the height of the land, buildings of any height would change the skyline of Shalford and tower over and detract from the enjoyment of the many users of the Tennis and Bowls Clubs and the Village Hall.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
**Comment ID:** PSLPP16/6545  
**Respondent:** 8752097 / Lucy Meade-King  
**Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the proposed changes to the Green Belt and to the proposed scale of development on it which I do not believe is justified.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** SQLP16/1023  
**Respondent:** 8752097 / Lucy Meade-King  
**Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I have previously indicated my concern that the complexity and volume of information makes this type of consultation difficult and inaccessible to anyone who is not a planning expert or a developer with the resources and a vested interest in pushing certain proposals through

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** SQLP16/1022  
**Respondent:** 8752097 / Lucy Meade-King  
**Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
This consultation process is not the first and residents in Guildford have been subject to a number of previous consultations in recent years. I do not believe that previous objections made about these matters have changed nor have they become irrelevant. I fear that on this occasion an element of consultation fatigue will have set in and/or people will feel that their previous objections will be taken into account. I therefore urge you to remember the petition signed by over 700 local residents objecting to changes to the settlement boundary and changes to the Green Belt that was sent to you in 2014.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/213  Respondent: 8752513 / R Attfield  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

There has been in sufficient consideration in regard to the impact to infrastructure, roads, rail and other amenities that would not support the grossly expanded population.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/212  Respondent: 8752513 / R Attfield  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

OBJECTION to the Proposed Submission Local Plan

I have considered the Proposed Submission Local Plan and once again find it entirely unacceptable. It is an unsubstantiated, aggressive expansionist proposal that would have a substantial impact across the region to the gross detriment to the residents of this borough. I support the details in the submission made by East Horsley Parish Council and offer the following additional comments:

The scale of development is disproportionate to the needs of the community and the assumptions on which it is based are fundamentally flawed, particularly following the recent decision to leave the EU and stem the levels of migration into the UK and the impact of negative economic growth forecasts.

On this basis I reject the ONS data as the assumptions on which it is based made are no longer valid and the projected population increases of some 15% for Guildford Borough over this period are grossly overstated.
Therefore the proposed scale of this building programme representing an increase of 25% in the housing stock is, at best, outrageous given also that the majority of it is within the Green belt in breach of planning policy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/214  Respondent: 8752513 / R Attfield  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The required level of affordable housing is substantially overstated and given the current economic forecasts and impact on housing prices in particular is further likely to provide some relief in this area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/678  Respondent: 8752513 / R Attfield  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to all of the proposals to make changes to boundaries and in particular those in regard to the Green Belt. I understand that NPPF rules state that Green Belt boundaries should only be changed in exceptional circumstances and none meeting this definition have been provided.

I strongly object to the proposal to inset East Horsley as it is a rural village that is pleasant to visit and makes a significant contribution to the character of the area and the Green Belt.

Finally I am very concerned about the belligerence of Guildford Borough Council’s planning department in continuing to favour such an aggressive expansionist policy that is to the gross detriment of the residents of this borough. To my knowledge this expansionist policy has not been made explicit by the council or any of its elected representatives and hence I do not believe that it has a sufficient mandate to support any part of it.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Environmental Impact of Proposed Housing in Horsley: Flood Risk

Building the large numbers of houses proposed in the Draft Local Plan will significantly increase the risk of flooding. I strongly object to the proposal in the Draft Local Plan for housing development in Ockham Road North, adjacent to Horsley station. This housing would be located in a floodplain. Housing on this site will adversely affect local drainage patterns, having a knock on effect further down the drainage basin. Increase in the volume of run-off due to paving over of arable land, coupled with higher incidence of flash-flooding caused by Global warming, will result in a greater frequency of abnormal fluvial discharge events, beyond the capacity of the existing drainage system. This will increase the likelihood of homes in the vicinity being flooded.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

The Impact of Additional Residential Housing and Population Increase on Local Facilities

I strongly disagree with the premise in the GBC Local Plan 2016 that Okham and the Horsleys are a suitable location for a large number of additional new houses. The housing numbers proposed for Guildford Borough are for 13040 homes over 15 years from 2016 to 2031. This number is too high. The number is based on a Strategic Housing Market Assessment (SHMA), which the council required to be amended by the Head of Planning. This amendment has not taken place and therefore the number of new builds proposed in the Draft Local Plan has no basis. I object to Guildford Council proposing a Draft Local Plan on the basis of flawed evidence.

As an inhabitant of West Horsley I know at first hand the existing population pressure on local facilities. The primary school in our neighbourhood (The Raleigh) is oversubscribed, in common with the local secondary school, the Howard of Effingham. Indeed, in spite of being a Horsley resident, I was not able to secure a place for my daughter in either school. The local medical centre is also filled to capacity. Residents of adjacent villages e.g., Ripley, East and West Clandon also use the centre. As a consequence, new residents to the village are known to register with alternative practices e.g., Bookham. In conclusion, the village services that currently exist in the Horsleys are already filled to capacity and do not have the facilities to accommodate the large number of new residents which would result from the increase in residential housing proposed in the Local Plan.
Impact of Increased Residential Population on Transport

An increase in the number of residents would result in a heavy increase in both construction-related traffic and subsequent traffic arising from an increase in local population.

Most residents of the Horsleys work outside the villages. They either commute into London or Guildford by train, or travel by road to places of work and education. There are very few indigenous employment opportunities in the Horsleys. Essentially they are commuter dormitories. The residents of proposed additional housing are unlikely to be employed in the immediate vicinity of the Horsleys. They will therefore join existing commuters travelling either by road or rail. Horsley station car park is already filled to capacity, and there is no option to extend the car parking facilities for the station. The land is not available for expansion. Likewise, at Effingham Junction, there is little land to spare for additional parking facilities. I would conclude, therefore, there is limited potential for additional commuters to park at the local stations and commute by train. I might add, that Horsley station already serves as a rail hub for adjacent villages (e.g., Shere and Ripley), resulting in heavy road usage at peak commuting time. The housing development proposed in the Local Plan will increase the traffic volume through the village, resulting in additional air and noise pollution.

Key road links to the Horsleys focus on the A246, from Leatherhead to Guildford, and additional rural (narrow and winding) roads linking the villages to Ripley, Cobham and the A3/M25. The A246 currently carries a very high volume of commuter traffic at peak periods creating bottle necks and traffic congestion at both the Givens Grove roundabout on the Leatherhead bypass, and the Merrow roundabout on the outskirts of Guildford. The A3 likewise carries a heavy flow of traffic both into Guildford and north to the M25 at peak hours, with stationary traffic a frequent occurrence. The construction of additional housing in a rural area, which by its location and nature, requires inhabitants to travel predominantly by car, will exacerbate an already congested road network. This will clearly have safety implications, as more congested narrow, rural roads will result in a greater frequency of road traffic accidents and undoubtedly loss of life. It will also increase traffic congestion in local employment hotspots such as Guildford, and Leatherhead.

It makes much more sense to redevelop brownfield sites in Guildford and Woking to accommodate additional housing needs. This would have the advantage of providing new residents with the option of using the existing public transport network, or walking or cycling to work or school. They would also have a full range of urban facilities on their doorstep.

In conclusion, I strongly object to the new housing proposals outlined in the Draft Local Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I would like to register objections to Guildford Borough Council Proposed Local Plan (June 2016) and inclusion in the plan of proposed multiple development sites in the Horsleys:

Urbanisation of the Green Belt

I strongly object to removal of the land areas in the vicinity of the Horsleys from the Green Belt. The Green Belt prevents urban sprawl and retains important wildlife corridors in proximity to the highly urbanized areas of outer London. It helps maintain clean air quality and provides recreational areas for urban dwellers from both Greater London and adjacent conurbations.

There are five legal reasons for protection of land assigned as Green Belt:

1. To check the unrestricted sprawl of large built up areas 2. To prevent neighbouring towns merging into one another
2. To assist in safeguarding the countryside from encroachment
3. To preserve the setting and special character of historic towns
4. To assist in urban regeneration by encouraging the recycling of derelict and other urban land.

The provision of the Green Belt in the vicinity of the Horsleys meets the criteria listed above. The National Planning Policy Framework (NPPF) requires any change of Green Belt boundaries to demonstrate exceptional circumstances. Unmet housing need is not an exceptional circumstance in law. In addition the existence of the Green Belt/AONB is a reason for not meeting objectively assessed housing need (i.e., such protected land is a legal constraint against any such development). The proposed Local Plan has not demonstrated exceptional circumstances requiring additional housing in the vicinity of East and West Horsley.

Removal of Villages from the Green Belt

I strongly disagree with and object to the assumption made in the Proposed Submission Plan that it is reasonable to remove villages such as West and East Horsley from the Green Belt. It seems remarkable that a single act of Parliament by the current Government can undo the good work for the provision of the Green Belt and protection of rural England laid out in the Town and Country Planning Act of 1947. The rationale behind the need to protect rural areas in close proximity to ever growing metropolitan areas is more relevant today than ever, in light of the projected growth in UK population.

I object to the method of defining settlement hierarchy as described in the Proposed Submission Local Plan. In particular, I take exception to the "classification" of East Horsley as a "Semi Urban village" and question the basis for this classification. Horsley lacks most of the infrastructure and community facilities taken for granted in an urban area. The key charm and attraction of Horsley is essentially its rural character.

To accrete large numbers of new houses to the Horsley - Okham area would change the character of these ancient villages permanently, resulting in a detrimental impact on the environmental and village character. I therefore object to the proposed settlement boundary changes in East and West Horsley.

In summary, I strongly object to the proposal in the Proposed Submission Local Plan to take the following villages out of the Green Belt: East Horsley and West Horsley (North), Effingham, Ripley, Shere and West Horsley (South).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Site A28 (Land to east of White Lane, Ash Green) should be removed from the Local Plan since it violates the policy of maintaining a separation between the Ash urban area and Ash Green village. The geographic feature of the disused railway line forms a natural southern boundary for the Ash urban area and urban sprawl should not be allowed south of this line.

If a major development is allowed at this site, the separation is reduced to a couple of hundred metres, encouraging coalescing between the urban area and the village.

The access onto White Lane is also problematic, due to the proximity of the bridge over the disused railway line with its hump back zig-zag construction restricting sight lines for oncoming traffic. It is unlikely that an access could be constructed that would meet the Surrey County Council's Highways Department's requirements for 65 metres clear sight lines at 2 metres in from the kerb.

Also the trees forming the boundary between the proposed site and White Lane form part of the Ancient Woodland and they are all covered by a blanket TPO. Obtaining permission to clear these trees, which are part of the Green Belt, would be difficult.

The site should be included in the new area of Green Belt surrounding Ash Green village and should be used as open space (SANG) for the residents of the 1,200 homes proposed for site A29 to the north of the disused railway line.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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Site A30 Ash railway new bridge scheme.

The section of Foreman Road between Grange Road and the railway station is narrow and has no footpath. It is extremely dangerous for the residents of Ash Green (and the new residents of homes to be build on site A29) to walk from their homes to the station.

The opportunity should be taken to use the new bridge scheme to construct a footpath along this section of Foreman Road. The site plan should extend southwards to the junction with Grange Road, to allow for this as part of the scheme. The cost should be covered by the developers of site A29.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I fully support the policy (4.3.17) of designating Green Belt between Ash Green Village and the Ash and Tongham urban areas to prevent coalescence. The geographic feature of the disused railway line provides natural boundary line for the southern extent of the Ash urban area.

Unfortunately the proposed Local Plan immediately violates the principles of Green Belt to prevent urban sprawl (4.3.11) by designating a major development site (A28) in what should be the area of separation. If this site is allowed to be developed, the separation between the Ash urban area and Ash Green village will be reduced to only a couple of hundred metres, encouraging coalescence.

Site A28 should be removed from the Local Plan and the area should be left as open space (SANG), to be used by the residents of the 1,200 homes proposed for the adjacent site A29.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

I wish to comment on the proposed site A28 in the revised draft Local Plan.

1. The address of the site should be "Land to the east of White Lane, Ash Green." This area is and always has been Ash Green, not Ash.
2. The southern boundary has been moved south to include an area of ancient woodland in which every tree is subject to a TPO. Since it is inconceivable that planning permission would be granted for this area of ancient woodland, the southern boundary should remain along the northern edge of the woodland as shown in the previous draft.
3. The western boundary has been moved to the west of White Lane, thereby including the road in the potential development site. It also includes the line of trees along the eastern edge of White Lane. These are also part of the ancient woodland and all the trees in this strip are subject to TPOs. The boundary should remain to the east of this woodland as shown in the previous draft.

4. It is the stated policy in the draft local plan that Ash Green should be protected from the sprawl of the Ash and Tongham Urban Area by the creation of new Green Belt to the North and West of the village. This site violates that Local Plan principle and leave virtually no protection for the village from urban spread from the north.

5. If some development of this site has to take place in should to provide facilities for the village of Ash Green, including a village Hall. It should also be used to provide open space (recreational ground or SANG) for the developments around Ash Manor in site A29.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: SQLP16/70  Respondent: 8766945 / Liz Machtynger  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (No)

I do not believe that the evidence base is correctly calculated. The growth predictions for the borough are not in keeping with the rest of the country or the historical growth. There are assumptions that this areas MUST take this amount of growth and I do not agree that this is correct. The greenbelt policy clearly states that it should only be altered in exceptional circumstances and not where demand for housing is the only factor.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: SQLP16/71  Respondent: 8766945 / Liz Machtynger  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 2: Legal compliance

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (No)
"the green belt should ONLY be altered in exceptional circumstances through the local plan process and with the SUPPORT of the local people" “Demand for housing alone will not change the green belt”.

It is clear from all local feedback in previous polls that there is NO support for this (apart from with borough councillors).

I believe that sites have been selected randomly according to the population count likely to object (high green belt = low number of people).

I believe that the rejection of previous applications e.g. at Wisley and elsewhere in the country show that this enormous change to the Green Belt policy is one which would require the courts to decide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/72    Respondent: 8766945 / Liz Machtynger    Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (No)

I do not believe that this plan in any way sound. I would challenge the proposed evidence base (much to large population count for this area), I would challenge the assumptions for infrastructure, even though the borough councillors stated that the infrastructure must come first at the recent council meeting, I do not believe that this would ever be the case and even with investment would not support the huge growth predicted for Horsley's, Clandon, Normandy, Send and Ripley.

The roads are currently under huge pressure (traffic and state of surfaces, speeds and parking), the schools are under huge pressure, Horsley have had a constant battle to remain part of the catchment for the Howard - their only local school, places are very tight already. The local health facilities are bursting at the seams, it takes days to get crucial appointments and I have just waited 10 hours at A&E for treatment.

I believe that the way in which this plan has made assumptions about "insetting" of villages and changing village boundaries then to propose building on green belt land is absolutely astonishing (stronger words would normally be required).

The new sites added in this recent plan to West Horsley have taken local people by surprise, many of my neighbours do not even know of the intention to do so. The nature of these changes proposed to East and West Horsley as well as Clandon would change our villages forever. We have a very strong village and enjoy green countryside, and chose to live here rather than Cobham or other villages which are built up and rapidly becoming additions to London.

The new site proposed for Garlick's arch appears to have been added without any consultation having listened to your recent borough council meeting. I was astonished to hear "its just ancient woodland so it will die out soon anyway". This is an areas of outstanding beauty and with this new site and access to the A3 we will decimate any of the beauty it currently has.
The site proposed for Wisley has already been rejected in recent proposals - mainly due to infrastructure. I consider this to be an irresponsible proposal considering its position, the current traffic, the proximity of small neighbouring villages whose character will be forever changed (and having only a small voice due to their small populations). Rail links although new ones are proposed will not fix the current overload on Effingham and Horsley stations and lack of carriages.

I am a local business owner, I do not believe that the proposals made in this plan are supportive of local businesses other than potentially retailers. Transport, infrastructure, delivery, halls and spaces to work, storage premises are all high on the list of my local business, these have all be provided to the development of the local Horsley plan, this has not yet been considered in this local plan. I wonder how the local people actually have a say in this process if this is the case?

My final point is about this plan process. I have spent hours listening to your borough meetings, with complete dismay. The local people voted for a council that would protect our Green Belt. I wonder where those people have gone? I was also dismayed at the behaviours of other councillors towards those who did try to respect this in your meeting by talking down and dismissing suggestions. I fear that this process is not in good hands, and not truly representing what the local residents require or support.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Please let us leave a green and pleasant legacy for our children. I strongly believe that in addressing the basis for the plan and identifying brownfield sites as well as business opportunities and transport opportunities this plan could be one that most could feel would deliver this.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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<thead>
<tr>
<th>Comment ID: PSLPA16/1746</th>
<th>Respondent: 8767009 / Audrey Munday</th>
<th>Agent:</th>
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<tbody>
<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Shalford (north)</td>
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<td><strong>Do you consider this section of the document; complies with the Duty to Cooperate?</strong> ( ), <strong>is Sound?</strong> ( ), <strong>is Legally Compliant?</strong> ( )</td>
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It is my understanding that proposed changes will remove the field's current protected status and leave them more open for housing development.

I have been informed that professional Chartered Land Surveyors have undertaken measurements from various places to the fields behind the Village Hall. From the Village Hall to the fields there is a rise of over 25 feet and from King's Road it is over 32 feet. Add on to this houses of potentially 25 feet plus and it will be a very imposing development looming over the Common and Shalford as a whole and out of character with this part of Shalford.

The land surrounding the Shalford Village settlement boundary includes the Surrey Wildlife Trust beauty spot of Chinthurst Hill – any development on the land behind the village hall would be clearly visible from this area too and much of the area around the hill. This area not only provides beautiful walking paths and recreational areas for the local population, but also for walkers and nature lovers from all over the County.

As a resident I am particularly concerned about the increased traffic volumes that will result if access to future housing development is via Chinthurst Lane. The road is already used as a “rat run” during peak hours as drivers seek to avoid the extreme congestion on the main Cranleigh / Guildford road, backing up from the Shalford roundabout. Chinthurst Lane is single carriageway along most of its length and it is not designed to take the traffic it currently does, let alone additional vehicles. Recent redevelopment of the Railway station car park has also resulted in an increased number of cars parking down Chinthurst Lane during the day and reducing the width of the carriageway further.

This land contributes to the open character of the village and provides an attractive setting for the village's community facilities.

I believe that any development of this land would undermine the character of the village and also add to the pressures on the limited infrastructure that already exists.

Green Belt and AGLV designations are there to protect our beautiful landscape and to protect the open character of this land for the enjoyment of current and future generations, not to be withdrawn as and when the GBC deem appropriate. I am very concerned that if this loss of Green Belt and AGLV goes ahead, it will set a precedent for future development on AGLV in the heart of the village.
Shalford as a village, as we know it, will cease to exist if all the proposals for building go ahead. The essential nature of Shalford will be undermined, which conflicts with another Council policy of retaining the character of the villages that surround Guildford. These fields should remain outside the settlement boundary and remain green belt and AGLV designated.

As a resident of Shalford Village, living in Chinthurst Lane, I strongly object to the repositioning proposal and to any resulting planning application that may result in the development of housing on this Green Belt and AGLV land.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/2572  Respondent: 8767265 / Pam Hewitt  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I’m writing to strongly object to the proposal to remove Chilworth from the ‘green Belt’. The whole point of the green belt was to prevent ‘urban sprawl’ and once removed the village would have no protection against development. The traffic problems getting in and out of the village currently are a nightmare so adding even more houses would render it virtually impassable at certain times of the day.

People move to the Surrey villages because they want to live in and enjoy the countryside and they pay a premium to do so, it’s very short sighted to think that by allowing development on the green belt and concreting over the countryside that people come here in large numbers to enjoy will somehow enhance the area, shame on you for even considering it.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/2453  Respondent: 8768161 / Adam Johnson  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I am writing to express the strongest opposition to the proposals, set out in the recent Guildford Borough Council Draft Local Plan document, to support development of 533 new houses in Horsley, of which 385 will be within West Horsley. Additionally, I oppose the extension of the village boundaries for East and West Horsley, and removal of the village areas within these boundaries from the protection of the Green Belt. In addition, I object to the inclusion of the Wisley Airfield site as a potential development site.

I believe that the proposals are extremely misguided, and would be highly damaging to the existing communities of East and West Horsley. In addition, they are strongly opposed by the residents of the area, and therefore the plans are at odds with the localism agenda.

I am a Chartered Surveyor with 15 years experience in commercial real estate and over 4 years experience working in urban regeneration. As such, I have a clear professional understanding of the issues involved and also of the economics of development. I have lived in West Horsley for over six years and intend to be a long term resident, and therefore am deeply concerned about the proposals set out in the draft plan.

My opposition can be summarised under the following headings, which I will consider in turn:

1. Concern over overall level of housing development for Guildford Borough.
2. Disproportionate housing development for West Horsley, compared with other settlements in the Borough.
   1. Effect of the Proposals on West Horsley.
   2. Effect of the Proposals on the Green Belt.
   3. Effect of the Proposals on the Surrey Hills AONB.
   4. Specific Comments on Potential Development Area at Waterlooo Farm/ Ockham Road North.
   5. Views of the Local Community in West Horsley.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/2459  Respondent: 8768161 / Adam Johnson  Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Disproportionate Level of Housing Development in West Horsley.

Not only do I oppose the level of green field housing development for the Borough as a whole, I also feel that the levels of housing proposed for West Horsley are disproportionate. The draft plan proposes 385 houses in major sites at West Horsley, with another 148 in close proximity within East Horsley. Additional "infill" developments are also proposed. West Horsley is a parish of 1,111 homes, but there are only 723 houses within the main settlement area of West Horsley (ie within the village boundaries). Therefore, the proposals for major sites alone would add 53% to the housing stock of the village, and 35% to the housing stock of the parish as a whole.

This is grossly disproportionate and beyond the level proposed for other settlements around the Borough- and particularly for Guildford itself, which does not seem to be taking its fair share of the proposed development.
West Horsley Parish Council has carried out a Housing Need Assessment, which showed a requirement for just 20 affordable homes. The proposals are therefore totally out of line with the requirements of the local community.

**Effect of the Proposals on West Horsley.**

I believe that the plans would have a severely detrimental effect on the character of the village. Given the profits to be made by housing development within Surrey, once sites are designated for future development, that development will surely be brought forward quickly, and to the maximum density permitted.

Specific comments are as follows:

- Several of the proposed development sites (particularly Manor Farm, ref A3 8/ID 15 and East Lane, ref A41/ ID 2063) would have the effect of contributing to a merged settlement of East and West Horsley, when I believe that the open character of the countryside here should be protected by safeguarding the countryside along East Lane, Long Reach and Green Lane which continues to separate the two settlements and which contributes to the rural character of West Horsley. I understand that there is a proposal for the Raleigh School to develop a new site on the East Lane site, which again I object to for the same reason of impact on rural character.

- The suggested density of housing is totally out of character with the rest of West Horsley. Building to this increased density is particularly inappropriate in the peripheral locations which are planned for development.

- The proposed development sites are on the outer edge of the village and so would reasonably be expected to generate considerable additional traffic, as the development will be some distance from the station and the centre of the village. Anyone who has spent any time in and around the village could tell you that the network of rural roads and lanes which surround the village simply do not have the capacity to serve this level of proposed additional development, and any extension of the road network would not only destroy the character of the village, but also the surrounding roads which would continue to pass through Green Belt land.

- I have strong concerns over the capacity of infrastructure such as drainage and sewerage.

- Localised flooding and poor surface water drainage is already a significant problem in the area. I have witnessed first hand flooding along Ockham Road North, Green Lane and Ripley Lane. This has occurred on one or more occasions each winter in recent years and therefore is clearly not a "once in a decade" or "once in a lifetime" event. The fields planned for development must play a role in helping to drain this area, and additional development would both remove this drainage capacity and create additional issues of surface drainage.

- Additional development of any significant scale will cause significant strain on the village school and doctors surgery (the later located in East Horsley), which are running close to capacity. Adding extra capacity to these services cannot easily be resolved, even if possible through entirely developer funded schemes, without fundamentally altering the geographic make-up of the village as there is little or no land in the core of the village to accommodate any additional services. Developing these facilities on the periphery of the village (which as noted above is now proposed for a potential extension of the Raleigh School) would once again fundamentally alter its character and position in its rural context.

- East and West Horsley are thriving villages, which do not need artificial support through rapid expansion of population.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Views of the Local Community in West Horsley.

The strength of feeling throughout the village against the proposed relaxation of the planning guidance is considerable. This opposition is shared by all of the local residents that I have spoken to, as well as by the West Horsley Parish Council. I believe that the views of those who have chosen to make their homes within the community should be paramount when making decisions which will have such a radical and irreversible impact on the village.

Indeed my view is supported by recent planning guidance which supports greater involvement of local communities in the planning process. If localism is to mean anything, Guildford Borough Council should be listening to the views of the local community whose lives and wellbeing would be so adversely affected by the plans.

Removing East and West Horsley from the Green Belt, and encouraging additional development on such a scale would exclude and ignore the strong feelings of the local community.

Conclusion.

In summary, I strongly oppose the current drafting of the Guildford Borough Council Local Plan in relation to West and East Horsley. In particular, I oppose the removal of West Horsley and East Horsley from the Green Belt, the extension of the village boundaries beyond their current extent, and plans for 533 houses across the two villages (of which 385 are planned for West Horsley), all of which are at unsuitably high densities, out of keeping with the current character of the villages.

So far as I am aware, no 'exceptional circumstances' have been put forward, let alone proved, in order to justify this development in the Green Belt.

I feel that the plans for West and East Horsley contained within the Local Plan are inappropriate, and ill-considered and would be deeply damaging to our community.

I urge you to listen to the views of the local community and also to place more value on the exceptional quality of the rural spaces and villages of the Borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Effect of the Proposals on West Horsley.

I believe that the plans would have a severely detrimental effect on the character of the village. Given the profits to be made by housing development within Surrey, once sites are designated for future development, that development will surely be brought forward quickly and to the maximum density permitted.

Specific comments are as follows:

-Several of the proposed development sites (particularly Manor Farm, ref A38/ID 15 and East Lane, ref A41/ID 2063) would have the effect of contributing to a merged settlement of East and West Horsley, when I believe that the open character of the countryside here should be protected by safeguarding the countryside along East Lane, Long Reach and Green Lane which continues to separate the two settlements and which contributes to the rural character of West Horsley. I understand that there is a proposal for the Raleigh School to develop a new site on the East Lane site, which again I object to for the same reason of impact on rural character.

-The suggested density of housing is totally out of character with the rest of West Horsley. Building to this increased density is particularly inappropriate in the peripheral locations which are planned for development.

-The proposed development sites are on the outer edge of the village and so would reasonably be expected to generate considerable additional traffic, as the development will be some distance from the station and the centre of the villages. Anyone who has spent any time in and around the village could tell you that the network of rural roads and lanes which surrounds the village simply do not have the capacity to serve this level of proposed additional development, and any extension of the road network would not only destroy the character of the village, but also the surrounding roads which would continue to pass through Green Belt land.

-I have strong concerns over the capacity of infrastructure such as drainage and sewerage.

-Localised flooding and poor surface water drainage is already a significant problem in the area. Since moving to the area I have witnessed first hand flooding along Ockham Road North, Green Lane and Ripley Lane. This has occurred on one or more occasions each winter in recent years and therefore is clearly not a "once in a decade" or "once in a lifetime" event. The fields planned for development must play a role at present in helping to drain this area, and additional development would both remove this drainage capacity and create additional issues of surface drainage.

-Additional development of any significant scale will cause significant strain on the village school and doctors surgery (the later located in East Horsley), which are running close to capacity. Adding extra capacity to these services cannot easily be resolved, even if possible through entirely developer funded schemes, without fundamentally altering the geographic make-up of the villageas there is little or no land in the core of the village to accommodate any additional services. Developing these facilities on the periphery of the village (which as noted above is now proposed for a potential extension of the Raleigh School) would once again fundamentally alter its character and position in its rural context.

-East and West Horsley are thriving villages, which do not need artificial support through rapid expansion of population.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: PSLPS16/3338</th>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Views of the Local Community in West Horsley.

The strength of feeling throughout the village against the proposed relaxation of the planning guidance is considerable. This opposition is shared by all of the local residents that I have spoken to, as well as by the West Horsley Parish Council.

I believe that the views of those who have chosen to make their homes within the community should be paramount when making decisions which will have such a radical and irreversible impact on the village.

Indeed my view is supported by recent planning guidance which supports greater involvement of local communities in the planning process. If localism is to mean anything, Guildford Borough Council should be listening to the views of the local community whose lives and well being would be so adversely affected by the plans.

Removing East and West Horsley from the Green Belt and encouraging additional development on such a scale would exclude and ignore the strong feelings of the local community.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/3337  Respondent: 8768161 / Adam Johnson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A40

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Specific Comments on Potential Development Area Ref A40/ID 975 (Land at Waterloo Farm/ Ockham Road North)

I am making detailed comments only about this site because it is in close proximity to where I live, and therefore I have a greater level of understanding of some of the detailed issues. I am sure that similar concerns will be raised by other locals in connection with each of the other potential development areas, and my opposition is to all of the potential development are as around West Horsley, as well as the redesignation of Green Belt Boundaries, rather than just this site.
With reference to this site, I believe that development on this site would cause an unacceptable increase in the risk of surface water flooding affecting existing houses in areas such as Ockham Road North and Nightingale Avenue. These are already designated as Flood Zone 2 and 3 (medium and high risk) as is part of this development site and as mentioned above, surface water flooding has been an issue here in recent years.

I also have concerns about how this site could be accessed. Both Green Lane and the current small access road to the Camping and Caravan Site do not provide good road access for a development of this size and junction access onto the Ockham Road would be dangerous. Any access through Nightingale Avenue (for example created by an additional access point at the North of the road) would also not be suitable. Once again, the junction onto Nightingale Avenue would not safely carry additional traffic, and the road network is already under particular strain during the school run. This route is also not suitable or safe for additional pedestrian access (and pedestrian access down Ockham Road North is also challenging as it requires crossing the road several times). At present there are no footpaths along Nightingale Avenue and it is not possible to widen what is a small residential road in order to allow safe access.

Whilst partially enclosed by housing, especially to the East, this site comprises pleasant fields which help to contribute to the rural character of the village, and to the semi-rural character of the housing stock along Ockham Road North. This proposed development would therefore sit on a gateway into the village. At present the village gradually becomes more developed as one drives down the Ockham Road and enters East Horsley, or turns into East Lane to continue through West Horsley. Significant development here, with attendant infrastructure such as highway improvements or pedestrian crossings, would significantly alter the rural context of the village by creating a far more stark and harsh boundary to the village.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Effect of the Proposals on the Surrey Hills Area of Outstanding Natural Beauty.

West Horsley is adjacent to the Surrey Hills Area of Outstanding Natural Beauty, which as you will be aware was designated in 1958 in order to preserve and safeguard the outstanding countryside for the benefit of all. As such, West Horsley forms an important part of the context for the AONB. The AONB boundary runs just to the South of the A246, within around 1 mile from the village.

The proposed inset of the village within the Green Belt means that further intensive development will be possible right up to the AONB boundary, and additionally the proposed development site adjacent to the "Bell and Colvill" Garage at West Horsley, for which 40 houses are planned, would bring unsuitable intense development to a site which is far closer to the boundary of the AONB, and which is adjacent to a site of Great Landscape Value.

Development on the scale proposed would have a significant impact on the AONB. Through changing the character of the surrounding landscape and increasing pressure on wildlife habitats, such development, both of the individual parcels identified and on the overall scale proposed in the plans, would reasonably be expected to give rise to additional traffic past and through the AONB which in turn would erode the character of the rural roads in the area, and have a detrimental impact on the AONB.

I feel that a more suitable approach would be to further strengthen the protections afforded to East and West Horsley and neighbouring villages along the A246 (including Clandon, Effingham and Bookham), rather than encouraging additional development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7318  Respondent: 8768161 / Adam Johnson  Agent:

Effect of the Proposal on the Green Belt.

I believe that it is vital to retain the integrity of the Green Belt within Surrey against development pressure. for the following reasons:

-Prevention of urban sprawl.

-Protection of valuable countryside.
- Green Belt aids urban regeneration by encouraging the reuse of derelict land within towns and cities.

- Provision of a valuable resource of open space to those living in London and other towns and cities.

Section 9 of the National Planning Policy Framework, published in March 2012 specifically states that "Once established, Green Belt boundaries should only be altered in exceptional circumstances". I cannot see why pressure to meet housing targets constitutes such an exceptional circumstance. The fact that the Green Belt is under such pressure to be developed is to me a sign that its protection should be enhanced, in order for it to continue to meet its original intention for future generations.

Recent research carried out by the CPRE shows that there are enough brownfield sites available in the UK to build 1,494,070 new homes, with the supply of these sites increasing. In this context, I would question the need for development on the Green Belt in any but the most exceptional case.

I know from direct experience within the real estate industry that there is a strong financial incentive to secure development rights and planning permission in the Green Belt because it is so much cheaper and requires less effort and skill, to develop a greenfield rather than brownfield site. In addition, developing greenfield land on the edge of existing settlements means that profits can be maximised by avoiding major investments in infrastructure which may be required in either brownfield or a true greenfield development. As a result of these financial drivers, I am sure that there will be powerful lobby groups intent on securing development rights, within the Green Belt of Surrey in order to maximise short-term profit. I cannot agree that this is in the best interests of the Borough as a whole.

The identified West Horsley development sites set out in the Document make a significant contribution to the open character of the village and its context within its rural surroundings and the Green Belt. The sites are generally located on the outskirts of the village, and so development upon them will affect the context and character of the village. When considering the effect on the Green Belt countryside of the area, there is a significant difference between infill development within the geographical boundaries of the village, and development significantly extending its borders.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/10245  Respondent: 8768161 / Adam Johnson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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- Green Belt aids urban regeneration by encouraging the reuse of derelict land within towns and cities.
- Provision of a valuable resource of open space to those living in London and other towns and cities.
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Recent research carried out by the CPRE shows that there are enough brownfield sites available in the UK to build 1,494,070 new homes, with the supply of these sites increasing. In this context, I would question the need for development on the Green Belt in any but the most exceptional case.

I know from direct experience within the real estate industry that there is a strong financial incentive to secure development rights and planning permission in the Green Belt because it is so much cheaper, and requires less effort and skill, to develop a greenfield rather than brownfield site. In addition, developing greenfield land on the edge of existing settlements means that profits can be maximised by avoiding major investments in infrastructure which may be required in either brownfield or a true greenfield development. As a result of these financial drivers, I am sure that there will be powerful lobby groups intent on securing development rights within the Green Belt of Surrey in order to maximise short-term profit. I cannot agree that this is in the best interests of the Borough as a whole.

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7277  Respondent: 8768161 / Adam Johnson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I am writing to express the strongest opposition to the proposals set out in the recent Guildford Borough Council Draft Local Plan document, to support development of 533 new houses in Horsley, of which 385 will be within West Horsley. Additionally, I oppose the extension of the village boundaries for East and West Horsley and removal of the village areas within these boundaries from the protection of the Green Belt. In addition, I object to the inclusion of the Wisley Airfield site as a potential development site.

I believe that the proposals are extremely misguided, and would be highly damaging to the existing communities of East and West Horsley. In addition, they are strongly opposed by the residents of the area, and therefore the plans are at odds with the localism agenda.

I am a Chartered Surveyor with 15 years experience in commercial real estate and over 4 years experience working in urban regeneration. As such, I have a clear professional understanding of the issues involved and also of the economics of
development. I have lived in West Horsley for over six years and intend to be a long term resident and therefore am deeply concerned about the proposals set out in the draft plan.

My opposition can be summarised under the following headings, which I will consider in turn:

1. Concern over overall level of housing development for Guildford Borough.
2. Disproportionate housing development for West Horsley, compared with other settlements in the Borough.
3. Effect of the Proposals on West Horsley.
4. Effect of the Proposals on the Green Belt.
5. Effect of the Proposals on the Surrey Hills AONB
6. Specific Comments on Potential Development Area at Waterloo Farm/ Ockham Road North.
7. Views of the Local Community in West Horsley.

Overall Level of Housing Development proposed for Guildford Borough.

I am extremely concerned about the overall level and type of housing development which is proposed for the Borough. My understanding is that the overall level of new housing proposed is far in excess of that proposed by other similar neighbouring authorities.

I have seen no clear rationale for the growth projections which underpin the housing calculations. Indeed, the number of new houses proposed for the Borough has increased from the 653 per annum proposed in the 2014 draft document to 693 per annum in the current proposals.

Of the 12,498 new homes proposed within specific sites, 65% are within the Green Belt. This percentage is far too high and will have a damaging impact across the Borough.

Disproportionate Level of Housing development in West Horsley.

Not only do I oppose the level of green field housing development for the Borough as a whole, I also feel that the levels of housing proposed for West Horsley are disproportionate. The draft plan proposes 385 houses in major sites at West Horsley, with another 148 in close proximity within East Horsley. Additional "infill" developments are also proposed. West Horsley is a parish of 1,111 homes, but there are only 723 houses within the main settlement area of West Horsley (i.e. within the village boundaries). Therefore, the proposals for major sites alone would add 53% to the housing stock of the village, and 35% to the housing stock of the parish as a whole.

This is grossly disproportionate and beyond the level proposed for other settlements around the Borough-and particularly for Guildford itself, which does not seem to be taking its fair share of the proposed development.

West Horsley Parish Council has carried out a Housing Need Assessment, which showed a requirement for just 20 affordable homes. The proposals are therefore totally out of line with the requirements of the local community.

Conclusion.

In summary, I strongly oppose the current drafting of the Guildford Borough Council Local Plan in relation to West and East Horsley. In particular, I oppose the removal of West Horsley and East Horsley from the Green Belt, the extension of the village boundaries beyond their current extent, and plans for 533 houses across the two villages (of which 385 are planned for West Horsley), all of which are at unsuitably high densities. out of keeping with the current character of the villages.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Overall Level of Housing Development proposed for Guildford Borough.

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Of the 12,498 new homes proposed within specific sites, 65% are within the Green Belt. This percentage is far too high and will have a damaging impact across the Borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the level of housing development proposed for West Horsley. Not only do I oppose the level of green field housing development for the Borough as a whole, I also feel that the levels of housing proposed for West Horsley are disproportionate. The draft plan proposes 295 houses in major sites at West Horsley, with another 100 in close proximity within East Horsley. Additional "infill" developments are also proposed. West Horsley is a parish of 1,111 homes, but there are only 723 houses within the main settlement area of West Horsley (ie within the village boundaries). Therefore, the proposals for major sites alone would add over 40% to the housing stock of the village, and 26% to the housing stock of the parish as a whole. This is grossly disproportionate and beyond the level proposed for other settlements around the Borough- and particularly for Guildford itself, which does not seem to be taking its fair share of the proposed development.

West Horsley Parish Council has carried out a Housing Need Assessment, which showed a requirement for just 29 affordable homes. The proposals are therefore totally out of line with the requirements of local residents.

I object to the plans which would have a severely detrimental effect on the character of the village.

Specific comments are as follows:
• I continue to object to West and East Horsley being inset from the Green Belt. This proposal has not changed since the 2016 consultation.
• The suggested density of housing is totally out of character with the rest of West Horsley. Building to this increased density is particularly inappropriate in the peripheral locations which are planned for development.
The proposed development sites are on the outer edge of the village and so would generate considerable additional traffic, as the development will be some distance from the station and the centre of the villages. The network of rural roads and lanes which surrounds the village simply do not have the capacity to serve this level of proposed additional development, and any extension of the road network would not only destroy the character of the village, but also the surrounding roads which would continue to pass through Green Belt land.

The proposed development site at Manor Farm (ref A38) would have the effect of contributing to a merged settlement of East and West Horsley. I believe that the open character of the countryside here should be protected by safeguarding the countryside along East Lane, Long Reach and Green Lane which continues to separate the two settlements and which contributes to the rural character of West Horsley.

I have strong concerns over the capacity of infrastructure such as drainage and sewerage. Localised flooding and poor surface water drainage is already a significant problem in the area. Since moving to the area I have witnessed first hand flooding along Ockham Road North, Green Lane and Ripley Lane. This has occurred on one or more occasions each winter in recent years and therefore is clearly not a "once in a decade" or "once in a lifetime" event. The fields planned for development must play a role at present in helping to drain this area, and additional development would both remove this drainage capacity and create additional issues of surface drainage.

Additional development of any significant scale will cause significant strain on the village school and doctors surgery (the later located in East Horsley), which are running close to capacity. Adding extra capacity to these services cannot easily be resolved, as there is little or no land in the core of the village to accommodate any additional services. Developing these facilities on the periphery of the village would once again fundamentally alter its character and position in its rural context.

East and West Horsley are thriving villages, which do not need artificial support through rapid expansion of population.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp173/653  Respondent: 8768161 / Adam Johnson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Appendix H: Maps - West Horsley South

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The strength of feeling throughout the village against the proposed relaxation of the planning guidance is considerable. This opposition is shared by all of the local residents that I have spoken to, as well as by the West Horsley Parish Council. I believe that the views of those who have chosen to make their homes within the community should be paramount when making decisions which will have such a radical and irreversible impact on the village. Removing East and West Horsley from the Green Belt, and encouraging additional development on such a scale, would exclude and ignore the strong feelings of the local community. Overall, I understand that the 2016 Local Plan Draft received over 30,000 objections, and these seem to have been largely disregarded in the current draft. It seems a case of the Borough Council continuing to publish the same document with minor changes, rather than addressing the very real concerns which local residents have over the proposals.

In summary, I strongly oppose the current drafting of the Proposed Submission Guildford Borough Council Local Plan. In particular, I oppose the removal of West Horsley and East Horsley from the Green Belt, the extension of development beyond the current village boundaries, and plans for 395 houses across the two villages (of which 295 are planned for West Horsley).

I also object because all of the development sites are proposed to be at unsuitably high densities, out of keeping with the current character of the villages.
So far as I am aware, no "exceptional circumstances" have been put forward, let alone proved, in order to justify this development in the Green Belt.

I remain of the view that the plans for West and East Horsley contained within the Draft Local Plan are inappropriate, misguided, and would be deeply damaging to our community.

I urge you to listen to the views of the local community and to protect the exceptional quality of the rural spaces and villages of the Borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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I object to the effect of the local plan on the Metropolitan Green Belt in this area. I believe that it is vital to retain the integrity of the Green Belt within Surrey against development pressure. Section 9 of the National Planning Policy Framework specifically states that "Once established, Green Belt boundaries should only be altered in exceptional circumstances". I cannot see why pressure to meet housing targets constitutes such an exceptional circumstance. The fact that the Green Belt is under such pressure to be developed is to me a sign that its protection should be enhanced, in order for it to continue to meet its original intention for future generations. The identified West Horsley development sites set out in the Document make a significant contribution to the open character of the village and its context within its rural surroundings and the Green Belt. The sites are generally located on the outskirts of the village, and so development upon them will affect the context and character of the village. When considering the effect on the Green Belt countryside of the area, there is a significant difference between infill development within the geographical boundaries of the village, and development significantly extending its borders. In addition, the proposals taken as a whole would have an adverse effect on the Surrey Hills Area of Outstanding Natural Beauty, which is located adjacent to West Horsley. The proposed development site adjacent to the "Bell and Colvill" Garage at West Horsley, for which 40 houses are planned, would bring unsuitable intense development to a site which is far closer to the boundary of the AONB, and which is adjacent to a site of Great Landscape Value.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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I object to the effect of the local plan on the Metropolitan Green Belt in this area. I believe that it is vital to retain the integrity of the Green Belt within Surrey against development pressure. Section 9 of the National Planning Policy Framework specifically states that "Once established, Green Belt boundaries should only be altered in exceptional circumstances". I cannot see why pressure to meet housing targets constitutes such an exceptional circumstance. The fact that the Green Belt is under such pressure to be developed is to me a sign that its protection should be enhanced, in order for it to continue to meet its original intention for future generations. The identified West Horsley development sites set out in the Document make a significant contribution to the open character of the village and its context within its rural surroundings and the Green Belt. The sites are generally located on the outskirts of the village, and so development upon them will affect the context and character of the village. When considering the effect on the Green Belt countryside of the area, there is a significant difference between infill development within the geographical boundaries of the village, and development significantly extending its borders. In addition, the proposals taken as a whole would have an adverse effect on the Surrey Hills Area of Outstanding Natural Beauty, which is located adjacent to West Horsley. The proposed development site adjacent to the "Bell and Colvill" Garage at West Horsley, for which 40 houses are planned, would bring unsuitable intense development to a site which is far closer to the boundary of the AONB, and which is adjacent to a site of Great Landscape Value.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I am writing to express the strongest opposition to the proposals, set out in the recent Guildford Borough Council Proposed Submission Local Plan document, to support development of 395 new houses in Horsley, of which 295 will be within West Horsley. Additionally, I oppose the removal of the village areas within the boundaries from the protection of the Green Belt. Whilst the scale of development has been reduced somewhat since the previous 2016 Draft Local Plan, I still believe that the proposals are extremely misguided, and would be highly damaging to the existing community of East and West Horsley. In addition, they are strongly opposed by the residents of the area. The small changes to the draft plan do not alter my fundamental objection to key elements of the plan. I have lived in West Horsley since 2009 and intend to be a long term resident, and therefore am deeply concerned about the proposals set out in the draft plan. I am also a Chartered Surveyor with 16 years of experience and so have a clear professional understanding of the issues involved. My objections are as follows.

Overall Level of Housing Development proposed for Guildford Borough. I object to overall level and type of housing development which is proposed for the Borough. I have seen no clear rationale for the considerable growth projections which underpin the housing calculations. The revised proposals show a modest reduction in new homes per annum compared with the 2016 draft plan, but to a level of 654 homes which is almost identical to what was originally proposed in 2014. The overall housing growth figures suggested are close to double the Office for National Statistics prediction for the growth of Guildford. Generally, I feel that far too many of the proposed development sites are located within the Metropolitan Green Belt. This will have a damaging effect on the quality of life across the Borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/1766  Respondent: 8768353 / Roger Hall  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Guildford Borough Council’s draft Local Plan proposals to build 1,800 houses, an industrial park and a highway on the slopes of the Hog’s Back at Blackwell Farm, which will:

- Destroy views from the Hog’s Back ridge – a nationally designated Area of Outstanding Natural Beauty
- Remove 72 hectares of scenic farmland and additional woodland from the green belt
- Increase tailbacks on the A31 and traffic congestion
- Result in rat running through local roads
- Add to Guildford’s pollution.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/6089  Respondent: 8768417 / Casper Gorniok  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy A46
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

MY OBJECTIONS ARE THESE:

1) BUILDING A SECONDARY SCHOOL:

I've done a bit of investigating, and I understand that Ash Manor (Ash/Tongham) and King's College (Park Barn / West of Guildford) are undersubscribed and potentially failing schools.

Under current legislation with the Department of Education, surely these schools could be run directly by the government in order to improve standards. Change the management / teachers and so forth.

The facts are that both schools are in highly populated areas, with a pool of students to continually draw from.

Also, surely it is eco-friendly and safer for all the obvious reasons to have children living close to their schools.

There’s also a huge assumption that the proposed new school:

1. Will draw from the proposed development of new homes + of course the existing population in Normandy. One has no idea who will buy these homes. It is perfectly possible that these children could go to a wide number of private schools in the surrounding areas, or, other state schools.
2. There is absolutely no guarantee that a new school will be a “great” school. Reputations take time to build, and the staff need to be attracted and retained.

Pro-active Alternative Plan: For King’s College:

I recommend a new site over the railway from within Surrey Research Park (where a new station could be built, easing pressures on Guildford town centre).

There's also access to Surrey Sports Park to keep the children fit, and maybe an experiment with University of Surrey to work from Primary through Secondary School to ensure children have the key skills from an early age. This could be a breakthrough partnership.

I know the BIG issue is funding. Surely a creative partnership involving Guildford Businesses and the new schools could provide the employees of the future, along with lifelong learning initiatives.

Also, there has to be alternative funding to a builder's profits. We need to get benefactors interested. Companies who want to sponsor etc. I totally understand the squeeze on Council finances, but that is no excuse to bulldoze through a village forever.

2) INFRASTRUCTURE & ENVIRONMENT:

Normandy has well-documented issues with:

- 2 railway bridges that are frankly dangerous - and that Network Rail know this as fact. This could be catastrophic in the future as previous repairs have never resolved the structural problems.

- Roads that have poor access: Glaziers Lane / Flexford Road & Westwood Lane in particular:

1. a) There's a very dangerous junction at Guildford Road / Westwood Lane & School Lane, which is absolute chaos at opening/closing time for Wyke Primary School in Normandy.
1. b) There’s also the crossroads of Westwood Lane & Flexford Road – a site which has seen many serious accidents over the past 30 years. This could increase exponentially if the new development goes ahead.

1. A323: Over the years there has been increasing traffic-flow on this road due to the development of the A31 upgrade & A331. Both for peak-time traffic, and specifically when there are accidents on these roads, which happen frequently. For instance, a bridge would need to be constructed at Ash railway station to ease congestion. Westwood Lane is also a “rat run” for the A331 to the Hog’s Back when there’s an accident on that dual carriageway. So, with a school being built + the traffic from an incremental 1,100 houses being built, there would be gridlock.

• **High Flood Plain:** throughout the proposed development area. This will have catastrophic consequences if land is developed. There’s a Flood Forum already in place as issues are already widely known.

• **Insufficient Sewage / Drainage:** highlighted by “in-fill” developments in Beech Lane within past 5 years. This is a potential health-risk.

• **Threat to Thames Basin Heath Special Protection Area (TBHSPA):** Normandy is home to extensive wildlife colonies and sites of Special Scientific Interest (SSI). Also, it must be pointed out that there was an exceptional incident at the government’s Merial Animal Health Facility in Pirbright, Surrey a few years ago, which released poisons into the river stream. The re-percussions were felt in Normandy, due to the interlinked drainage / river systems. If there’s future development in Normandy, this could be catastrophic.

3) **GREEN BELT:**

I have always believed that Surrey County Council / Guildford Borough Council MUST:

1. a) Build on brownfield sites FIRST, and overcome the challenges of these sites.
2. b) Re-cycle empty & under-used buildings & office blocks. Revitalise town centres (do we REALLY need that many shops?).
3. c) Re-use state owned assets (like what will be happening in Aldershot for instance).
4. d) In-fill sensitively. In Normandy we've built about 100 properties in the past 15 years. Same again is feasible. I do also think a sheltered housing proposition would be ideal, given the many people in the village who are elderly and want to downsize. This could re-cycle the “housing stock”.

It will be a blot on the reputation of Guildford Borough council if such a project were to go ahead because it was "legally" acceptable. Building on protected Green Belt land will set a very dangerous precedence for the future.

Once land is gone, it cannot come back into use. More farmland is needed for a growing population.

Decisions affect people / environments and quality of life.

4) **NO MORE TRAVELLERS’ SITES:**

Over the last 20-25 years, Normandy has become home to more than its fair share of travellers [Response has been redacted due to statements being considered contrary to the Council’s duty under the Equalities Act 2010 to eliminate discrimination, harassment, victimisation against persons with a protected characteristic; and to foster good relations between persons with a protected characteristic and persons who do not share it].

There are ample sites throughout the borough elsewhere.

Specifically, we have at least 3 sites already.

5) **LEGAL ISSUES:**

I'm far from a legal expert. But I simply believe if it was NO for Normandy in 2014's Local Plan. I just don't see how the "legal context" has changed so drastically in two years. This is Green Belt Robbery - at a time when the country needs to be
more sustainable and grow more of our own foods of all kinds. If anything, Normandy needs an entrepreneurial farmer who can revitalise our underutilised farmland.

At no time has there ever been any early and meaningful engagement and collaboration with our village. Taylor Wimpey have bypassed all protocols in submitting their 2014 plans.

IN SUMMARY:

Thank you for reviewing my reasons why I cannot countenance ripping out the heart of Normandy into the unknown. Coupled with the chaos it will bring to thousands of people's lives for many, many years.

Carefully thought through, the existing secondary schools in Ash & Park Barn can survive & flourish under new management. I've worked in many turnarounds / relaunches in my business career. The same can be done for these schools.

There are many major environmental, infrastructure, “quality of life” issues and day-to-day practicalities that are flatly ignored by Strategic Site A46’s proposed development of Normandy. Let alone all the legal & procedural protocols that have not been followed or adhered to.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/412  Respondent: 8768417 / Casper Gorniok  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/3245  Respondent: 8768417 / Casper Gorniok  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A46
We fully support the removal of site allocation A46. It was proved beyond all doubt that there was no strategic case for the secondary school to be sited in Normandy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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We object in the strongest possible terms with regards to including a plot to the South West of Flexford. As mentioned in our objection to Amendment 2 - Normandy simply doesn't have the infrastructure to cope with increased traffic. Plus, we are very aware of the desires to build on land towards the Hog's Back which is totally and utterly unacceptable. We thought that The Surrey Hills (which this is part of), was exempt from any house building whatsoever.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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We support the removal of site allocation A47. As is always the case with Normandy, we have significant infrastructure issues (local roads, very old railway bridges etc) which simply cannot cope with more traffic. Day-to-day is bad enough when there are issues with the A31 dual carriageway and traffic is diverted through the village to the A323. It is only a matter of time before more serious accidents occur.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
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<td>The huge number (nearly half) envisaged as being necessary, to be built in one area of the Borough is going to turn pleasant villages into urban sprawl and lovely Guildford town into a conurbation. Lord Onlsow's plans for building a huge number of houses in Merrow on green belt land are not included yet.</td>
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<td>The demand on education, health and transport services not just locally but all over the area is not coping with the numbers now without the increase of thousands of new homes.</td>
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<td>The potential risk of flooding on Slyfield Green where there has been problems, plus on the surrounding roads at the Aldi junction, Merrow and Epsom Road. There is always water on the road at Gosden Hill, where will that river go?</td>
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<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3</td>
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4. There are not enough jobs in Guildford for all the potential new residents so most will be commuting in all directions but particularly to London. There is no infrastructure in place. There may be a new station but there are not enough trains possible to be run on the existing lines. Already no seats available on morning or evening trains on the main line and branch lines to Waterloo. Traffic on the A3 is excessive and the roads in Guildford Centre and around cannot cope now, it only needs one small event to cause havoc to thousands and delays of hours. Park and ride is affected by any road problems and doesn't run long enough hours for commuters to and from London.

5. The Wisley Junction 10 where the A3 meets the M25 is already an accident black spot.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<td>The loss of any Green Belt is detrimental to the health of future generations. Pollution to existing residents and potential new residents in view of increased number of cars on the roads and long queues of waiting cars at junctions.</td>
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A longer period of consultation needed to assess the future needs in view of the altered political scene when there are already doubts of the numbers of houses allegedly needed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/2071  Respondent: 8768673 / Maureen Worley  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Guildford Borough Council’s draft Local Plan proposals to build 1800 houses, an industrial park and a highway on the slopes of the Hog’s Back at Blackwell Farm, which will:

- Destroy views form the Hog’s Back ridge – a nationally designated Area of Outstanding Natural Beauty
- Remove 72 hectares of scenic farmland and additional ancient woodland from the green belt
- Increase tailbacks on the A31 and traffic congestion
- Result in rat-running through local roads
- Add to Guildford’s pollution

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/481  Respondent: 8768673 / Maureen Worley  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the site merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPA16/3745  **Respondent:** 8769217 / Ann Dickinson  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Clandon

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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I object to so much development in one area of the borough. While I accept the need for more housing it seems bad planning to create so much housing in one area because this will have a dramatic increase in traffic especially on The Street in West Clandon.

We live at [Response has been redacted due to statement containing personal data which cannot be disclosed due to the provisions of the Data Protection Act 1998] and everyday at around 6pm there is a slow moving traffic jam back from the traffic lights at the junction with the A246. The Street is too narrow and windy to take more traffic, every year there are accidents on this road. There was a car crash just last week on the 12 July and this year alone two cars have crashed through our fence and into our garden. More cars resulting from the housing you are proposing will increase the dangers of further collisions and to pedestrians.

I object to all erosion of the greenbelt. Unless we keep the greenbelt there is a danger villages such as West Clandon will lose their identity as has already happened to Merrow, which has become part of the Guildford urban sprawl.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** pslp171/2690  **Respondent:** 8769569 / Mike Heath  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
We have to believe there are insufficient homes and therefore we have to believe homes are required. We have to believe the number of homes needed. It is important to choose carefully where these homes are to be built - either as tagged on to existing or create new home areas. It is important to provide the correct design of easy to maintain homes - which the young can afford to purchase or rent. It is important to build on land which is Surface Water Managed and suitable highway/transport provided - i.e. Highway speed controlled, ample traffic filtering (traffic lights) and adequate parking facilities. It is important to provide reasonable space for each dwelling for healthy living - i.e. do not over-develop with density of build. There are dwellings and land in a neglected state that could be redeveloped into affordable flats/first time buys.

There are roads/junctions that could be redesigned to filter traffic/ease congestion. There are businesses that could be moved so to provide parking. The impact on our highways needs some forethought with changes before development, rather than deal with gridlock. So much time is wasted now due to congestion and the lack of traffic control/filtering. Facilities such as wastewater treatment should be put in place before demand is increased.

We cannot afford sustainability now due to the lack of funds. We are having to accept low standards now - how long can this be tolerated?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
1. SITES - POLICIES A1 TO A57

I OBJECT to all strategic sites proposed in the draft Plan to be built in the Green Belt.

1. I object to the identification and allocation of sites in this plan without regard to Green Belt, infrastructure or other constraints. The plan says that “allocating these sites does not grant planning permission for development.” However, each of the sites will be removed from the Green Belt and will be available in principle for development and non-Green Belt uses. The inclusion of these sites without detailed site by site justification shows contempt for the thousands of detailed comments the Council have received about individual sites ever since the Issues and Options consultation in 2013. The plan has hardly changed since the Council received 20,000 objections to its first draft plan in 2014. The Inspector considering the plan may conclude that the consultation has not been properly conducted.

2. The housing needs assessment is flawed in various respects and overstates housing need. In addition since it was produced, the referendum Brexit decision has almost certainly reduced future housing need and rendered the previous assessment seriously out of date. As a result any assessment of Green Belt sites which took place to consider whether “exceptional circumstances” existed to outweigh the harm to the Green Belt was based on false premises and should be reconsidered.

3. Having determined housing need the Council was entitled to consider constraints before determining the housing number. I believe that as Ill as being entitled to do this the Council was required to give proper consideration to constraints. The scarcity of sites outside the Green Belt as Ill as infrastructure (most notable roads) considerations all represented constraints which should have been taken into account in determining the final housing number. Accordingly in this regard our objection to the allocation of Green Belt sites is twofold. First I believe constraints should have been applied. Secondly I believe the Council did not properly consider constraints and that their decision making process was flawed and thus subject to being set aside by the Inspector.

4. Even if having properly applied constraints there is a need to develop in the Green Belt then specific Green Belt sites should not be included in the plan unless “exceptional circumstances” for development are proven in relation to that specific site, as stipulated repeatedly in the NPPF. The Green Belt should trump short-term considerations such as perceived housing need, as case law has established. There needs to be a specific balancing exercise conducted on each Green Belt site weighing the harm to the Green Belt against the very special circumstances which are argued in favour of development at that particular site. There is no evidence this has been done. Instead the council have appeared to say that having chosen a housing needs figure and decided it cannot be met without building on Green Belt then there is no need for any further consideration and any convenient Green Belt site can be allocated for building at will.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/3020  Respondent: 8769793 / Laura Richards  Agent:  

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
1. **APPENDIX D**

I OBJECT to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)

- The “objectively assessed need” figure of 693 homes a year is too high.
- A professional review by NMSS has concluded that, even basing the calculations on a period of stronger economic and student growth, the housing need figure should be revised down to 510 homes a year and the method changed to consider student housing need separately due to the distorting effects.
- The current SHMA inflates the proposed housing figure due to
  - failure to correct for errors in the historical data for international migration flows,
  - issues with the way it considers students and affordability and
  - flaws in the method for estimating the number of homes needed to support job growth.
- It is unacceptable that demographic and economic model assumptions have been withheld and cannot be checked making the process unaccountable.

The Plan’s proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the borough, it is over double the previous figure of 322 used in previous plans. The SHMA report methodology is I believe inaccurate; it inflates the needs of the borough by distorted student numbers. However, it is based on commercially confidential modelling assumptions that cannot be checked or reviewed. There is no transparency to this evidence base and it is therefore impossible to assess its accuracy. This is not democratic and is not appropriate for consultation of the Plan.

The National Planning Policy Framework allows the overall housing target to be reduced to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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<th>Respondent: 8769793 / Laura Richards</th>
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<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy A25</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. **POLICY A25 - Gosden Hill Farm**

I OBJECT to Policy A25 with proposals for Gosden Hill Farm.

The Green Belt at this point serves the important function of separating West Clandon from the edge of urban Guildford. Development here will cause the two to coalesce defeating one of the objectives of the Green Belt. If this development
proceeds I believe the narrow strip of Green. Belt remaining between Guildford and Clandon at this point will be too narrow and will come under further pressure.

It will represent an undesirable ribbon development along the A3. It will be highly visible from the A3 when approaching Guildford and will, in conjunction with A43a at Garlick's Arch give the appearance of almost continuous development from Send through to Guildford.

The Plan does not put forward any evidence that exceptional circumstances exist to justify removing this site from the Green Belt.

The development will overburden the local road network and increase congestion on the A3 and A247 through the centre of West Clandon. This is already very heavily used whilst being unsuitable for designation as an A road. In places it is too narrow for two lorries to pass causing them to mount the pavement.

Note the following accident data:

2010 –2014 from Crashmap data

- Clandon Cross Roads Area to Bulls Head - 17 incidents
- Bulls Heads Head to Bennett Way - 8 incidents
- Bennett Way to Highcotts Lane - 15 incidents
- Tithebarn Lane to Portsmouth Road Birch Close - 8 incidents

2015

- 21 Oct 2015 – A247 near shell garage - Three vehicles collided causing delays
  Surrey Fire and Rescue deployed.

2016

- 15 April 2016 12 year old boy injured in The Street – A247 closed in both directions
- 28 April 2016 A3 West Clandon London bound between A247 Tythebarns Lane (Burntcommon and M25J10 (Wisley Interchange) congestion on A3 to A3100 Clay Lane Burpham
- 30 6 2016 Motorcyclists with injuries airlifted to hospital Send Marsh Road

Attempts have been made over many years to reduce traffic, traffic speeds and accident risks through West Clandon, however little has been achieved as the road cannot be widened and SCC is reluctant to impose further speed limits as congestion is already very high.

I object most strongly to the proposal for a link road to bring traffic from the Gosden Hill development to the proposed 4 way junction at Burnt Common. This has the potential to generate large volumes of traffic (including commercial vehicles) on the A247 through West Clandon - a road which is already under traffic stress (see below).

The land in Gosden Hill does exactly what the Greenbelt was designed to achieve. It provides a green buffer between the Guildford Urban Area and West Clandon, gives Burpham a defined green boundary and breathing space and it hides Guildford town from visitors until they pass the off-slip to Burpham.

No exceptional circumstances have been demonstrated for building on this site and therefore it does not comply with paragraphs 87-89 of the NPPF. It stops the sprawl of Guildford town, assists in safeguarding the countryside from encroachment and assists in urban regeneration by encouraging the recycling of derelict and other urban land. All of these are requirements of the NPPF.

The scale of Gosden Hill is out of proportion to West Clandon. It would have four times the amount of housing plus shops, offices/factories, GP surgery, schools. Development on this scale would blight a historic village with a history going back to the doomsday book and beyond.
Gosden Hill is the most obvious location for the north end of an A3 tunnel. It has rising ground and is situated just before the urban area. If it is built on, it will be very difficult to construct a tunnel.

The development will generate in the region of 6,000 vehicles which will pour on to the A3 which is stationary every day during rush hours. The linking of the A3100, B2215 and A247 would channel thousands of cars through the narrow, winding road through West Clandon, a road where large lorries mount the pavement virtually every day and through Send and Ripley which are also severely constrained.

The volume of traffic will greatly increase air pollution which is particularly critical given the proposal to build two schools.

Currently, a two way junction at the site would require vehicles wanting to go north on the A3 to go through Burpham which is grid-locked every day.

Burpham’s sewers are at capacity. Sewage would have to be pumped to Slyfield for processing, a project of enormous cost.

There is inadequate fresh water in Guildford and current supplies could not meet the needs of a development of this size.

Electricity supply is also inadequate and would require a big infrastructure development.

The railway station was rejected by Guildford Borough Council in 1984 because it feared Gosden Hill would become a dormitory estate for London.

The wording of the Local Plan with regard to Gosden Hill is so loose that the developer could virtually do whatever it wants.

The remaining agricultural land between Gosden Hill and West Clandon is so small that it is highly likely to be uneconomic and therefore a prime candidate for further development which would roll the Guildford Urban Area over West Clandon towards East Clandon and Wisley.

If the Strategic Sites are developed, the north of Guildford will deliver 36%, 5,036 houses towards the total of around 14,000. The infrastructures of the existing villages and the A3 will be overwhelmed by the scale of development.

A new on-slip at Burpham would only be 1.8km from the on-slip at Burnt Common which is against Highway England’s requirement of 2km.

Development of the A3 at best will not start until after 2020 and the building of a tunnel, which is only an “aspiration” in the Local Plan, is likely to be many years after. In the meantime given that developers build houses to provide cash-flow for infrastructure, Gosden Hill will have a crippling effect on villages like West Clandon and the A3.

Gosden Hill already has surface water problems. Merrow Stream crosses the site. No hydrological survey has been carried out to assess the implications. Electricity pylons run through the centre of Gosden Hill which have health and safety issues.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43</td>
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**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**
### 1. POLICY A43 AND A43a – Garlick’s Arch

I OBJECT to Policy A43 and A43a on Garlick’s Arch.

The site was only inserted in the draft plan at a late stage just before publication of the consultation draft which is a shabby way for the Council to proceed. The site is not a sustainable site being far from any infrastructure facilities and transport links. The bus service is infrequent and it is almost certain any future residents will rely almost entirely on cars for journeys. Similarly any employees at the employment areas will almost undoubtedly arrive and leave by car.

The site is susceptible to flooding and will not make a suitable site.

The Green Belt at this point serves the important function of separating West Clandon from Send. Building here will cause the two to coalesce defeating one of the objectives of the Green Belt.

I have seen no evidence that exceptional circumstances exist to justify removing this site from the Green Belt or that this important issue has been addressed. The Green Belt and Countryside study did not even consider this site.

It is understood the Council's eyes may have been turned by the possibility of receiving for free the land which might be used for new A3 slip roads in return for allowing this development, thus justifying it as some form of enabling development. However the slip road land if needed could be safeguarded in the plan and acquired by compulsory purchase when required. Lack of current funding for the slip road is not a justification for allowing the development of this site. If the slip road is genuinely needed then government funding will be available for it. (One of the reasons for turning down the so called enabling development proposal intended to fund the rebuilding of the Howard of Effingham School was that the redevelopment of the school was not essential. As and when it became essential Government funding would become available. Accordingly enabling development was not necessary. The same principle applies here.)

The A247 running south past this site through the centre of West Clandon is already very heavily used whilst being unsuitable for designation as an A road. In places it is too narrow for two lorries to pass causing them to mount the pavement- often at speed. It has narrow bends with poor sight lines, an infants school and a hump-backed bridge concealing the entrance road to the station for southward traffic. In addition, there are no continuous footpaths which forces pedestrians to cross and re-cross the road. Development at Garlick’s Arch will only exacerbate the problem and make the road even more congested and unsafe for pedestrians.

The development will cause harm to the ancient woodland on and by the site.

Taken together with the Gosden Hill site, there will be a ribbon of development along the A3 in contrast to the current “soft” edge approach to Guildford.

Garlick’s Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8). There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).

The Plan states the preference is to making the best use of previously developed land. Yet at the 11th hour a perfectly acceptable brown field site at Burnt Common, capable of accommodating approximately 100 houses, was removed from the Plan and replaced with the Garlick’s Arch site. There was no proper consultation in relation to the inclusion of this site. Why was a brownfield site removed and replaced with a Greenfield site? There is no evidence that Section 18 of the Planning and Compulsory Purchase Act 2004, which requires local planning authorities to produce a Statement of Community Involvement, has been complied with for this site. This only came to light for local residents following a Council meeting on 11th May 2016.
Moreover, Guildford Borough Council’s own Green Belt & Countryside Report does not address Garlick’s Arch at all, so there is no evidence base to support the inclusion of this site.

National Planning Policy promotes sustainable developments, with sustainable transport. With ever reducing bus services in the area and no train station within reasonable walking distance it is impossible for any development on this site to offer a sustainable transport solution. Development on this site is wholly inappropriate (Policy I3).

The stream, which runs through the site, is identified as having a high risk of flooding by the Environment Agency. There are other sites that do not flood that can be developed and therefore this site should be removed from the Plan (Policy P4).

This site is bordered by Ancient Woodland and within it a number of trees are protected by Tree Preservation Orders (Policy D3).

The site has an abundance of wildlife, some of which are protected. It is home to many types of owls and bats, with the woods having cuckoos and woodpeckers. In addition there are regular sightings of badgers, deer and red kites. The development of the site will result in the loss of habitat. No wildlife report has been conducted on the site. (Policy I4)

It is clear that with this site being added at the 11th hours no infrastructure planning has been undertaken. The Infrastructure Schedule makes no provision for any infrastructure improvements for this site. How will the local services such as schools and doctors cope, many of which are already at capacity? (Policy I1)

Furthermore, several electricity pylon runs through the site, which will have the potential to be a health hazard for any residents.

I OBJECT to the inclusion of the land for new on/off ramps at Burnt Common (A43a)

The addition north facing ramps to the A3 at Burnt Common would be a disaster for local communities. There is no requirement for local traffic to access the A3 to the north, but the addition will draw in a huge amount of ‘through’ traffic.

The route from London/M25 to Woking or would now be through Burnt Common and Send. Equally traffic from the east of Guildford (Merrow etc) and the A25 will now go through West Clandon and Burnt Common. This will cause immense damage to those areas on small roads which cannot be improved.

This Plan does not address the needs of local communities or the Borough in this regard. There has again been no Section 18 consultation on this.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12536  Respondent: 8769793 / Laura Richards  Agent:
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
1. **POLICY D3**

I OBJECT to the damage to the historic environment as a result of the scale of the proposed development (Policy D3).

I OBJECT to the local plan based on the impact it will have on the special countryside of the borough.

The proposed development at Garlick’s Arch (A43) will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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1. **POLICY D3**

I OBJECT to Policy D3 - Historic environment

I object to this policy as it is very weak and I do not think it is clear enough in its support for the conservation of the historic environment. It provides for development which will “enhance” heritage assets which I fear is a developer’s charter as it leaves plenty of room for abuse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
1. POLICY D4

I OBJECT to Policy D4 - Development in urban areas and inset villages

The policy should place much greater emphasis on residential development in the existing urban centres. In this way housing needs can be met without resorting to large developments in the Green Belt. There are urban areas in need of regeneration but these are ignored in favour of Green Belt development.

The policy should not be applied to the villages which should remain in the Green Belt. Unrestricted application of this policy to the villages intended to be inset will change their characters radically and for the worse. The development it encourages will increase traffic and congestion disproportionately.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12533  Respondent: 8769793 / Laura Richards  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. POLICY E1

I OBJECT to the sustainable employment policy (Policy E1)

I object to the inclusion of a strategic employment site at Gosden Hill Farm. Employment sites should be concentrated on previously developed land in more sustainable locations with good transport links where the infrastructure can support development. Warehousing, distribution and industrial premises cause considerable commercial traffic, noise, pollution and general disruption. They are not good neighbours for schools and 2000 houses. Many of the jobs will be taken by people outside the area leading to additional congestion in Burpham and on the A3.

I OBJECT to the inclusion of a strategic employment site at Garlick’s Arch. It is in a non-sustainable location remote from any facilities of any kind and with poor public transport links. It is unlikely jobs there will be taken by local residents and it is likely all travel to and from work will be by car adding to local congestion. Employment sites should be concentrated on previously developed land in more sustainable location with good transport links where the infrastructure can support development.

The site is in any event subject to frequent flooding and unsuitable for development.

If developed, the new employment site at Garlick’s Arch, Send Marsh/Burnt Common (A43), would be treated as a Strategic Employment Site.

The proposed development of up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8) at Garlick’s Arch (A43) is in the scheme of industrial development relatively small. Just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m. The Garlick’s Arch site which is in the Green Belt should not be developed as a Strategic Employment Site when there is a suitable alternative brownfield site very close by, which is far more sustainable.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12534  Respondent: 8769793 / Laura Richards  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. POLICY E2

I OBJECT to the location for new employment floorspace (Policy E2)

I object to this policy. It would be more sensible to confine new office and research and development floor space to the urban Guildford area. I also oppose the policy of expanding the Research Park onto Blackwell Farm. No exceptional circumstances, as defined under the NPPF, have been advanced to justify incursion into this permanent and high-quality area of Green Belt.

Proposals for new industrial, warehousing and storage (use Class B1c, B2 and B8) floorspace will be directed to the Industrial Strategic Employment Sites.

There is no need for the new employment floorspace to be located at Garlick’s Arch or Gosden Hill Farm, when near to these sites at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12535  Respondent: 8769793 / Laura Richards  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Page 2516 of 3335
1. **POLICY E5**

I OBJECT to the loss of rural employment (Policy E5)

Policy E5 supports the retention and development of local services and community facilities in our inset and identified villages. Yet the development at Garlick’s Arch (A43) would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises. The Plan does not promote rural employment; rather it will result in the loss of existing local rural businesses.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ( )**

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1. **POLICY E6**

I OBJECT to Policy E6 - The leisure and visitor experience.

The policy should acknowledge that whilst in some areas new and enhanced leisure facilities are valuable (for example the new Opera House at West Horsley Place Towers), much tourism depends on the undeveloped nature of Green Belt areas surrounding Guildford. Accordingly the policy should recognize that in many rural areas new and enhanced visitor facilities may be unnecessary and counterproductive, particularly away from existing buildings and development. For example the attraction of Newlands Corner is its undeveloped nature. Significant development of visitor facilities there is likely to diminish rather than increase its attractions. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment. Heritage sites and the Green Belt are particularly vulnerable to harm.

Tourism and visitors do not depend on new visitor “attractions” and could actually be damaged by them, as compellingly argued in the current debate over Newlands Corner. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment/“Disneyfication”. Heritage sites and the Green Belt are particularly vulnerable to harm.

Guildford has many “leisure and visitor attractions” already. The case for creating more is not made and no examples are given. Instead, the plan’s explicit priorities should be:

1. To protect the borough’s prime leisure and tourism asset, its countryside, from inappropriate development. This is all the more valuable because of its accessibility from London, the rest of Britain and the Continent, in that order. Rural residents are its custodians and require no Council interference. Economically, the most valuable forms of tourism, such as walking and cycling, require no new development. In the overcrowded South-East of England, lack of development is a leisure and tourism asset, not a liability.
2. To help make Guildford’s river landscape less off-putting and support town-break packages for high-value tourists. To achieve this, the policy needs to define what leverage, if any, Council planners have to influence normal tourism market mechanisms.
3. To help private providers market local tourism. This need not involve extra spending. The Council could, for instance, help co-ordinate ready-made, local tourism packages under a distinctive brand at an all-in price. An “English town break” (including B&B accommodation, a walking tour of Guildford, a pub lunch in the Surrey Hills, a visit to Wisley Gardens and a National Trust property and a Southwest Trains travelcard for a day out in London) would be highly attractive to many European visitors who currently by-pass Guildford to go to Bath, Oxford or Cambridge instead.

4. To rule out the redevelopment of scarce rural hotel sites (e.g. Thatchers, East Horsley, earmarked for 40 new houses under Site A37 of the plan yet just a short walk from the new opera house).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12545  Respondent: 8769793 / Laura Richards  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E7

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. POLICY E7

I OBJECT to Policy E7 Guildford Town Centre

The policy “vision” describes protecting the Guildford’s unique setting and historical character and sets out some of the ways this will be done. However none of this is included in the formal Policy wording in the blue box. I suspect the Vision wording is effectively of little or any force. These principles should be included in the formal policy.

There should be a much greater focus on residential use of the town centre where many people would like to live and where the necessary amenities and infrastructure exist. The policy misses the opportunity to propose forward looking sustainable residential development plans in, for example the Walnut Tree Close area, where very significant numbers of new homes could be provided. Such town centre sites could meet much of the housing need over the plan period without harming the countryside.

There is an urgent need for a strategy to focus on brownfield redevelopment before considering development outside the existing urban area.

The policy does not address any of the major issues raised by the Council’s own Town Centre Master Plan, the Guildford Vision Group’s proposal for new river and rail crossings or plans for the redevelopment of Guildford Station, all of which are already the subject of public discussion.

The policy also fails to provide guidance on design requirements, as required by the NPPF.

The policy and surrounding text concentrates too much on shopping without regard to its nature which risks a proliferation of dull high-street chain stores. The policy should seek to enhance Guildford’s character and encourage a wider variety of small shops including locally owned businesses and shops of use to consumers. (For example there is no butcher in Guildford.)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
I OBJECT to Policy H1 – Homes for all. Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan period. It fails to set rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions.

The housing mix is based on out-of-date, pre-Brexit projections and on assumptions set out in a flawed SHMA that has not been scrutinised or evaluated.

I support higher density development in the urban area, without resorting to dehumanising, high-rise buildings that developers commonly claim are necessary for financial viability. Much of Guildford town could usefully be regenerated with 4-5 storey blocks with landscaping and underground parking, as often seen on the Continent and, recently, in London.

Student accommodation should provided for 100% of new students and more than 60% of existing students, which would free up ideal family accommodation in the urban area. Other university cities (e.g. Oxford) insist on higher percentages than those proposed in the plan. In my view, the Council’s timidity is a case of “regulatory capture” by Surrey University, which has failed to use its existing planning permissions (dating from 2004) to accommodate 3,000 students or to improve the efficient development of its campus (e.g. by building on its extensive and under-used surface car parks). If all students were accommodated in this way, 2,000 homes would be freed up in town and there would be no need to build on the Hog’s Back.

It is not appropriate to release Green Belt land to house students who could be accommodated on the Surrey campus or other university sites. The plan should take account of the university's ability to house its own students and reduce the housing number accordingly.

Guildford borough has already a higher proportion of traveller sites than most comparable boroughs. Over-provision is inappropriate given other constraints.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. POLICY H2

I OBJECT to this policy on affordable homes (Policy H2) on the grounds of feasibility and that it should be more firm and explicit on unviability in paragraph 4.2.40.

In particular a scheme is only unviable if the value of developing the land (including some allowance for development risk and a normal level of profit) falls below the sale vale of the land for alternative non-premium uses such as agriculture. The price paid for the land is not relevant. The possibility of avoiding the affordable housing obligation through use of unviability arguments only serves to inflate land values. It will become clear that developments are unviable when developers start selling land for alternative non-development uses.

It should be noted in the plan that because of Guildford's relative popularity as a place to live combined with its location close to others towns and within the London Commuter belt no amount of building will meet demand. Similarly no amount of affordable housing will ever meet demand.

In addition the definition of an ‘affordable home’ is 80% of market value. With even a 2 bedroom flat in Guildford now having a market value of +£360,000 the discounted price is still not going to be affordable to anyone on a normal income.

And at what point will ‘affordable homes’ be able to go onto the market at full market price?

As we have seen with council houses it is not long before the discounted property is sold at full market value with the original owner simply pocketing the profit.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12548  Respondent: 8769793 / Laura Richards  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. POLICY H3

I OBJECT to Policy H3 – Rural Exception Homes as this Trojan horse policy. It says that homes can be built anywhere near a settlement of any form (including agricultural land and the AONB). These homes are meant for people with a village connection, but they could be for anyone on the Guildford borough housing list. To make the housing viable, or to improve the “mix” this can include “market” housing (i.e. normal commercial development which in Guildford usually means large executive homes). This policy means building anywhere, and ignoring all historic planning restrictions.
The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove “exceptional circumstances.”

The wording of the policy is far too wide and drives a coach and horses through all other aspects of planning policy. As drafted the planning authority could be obliged to grant permission for inappropriate and unsuitable developments.

The wording provides no ability to balance the desirability of the development against other considerations including harm to the Green Belt or the AONB. (If the housing would meet identified need and adjoins a settlement under this policy wording permission would have to be granted even in the most sensitive AONB location, even if more suitable locations are available.) The policy should include the need for a balancing exercise including consideration whether more suitable locations exist.

The policy wording should not allow market housing. The ability to include market housing is likely to inflate land values, leading to a self-perpetuating need to include market housing. It may lead to spurious developer led proposals which will be difficult to resist.

The policy wording should define small, either in land size or number of units. I am concerned that if small is left undefined the policy could be used to justify significant developments. In the context of the plan a development of 150 homes might be argued as small. (If Wisley at 2,500 homes is a big development then 500 homes might be a medium development and 150 could be small.)

The policy wording should be restricted to adjoining sites or define the concept of being "closely related". In particular I believe adding the concept of safe and easy walking distance extends the potential radius within which sites will be argued to be “closely related.” Many people would regard a mile or so as an easy walking distance. (School children are expected to walk further than that before being eligible for free school travel.)

The wording of the policy itself does not require the local connection requirement for tenants to be secured in perpetuity - only the affordability must be secured in perpetuity. (For example housing could be built for retired Cabinet Ministers under this policy so long as the first tenant was required to have a local connection.) The introduction to the policy mentions this point, but it is not part of the policy itself and may carry little weight at appeal.

The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove “exceptional circumstances.” The size and location of sites should be better defined and it should be clear market housing cannot be included.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12538  Respondent: 8769793 / Laura Richards  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
1. POLICY II

I OBJECT, due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy II)

Our villages are already suffering from severe congestion for much of the day, for example the Newark Road & Rose Lane junction in the centre of Ripley and the A247 through West Clandon. The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.

Furthermore, many of the country lanes around the villages of Ripley, Send and Clandon are narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition.

I OBJECT to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces.

Many of the affected villages, such as West Clandon, already suffer from traffic congestion. Further development around these villages will only result in more traffic and more parking problems.

With some 5,000 houses being proposed close to the village of Ripley, the roads serving the village will become even more congested. Cycling has become an ever popular past time, particularly at weekends hundreds of cyclists past through the villages on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road accidents involving cyclists as a result of the development proposed under the local plan.

The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the road becoming ever more dangerous for pedestrians.

The council has a statutory obligation to protect the public and the additional traffic flows will bring added accidents, noise, pollution and injury of the public. In the case of West Clandon the Street often only has a narrow footpath on one side of the road making it very dangerous, especially when vehicles mount the pavements.

This policy as it is inappropriate and inadequate and fails to respond to the challenges raised by the proposed significant Green belt developments. The borough’s infrastructure is already heavily strained. However the plan’s determination to build large housing estates across the Guildford countryside significantly increases the need for infrastructure investment without securing the means for its provision. Placing housing in the established urban areas would reduce the need for enhanced infrastructure as would a more realistic housing number.

The policy wording says nothing about roads and traffic. The Council’s methodology for assessing traffic congestion - averaging it over periods of several hours and ignoring the effects of junctions - simply hides the problem, which will get worse as development proceeds. The schemes referred to in this policy will not solve existing congestion and the local road network has not been given sufficient consideration. Some proposed development locations would require highway schemes that are unlikely ever to happen.

Adequate infrastructure provision is a pre-condition of sustainable development. But in this plan it is an afterthought buried away in Policy II. By prioritizing greenfield over urban, brownfield regeneration, the plan creates insurmountable (and unnecessary) obstacles for itself. Common sense suggests a local plan should first assess the borough’s infrastructure capacity for sustainable development, and then tailor development accordingly. This plan, however, assumes infrastructure will follow on the heels of housebuilding as if by magic. It makes implementation critically dependent on providers outside the Council’s control and on the vagaries of CIL income. Instead of recognizing this as a key constraint, the plan is based on hope. It is also highly likely that developers faced with the imposition of large infrastructure requirements will go to court to invoke the NPPF provision that prevents authorities from imposing conditions that make a development non-viable.

Policy II requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.
Despite the Garlick’s Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents’ in the locality will see their quality of life significantly deteriorate in many ways.

Many of the utilities in the Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers. No plans to improve these services should mean no development of the Garlick’s Arch site.

Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are already at capacity and suffering from funding cuts or freezes. Any further development without funding will place further stress upon existing health services.

Police services are seeing funding reduced. The development of the proposed 13,860 homes during the plan period will stretch the police services further and is unsustainable.

There is no provision of the increased capacity of Guildford hospital, where is this assessed and remedied?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I am a long term resident of West Clandon, having grown up here myself, and now bringing up my own young children in the village.

I OBJECT in the strongest possible terms to the Guildford Borough Proposed Submission Local Plan (June 2016). This Plan is unsustainable, unworkable and, in many provisions, unnecessary.

I set out below my objections to specific policies and matters within the Plan and would make in addition one key point upfront regarding traffic – I have seen first-hand over the years the increase in traffic through the village on a road (the A247) which simply cannot cope with it. The pavements are narrow, the road is narrow and there are difficult bends and twists. The cars and large lorries travel far too fast through the village and there are too many of them. Only this week there was a serious accident causing 2 cars to fully mount the pavement, and this happened just minutes after a group of children passed by that point walking to school. It can surely only be a matter of time before there is a tragic loss of life on this road and as such I object in the strongest possible terms to any further development which leads to even more traffic passing through West Clandon – including the proposed developments at both Gosden Hill Farm and Garlicks Arch.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
1. POLICY I3

I OBJECT to poor air quality concerns (Policy I3)

Paragraph 4.6.27 of the Plan states that “Development must also mitigate its traffic impacts, including its environmental impacts and impacts on amenity and health.” The significant level of development being proposed, particularly in the north east of the borough will lead to considerable further congestion, despite any attempts to mitigate this through travel plans. This will be particularly acute in built up residential areas and will only lead to greater levels of air pollution, which will have a detrimental effect on local residents and their health and can result in early death.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12531  Respondent: 8769793 / Laura Richards  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. POLICY P2

I OBJECT to not protecting the Green Belt (Policy P2)

This policy does not sufficiently safeguard the Green Belt even though Green Belt constitutes 89% of the borough and should be the cornerstone of all local planning policy. The Green Belt is not the Council’s to give away and once it is gone it is gone forever. Sacrificing areas of the Green Belt to a developer influenced growth agenda is a betrayal of future generations and does not constitute sustainable development.

The Green Belt should be protected in perpetuity, but Policy P2 seeks to justify excessive development in supposedly protected areas. This is in breach of party manifesto commitments and contrary to previous responses to public consultation. It is disreputable to argue, as the Council does, that the Plan would involve the loss of “only” 1.6% of the borough’s Green Belt. Leaving aside the reliability of that statistic, the NPPF does not set an “acceptable” percentage. The fact remains that the plan proposes that 65% of the housing plus industrial development be built on land to be taken out of the Green Belt.

Paragraph 4.3.16 is seriously deficient in simply stating that the Council considers that exceptional circumstances exist to justify amendment of Green Belt boundaries. The exceptional circumstances are not identified. It is clear from national guidance that unmet housing need is not on its own an exceptional circumstance. Even to the extent that exceptional circumstances exist, these have to be balanced against the harm to the Green Belt in the specific sites proposed to be taken out of the Green Belt. This balancing exercise appears not to have been done.

The Countryside Study which the Council may argue fulfilled the need to demonstrate the exceptional circumstances required to justify removal of areas from the Green Belt was a simplistic tick box exercise. Within limits it may have answered certain questions about different attributes of different areas of Green Belt but it did not carry out the balancing exercise needed to determine whether specific exceptional circumstances justified removal of specific areas of land from the Green Belt. I believe that each of the identified Green Belt site proposed to be removed from the Green Belt should be carefully assessed against any exceptional circumstances in deciding whether it should be removed from the Green Belt in the final plan. This exercise should bear in mind that housing need in itself is not an exceptional circumstance and nor is
the Council’s growth aspiration. An important consideration is that more housing need could be met on urban sites than is currently planned. The Plan has fallen into the developers’ hands and developers prefer building on undeveloped land rather than brown field sites.

I note that the Summer 2016 edition of "About Guildford" (published by the Council) on page 5 states that "... the Plan rejects any schemes that would have a detrimental impact on the Green Belt.” This is demonstrably untrue and I consider this to be a deliberate untruth which compromises the consultation process. I would ask that this untruth be corrected and the consultation period restarted after the correction has been given the same distribution as the original statement. (I assume the document was delivered to most houses in the Borough.) I reserve the right to argue before the inspector that the consultation process was flawed and ineffective because of this.

I OBJECT to the “insetting” of 14 villages from the Green Belt. Contrary to assertions made in the Plan process many of these villages do contribute to the openness of the Green Belt and there is no need to inset them.

I ALSO OBJECT to the wholesale extensions to the settlement boundaries in many villages to allow for infilling and that infilling is also proposed outside the settlement boundaries of 11 further villages. Many Guildford villages are linear. It is all too easy to square off boundaries by including countryside bounded on only one or two sides by existing development, claiming it contributes nothing to the “openness” of the Green Belt, a term which neither the plan nor the NPPF defines. The NPPF’s other 4 tests of Green Belt status, including the prevention of urban sprawl, are ignored. Effectively, this policy makes all villages within the Green Belt vulnerable to large blocks of new development and seems almost calculated to secure the rejection of the plan as a whole.

To “inset” two-thirds of the borough’s rural villages on the grounds that they no longer contribute to the purposes of the Green Belt is extreme and inherently implausible, given the borough’s location on the edge of Metropolitan London. I cannot see how such extensive areas fail to contribute to the purposes of the Green Belt under the NPPF, but this could quickly be the case if the proposed “insetting” and boundary extensions go ahead.

This policy is wildly disproportionate in terms of any foreseeable development need and has caused tidal waves of opposition from residents. It flies in the face of NPPF paragraph 17’s aim of “empowering local people to shape their surroundings” and other NPPF provisions.

Paragraph 4.3.17 states that “the general extent of the Green Belt has been retained.” I believe this should be deleted as an untruth.

In addition I OBJECT to the proposals to remove from the Green Belt the so called ‘strategic sites’ of Wisley Airfield (A35), Gosden Hill Farm (A25) and Garlick’s Arch (A43) and all other strategic sites. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these sites and villages (as mere housing need does not constitute a ‘special circumstance’) to be taken from the Green Belt. Once taken from the green belt they will be lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached.


gbc’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site.

Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
### 1. POLICY P4

I OBJECT to development in areas which are at risk of flooding (Policy P4)

National Planning Policy states that Local Plans should take account of climate change over the longer term, including factors such as flood risk. It goes on to say that new development should be planned to avoid increased vulnerability to the range of impacts arising from climate change.

The Plan states that in accordance with national planning practice guidance, the Level 1 SFRA has been used to guide development towards areas at the lowest risk of flooding and identify areas unsuitable for development. However, the document concludes that land outside of the area of flood risk is not capable of accommodating all of the borough’s identified development needs. A Level 2 SFRA has therefore also been produced and will help the Council apply the exceptions test (as described in the NPPG) as necessary to development proposals in areas at risk of flooding.

The site at Garlick’s Arch (A43) is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. Knowing the area well I am aware that this site often floods during the winter months and the flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: PSLPP16/12526</th>
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### 1. POLICY S1

I OBJECT to this Policy as the development proposed will not be sustainable (Policy S1)

The NPPF states that the presumption in favour of sustainable development “should be seen as a golden thread running through both plan-making and decision-taking.” As the first policy in the Plan, Policy S1 ought to set a clear framework. Instead, no definition of “sustainable development” is given. The policy also fails to set out any principles for applying sustainable development in practice to local planning decisions, which often have serious long-term impacts.
The policy states that it aims “to secure development that secures the economic, social and environmental conditions in the area”. This fails to recognize that economic growth, social justice and environmental protection often conflict. The policy does not say how each element is to be weighted or conflicts resolved. As a practical guide to the planning decision to be taken in the Plan period it is seriously deficient. The policy is likely to be used by developers to justify inappropriate developments on economic grounds. Under this policy, virtually any development will qualify as “sustainable”, in breach of the NPPF’s most important guideline.

Policy S1 is also seriously deficient in making no mention of the Green Belt. The Green Belt is a long term Government policy enshrined in primary legislation to protect green areas in perpetuity. The Green Belt is a living example of sustainable development in practice and is one of the most important factors affecting sustainable development in the area covered by the Plan and should be acknowledged in this policy. Policy S1 should include a commitment to protect the Green Belt from inappropriate development and to uphold Green Belt boundaries and protections. This would set at least one clear boundary to planning decisions. The Plan and the Council have treated the Green Belt as a developable land bank rather than as a constraint to development.

The commitment to approve planning applications “wherever possible” and “without delay” reveals the pro-development bias of the plan. Countervailing references to sustainability are so vague that the NPPF presumption in favour of sustainable development becomes a presumption in favour of any development at all.

This policy also ignores, as if they are inconvenient constraints, most of the 12 Core Planning Principles set out in NPPF paragraph 17.

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill Farm (A25) are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are also unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick’s Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Respondent: 8769793 / Laura Richards</th>
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1. **POLICY S2**

I OBJECT to the Borough Wide Strategy (Policy S2)

The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

The housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.

The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guildford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

The assumptions and calculations in the SHMA are widely regarded as flawed and even before Brexit, produced an inflated housing needs number. The figure of 13,860 new homes is completely unsubstantiated. It has not been scrutinized by Councillors despite repeated requests for debate. The assumptions and calculations underlying the model are hidden, protected by a claim to intellectual property by a commercial sub-contractor used in preparing the SHMA. I have serious doubts about the objectivity of the SHMA because it has been produced by consultants whose website openly proclaims their pro-development agenda leading to reasonable suspicion that the figures are inflated. Guildford’s OAN is not transparent but has been taken on trust by the authors of the plan. Given that almost every element of the plan is predicated on this OAN, the plan as a whole cannot be considered “sound”.

The status of the 13,860 figure is ambiguous. The Council has said that the housing number and the OAN are identical because the OAN is “deliverable” and is by definition objective and cannot be contradicted. The OAN is only deliverable because of the Council’s cavalier approach to the Green Belt in contravention of the NPPF, ministerial statements and local and national Conservative Party manifesto commitments. The plan also states that infrastructure or other constraints may in due course affect deliverability. It is also unlikely that the number of houses can be built at the rate proposed. In recent years, housing starts have on average been less than half the proposed rate. This is not because developers do not have the land or cannot get planning permission. Constraints in the supply chain and maintaining profit levels have been more important.

The plan cannot be considered “deliverable”. In addition, the number of homes proposed, plus existing planning permissions, plus expected “windfall” sites, exceeds the total of 13,860. So how many homes (taking account of these adjustments) do the Council want built? The plan does not say. Without this figure it is hard to see how anything else can be planned. This undermines the validity of the whole consultation. It is unreasonable to ask the public to approve a “plan” that fails to propose a target number that takes all the standard constraints and adjustments realistically into account, leaving the Council to set one without further consultation. Even if the OAN is not flawed, it is at best only a baseline figure and should not be passed off as a policy proposal.
It is unreasonable to embark on a radical transformation of the borough on the basis of an unclear housing target. Most of Guildford Borough is highly protected from development (89% Green Belt, 44% AONB and about 75% protected by SPA). Whether or not increasing the number of dwellings by up to a quarter is desirable, it would be a major and irreversible change, arguably turning a largely rural borough into a mainly urban or suburban one like Woking. The scale of the housing number increases the onus for it to be seen to be sound. A substantially lower number, on the other hand, would remove the need to build on Green Belt or open countryside, and instantly meet the single biggest public objection to the plan as a whole.

The Plan in general and this policy in particular does not address the point that Guildford exists as part of London’s commuter belt. Any increase in supply of housing in Guildford, particularly if the increase is proportionately greater than elsewhere in the commuter belt, will simply result in a shift of population into the area. It will not reduce prices or increase availability except imperceptibly. The Plan also ignores the point that many of those working in the area live elsewhere. Accordingly in considering the housing number the Plan should take into account that in this part of London’s commuter belt, demand for housing is, in practical terms, unlimited.

This policy does not take proper accounts of the constraints to development which exist, principally posed by the Green Belt and by infrastructure limitations. I believe the Council is under a duty to properly consider applying these constraints. It is clear the Council has failed to do this. This approach differs from all the other boroughs in Surrey. The Plan appears to have deliberately been manipulated towards a growth agenda without disclosing why this is being done. The housing that is needed should be concentrated on urban brown field sites and through increasing the housing density of existing built up urban areas.

The development of 13,860 homes in the Plan period with 65% in the Green Belt does not constitute sustainable development. It will have a permanently detrimental impact on the Borough in general and on West Clandon and surrounding area in particular. The developments at Garlick’s Arch and Gosden Hill Farm do not meet the needs of the local communities. The road infrastructure in and around West Clandon will be unable to cope with additional demand. The edge of urban Guildford will creep that much closer to West Clandon, thus negating the purposes of the Green Belt in the area which include safeguarding the countryside from encroachment, checking the unrestricted sprawl of large built up areas and preventing neighboring towns merging into one another.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill Farm (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (No)

I do not agree that the evidence used for the Proposed Submission Local Plan Strategy and Sites is adequate, up-to-date and relevant.

The fundamental driving forces for much of the development proposed in the Plan (particularly that on Green Belt land) are based on:

1. An excessive ambition to expand the local economy which is neither warranted nor wanted by the local population. Guildford is already one of the highest ‘value creation’ areas in the country and has one of the lowest unemployment rates. There is no evidence that massive and accelerated expansion is required.

1. SHMA figures which are neither transparent nor justifiable, especially in view of previous figures set. Independent assessments of the SHMA (eg from Guildford Residents’ Association and David Reeve) show it is set far too high and so cannot be said to be adequate, up to date or relevant.

In addition the recent vote to leave the EU and the impact this will have on the economy and migration have not been taken into account.

The Plan should be re-assessed and the methodology for arriving at housing need figures should be fully transparent.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/1484  Respondent: 8769793 / Laura Richards  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 2: Legal compliance

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (No)

I do not consider the Proposed Submission Local Plan: strategy and sites as a whole to be legally compliant because it mainly ignores the consultation process for the 2014 draft Plan it is claimed to be based on.

That consultation process was absolutely clear by some +20,000 responses that that Plan was flawed and no development should be carried out on Green Belt land.

Instead this 2016 draft Plan actually increases the number of dwellings being built on the Green Belt, in direct contradiction to the consultation process, yet is stated to be a Regulation 19 proposal.

As a result I do not see how the 2016 draft Plan can be Legally Compliant.

The 2016 draft Plan should be re-assessed and should take into account the views of the majority of responses from the consultation process for the 2014 draft Plan.
I do not consider the Proposed Submission Local Plan: strategy and sites as a whole to be sound, because, but not limited to, the following reasons:

1. “Only sites that propose sustainable solutions have been included in the Plan and the Plan rejects any schemes that would have a detrimental effect on the green belt.” Summer 2016 edition of "About Guildford" (published by the Council) on page 5. This is demonstrably untrue and appears designed to bias the consultation process.
2. The housing OAN figure has been calculated by a process which is not transparent. It has not been properly examined by Councillors before being adopted.
3. The OAN has been adopted as the housing number without the application of any constraints to take account of Guildford's circumstances, including in particular the Green Belt, AONB and road infrastructure. National policy permits such constraints to be applied and it is inappropriate not to consider the need to do this.
4. The draft Plan does not accord with the NPPF policies on protecting the Green Belt.

Exceptional circumstances need to be shown to justify removing areas from the Green Belt and this has not been done. The housing need number is not justification in itself according to published ministerial statements. Having properly calculated an OAN, constraints should be applied to it to reflect the Green Belt, AONB and infrastructure. Each proposed Green Belt site then needs to be justified on its own merits. The benefits of the proposed development need to be identified together with the harm to the Green Belt. Only if there are exceptional circumstances and following a proper balancing exercise demonstrating that these exceptional circumstances outweigh the harm to the Green Belt can the proposal proceed. The draft Plan does not demonstrate that this has been done. The housing number has been used as a blanket justification for all Green Belt sites-which amount to 65% of the proposed housing number.

1. Whatever the justification for the assumptions made in calculating the OAN, those assumptions are now almost certainly incorrect following the referendum.
2. The housing number is at least twice the achieved rate of building in the Borough over the last few years. There is no evidence in the Plan to show that this rate is achievable and sustainable.
3. Much of the infrastructure required to support the level of development proposed is outside the Council’s control. The Infrastructure Plan is long on possibilities and aspirations and very short on commitments. The infrastructure requirements placed on developers are supposed to be in place before development commences. This is utterly unrealistic and indicates a lack of knowledge of developer’s business models which depend on positive cash flow. It seems very clear that at best, infrastructure provision will seriously lag development and leave higher levels of congestion than now. This will reduce the quality of life for residents through congestion and disruption.
4. The 40-45% requirement for affordable homes together with infrastructure such as railway stations, park and ride facilities, schools and roads is highly likely to be challenged on a site by site basis by developers using the NPPF provision that Councils cannot impose conditions which make development non-viable.
1. GBC has not included details of its Town Centre Master Plan and urban development proposals in time for and as a part of the Guildford Local Plan consultation
2. GBC has failed to provide an Infrastructure Report in time for and as a part of the Guildford Local Plan consultation
3. GBC has proposed an OAN of 693 houses per annum in the GL Hearn West Surrey Strategic Housing Market Assessment (SHMA) which many, including independent assessors, consider unsound
4. Highways England will not start to consider what it intends to do as regards the A3 in the vicinity of Guildford until 2018
5. Network Rail have not made available for the public consultation any plans for a new railway station at Merrow with an adjacent Park & Ride for 1,000 cars
6. The GBC proposals for Gosden Hill Farm do not appear to be in coordination with the Neighbourhood Plan for Burpham
7. The draft Local Plan will cause further linear development along the A3 between Burpham and West Clandon PC and encroachment onto open Green Belt countryside in clear conflict with the National Planning Policy Framework
8. The proposal for Garlick’s Arch was added to the draft Local Plan without any prior consultation under Regulation 18.
9. The Land Availability Assessment (LAA) indicates a range of planning difficulties for Gosden Hill Farm and Burpham which have to be met by the developer involved. These include Electricity Grid supply problems and foul sewage and surface water issues that suggest the development proposed cannot easily be implemented both technically and financially.
10. No adequate explanation is given as to how the aspirational proposal for a tunnel will be used to overcome traffic issues relating to the quality of life and amenity of Burpham, West Clandon, Send and Ripley citizens
11. In common with many others I do not believe the housing figure has been properly calculated and I believe it overstates housing need. The Council has prevented councilors or others from properly considering the SHMA by refusing to make public the basis on which it was drawn up.
12. The housing figure, when properly recalculated, should be subject to constraints to reflect Guildford's circumstances, including in particular the Green Belt and road infrastructure. National policy permits such constraints to be applied and it is inappropriate not to consider the need to do this.
13. Even once a housing number has been calculated it cannot be used to justify taking land out of the Green Belt on a wholesale basis.
14. Cast iron commitment should be included in the plan that development can only commence when required infrastructure improvements have been secured.
15. The status of the text which accompanies each policy box is not clear. If the accompanying text does not have the force of policy a number of the policies (i.e. the text in blue) are so vague and general that they commit the Council to very little.

The draft Plan should be re-assessed with housing on brownfield sites made a priority over commercial development and Greenfield sites and each of the above points addressed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/1486  Respondent: 8769793 / Laura Richards  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Question 4: Duty to cooperate

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )
I do not consider the Proposed Submission Local Plan: strategy and sites as a whole has complied with the Duty to cooperate.

This 2016 draft of the Local Plan clearly demonstrates Guildford Borough Council’s refusal to co-operate with the wishes and requirements of the vast majority of the residents in its Borough.

The Council has failed to co-operate with the results of the consultation process for the 2014 draft Plan which was meant to inform and guide this 2016 draft Plan.

Despite campaigning on a clear statement ‘Conservatives Say Green Belt To Stay’, the ruling party on GBC is now intent on pushing through a Plan which will devastate Green Belt land and extend the Guildford Urban Area to further merge into surrounding rural villages.

This is not cooperation by any definition.

In addition the Council has failed to cooperate in providing any transparency to the housing need figures commissioned by the Council from GL Hearn.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/1268  
Respondent: 8770177 / Phil Attwood  
Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

17.1 OBJECT to the proposed Infrastructure Schedule (Appendix C)

The Infrastructure Schedule sets out the key infrastructure requirements on which the delivery of the plan depends. For each of the Key Allocated Sites in the borough it identifies infrastructure projects that are required, except for Garlick’s Arch (A43) which is not mentioned. It is clear that the Plan takes no account of the infrastructure required for this site and is therefore not fit for purpose.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/1270  
Respondent: 8770177 / Phil Attwood  
Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
18.I OBJECT to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)

The Plan’s proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the borough, it is over double the previous figure of 322 used in previous plans. The SHMA report methodology I believe is inaccurate; inflating the needs of the borough by distorting student numbers. It is based on commercially confidential modelling assumptions that cannot be checked or reviewed. There is no transparency to this evidence base and it is therefore impossible to assess its accuracy. This is not democratic and is not appropriate for consultation of the Plan.

The National Planning Policy Framework allows the overall housing target to be reduced to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/2300  Respondent: 8770177 / Phil Attwood  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A25

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT to Gosden Hill development being in the Local Plan. The land in Gosden Hill does exactly what the Greenbelt was designed to achieve. It provides a green buffer between the Guildford Urban Area and West Clandon, gives Burpham a defined green boundary and breathing space and it hides Guildford town from visitors until they pass the off-slip to Burpham.

No exceptional circumstances have been demonstrated for building on this site and therefore it does not comply with paragraphs 87-89 of the NPPF. It stops the sprawl of Guildford town, assists in safeguarding the countryside from encroachment and assists in urban regeneration by encouraging the recycling of derelict and other urban land: all requirements of the NPPF.

The scale of Gosden Hill is out of proportion to West Clandon. It would have four times the amount of housing plus shops, offices/factories, GP surgery, schools. Development on this scale would blight a historic village with a history going back to the doomsday book and beyond.

Gosden Hill is the most obvious location for the north end of an A3 tunnel. It has rising ground and is situated just before the urban area. If it is built on, it will be very difficult to construct a tunnel.

The development will generate in the region of 6,000 vehicles which will pour on to the A3 which is stationary every day during rush hours. The linking of the A3100, B2215 and A247 would channel thousands of cars through the narrow,
winding road through West Clandon, a road where large lorries mount the pavement every day and through Send and Ripley which are also severely constrained.

The volume of traffic will greatly increase air pollution which is particularly critical given the proposal to build two schools.

Currently, a two way junction at the site would require vehicles wanting to go north on the A3 to go through Burpham which is grid-locked every day.

Burpham’s sewers are at capacity. Sewage would have to be pumped to Slyfield for processing, a project of enormous cost.

There is inadequate fresh water in Guildford and current supplies could not meet the needs of a development of this size.

Electricity supply is also inadequate and would require a big infrastructure development.

The railway station was rejected by Guildford Borough Council in 1984 because it feared Gosden Hill would become a dormitory estate for London.

The wording of the Local Plan with regard to Gosden Hill is so loose that the developer could virtually do whatever it wants.

The remaining agricultural land between Gosden Hill and West Clandon is so small that it is highly likely to be uneconomic and therefore a prime candidate for further development which would roll the Guildford Urban Area over West Clandon towards East Clandon and Wisley.

If the Strategic Sites are developed, the north of Guildford will deliver 36%, 5,036 houses towards the total of around 14,000. The infrastructures of the existing villages and the A3 will be overwhelmed by the scale of development.

A new on-slip at Burpham would only be 1.8km from the on-slip at Burnt Common which is against Highway England’s requirement of 2km.

Development of the A3 at best will not start until after 2020 and the building of a tunnel, which is only an “aspiration” in the Local Plan is likely to be many years after. In the meantime given that developers build houses to provide cash-flow for infrastructure, Gosden Hill will have a crippling effect on villages like West Clandon and the A3.

Gosden Hill already has surface water problems. Merrow Stream crosses the site. No hydrological survey has been carried out to assess the implications. Electricity pylons run through the centre of Gosden Hill which have health and safety issues.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/2301  Respondent: 8770177 / Phil Attwood  Agent:  

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
15.I OBJECT to the inclusion of the land at Garlick’s Arch, Send Marsh/Burnt Common and Ripley (A43)

Garlick’s Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8). There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).

The Plan states the preference is to making the best use of previously developed land. Yet at the 11th hour a perfectly acceptable brown field site at Burnt Common, capable of accommodating approximately 100 houses, was removed from the Plan and replaced with the Garlick’s Arch site. There was no proper consultation in relation to the inclusion of this site.

Why was a brownfield site removed and replaced with a Greenfield site?

There is no evidence that Section 18 of the Planning and Compulsory Purchase Act 2004, which requires local planning authorities to produce a Statement of Community Involvement, has been complied with for this site. This only came to light for local residents following a Council meeting on 11th May 2016.

Guildford Borough Council’s own Green Belt & Countryside Report does not address Garlick’s Arch at all, so there is no evidence base to support the inclusion of this site.

National Planning Policy promotes sustainable developments, with sustainable transport. With ever reducing bus services in the area and no train station within reasonable walking distance it is impossible for any development on this site to offer a sustainable transport solution. Development on this site is wholly inappropriate (Policy I3).

The stream, which runs through the site, is identified as having a high risk of flooding by the Environment Agency. There are other sites that do not flood that can be developed and therefore this site should be removed from the Plan (Policy P4).

This site is bordered by Ancient Woodland and within it a number of trees are protected by Tree Preservation Orders (Policy D3).

The site has an abundance of wildlife, some of which are protected. It is home to many types of owls and bats, with the woods having cuckoos and woodpeckers. In addition there are regular sightings of badgers, deer and red kites. Development of the site will result in the loss of habitat. No wildlife report has been conducted on the site. (Policy I4)

It is clear that with this site being added at the 11th hours no infrastructure planning has been undertaken. The Infrastructure Schedule makes no provision for any infrastructure improvements for this site. How will the local services such as schools and doctors cope, many of which are already at capacity? (Policy I1)

Furthermore, several electricity pylon runs through the site, which will have the potential to be a health hazard for any residents.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/2302  Respondent: 8770177 / Phil Attwood  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Page 2537 of 3335
16.1 OBJECT to the inclusion of the land for new on/off ramps at Burnt Common (A43a)

The addition of north facing ramps to the A3 at Burnt Common would be a disaster for local communities. There is no requirement for local traffic to access the A3 to the north, but the addition will draw in a huge amount of ‘through’ traffic.

The route from London/M25 to Woking or would now be through Burnt Common and Send. Equally traffic from the east of Guildford (Merrow etc) and the A25 will now go through West Clandon and Burnt Common. This will cause immense damage to those areas on small roads which cannot be improved.

This Plan does not address the needs of local communities or the Borough in this regard. There has again been no Section 18 consultation on this.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5069  Respondent: 8770177 / Phil Attwood  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

8.1 OBJECT to the damage to the historic environment as a result of the scale of the proposed development (Policy D3)

I OBJECT to the local plan based on the impact it will have on the special countryside of the borough.

The proposed development at Garlick’s Arch (A43) will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5066  Respondent: 8770177 / Phil Attwood  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
5.1 OBJECT to the sustainable employment policy (Policy E1)

If developed, the new employment site at Garlick’s Arch, Send Marsh/Burnt Common (A43), would be treated as a Strategic Employment Site.

The proposed development of up to 7,000 sq m of either a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8) at Garlick’s Arch (A43) is in the scheme of industrial development relatively small. Just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m. The Garlick’s Arch site which is in the Green Belt should not be developed as a Strategic Employment Site when there is a suitable alternative brownfield site very close by, which is far more sustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/5067  Respondent: 8770177 / Phil Attwood  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

6.1 OBJECT to the location for new employment floor space at Garlick’s Arch – Site A43 (Policy E2)

Proposals for new industrial, warehousing and storage (use Class B1c, B2 and B8) floor space will be directed to the Industrial Strategic Employment Sites.

There is no need for the new employment floor space to be located at Garlick’s Arch, when just to the south, at Burnt Common, there is existing industrial development, with surplus land that could accommodate further development of 7,000 sq m.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/5068  Respondent: 8770177 / Phil Attwood  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
7.1 OBJECT to the loss of rural employment (Policy E5)

Policy E5 supports the retention and development of local services and community facilities in our inset and identified villages. Yet the development at Garlick’s Arch (A43) would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises. The Plan does not promote rural employment; rather it will result in the loss of existing local rural businesses.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5077  Respondent: 8770177 / Phil Attwood  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E6

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. POLICY E6 - The leisure and visitor experience

I OBJECT Tourism and visitors do not depend on new visitor “attractions” and could actually be damaged by them, as compellingly argued in the current debate over Newlands Corner. In this policy, the presumption in favour of development runs the risk of becoming an excuse for “overdevelopment”. Heritage sites and the Green Belt are particularly vulnerable. Guildford has many “leisure and visitor attractions” already. The case for creating more is not made and no examples are given. Instead, the plan’s explicit priorities should be:

1. To protect the borough’s prime leisure and tourism asset, its countryside, from inappropriate development. This is all the more valuable because of its accessibility from London, the rest of Britain and the Continent, in that order. Rural residents are its custodians and require no Council interference. Economically, the most valuable forms of tourism, such as walking and cycling, require no new development. In the overcrowded South-East of England, lack of development is a leisure and tourism asset, not a liability.

2. To help make Guildford’s river landscape less off-putting and support town-break packages for high-value tourists. To achieve this, the policy needs to define what leverage, if any, Council planners have to influence normal tourism market mechanisms.

3. To help private providers market local tourism. This need not involve extra spending. The Council could, for instance, help co-ordinate ready-made, local tourism packages under a distinctive brand at an all-in price. An “English town break” (including B&B accommodation, a walking tour of Guildford, a pub lunch in the Surrey Hills, a visit to Wisley Gardens and a National Trust property and a SouthWestTrains travel card for a day out in London) would be highly attractive to many European visitors who currently by-pass Guildford to go to Bath, Oxford or Cambridge instead.

4. To rule out the redevelopment of scarce rural hotel sites (e.g. Thatchers, East Horsley, earmarked for 40 new houses under Site A37 of the plan yet just a short walk from the new opera house).

I trust the objections made above are fully considered and that the Plan is amended accordingly.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I OBJECT (POLICY H1 – Homes for all) Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan period. It fails to set rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions.

The housing mix is based on out-of-date, pre-Brexit projections and on assumptions set out in a flawed SHMA that has not been scrutinised or evaluated.

I support higher density development in the urban area, without resorting to dehumanising, high-rise buildings that developers commonly claim are necessary for financial viability. Much of Guildford town could usefully be regenerated with 4-5 storey blocks with landscaping and underground parking, as often seen on the Continent and, recently, in London.

Student accommodation should be provided for 100% of new students and more than 60% of existing students, which would free up ideal family accommodation in the urban area. Other university cities (e.g. Oxford) insist on higher percentages than those proposed in the plan. In my view, the Council’s timidity is a case of “regulatory capture” by Surrey University, which has failed to use its existing planning permissions (dating from 2004) to accommodate 3,000 students or to improve the efficient development of its campus (e.g. by building on its extensive and under-used surface car parks). If all students were accommodated in this way, 2,000 homes would be freed up in town and there would be no need to build on the Hog’s Back.

Guildford Borough already has a higher proportion of traveller sites than most comparable boroughs. Over-provision is inappropriate given other constraints.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

POLICY H3 – Rural Exception Homes

I OBJECT This is a Trojan horse policy. It says that homes can be built anywhere near a settlement of any form (including agricultural land and the AONB). These homes are meant for people with a village connection, but they could be for anyone on the Guildford borough housing list. To make the housing viable, or to improve the “mix” this can include “market” housing (i.e. normal commercial development which in Guildford usually means large executive homes). This policy means building anywhere, and ignoring all historic planning restrictions.
The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove "exceptional circumstances."

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

**Comment ID:** PSLPP16/5071  **Respondent:** 8770177 / Phil Attwood  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

**9.I OBJECT** due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1)

Our villages already suffer from severe congestion for much of the day, for example the Newark Road & Rose Lane junction in the centre of Ripley. The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on local roads.

Many of the country lanes around the villages of Ripley, Send and Clandon are narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition.

**I OBJECT** to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces.

Many of the affected villages, West Clandon included, already suffer from traffic congestion. Development around these villages will result in more traffic and more parking problems.

With some 5000 houses being proposed close to the village of Ripley, the roads serving the village will become even more congested. Cycling has become ever popular, particularly at weekends with hundreds of cyclists passing through the villages on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road accidents involving cyclists as a result of development proposed under the local plan.

The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the road becoming ever more dangerous for pedestrians.

The council has a statutory obligation to protect the public and the additional traffic flows will bring added pollution and risk to injury of the public. In the case of West Clandon the Street often only has a narrow footpath on one side of the road making it very dangerous, especially when vehicles mount the pavements, as they often need to.

**10.I OBJECT** to the lack of proper infrastructure planning for sites (Policy I1)

Policy I1 requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.
Despite the Garlick’s Arch site (A43) being significant for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents will see their quality of life significantly deteriorate.

Many of the utilities in the Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers. No plans to improve these services should mean no development of the Garlick’s Arch site.

Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send, will have their services stretched and overwhelmed. Many of these services are already at capacity and suffering from funding cuts or freezes. Any further development without funding will place further stress upon existing health services.

Police services are seeing funding reduced. The development of the proposed 13,860 homes during the plan period will stretch the police services further and is not sustainable.

There is no provision for the increased capacity of Guildford hospital, where is this assessed and remedied?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
12.1 OBJECT to poor air quality concerns (Policy I3)

Paragraph 4.6.27 of the Plan states that “Development must also mitigate its traffic impacts, including its environmental impacts and impacts on amenity and health.” The significant level of development being proposed, particularly in the north east of the borough will lead to considerable further congestion, despite any attempts to mitigate this through travel plans. This will be particularly acute in built up residential areas and will only lead to greater levels of air pollution, which will have a detrimental effect on local residents and their health and can result in early death.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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3.1 OBJECT to not protecting the Green Belt (Policy P2)

I OBJECT to the proposals to remove the villages of Ripley, Send and Clandon from the Green Belt, together with sites of Wisley Airfield (A35) and Garlick’s Arch (A43). National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these villages (as mere housing need does not constitute a ‘special circumstance’) and the land to be taken from the Green Belt. Once taken the green belt is lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl and neighbouring villages merging into each other. The significant development in these villages will result in the character of these villages being lost and the countryside encroached. GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site.

Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
4.1 OBJECT to development in areas which are at risk of flooding (Policy P4)

National Planning Policy states that Local Plans should take account of climate change over the longer term, including factors such as flood risk. It goes on to say that new development should be planned to avoid increased vulnerability to the range of impacts arising from climate change.

The Plan states that in accordance with national planning practice guidance, the Level 1 SFRA has been used to guide development towards areas at the lowest risk of flooding and identify areas unsuitable for development. However, the document concludes that land outside of the area of flood risk is not capable of accommodating all of the borough’s identified development needs. A Level 2 SFRA has therefore also been produced and will help the Council apply the exceptions test (as described in the NPPG) as necessary to development proposals in areas at risk of flooding.

The site at Garlick’s Arch (A43) is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. I am aware that this site often floods during winter months and the flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5062  Respondent: 8770177 / Phil Attwood  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Objections to Guildford Borough Proposed Submission Local Plan (June 2016)

I OBJECT in the strongest possible terms to the Guildford Borough Proposed Submission Local Plan (June 2016). This Plan is unsustainable, unworkable and, in many provisions, unnecessary.

I set out below my objections to specific policies and matters within the Plan.

1.1 OBJECT to the Local Plan as the development proposed will not be sustainable (Policy S1)

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a lasting detrimental impact on existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will not be able to cope with the proposed level of development. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are just unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's
Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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<th>Respondent: 8770177 / Phil Attwood</th>
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<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire): ()**

**2.1 OBJECT** to the Borough Wide Strategy (Policy S2)

1. The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

2. The Housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.

3. The Housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any commonsense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guilford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of...
the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/4677  Respondent: 8770177 / Phil Attwood  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A25

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to the changed policy A25 Gosden Hill for the development of 1700 homes which is still far too much.
2. There is no need for housing on this site because the local plan housing target is incorrect and inflated and ignores constraints.
3. Gosden Hill is located entirely within the Green Belt. No exceptional circumstances have been demonstrated for building on this site and therefore development here does not meet paragraphs 87-89 of the NPPF. Furthermore, Gosden Hill performs all five functions of green belt,
4. The site has no provision for foul or surface water sewerage and adjoining sewerage is at capacity
5. The Green Belt at this point serves the important function of separating West Clandon from the edge of urban Guildford. Development here will cause the two to coalesce defeating one of the objectives of the Green Belt. If this development proceeds I believe the narrow strip of Green Belt remaining between Guildford and Clandon at this point will be too narrow and will come under further pressure. It will represent an undesirable ribbon development along the A3. It will be highly visible from the A3 when approaching Guildford and will, in conjunction with A43a at Garlick's Arch give the appearance of almost continuous development from Send through to Guildford.
6. The development of this site cannot be sustainable and will cause massive congestion onto surrounding roads. The development will generate in the region of 6,000 vehicles which will exit straight on to the A3 which is stationary every day during rush hours. The linking of the A3100, B2215 and A247 would channel thousands of cars through the narrow, winding road through West Clandon.
7. I object to the proposal for a link road to bring traffic from the Gosden Hill development to the proposed 4 way junction at Burnt Common. This has the potential to generate large volumes of traffic (including commercial vehicles) on the A247 through Send and West Clandon - a road which is already under traffic stress (see below).
8. The volume of traffic will greatly increase air pollution which is particularly critical given the proposal to build two schools.
9. A new on-slip at Burpham would only be 1.8km from the on-slip at Burnt Common which is against Highway England’s requirement of 2km.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document: complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to the changed policy A43 Garlick’s Arch for 400 homes and 6 travelling show people pitches
2. It ignores all the thousands of previous objections made by local people
3. There is no proven demand for travelling show people plots in this location
4. There is no need for putting houses on this site because the local plan housing target is incorrect and inflated and ignores constraints.
5. The allocation of 28.9 ha is an excessive land grab into the Green Belt. If we take a normal density of 30 homes per ha and it is at the end of the day proven that there is a need for 400 homes in this location the land requirement is 13 ha not 28.9 ha which is more than double. This replicates a similar over land grab at Burnt Common where the factor is 7 times the land required.
6. This confirms the worrying impression that GBC have a pre-determined policy of building on the Green Belt at every opportunity. The arithmetic does not stack up. One would have thought that they would as custodians of the green belt be intent on conserving it rather than exploiting it.
7. The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.
8. Garlick’s Arch (A43) is in an unsustainable location. It does not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. The site is unsuitable due to lack of access to sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick’s Arch in the Infrastructure Plan. Residents will be dependent on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.
9. The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.
10. I object to the proposal to remove Garlick’s Arch from the Green Belt. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for this land to be taken from the Green Belt. Once taken the green belt is lost forever. There is a real danger that the loss of this Green Belt will result in urban sprawl and the neighbouring villages merging into one another. The significant development in West Clandon, Send and Ripley will result in the character of these villages being lost and the countryside encroached.
11. I object to the development at Garlick’s Arch because of flood risk. The site at Garlick’s Arch is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. Knowing the area well I am aware that this site often floods during the winter months and the flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.
12. I object to the loss of rural employment on the site. The development at Garlick’s Arch would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises.
13. I object to the potential loss of Ancient Woodland on the site. The proposed development at Garlick’s Arch will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees that existed in the year 1600.
14. I object due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1). Our villages are already suffering from severe congestion for much of the day, for example the Newark Road and Rose Lane junction in the centre of Ripley and the A247 through West Clandon.
The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.

15. Furthermore, many of the country lanes around the villages of West Clandon, East Clandon, Ripley, and Send are narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition. I object to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces.

16. Many of the affected villages, such as West Clandon, East Clandon, Send and Ripley, already suffer from parking problems. Further development around these villages will only result in more traffic and more parking problems.

17. With some 5000 houses being proposed close to the villages of West Clandon, East Clandon, Send and Ripley, the roads serving the village will become even more congested. Cycling has become a popular past time, particularly at weekends hundreds of cyclists past through the village on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road accidents involving cyclists as a result of the development proposed under the local plan.

18. The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the roads becoming ever more dangerous for pedestrians.

19. I object to the lack of proper infrastructure planning for sites (Policy I1). Policy I1 requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.

20. Despite the Garlick’s Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents’ in the locality will see their quality of life significantly deteriorate in many ways.

21. Many of the utilities in the West Clandon, East Clandon, Burpham, Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers. No plans to improve these services should mean no development of the Garlick’s Arch site.

22. Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are already at capacity and suffering from funding cuts or freezes. Any further development without funding will place further stress upon existing health services.

23. I object due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2). There is no certainty that either the A3 or M25 in the borough will be improved to increase capacity and reduce congestion during the Plan period. Highways England has no plans to even examine improving the A3 before 2020. I have considerable concerns that development of the large residential sites identified at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), will take place before any improvements are made to the trunk road network. The A3 & M25 are already at capacity during peak hours and any development prior to improvement of these roads will only make the situations worse.

24. I object to poor air quality concerns (Policy I3). Paragraph 4.6.27 of the Plan states that “Development must also mitigate its traffic impacts, including its environmental impacts and impacts on amenity and health.” The significant level of development being proposed, particularly in the north east of the borough will lead to considerable further congestion, despite any attempts to mitigate this through travel plans. This will be particularly acute in built up residential areas and will only lead to greater levels of air pollution, which will have a detrimental effect on local residents and their health.

25. I object to the inclusion of the land at Garlick’s Arch, Send Marsh/Burnt Common and Ripley (A43). Garlick’s Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8). There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).

26. It is clear that with this site being added at the eleventh hour and no infrastructure planning has been undertaken. The Infrastructure Schedule makes no provision for any infrastructure improvements for this site. How will the local services such as schools and doctors cope, many of which are already at capacity? (Policy I1)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to Policy A 58 at Burnt Common and to the proposed inclusion of Burnt Common as an Industrial Strategic Employment Site
2. This previous allocation for B1c, B2 and B8 development was removed from the 2014 draft due to all the objections made previously.
3. The word “minimum” is a change from the previous “maximum” in the 2016 plan and since that time there has been a decline in demand for industrial land. This change alone is unacceptable since even if there was a need to build 7,000 sq m at Burnt Common this development would only require 1.4 ha at a standard plot ratio density of 50% not 9.26 ha. There is no justification for zoning an additional 7.86 ha in the Green Belt.
4. There is in fact no justification for building any more industrial development in the borough particularly at Burnt Common. The current industrial pipeline of granted consents of 38,357sqm in B1c, B2 or B8 use class space is double the 19,000 sq m said to be needed by Aecom who justify the need for new space on top of the existing pipeline by a completely unsubstantiated suggestion that “there is the possibility that some pipeline developments may not come forward at all, or be developed in different quantities by use class than has been consented.”
5. There is no need to build industrial or warehouse development in the middle of the Green Belt when Slyfield and Guildford still have empty sites and industrial units.
6. The 2017 Employment Land Need Assessment shows a reduction in demand to 3.9 hectares for industrial land for the whole borough not a huge over allocation of 9.26 hectares at Send in the Green Belt.
7. The Employment Land Needs Assessment update 2017 (ELNA) states “that the pipeline for employment floorspace defined by planning permissions yet to be implemented and prior approvals suggests the potential for an additional 33,607sqm of B use class floorspace to come forward. This figure comprises a net loss of 4,750sqm of B1a use class floorspace and a net gain of 38,357sqm in B1c, B2 or B8 use class space.”
8. 38,357 sq m of B1c, B2 or B8 use class is quite sufficient supply for the plan period and is in fact more space than the 3.9 ha of industrial land that is said to be needed for the plan period by Aecom. Since if you were to develop 3.9 ha at a plot ratio of 50% it would provide new industrial development of 19,000 sq m approximately half of current planning permissions granted. This does not justify the need for new development of industrial space on the Green Belt in such areas as Burnt Common.
9. The reality of demand for industrial space is that it is both nationally and locally in decline and this is evidenced by old existing permissions that have not been taken up and developed. The ELNA alludes incorrectly to the poor quality of existing space being a “constraint” on supply and fails to acknowledge that this assertion cannot apply to potential newly developed space e.g. the undeveloped pipeline of 38,357sqm.
10. The impact on small surrounding roads will create traffic gridlock.
11. It will join up existing villages and defeat the purpose of the Green Belt.
12. The ongoing poor quality of the updated research undertaken by Aecom in the Employment Land Needs Assessment 2017 does not support industrial development on land in the Green Belt at Burnt Common.
13. The Aecom research is generally superficial and lacks sufficient detail and analysis between B1c, B2 and B8 use classes and no reliable individual analysis has been undertaken of the widely different supply and demand dynamics of light industrial, general industrial and warehousing and distribution floor space.
14. The potential inclusion of a waste management facility mentioned at paragraph 4.4.23a lacks enough detail for proper consultation and is completely inappropriate.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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The Plan now states: “the presumption in favour of sustainable development will not automatically apply to policies relating to sites protected under the Birds and Habitats Directives and/or designated as Sites of Special Scientific Interest (SSSIs), land designated as Green Belt, Local Green Space, the Surrey Hills Area of Outstanding Natural Beauty, designated heritage assets and locations identified as at risk of flooding.”

Gosden Hill and Blackwell Farm (both currently in the green belt) are called “urban extensions” surely a euphemism for urban sprawl? Garlick’s Arch and Burnt Common developments take land from the green belt to extend Ripley/Send. One of the important specific purposes of the green belt is to prevent urban sprawl.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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The NPPF states para 155: “Early and meaningful engagement and collaboration with neighbourhoods, local organisations and businesses is essential. A wide section of the community should be proactively engaged, so that Local Plans, as far as possible, reflect a collective vision and a set of agreed priorities for the sustainable development of the area, including those contained in any neighbourhood plans that have been made.”

The changes in this latest version of the Guildford Local Plan show little or no willingness of Guildford Borough Council to reflect a collective vision. Despite the many thousands of responses to previous versions of the Plan which overwhelmingly rejected building on Green Belt land this latest version has as much, if not more, building on the Green Belt and increased problems of infrastructure and traffic which will bring increased noise and air pollution and danger to residents.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. **APPENDIX C**

I OBJECT to the proposed Infrastructure Schedule (Appendix C)

The Infrastructure Schedule sets out the key infrastructure requirements on which the delivery of the plan depends. For each of the Key Allocated Sites in the borough it identifies infrastructure projects that are required, except for Garlick’s Arch (A43) which is not mentioned. It is clear that the Plan takes no account of the infrastructure required for this site and is therefore not fit for purpose.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPA16/1231  **Respondent:** 8771233 / Ranald Mackinnon  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. The housing needs assessment is flawed in various respects and overstates housing need. In addition since it was produced, the referendum Brexit decision has almost certainly reduced future housing need and rendered the previous assessment seriously out of date. As a result any assessment of Green Belt sites which took place to consider whether “exceptional circumstances” existed to outweigh the harm to the Green Belt was based on false premises and should be reconsidered.

2. Having determined housing need the Council was entitled to consider constraints before determining the housing number. I believe that as Ill as being entitled to do this the Council was required to give proper consideration to constraints. The scarcity of sites outside the Green Belt as Ill as infrastructure (most notable roads) considerations all represented constraints which should have been taken into account in determining the final housing number. Accordingly in this regard our objection to the allocation of Green Belt sites is twofold. First I believe constraints should have been applied. Secondly I believe the Council did not properly consider constraints and that their decision making process was flawed and thus subject to being set aside by the Inspector.

3. Even if having properly applied constraints there is a need to develop in the Green Belt then specific Green Belt sites should not be included in the plan unless “exceptional circumstances” for development are proven in relation to that specific site, as stipulated repeatedly in the NPPF. The Green Belt should trump short-term considerations such as perceived housing need, as case law has established. There needs to be a specific balancing exercise conducted on each Green Belt site weighing the harm to the Green Belt against the very special circumstances which are argued in favour of development at that particular site. There is no evidence this has been done. Instead the council have appeared to say that having chosen a housing needs figure and decided it cannot be met without building on Green Belt then there is no need for any further consideration and any convenient Green Belt site can be allocated for building at will.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Do you consider this section of the document: complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. **APPENDIX D**

I OBJECT to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)

- The “objectively assessed need” figure of 693 homes a year is too high.
- A professional review by NMSS has concluded that, even basing the calculations on a period of stronger economic and student growth, the housing need figure should be revised down to 510 homes a year and the method changed to consider student housing need separately due to the distorting effects.
- The current SHMA inflates the proposed housing figure due to
  - failure to correct for errors in the historical data for international migration flows,
  - issues with the way it considers students and affordability and
  - flaws in the method for estimating the number of homes needed to support job growth.
- It is unacceptable that demographic and economic model assumptions have been withheld and cannot be checked making the process unaccountable.

The Plan’s proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the borough, it is over double the previous figure of 322 used in previous plans. The SHMA report methodology is I believe inaccurate; it inflates the needs of the borough by distorted student numbers. However, it is based on commercially confidential modelling assumptions that cannot be checked or reviewed. There is no transparency to this evidence base and it is therefore impossible to assess its accuracy. This is not democratic and is not appropriate for consultation of the Plan.

The National Planning Policy Framework allows the overall housing target to be reduced to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. POLICY A25 - Gosden Hill Farm

I OBJECT to Policy A25 with proposals for Gosden Hill Farm.

The Green Belt at this point serves the important function of separating West Clandon from the edge of urban Guildford. Development here will cause the two to coalesce defeating one of the objectives of the Green Belt. If this development proceeds I believe the narrow strip of Green Belt remaining between Guildford and Clandon at this point will be too narrow and will come under further pressure.

It will represent an undesirable ribbon development along the A3. It will be highly visible from the A3 when approaching Guildford and will, in conjunction with A43a at Garlick's Arch give the appearance of almost continuous development from Send through to Guildford.

The Plan does not put forward any evidence that exceptional circumstances exist to justify removing this site from the Green Belt.

The development will overburden the local road network and increase congestion on the A3 and A247 through the centre of West Clandon. This is already very heavily used whilst being unsuitable for designation as an A road. In places it is too narrow for two lorries to pass causing them to mount the pavement.

Note the following accident data:

2010 –2014 from Crashmap data

- Clandon Cross Roads Area to Bulls Head - 17 incidents
- Bulls Heads Head to Bennett Way - 8 incidents
- Bennett Way to Highcotts Lane - 15 incidents
- Tithebarn Lane to Portsmouth Road Birch Close - 8 incidents

2015

- 21 Oct 2015 – A247 near shell garage - Three vehicles collided causing delays
  
  Surrey Fire and Rescue deployed.

2016

- 15 April 2016 12 year old boy injured in The Street – A247 closed in both directions
- 28 April 2016 A3 West Clandon London bound between A247 Tythebarns Lane (Burntcommon and M25J10 (Wisley Interchange) congestion on A3 to A3100 Clay Lane Burpham
- 30 6 2016 Motorcyclists with injuries airlifted to hospital Send Marsh Road

Attempts have been made over many years to reduce traffic, traffic speeds and accident risks through West Clandon, however little has been achieved as the road cannot be widened and SCC is reluctant to impose further speed limits as congestion is already very high.

I object most strongly to the proposal for a link road to bring traffic from the Gosden Hill development to the proposed 4 way junction at Burnt Common. This has the potential to generate large volumes of traffic (including commercial vehicles) on the A247 through West Clandon - a road which is already under traffic stress (see below).
The land in Gosden Hill does exactly what the Greenbelt was designed to achieve. It provides a green buffer between the Guildford Urban Area and West Clandon, gives Burpham a defined green boundary and breathing space and it hides Guildford town from visitors until they pass the off-slip to Burpham.

No exceptional circumstances have been demonstrated for building on this site and therefore it does not comply with paragraphs 87-89 of the NPPF. It stops the sprawl of Guildford town, assists in safeguarding the countryside from encroachment and assists in urban regeneration by encouraging the recycling of derelict and other urban land. All of these are requirements of the NPPF.

The scale of Gosden Hill is out of proportion to West Clandon. It would have four times the amount of housing plus shops, offices/factories, GP surgery, schools. Development on this scale would blight a historic village with a history going back to the doomsday book and beyond.

Gosden Hill is the most obvious location for the north end of an A3 tunnel. It has rising ground and is situated just before the urban area. If it is built on, it will be very difficult to construct a tunnel.

The development will generate in the region of 6,000 vehicles which will pour on to the A3 which is stationary every day during rush hours. The linking of the A3100, B2215 and A247 would channel thousands of cars through the narrow, winding road through West Clandon, a road where large lorries mount the pavement virtually every day and through Send and Ripley which are also severely constrained.

The volume of traffic will greatly increase air pollution which is particularly critical given the proposal to build two schools.

Currently, a two way junction at the site would require vehicles wanting to go north on the A3 to go through Burpham which is grid-locked every day.

Burpham’s sewers are at capacity. Sewage would have to be pumped to Slyfield for processing, a project of enormous cost.

There is inadequate fresh water in Guildford and current supplies could not meet the needs of a development of this size.

Electricity supply is also inadequate and would require a big infrastructure development.

The railway station was rejected by Guildford Borough Council in 1984 because it feared Gosden Hill would become a dormitory estate for London.

The wording of the Local Plan with regard to Gosden Hill is so loose that the developer could virtually do whatever it wants.

The remaining agricultural land between Gosden Hill and West Clandon is so small that it is highly likely to be uneconomic and therefore a prime candidate for further development which would roll the Guildford Urban Area over West Clandon towards East Clandon and Wisley.

If the Strategic Sites are developed, the north of Guildford will deliver 36%, 5,036 houses towards the total of around 14,000. The infrastructures of the existing villages and the A3 will be overwhelmed by the scale of development.

A new on-slip at Burpham would only be 1.8km from the on-slip at Burnt Common which is against Highway England’s requirement of 2km.

Development of the A3 at best will not start until after 2020 and the building of a tunnel, which is only an “aspiration” in the Local Plan, is likely to be many years after. In the meantime given that developers build houses to provide cash-flow for infrastructure, Gosden Hill will have a crippling effect on villages like West Clandon and the A3.

Gosden Hill already has surface water problems. Merrow Stream crosses the site. No hydrological survey has been carried out to assess the implications. Electricity pylons run through the centre of Gosden Hill which have health and safety issues.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
I OBJECT to Policy A43 and A43a on Garlick’s Arch.

The site was only inserted in the draft plan at a late stage just before publication of the consultation draft which is a shabby way for the Council to proceed. The site is not a sustainable site being far from any infrastructure facilities and transport links. The bus service is infrequent and it is almost certain any future residents will rely almost entirely on cars for journeys. Similarly any employees at the employment areas will almost undoubtedly arrive and leave by car.

The site is susceptible to flooding and will not make a suitable site.

The Green Belt at this point serves the important function of separating West Clandon from Send. Building here will cause the two to coalesce defeating one of the objectives of the Green Belt.

I have seen no evidence that exceptional circumstances exist to justify removing this site from the Green Belt or that this important issue has been addressed. The Green Belt and Countryside study did not even consider this site.

It is understood the Council's eyes may have been turned by the possibility of receiving for free the land which might be used for new A3 slip roads in return for allowing this development, thus justifying it as some form of enabling development. However the slip road land if needed could be safeguarded in the plan and acquired by compulsory purchase when required. Lack of current funding for the slip road is not a justification for allowing the development of this site. If the slip road is genuinely needed then government funding will be available for it. (One of the reasons for turning down the so called enabling development proposal intended to fund the rebuilding of the Howard of Effingham School was that the redevelopment of the school was not essential. As and when it became essential Government funding would become available. Accordingly enabling development was not necessary. The same principle applies here.)

The A247 running south past this site through the centre of West Clandon is already very heavily used whilst being unsuitable for designation as an A road. In places it is too narrow for two lorries to pass causing them to mount the pavement- often at speed. It has narrow bends with poor sight lines, an infants school and a hump-backed bridge concealing the entrance road to the station for southward traffic. In addition, there are no continuous footpaths which forces pedestrians to cross and re-cross the road. Development at Garlick’s Arch will only exacerbate the problem and make the road even more congested and unsafe for pedestrians.

The development will cause harm to the ancient woodland on and by the site.

Taken together with the Gosden Hill site, there will be a ribbon of development along the A3 in contrast to the current “soft” edge approach to Guildford.
Garlick’s Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8). There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).

The Plan states the preference is to making the best use of previously developed land. Yet at the 11th hour a perfectly acceptable brown field site at Burnt Common, capable of accommodating approximately 100 houses, was removed from the Plan and replaced with the Garlick’s Arch site. There was no proper consultation in relation to the inclusion of this site. Why was a brownfield site removed and replaced with a Greenfield site? There is no evidence that Section 18 of the Planning and Compulsory Purchase Act 2004, which requires local planning authorities to produce a Statement of Community Involvement, has been complied with for this site. This only came to light for local residents following a Council meeting on 11th May 2016.

Moreover, Guildford Borough Council’s own Green Belt & Countryside Report does not address Garlick’s Arch at all, so there is no evidence base to support the inclusion of this site.

National Planning Policy promotes sustainable developments, with sustainable transport. With ever reducing bus services in the area and no train station within reasonable walking distance it is impossible for any development on this site to offer a sustainable transport solution. Development on this site is wholly inappropriate (Policy I3).

The stream, which runs through the site, is identified as having a high risk of flooding by the Environment Agency. There are other sites that do not flood that can be developed and therefore this site should be removed from the Plan (Policy P4).

This site is bordered by Ancient Woodland and within it a number of trees are protected by Tree Preservation Orders (Policy D3).

The site has an abundance of wildlife, some of which are protected. It is home to many types of owls and bats, with the woods having cuckoos and woodpeckers. In addition there are regular sightings of badgers, deer and red kites. The development of the site will result in the loss of habitat. No wildlife report has been conducted on the site. (Policy I4)

It is clear that with this site being added at the 11th hours no infrastructure planning has been undertaken. The Infrastructure Schedule makes no provision for any infrastructure improvements for this site. How will the local services such as schools and doctors cope, many of which are already at capacity? (Policy I1)

Furthermore, several electricity pylon runs through the site, which will have the potential to be a health hazard for any residents.

I OBJECT to the inclusion of the land for new on/off ramps at Burnt Common (A43a)

The addition north facing ramps to the A3 at Burnt Common would be a disaster for local communities. There is no requirement for local traffic to access the A3 to the north, but the addition will draw in a huge amount of ‘through’ traffic.

The route from London/M25 to Woking or would now be through Burnt Common and Send. Equally traffic from the east of Guildford (Merrow etc) and the A25 will now go through West Clandon and Burnt Common. This will cause immense damage to those areas on small roads which cannot be improved.

This Plan does not address the needs of local communities or the Borough in this regard. There has again been no Section 18 consultation on this.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. POLICY D3

I OBJECT to the damage to the historic environment as a result of the scale of the proposed development (Policy D3)

I OBJECT to the local plan based on the impact it will have on the special countryside of the borough.

The proposed development at Garlick’s Arch (A43) will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4898  Respondent: 8771233 / Ranald Mackinnon  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. POLICY D3

I OBJECT to Policy D3 - Historic environment

I object to this policy as it is very weak and I do not think it is clear enough in its support for the conservation of the historic environment. It provides for development which will “enhance” heritage assets which I fear is a developer’s charter as it leaves plenty of room for abuse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4899  Respondent: 8771233 / Ranald Mackinnon  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
1. POLICY D4

I OBJECT to Policy D4 - Development in urban areas and inset villages

The policy should place much greater emphasis on residential development in the existing urban centres. In this way housing needs can be met without resorting to large developments in the Green Belt. There are urban areas in need of regeneration but these are ignored in favour of Green Belt development.

The policy should not be applied to the villages which should remain in the Green Belt. Unrestricted application of this policy to the villages intended to be inset will change their characters radically and for the worse. The development it encourages will increase traffic and congestion disproportionately.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4888  Respondent: 8771233 / Ranald Mackinnon  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. POLICY E1

I OBJECT to the sustainable employment policy (Policy E1)

I object to the inclusion of a strategic employment site at Gosden Hill Farm. Employment sites should be concentrated on previously developed land in more sustainable locations with good transport links where the infrastructure can support development. Warehousing, distribution and industrial premises cause considerable commercial traffic, noise, pollution and general disruption. They are not good neighbours for schools and 2000 houses. Many of the jobs will be taken by people outside the area leading to additional congestion in Burpham and on the A3.

I object to the inclusion of a strategic employment site at Garlick’s Arch. It is in a non-sustainable location remote from any facilities of any kind and with poor public transport links. It is unlikely jobs there will be taken by local residents and it is likely all travel to and from work will be by car adding to local congestion. Employment sites should be concentrated on previously developed land in more sustainable location with good transport links where the infrastructure can support development.

The site is in any event subject to frequent flooding and unsuitable for development.

If developed, the new employment site at Garlick’s Arch, Send Marsh/Burnt Common (A43), would be treated as a Strategic Employment Site.

The proposed development of up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8) at Garlick’s Arch (A43) is in the scheme of industrial development relatively small. Just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m. The Garlick’s Arch site which is in the Green Belt should not be developed as a Strategic Employment Site when there is a suitable alternative brownfield site very close by, which is far more sustainable.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/4889  Respondent: 8771233 / Ranald Mackinnon  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. POLICY E2

I OBJECT to the location for new employment floorspace (Policy E2)

I object to this policy. It would be more sensible to confine new office and research and development floor space to the urban Guildford area. I also oppose the policy of expanding the Research Park onto Blackwell Farm. No exceptional circumstances, as defined under the NPPF, have been advanced to justify incursion into this permanent and high-quality area of Green Belt.

Proposals for new industrial, warehousing and storage (use Class B1c, B2 and B8) floorspace will be directed to the Industrial Strategic Employment Sites.

There is no need for the new employment floorspace to be located at Garlick’s Arch or Gosden Hill Farm, when near to these sites at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/4890  Respondent: 8771233 / Ranald Mackinnon  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
1. **POLICY E5**

I OBJECT to the loss of rural employment (Policy E5)

Policy E5 supports the retention and development of local services and community facilities in our inset and identified villages. Yet the development at Garlick’s Arch (A43) would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises. The Plan does not promote rural employment; rather it will result in the loss of existing local rural businesses.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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1. **POLICY E6**

I OBJECT to Policy E6 - The leisure and visitor experience.

The policy should acknowledge that whilst in some areas new and enhanced leisure facilities are valuable (for example the new Opera House at West Horsley Place Towers), much tourism depends on the undeveloped nature of Green Belt areas surrounding Guildford. Accordingly the policy should recognize that in many rural areas new and enhanced visitor facilities may be unnecessary and counterproductive, particularly away from existing buildings and development. For example the attraction of Newlands Corner is its undeveloped nature. Significant development of visitor facilities there is likely to diminish rather than increase its attractions. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment. Heritage sites and the Green Belt are particularly vulnerable to harm.

Tourism and visitors do not depend on new visitor “attractions” and could actually be damaged by them, as compellingly argued in the current debate over Newlands Corner. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment/“Disneyfication”. Heritage sites and the Green Belt are particularly vulnerable to harm.

Guildford has many “leisure and visitor attractions” already. The case for creating more is not made and no examples are given. Instead, the plan’s explicit priorities should be:

1. To protect the borough’s prime leisure and tourism asset, its countryside, from inappropriate development. This is all the more valuable because of its accessibility from London, the rest of Britain and the Continent, in that order. Rural residents are its custodians and require no Council interference. Economically, the most valuable forms of tourism, such as walking and cycling, require no new development. In the overcrowded South-East of England, lack of development is a leisure and tourism asset, not a liability.

2. To help make Guildford’s river landscape less off-putting and support town-break packages for high-value tourists. To achieve this, the policy needs to define what leverage, if any, Council planners have to influence normal tourism market mechanisms.
3. To help private providers market local tourism. This need not involve extra spending. The Council could, for instance, help co-ordinate ready-made, local tourism packages under a distinctive brand at an all-in price. An “English town break” (including B&B accommodation, a walking tour of Guildford, a pub lunch in the Surrey Hills, a visit to Wisley Gardens and a National Trust property and a Southwest Trains travelcard for a day out in London) would be highly attractive to many European visitors who currently by-pass Guildford to go to Bath, Oxford or Cambridge instead.

4. To rule out the redevelopment of scarce rural hotel sites (e.g. Thatchers, East Horsley, earmarked for 40 new houses under Site A37 of the plan yet just a short walk from the new opera house).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<tr>
<th>Comment ID: PSLPP16/4897</th>
<th>Respondent: 8771233 / Ranald Mackinnon</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E7</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. **POLICY E7**

I OBJECT to Policy E7 Guildford Town Centre

The policy “vision” describes protecting the Guildford’s unique setting and historical character and sets out some of the ways this will be done. However none of this is included in the formal Policy wording in the blue box. I suspect the Vision wording is effectively of little or any force. These principles should be included in the formal policy.

There should be a much greater focus on residential use of the town centre where many people would like to live and where the necessary amenities and infrastructure exist. The policy misses the opportunity to propose forward looking sustainable residential development plans in, for example the Walnut Tree Close area, where very significant numbers of new homes could be provided. Such town centre sites could meet much of the housing need over the plan period without harming the countryside.

There is an urgent need for a strategy to focus on brownfield redevelopment before considering development outside the existing urban area.

The policy does not address any of the major issues raised by the Council’s own Town Centre Master Plan, the Guildford Vision Group’s proposal for new river and rail crossings or plans for the redevelopment of Guildford Station, all of which are already the subject of public discussion.

The policy also fails to provide guidance on design requirements, as required by the NPPF.

The policy and surrounding text concentrates too much on shopping without regard to its nature which risks a proliferation of dull high-street chain stores. The policy should seek to enhance Guildford’s character and encourage a wider variety of small shops including locally owned businesses and shops of use to consumers. (For example there is no butcher in Guildford.)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Attached documents:

Comment ID: PSLPP16/4895  Respondent: 8771233 / Ranald Mackinnon  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. POLICY H1

I OBJECT to Policy H1 – Homes for all. Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan period. It fails to set rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions.

The housing mix is based on out-of-date, pre-Brexit projections and on assumptions set out in a flawed SHMA that has not been scrutinised or evaluated.

I support higher density development in the urban area, without resorting to dehumanising, high-rise buildings that developers commonly claim are necessary for financial viability. Much of Guildford town could usefully be regenerated with 4-5 storey blocks with landscaping and underground parking, as often seen on the Continent and, recently, in London.

Student accommodation should provided for 100% of new students and more than 60% of existing students, which would free up ideal family accommodation in the urban area. Other university cities (e.g. Oxford) insist on higher percentages than those proposed in the plan. In my view, the Council’s timidity is a case of “regulatory capture” by Surrey University, which has failed to use its existing planning permissions (dating from 2004) to accommodate 3,000 students or to improve the efficient development of its campus (e.g. by building on its extensive and under-used surface car parks). If all students were accommodated in this way, 2,000 homes would be freed up in town and there would be no need to build on the Hog’s Back.

It is not appropriate to release Green Belt land to house students who could be accommodated on the Surrey campus or other university sites. The plan should take account of the university's ability to house its own students and reduce the housing number accordingly.

Guildford borough has already a higher proportion of traveller sites than most comparable boroughs. Over-provision is inappropriate given other constraints.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4896  Respondent: 8771233 / Ranald Mackinnon  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H2
1. **POLICY H2**

I OBJECT to this policy on affordable homes (Policy H2) on the grounds of feasibility and that it should be more firm and explicit on unviability in paragraph 4.2.40.

In particular a scheme is only unviable if the value of developing the land (including some allowance for development risk and a normal level of profit) falls below the sale vale of the land for alternative non-premium uses such as agriculture. The price paid for the land is not relevant. The possibility of avoiding the affordable housing obligation through use of unviability arguments only serves to inflate land values. It will become clear that developments are unviable when developers start selling land for alternative non-development uses.

It should be noted in the plan that because of Guildford's relative popularity as a place to live combined with its location close to others towns and within the London Commuter belt no amount of building will meet demand. Similarly no amount of affordable housing will ever meet demand.

In addition the definition of an ‘affordable home’ is 80% of market value. With even a 2 bedroom flat in Guildford now having a market value of +£360,000 the discounted price is still not going to be affordable to anyone on a normal income.

And at what point will ‘affordable homes’ be able to go onto the market at full market price?

As we have seen with council houses it is not long before the discounted property is sold at full market value with the original owner simply pocketing the profit.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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1. **POLICY H3**

I OBJECT to Policy H3 – Rural Exception Homes as this Trojan horse policy. It says that homes can be built anywhere near a settlement of any form (including agricultural land and the AONB). These homes are meant for people with a village connection, but they could be for anyone on the Guildford borough housing list. To make the housing viable, or to improve the “mix” this can include “market” housing (i.e. normal commercial development which in Guildford usually means large executive homes). This policy means building anywhere, and ignoring all historic planning restrictions.
The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove “exceptional circumstances.”

The wording of the policy is far too wide and drives a coach and horses though all other aspects of planning policy. As drafted the planning authority could be obliged to grant permission for inappropriate and unsuitable developments.

The wording provides no ability to balance the desirability of the development against other considerations including harm to the Green Belt or the AONB. (If the housing would meet identified need and adjoins a settlement under this policy wording permission would have to be granted even in the most sensitive AONB location, even if more suitable locations were available.) The policy should include the need for a balancing exercise including consideration whether more suitable locations exist.

The policy wording should not allow market housing. The ability to include market housing is likely to inflate land values, leading to a self-perpetuating need to include market housing. It may lead to spurious developer led proposals which will be difficult to resist.

The policy wording should define small, either in land size or number of units. I am concerned that if small is left undefined the policy could be used to justify significant developments. In the context of the plan a development of 150 homes might be argued as small. (If Wisley at 2,500 homes is a big development then 500 homes might be a medium development and 150 could be small.)

The policy wording should be restricted to adjoining sites or define the concept of being "closely related". In particular I believe adding the concept of safe and easy walking distance extends the potential radius within which sites will be argued to be “closely related” Many people would regard a mile or so as an easy walking distance. (School children are expected to walk further than that before being eligible for free school travel.)

The wording of the policy itself does not require the local connection requirement for tenants to be secured in perpetuity - only the affordability must be secured in perpetuity. (For example housing could be built for retired Cabinet Ministers under this policy so long as the first tenant was required to have a local connection.) The introduction to the policy mentions this point, but it is not part of the policy itself and may carry little weight at appeal.

The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove “exceptional circumstances.” The size and location of sites should be better defined and it should be clear market housing cannot be included.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/4892  **Respondent:** 8771233 / Ranald MacKinnon  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire):** ()
1. POLICY II

I OBJECT, due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy II).

Our villages are already suffering from severe congestion for much of the day, for example the Newark Road & Rose Lane junction in the centre of Ripley and the A247 through West Clandon. The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.

Furthermore, many of the country lanes around the villages of Ripley, Send and Clandon are narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition.

I OBJECT to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces.

Many of the affected villages, such as West Clandon, already suffer from traffic congestion. Further development around these villages will only result in more traffic and more parking problems.

With some 5,000 houses being proposed close to the village of Ripley, the roads serving the village will become even more congested. Cycling has become an ever popular pastime, particularly at weekends hundreds of cyclists past through the villages on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road accidents involving cyclists as a result of the development proposed under the local plan.

The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the road becoming ever more dangerous for pedestrians.

The council has a statutory obligation to protect the public and the additional traffic flows will bring added accidents, noise, pollution and injury of the public. In the case of West Clandon the Street often only has a narrow footpath on one side of the road making it very dangerous, especially when vehicles mount the pavements.

This policy as it is inappropriate and inadequate and fails to respond to the challenges raised by the proposed significant Green belt developments. The borough’s infrastructure is already heavily strained. However the plan’s determination to build large housing estates across the Guildford countryside significantly increases the need for infrastructure investment without securing the means for its provision. Placing housing in the established urban areas would reduce the need for enhanced infrastructure as would a more realistic housing number.

The policy wording says nothing about roads and traffic. The Council’s methodology for assessing traffic congestion - averaging it over periods of several hours and ignoring the effects of junctions - simply hides the problem, which will get worse as development proceeds. The schemes referred to in this policy will not solve existing congestion and the local road network has not been given sufficient consideration. Some proposed development locations would require highway schemes that are unlikely ever to happen.

Adequate infrastructure provision is a pre-condition of sustainable development. But in this plan it is an afterthought buried away in Policy II. By prioritizing greenfield over urban, brownfield regeneration, the plan creates insurmountable (and unnecessary) obstacles for itself. Common sense suggests a local plan should first assess the borough’s infrastructure capacity for sustainable development, and then tailor development accordingly. This plan, however, assumes infrastructure will follow on the heels of housebuilding as if by magic. It makes implementation critically dependent on providers outside the Council’s control and on the vagaries of CIL income. Instead of recognizing this as a key constraint, the plan is based on hope. It is also highly likely that developers faced with the imposition of large infrastructure requirements will go to court to invoke the NPPF provision that prevents authorities from imposing conditions that make a development non-viable.

Policy II requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.
Despite the Garlick’s Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents’ in the locality will see their quality of life significantly deteriorate in many ways.

Many of the utilities in the Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers. No plans to improve these services should mean no development of the Garlick’s Arch site.

Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are already at capacity and suffering from funding cuts or freezes. Any further development without funding will place further stress upon existing health services.

Police services are seeing funding reduced. The development of the proposed 13,860 homes during the plan period will stretch the police services further and is unsustainable.

There is no provision of the increased capacity of Guildford hospital, where is this assessed and remedied?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** PSLPP16/4893  **Respondent:** 8771233 / Ranald Mackinnon  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy ID2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. **POLICY I2**

I OBJECT due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2)

I object to this policy as it is too vague and optimistic. Significant improvements to the road infrastructure are like to be many years away even if they ever happen. The draft plan, however, commits to building massive housing estates in the countryside before any of these road improvements are in place. This is inappropriate and will lead to massive traffic disruption during the construction phase and will add permanently to an already congested network (about 3,000 private cars from the 2,100 new homes at Wisley Airfield alone).

Road infrastructure represents a major constraint that should have been applied to the housing target at a much earlier stage in the plan process and not left as an unresolved difficulty in the draft plan.

There is no certainty that either the A3 or M25 in the borough will be improved to increase capacity and reduce congestion during the Plan period. Highways England has no plans to even examine improving the A3 before 2020. I have considerable concerns that development of the large residential sites identified at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), will take place before any improvements are made to the trunk road network. The A3 & M25 are already at capacity during peak hours and any development prior to improvement of these roads will only make the situations worse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Comment ID: PSLPP16/4894  Respondent: 8771233 / Ranald Mackinnon  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. POLICY ID3

I OBJECT to poor air quality concerns (Policy ID3)

Paragraph 4.6.27 of the Plan states that “Development must also mitigate its traffic impacts, including its environmental impacts and impacts on amenity and health.” The significant level of development being proposed, particularly in the north east of the borough will lead to considerable further congestion, despite any attempts to mitigate this through travel plans. This will be particularly acute in built up residential areas and will only lead to greater levels of air pollution, which will have a detrimental effect on local residents and their health and can result in early death.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4886  Respondent: 8771233 / Ranald Mackinnon  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. POLICY P2

I OBJECT to not protecting the Green Belt (Policy P2)

This policy does not sufficiently safeguard the Green Belt even though Green Belt constitutes 89% of the borough and should be the cornerstone of all local planning policy. The Green Belt is not the Council’s to give away and once it is gone it is gone forever. Sacrificing areas of the Green Belt to a developer influenced growth agenda is a betrayal of future generations and does not constitute sustainable development.
The Green Belt should be protected in perpetuity, but Policy P2 seeks to justify excessive development in supposedly protected areas. This is in breach of party manifesto commitments and contrary to previous responses to public consultation. It is disreputable to argue, as the Council does, that the Plan would involve the loss of “only” 1.6% of the borough’s Green Belt. Leaving aside the reliability of that statistic, the NPPF does not set an “acceptable” percentage. The fact remains that the plan proposes that 65% of the housing plus industrial development be built on land to be taken out of the Green Belt.

Paragraph 4.3.16 is seriously deficient in simply stating that the Council considers that exceptional circumstances exist to justify amendment of Green Belt boundaries. The exceptional circumstances are not identified. It is clear from national guidance that unmet housing need is not on its own an exceptional circumstance. Even to the extent that exceptional circumstances exist, these have to be balanced against the harm to the Green Belt in the specific sites proposed to be taken out of the Green Belt. This balancing exercise appears not to have been done.

The Countryside Study which the Council may argue fulfilled the need to demonstrate the exceptional circumstances required to justify removal of areas from the Green Belt was a simplistic tick box exercise. Within limits it may have answered certain questions about different attributes of different areas of Green Belt but it did not carry out the balancing exercise needed to determine whether specific exceptional circumstances justified removal of specific areas of land from the Green Belt. I believe that each of the identified Green Belt site proposed to be removed from the Green Belt should be carefully assessed against any exceptional circumstances in deciding whether it should be removed from the Green Belt in the final plan. This exercise should bear in mind that housing need in itself is not an exceptional circumstance and nor is the Council’s growth aspiration. An important consideration is that more housing need could be met on urban sites than is currently planned. The Plan has fallen into the developers’ hands and developers prefer building on undeveloped land rather than brown field sites.

I object to the “insetting” of 14 villages from the Green Belt. Contrary to assertions made in the Plan process many of these villages do contribute to the openness of the Green Belt and there is no need to inset them.

I also object to the wholesale extensions to the settlement boundaries in many villages to allow for infilling and that infilling is also proposed outside the settlement boundaries of 11 further villages. Many Guildford villages are linear. It is all too easy to square off boundaries by including countryside bounded on only one or two sides by existing development, claiming it contributes nothing to the “openness” of the Green Belt, a term which neither the plan nor the NPPF defines. The NPPF’s other 4 tests of Green Belt status, including the prevention of urban sprawl, are ignored. Effectively, this policy makes all villages within the Green Belt vulnerable to large blocks of new development and seems almost calculated to secure the rejection of the plan as a whole.

To “inset” two-thirds of the borough’s rural villages on the grounds that they no longer contribute to the purposes of the Green Belt is extreme and inherently implausible, given the borough’s location on the edge of Metropolitan London. I cannot see how such extensive areas fail to contribute to the purposes of the Green Belt under the NPPF, but this could quickly be the case if the proposed “insetting” and boundary extensions go ahead.

This policy is wildly disproportionate in terms of any foreseeable development need and has caused tidal waves of opposition from residents. It flies in the face of NPPF paragraph 17’s aim of “empowering local people to shape their surroundings” and other NPPF provisions.

Paragraph 4.3.17 states that “the general extent of the Green Belt has been retained.” I believe this should be deleted as an untruth.

In addition I OBJECT to the proposals to remove from the Green Belt the so called ‘strategic sites’ of Wisley Airfield (A35), Gosden Hill Farm (A25) and Garlick’s Arch (A43) and all other strategic sites. National Planning Policy requires...
there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these sites and villages (as mere housing need does not constitute a ‘special circumstance’) to be taken from the Green Belt. Once taken from the green belt they will be lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached.

GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site.

Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. **POLICY P4**

I OBJECT to development in areas which are at risk of flooding (Policy P4)

National Planning Policy states that Local Plans should take account of climate change over the longer term, including factors such as flood risk. It goes on to say that new development should be planned to avoid increased vulnerability to the range of impacts arising from climate change.

The Plan states that in accordance with national planning practice guidance, the Level 1 SFRA has been used to guide development towards areas at the lowest risk of flooding and identify areas unsuitable for development. However, the document concludes that land outside of the area of flood risk is not capable of accommodating all of the borough’s identified development needs. A Level 2 SFRA has therefore also been produced and will help the Council apply the exceptions test (as described in the NPPG) as necessary to development proposals in areas at risk of flooding.

The site at Garlick’s Arch (A43) is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. Knowing the area well I am aware that this site often floods during the winter months and the flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPP16/4884 **Respondent:** 8771233 / Ranald Mackinnon **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Re: Responses to Guildford Borough Proposed Submission Local Plan (June 2016)

I OBJECT in the strongest possible terms to the Guildford Borough Proposed Submission Local Plan (June 2016). This Plan is unsustainable, unworkable and, in many provisions, unnecessary.

I set out below my objections to specific policies and matters within the Plan.

1. **POLICY S1**

I OBJECT to this Policy as the development proposed will not be sustainable (Policy S1)
The NPPF states that the presumption in favour of sustainable development “should be seen as a golden thread running through both plan-making and decision-taking.” As the first policy in the Plan, Policy S1 ought to set a clear framework. Instead, no definition of “sustainable development” is given. The policy also fails to set out any principles for applying sustainable development in practice to local planning decisions, which often have serious long-term impacts.

The policy states that it aims “to secure development that secures the economic, social and environmental conditions in the area”. This fails to recognize that economic growth, social justice and environmental protection often conflict. The policy does not say how each element is to be weighted or conflicts resolved. As a practical guide to the planning decision to be taken in the Plan period it is seriously deficient. The policy is likely to be used by developers to justify inappropriate developments on economic grounds. Under this policy, virtually any development will qualify as “sustainable”, in breach of the NPPF’s most important guideline.

Policy S1 is also seriously deficient in making no mention of the Green Belt. The Green Belt is a long term Government policy enshrined in primary legislation to protect green areas in perpetuity. The Green Belt is a living example of sustainable development in practice and is one of the most important factors affecting sustainable development in the area covered by the Plan and should be acknowledged in this policy. Policy S1 should include a commitment to protect the Green Belt from inappropriate development and to uphold Green Belt boundaries and protections. This would set at least one clear boundary to planning decisions. The Plan and the Council have treated the Green Belt as a developable land bank rather than as a constraint to development.

The commitment to approve planning applications “wherever possible” and “without delay” reveals the pro-development bias of the plan. Countervailing references to sustainability are so vague that the NPPF presumption in favour of sustainable development becomes a presumption in favour of any development at all.

This policy also ignores, as if they are inconvenient constraints, most of the 12 Core Planning Principles set out in NPPF paragraph 17.

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill Farm (A25) are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are also unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. POLICY S2

I OBJECT to the Borough Wide Strategy (Policy S2)

The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

The housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.

The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guilford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

The assumptions and calculations in the SHMA are widely regarded as flawed and even before Brexit, produced an inflated housing needs number. The figure of 13,860 new homes is completely unsubstantiated. It has not been scrutinized by Councillors despite repeated requests for debate. The assumptions and calculations underlying the model are hidden, protected by a claim to intellectual property by a commercial sub-contractor used in preparing the SHMA. I have serious doubts about the objectivity of the SHMA because it has been produced by consultants whose website openly proclaims their pro-development agenda leading to reasonable suspicion that the figures are inflated. Guildford’s OAN is not transparent but has been taken on trust by the authors of the plan. Given that almost every element of the plan is predicated on this OAN, the plan as a whole cannot be considered “sound”.

The status of the 13,860 figure is ambiguous. The Council has said that the housing number and the OAN are identical because the OAN is “deliverable” and is by definition objective and cannot be contradicted. The OAN is only deliverable because of the Council’s cavalier approach to the Green Belt in contravention of the NPPF, ministerial statements and local and national Conservative Party manifesto commitments. The plan also states that infrastructure or other constraints may in due course affect deliverability. It is also unlikely that the number of houses can be built at the rate proposed. In recent years, housing starts have on average been less than half the proposed rate. This is not because developers do not have the land or cannot get planning permission. Constraints in the supply chain and maintaining profit levels have been more important.

The plan cannot be considered “deliverable”. In addition, the number of homes proposed, plus existing planning permissions, plus expected “windfall” sites, exceeds the total of 13,860. So how many homes (taking account of these
adjustments) do the Council want built? The plan does not say. Without this figure it is hard to see how anything else can be planned. This undermines the validity of the whole consultation. It is unreasonable to ask the public to approve a “plan” that fails to propose a target number that takes all the standard constraints and adjustments realistically into account, leaving the Council to set one without further consultation. Even if the OAN Ire not flawed, it is at best only a baseline figure and should not be passed off as a policy proposal.

It is unreasonable to embark on a radical transformation of the borough on the basis of an unclear housing target. Most of Guildford Borough is highly protected from development (89% Green Belt, 44% AONB and about 75% protected by SPA). Whether or not increasing the number of dwellings by up to a quarter is desirable, it would be a major and irreversible change, arguably turning a largely rural borough into a mainly urban or suburban one like Woking. The scale of the housing number increases the onus for it to be seen to be sound. A substantially lower number, on the other hand, would remove the need to build on Green Belt or open countryside, and instantly meet the single biggest public objection to the plan as a whole.

The Plan in general and this policy in particular does not address the point that Guildford exists as part of London's commuter belt. Any increase in supply of housing in Guildford, particularly if the increase is proportionately greater than elsewhere in the commuter belt, will simply result in a shift of population into the area. It will not reduce prices or increase availability except imperceptibly. The Plan also ignores the point that many of those working in the area live elsewhere. Accordingly in considering the housing number the Plan should take into account that in this part of London’s commuter belt, demand for housing is, in practical terms, unlimited.

This policy does not take proper accounts of the constraints to development which exist, principally posed by the Green Belt and by infrastructure limitations. I believe the Council is under a duty to properly consider applying these constraints. It is clear the Council has failed to do this. This approach differs from all the other boroughs in Surrey. The Plan appears to have deliberately been manipulated towards a growth agenda without disclosing why this is being done. The housing that is needed should be concentrated on urban brown field sites and through increasing the housing density of existing built up urban areas.

The development of 13,860 homes in the Plan period with 65% in the Green Belt does not constitute sustainable development. It will have a permanently detrimental impact on the Borough in general and on West Clandon and surrounding area in particular. The developments at Garlick’s Arch and Gosden Hill Farm do not meet the needs of the local communities. The road infrastructure in and around West Clandon will be unable to cope with additional demand. The edge of urban Guildford will creep that much closer to West Clandon, thus negating the purposes of the Green Belt in the area which include safeguarding the countryside from encroachment, checking the unrestricted sprawl of large built up areas and preventing neighboring towns merging into one another.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill Farm (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/852  Respondent: 8771233 / Ranald Mackinnon  Agent:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. Questions posed by Guildford Borough Council as part of its consultation.

Questions from GBC

24.A. Question 1: The evidence base and submission documents

The Proposed Submission Local Plan: strategy and sites is based on up-to-date evidence. The evidence base documents contributing to the preparation of the plan are listed in Appendix D and can be found on our website (links open in a new window).

Do you agree that the evidence used for the Proposed Submission Local Plan Strategy and Sites is adequate, up-to-date and relevant?

ANSWER

I do not agree that the evidence used for the Proposed Submission Local Plan Strategy and Sites is adequate, up-to-date and relevant.

The fundamental driving forces for much of the development proposed in the Plan (particularly that on Green Belt land) are based on:

1. An excessive ambition to expand the local economy which is neither warranted nor wanted by the local population. Guildford is already one of the highest ‘value creation’ areas in the country and has one of the lowest unemployment rates. There is no evidence that massive and accelerated expansion is required.

1. SHMA figures which are neither transparent nor justifiable, especially in view of previous figures set. Independent assessments of the SHMA (eg from Guildford Residents’ Association and David Reeve) show it is set far too high and so cannot be said to be adequate, up-to-date or relevant.

In addition the recent vote to leave the EU and the impact this will have on the economy and migration have not been taken into account.

The Plan should be re-assessed and the methodology for arriving at housing need figures should be fully transparent.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
24.B. Question 2: Legal Compliance

Do you consider the Proposed Submission Local Plan: strategy and sites as a whole is legally compliant? Please provide the following information being as precise as possible:

- why you consider it is or is not legally compliant and
- what change(s) (if any) you consider necessary to make it legally compliant, explaining why this is the case.

**ANSWER**

I do not consider the Proposed Submission Local Plan: strategy and sites as a whole to be legally compliant because it mainly ignores the consultation process for the 2014 draft Plan it is claimed to be based on.

That consultation process was absolutely clear by some +20,000 responses that that Plan was flawed and no development should be carried out on Green Belt land.

Instead this 2016 draft Plan actually increases the number of dwellings being built on the Green Belt, in direct contradiction to the consultation process, yet is stated to be a Regulation 19 proposal.

As a result I do not see how the 2016 draft Plan can be Legally Compliant.

The 2016 draft Plan should be re-assessed and should take into account the views of the majority of responses from the consultation process for the 2014 draft Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/854  Respondent: 8771233 / Ranald Mackinnon  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire): ( )**

24.C. Question 3: Soundness

Do you consider the Proposed Submission Local Plan: strategy and sites as a whole to be sound? Please provide the following information being as precise as possible:

- why you consider it is or is not sound and
- what change(s) (if any) you consider necessary to make it sound, explaining why this is the case.

**ANSWER**
I do not consider the Proposed Submission Local Plan: strategy and sites as a whole to be sound, because, but not limited to, the following reasons:

1. “Only sites that propose sustainable solutions have been included in the Plan and the Plan rejects any schemes that would have a detrimental effect on the green belt.” Summer 2016 edition of “About Guildford” (published by the Council) on page 5. This is demonstrably untrue and appears designed to bias the consultation process.
2. The housing OAN figure has been calculated by a process which is not transparent. It has not been properly examined by Councillors before being adopted.
3. The OAN has been adopted as the housing number without the application of any constraints to take account of Guildford's circumstances, including in particular the Green Belt, AONB and road infrastructure. National policy permits such constraints to be applied and it is inappropriate not to consider the need to do this.
4. The draft Plan does not accord with the NPPF policies on protecting the Green Belt.

Exceptional circumstances need to be shown to justify removing areas from the Green Belt and this has not been done. The housing need number is not justification in itself according to published ministerial statements Having properly calculated an OAN, constraints should be applied to it to reflect the Green Belt, AONB and infrastructure. Each proposed Green Belt site then needs to be justified on its own merits. The benefits of the proposed development need to be identified together with the harm to the Green Belt. Only if there are exceptional circumstances and following a proper balancing exercise demonstrating that these exceptional circumstances outweigh the harm to the Green Belt can the proposal proceed. The draft Plan does not demonstrate that this has been done. The housing number has been used as a blanket justification for all Green Belt sites— which amount to 65% of the proposed housing number.

1. Whatever the justification for the assumptions made in calculating the OAN, those assumptions are now almost certainly incorrect following the referendum.
2. The housing number is at least twice the achieved rate of building in the Borough over the last few years. There is no evidence in the Plan to show that this rate is achievable and sustainable.
3. Much of the infrastructure required to support the level of development proposed is outside the Council’s control. The Infrastructure Plan is long on possibilities and aspirations and very short on commitments. The infrastructure requirements placed on developers are supposed to be in place before development commences. This is utterly unrealistic and indicates a lack of knowledge of developer’s business models which depend on positive cash flow. It seems very clear that at best, infrastructure provision will seriously lag development and leave higher levels of congestion than now. This will reduce the quality of life for residents through congestion and disruption.
4. The 40-45% requirement for affordable homes together with infrastructure such as railway stations, park and ride facilities, schools and roads is highly likely to be challenged on a site by site basis by developers using the NPPF provision that Councils cannot impose conditions which make development non-viable.

1. GBC has not included details of its Town Centre Master Plan and urban development proposals in time for and as a part of the Guildford Local Plan consultation
2. GBC has failed to provide an Infrastructure Report in time for and as a part of the Guildford Local Plan consultation
3. GBC has proposed an OAN of 693 houses per annum in the GL Hearn West Surrey Strategic Housing Market Assessment (SHMA) which many, including independent assessors, consider unsound
4. Highways England will not start to consider what it intends to do as regards the A3 in the vicinity of Guildford until 2018
5. Network Rail have not made available for the public consultation any plans for a new railway station at Merrow with an adjacent Park & Ride for 1,000 cars
6. The GBC proposals for Gosden Hill Farm do not appear to be in coordination with the Neighbourhood Plan for Burpham
7. The draft Local Plan will cause further linear development along the A3 between Burpham and West Clandon PC and encroachment onto open Green Belt countryside in clear conflict with the National Planning Policy Framework
8. The proposal for Garlick’s Arch was added to the draft Local Plan without any prior consultation under Regulation 18.
9. The Land Availability Assessment (LAA) indicates a range of planning difficulties for Gosden Hill Farm and Burpham which have to be met by the developer involved. These include Electricity Grid supply problems and
foul sewage and surface water issues that suggest the development proposed cannot easily be implemented both technically and financially.

10. No adequate explanation is given as to how the aspirational proposal for a tunnel will be used to overcome traffic issues relating to the quality of life and amenity of Burpham, West Clandon, Send and Ripley citizens.

11. In common with many others I do not believe the housing figure has been properly calculated and I believe it overstates housing need. The Council has prevented councilors or others from properly considering the SHMA by refusing to make public the basis on which it was drawn up.

12. The housing figure, when properly recalculated, should be subject to constraints to reflect Guildford's circumstances, including in particular the Green Belt and road infrastructure. National policy permits such constraints to be applied and it is inappropriate not to consider the need to do this.

13. Even once a housing number has been calculated it cannot be used to justify taking land out of the Green Belt on a wholesale basis.

14. Cast iron commitment should be included in the plan that development can only commence when required infrastructure improvements have been secured.

15. The status of the text which accompanies each policy box is not clear. If the accompanying text does not have the force of policy a number of the policies (i.e. the text in blue) are so vague and general that they commit the Council to very little.

The draft Plan should be re-assessed with housing on brownfield sites made a priority over commercial development and Greenfield sites and each of the above points addressed.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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<thead>
<tr>
<th>Comment ID: SQLP16/855</th>
<th>Respondent: 8771233 / Ranald Mackinnon Agent:</th>
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<tr>
<td>Document: <strong>Proposed Submission Local Plan: strategy and sites 2016 / Question 4: Duty to cooperate</strong></td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

**24.D. Question 4: Duty to cooperate**

Do you consider the Proposed Submission Local Plan: strategy and sites **as a whole** has complied with the Duty to cooperate? Please provide the following information being as precise as possible:

- why you consider it has or has not complied with the Duty to cooperate and
- what change(s) (if any) you consider necessary to make it comply with the duty to cooperate, explaining why this is the case.

**ANSWER**

I do not consider the Proposed Submission Local Plan: strategy and sites **as a whole** has complied with the Duty to cooperate.

This 2016 draft of the Local Plan clearly demonstrates Guildford Borough Council’s refusal to co-operate with the wishes and requirements of the vast majority of the residents in its Borough.
The Council has failed to co-operate with the results of the consultation process for the 2014 draft Plan which was meant to inform and guide this 2016 draft Plan.

Despite campaigning on a clear statement ‘Conservatives Say Green Belt To Stay’, the ruling party on GBC is now intent on pushing through a Plan which will devastate Green Belt land and extend the Guildford Urban Area to further merge into surrounding rural villages.

This is not cooperation by any definition.

In addition the Council has failed to cooperate in providing any transparency to the housing need figures commissioned by the Council from GL Hearn.

The 2016 draft Local Plan should be reassessed with a reviewed and transparent SHMA and revised to reflect the views of the residents of the Borough, who pay for Guildford Borough Council to act in their interests, and not those of developers and central government.

I trust that the objections made above are fully taken into consideration and that the 2016 draft Local Plan is amended accordingly.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: pslp173/212</th>
<th>Respondent: 8771233 / Ranald Mackinnon</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2017 / Appendix H: Maps - West Horsley North</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policies A37, 38, 40, 42, 44 & 45 – My Objections

Some 295 houses in various smaller developments in West Horsley, 100 in Send and 15 in Ripley. These will generate traffic on the A 247 to access the A3.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: pslp172/1979</th>
<th>Respondent: 8771233 / Ranald Mackinnon</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A25</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Gosden Hill development of 1700 houses. Reference to a potential link road from the development to the A247. The clear implication is for an access from the development to the A247 with enormous traffic implications for the A247.

South bound off- and on- slip roads to service the development and replace the existing off- slip road to Burpham. The only North bound access to the A3 will be via the existing slip road off Clay Lane. (See later, Burnt Common).

A 4-entry form secondary school, a primary school, a retail centre and a park and ride for up to 700 cars.

When developed, the new employment site at the north side of Gosden Hill Farm (site allocation A25) will be treated as an Office and Research & Development Strategic Employment Site (7000sq.m). This could mean several hundred employees.

1. I object to the changed policy A25 Gosden Hill for the development of 1700 homes which is still far too much.
2. There is no need for housing on this site because the local plan housing target is incorrect and inflated and ignores constraints.
3. Gosden Hill is located entirely within the Green Belt. No exceptional circumstances have been demonstrated for building on this site and therefore development here does not meet paragraphs 87-89 of the NPPF. Furthermore, Gosden Hill performs all five functions of green belt,
4. The site has no provision for foul or surface water sewerage and adjoining sewerage is at capacity
5. The Green Belt at this point serves the important function of separating West Clandon from the edge of urban Guildford. Development here will cause the two to coalesce competing one of the objectives of the Green Belt. If this development proceeds I believe the narrow strip of Green Belt remaining between Guildford and Clandon at this point will be too narrow and will come under further pressure. It will represent an undesirable ribbon development along the A3. It will be highly visible from the A3 when approaching Guildford and will, in conjunction with A43a at Garlick's Arch give the appearance of almost continuous development from Send through to Guildford.
6. The development of this site cannot be sustainable and will cause massive congestion onto surrounding roads. The development will generate in the region of 6,000 vehicles which will exit straight on to the A3 which is stationary every day during rush hours. The linking of the A3100, B2215 and A247 would channel thousands of cars through the narrow, winding road through West Clandon.
7. I object to the proposal for a link road to bring traffic from the Gosden Hill development to the proposed 4 way junction at Burnt Common. This has the potential to generate large volumes of traffic (including commercial vehicles) on the A247 through Send and West Clandon - a road which is already under traffic stress (see below).
8. The volume of traffic will greatly increase air pollution which is particularly critical given the proposal to build two schools.
9. A new on-slip at Burpham would only be 1.8km from the on-slip at Burnt Common which is against Highway England’s requirement of 2km.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Garlick’s Arch development of 400+ houses and facilities for travelling showmen (implies storage yards and long vehicles). This will generate traffic on the A247.

1. I object to the changed policy A43 Garlick’s Arch for 400 homes and 6 travelling show people pitches
2. It ignores all the thousands of previous objections made by local people
3. There is no proven demand for travelling show people plots in this location
4. There is no need for putting houses on this site because the local plan housing target is incorrect and inflated and ignores constraints.
5. The allocation of 28.9 ha is an excessive land grab into the Green Belt. If we take a normal density of 30 homes per ha and it is at the end of the day proven that there is a need for 400 homes in this location the land requirement is 13 ha not 28.9 ha which is more than double. This replicates a similar over land grab at Burnt Common where the factor is 7 times the land required.
6. This confirms the worrying impression that GBC have a pre-determined policy of building on the Green Belt at every opportunity. The arithmetic does not stack up. One would have thought that they would as custodians of the green belt be intent on conserving it rather than exploiting it.
7. The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.
8. Garlick’s Arch (A43) is in an unsustainable location. It does not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. The site is unsuitable due to lack of access to sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be dependent on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.
9. The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.
10. I object to the proposal to remove Garlick’s Arch from the Green Belt. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for this land to be taken from the Green Belt. Once taken the green belt is lost forever. There is a real danger that the loss of this Green Belt will result in urban sprawl and the neighbouring villages merging into one another. The significant development in West Clandon, Send and Ripley will result in the character of these villages being lost and the countryside encroached.
11. I object to the development at Garlick’s Arch because of flood risk. The site at Garlick’s Arch is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. Knowing the area well I am aware that this site often floods during the winter months and the flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.
12. I object to the loss of rural employment on the site. The development at Garlick’s Arch would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises.
13. I object to the potential loss of Ancient Woodland on the site. The proposed development at Garlick’s Arch will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees that existed in the year 1600.
14. I object due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy 11). Our villages are already suffering from severe congestion for much of the day, for example the Newark Road and Rose Lane junction in the centre of Ripley and the A247 through West Clandon. The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.
15. Furthermore, many of the country lanes around the villages of West Clandon, East Clandon, Ripley, and Send are narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition. I object to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces.
16. Many of the affected villages, such as West Clandon, East Clandon, Send and Ripley, already suffer from parking problems. Further development around these villages will only result in more traffic and more parking problems.

17. With some 5000 houses being proposed close to the villages of West Clandon, East Clandon, Send and Ripley, the roads serving the village will become even more congested. Cycling has become a popular past time, particularly at weekends hundreds of cyclists pass through the village on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road accidents involving cyclists as a result of the development proposed under the local plan.

18. The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the roads becoming ever more dangerous for pedestrians.

19. I object to the lack of proper infrastructure planning for sites (Policy I1). Policy I1 requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.

20. Despite the Garlick’s Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents’ in the locality will see their quality of life significantly deteriorate in many ways.

21. Many of the utilities in the West Clandon, East Clandon, Burpham, Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers. No plans to improve these services should mean no development of the Garlick’s Arch site.

22. Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are already at capacity and suffering from funding cuts or freezes. Any further development without funding will place further stress upon existing health services.

23. I object due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2). There is no certainty that either the A3 or M25 in the borough will be improved to increase capacity and reduce congestion during the Plan period. Highways England has no plans to even examine improving the A3 before 2020. I have considerable concerns that development of the large residential sites identified at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), will take place before any improvements are made to the trunk road network. The A3 & M25 are already at capacity during peak hours and any development prior to improvement of these roads will only make the situations worse.

24. I object to poor air quality concerns (Policy I3). Paragraph 4.6.27 of the Plan states that “Development must also mitigate its traffic impacts, including its environmental impacts and impacts on amenity and health.” The significant level of development being proposed, particularly in the north east of the borough will lead to considerable further congestion, despite any attempts to mitigate this through travel plans. This will be particularly acute in built up residential areas and will only lead to greater levels of air pollution, which will have a detrimental effect on local residents and their health.

25. I object to the inclusion of the land at Garlick’s Arch, Send Marsh/Burnt Common and Ripley (A43). Garlick’s Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8). There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).

26. It is clear that with this site being added at the eleventh hour and no infrastructure planning has been undertaken. The Infrastructure Schedule makes no provision for any infrastructure improvements for this site. How will the local services such as schools and doctors cope, many of which are already at capacity? (Policy I1)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Burnt Common strategic industrial employment site for light industry, storage and distribution activities. It is to be designated an Industrial Strategic Employment Site which means that it is a preferred site for industrial development including waste management facilities. The site is 9ha which it is stated allows for considerable future expansion. This will generate large amounts of traffic including heavy vehicles on the A247.

1. I object to Policy A 58 at Burnt Common and to the proposed inclusion of Burnt Common as an Industrial Strategic Employment Site
2. This previous allocation for B1c, B2 and B8 development was removed from the 2014 draft due to all the objections made previously.
3. The word “minimum” is a change from the previous “maximum” in the 2016 plan and since that time there has been a decline in demand for industrial land. This change alone is unacceptable since even if there was a need to build 7,000 sq m at Burnt Common this development would only require 1.4 ha at a standard plot ratio density of 50% not 9.26 ha. There is no justification for zoning an additional 7.86 ha in the Green Belt.
4. There is in fact no justification for building any more industrial development in the borough particularly at Burnt Common. The current industrial pipeline of granted consents of 38,357sqm in B1c, B2 or B8 use class space is double the 19,000 sq m said to be needed by Aecom who justify the need for new space on top of the existing pipeline by a completely unsubstantiated suggestion that “there is the possibility that some pipeline developments may not come forward at all, or be developed in different quantities by use class than has been consented.”
5. There is no need to build industrial or warehouse development in the middle of the Green Belt when Slyfield and Guildford still have empty sites and industrial units.
6. The 2017 Employment Land Need Assessment shows a reduction in demand to 3.9 hectares for industrial land for the whole borough not a huge over allocation of 9.26 hectares at Send in the Green Belt.
7. The Employment Land Needs Assessment update 2017 (ELNA) states “that the pipeline for employment floorspace defined by planning permissions yet to be implemented and prior approvals suggests the potential for an additional 33,607sqm of B use class floorspace to come forward. This figure comprises a net loss of 4,750sqm of B1a use class floorspace and a net gain of 38,357sqm in B1c, B2 or B8 use class space.”
8. 38,357 sq m of B1c, B2 or B8 use class is quite sufficient supply for the plan period and is in fact more space than the 3.9 ha of industrial land that is said to be needed for the plan period by Aecom. Since if you were to develop 3.9 ha at a plot ratio of 50% it would provide new industrial development of 19,000 sq m approximately half of current planning permissions granted. This does not justify the need for new development of industrial space on the Green Belt in such areas as Burnt Common.
9. The reality of demand for industrial space is that it is both nationally and locally in decline and this is evidenced by old existing permissions that have not been taken up and developed. The ELNA alludes incorrectly to the poor quality of existing space being a “constraint” on supply and fails to acknowledge that this assertion cannot apply to potential newly developed space e.g. the undeveloped pipeline of 38,357sqm.
10. The impact on small surrounding roads will create traffic gridlock.
11. It will join up existing villages and defeat the purpose of the Green Belt.
12. The ongoing poor quality of the updated research undertaken by Aecom in the Employment Land Needs Assessment 2017 does not support industrial development on land in the Green Belt at Burnt Common.
13. The Aecom research is generally superficial and lacks sufficient detail and analysis between B1c, B2 and B8 use classes and no reliable individual analysis has been undertaken of the widely different supply and demand dynamics of light industrial, general industrial and warehousing and distribution floor space.
14. The potential inclusion of a waste management facility mentioned at paragraph 4.4.23a lacks enough detail for proper consultation and is completely inappropriate.
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Although much is made of the need for new infrastructure to support these developments and for this to be in place as needed, the Plan admits …”we forecast that there will also be an absolute increase in overall traffic volumes” and this is assuming all the infrastructure (listed in App. C to the Plan) is in place in a timely fashion. GBC has little or no control over the plans of Surrey County Council as the local highways authority and Highways England for trunk roads. Worryingly, the Plan now has less substantive information about improvements to the A3 South of the M25 from Highways England and it appears that their plans are not yet formed (Policy ID2). In the absence of such information, the infrastructure proposed is specific to each proposed development and does not address cumulative effects. What would be the case with regard to planning approval if SCC and/or HE do not provide timely infrastructure?

The Plan now calls for nearly all infrastructure to be funded by developers (see APP. C). We question how realistic it is to expect developers not only to pay for all the infrastructure but also to have it in place in a timely fashion. The Plan says that planning permission will be refused if timely provision of infrastructure cannot be secured. Such refusals will almost certainly be settled in the courts. Developers’ business models are based on building and selling houses to create the cash to provide infrastructure. People will be living on the sites well before infrastructure is complete. Will GBC prevent development of Gosden Hill until slip roads etc. are provided off and onto the A3? Again, the infrastructure is site specific and does not address cumulative effects.

If development were to be refused the land would still have been removed from the green belt and its future rendered uncertain.

Residents are being asked to accept very large amounts of development with little or no detail being provided on measures which would relieve existing congestion and limit future problems. The cumulative effects of the developments listed below are certain to have a devastating effect on the A247 through our village (and of course on Send) and it is hard to see how any of the infrastructure proposed in the Plan (App. C) will do anything to mitigate the effects of these developments on the A247 and hence our village.

Summary of the Impacts on the A247 – My Objections

All of these developments will draw additional traffic to the A247 through the village. It would be naïve to think that the employment sites and schools will serve only the developments themselves. Apart from the normal movements of residents to and from the new sites there will be considerable additional traffic on the A247 generated by:

- children from elsewhere being delivered to schools and collected
- the employees of the offices and industrial sites getting to work and returning home
- the vehicle movements generated by distribution and storage activities
- traffic from Wisley wishing to travel South and returning
- traffic from Gosden Hill wishing to travel South and returning
- traffic from Slyfield wishing to travel South and returning
- private and commercial traffic originating in the South and accessing Gosden Hill, Burnt Common or the A3 and returning (including traffic from Dunsfold)
The A247 although an A road:
-is less than 2 vehicle wide in places
-does not have continuous footpaths
-has several sharp bends
-has a hump-backed bridge with poor site lines
-has a very difficult junction to access the station
-is largely unlit
-has a primary school
-is already very congested at times

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp17q/61  Respondent: 8771233 / Ranald Mackinnon  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Question 4: Duty to cooperate

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Non-plan Items– My Objections

Surrey County Council’s business plan for Newlands Corner (not referenced in the Local Plan) to attract 100,000 more visitors a year. A significant proportion of these can be expected to use the A247.

Waverly B. C. has approved the development of 1,800 homes at Dunsfold which has the potential to feed traffic trying to avoid Guildford, onto the A247 to access the A3 (not referenced in the Local Plan).

Cumulative impact of changes – My Objections

Changes to the Plan have done nothing to alleviate the problems (particularly of traffic and congestion) raised in residents’ previous responses. Indeed it is now clear that the problems will be made much worse. There do not appear to be any changes which would be of benefit to the Clandons and indeed the cumulative effect of what is in the Plan and some external factors not in the Plan will have a much worse impact on the A247 through West Clandon and Send than the 2016 draft. Note that the A247 is the only road over the Guildford to Waterloo railway, North of Guildford that doesn’t involve travelling through the town centre.

Duty to Cooperate – My Objections

The NPPF states para 155: “Early and meaningful engagement and collaboration with neighbourhoods, local organisations and businesses is essential. A wide section of the community should be proactively engaged, so that Local Plans, as far as
possible, reflect a collective vision and a set of agreed priorities for the sustainable development of the area, including those contained in any neighbourhood plans that have been made.”

The changes in this latest version of the Guildford Local Plan show little or no willingness of Guildford Borough Council to reflect a collective vision. Despite the many thousands of responses to previous versions of the Plan which overwhelmingly rejected building on Green Belt land this latest version has as much, if not more, building on the Green Belt and increased problems of infrastructure and traffic which will bring increased noise and air pollution and danger to residents.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule</td>
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Answer (if comment is on questions 1-7 of the questionnaire): ()

1. APPENDIX C

I OBJECT to the proposed Infrastructure Schedule (Appendix C)

The Infrastructure Schedule sets out the key infrastructure requirements on which the delivery of the plan depends. For each of the Key Allocated Sites in the borough it identifies infrastructure projects that are required, except for Garlick’s Arch (A43) which is not mentioned. It is clear that the Plan takes no account of the infrastructure required for this site and is therefore not fit for purpose.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
1. The housing needs assessment is flawed in various respects and overstates housing need. In addition since it was produced, the referendum Brexit decision has almost certainly reduced future housing need and rendered the previous assessment seriously out of date. As a result any assessment of Green Belt sites which took place to consider whether “exceptional circumstances” existed to outweigh the harm to the Green Belt was based on false premises and should be reconsidered.

2. Having determined housing need the Council was entitled to consider constraints before determining the housing number. I believe that as Ill as being entitled to do this the Council was required to give proper consideration to constraints. The scarcity of sites outside the Green Belt as Ill as infrastructure (most notable roads) considerations all represented constraints which should have been taken into account in determining the final housing number. Accordingly in this regard our objection to the allocation of Green Belt sites is twofold. First I believe constraints should have been applied. Secondly I believe the Council did not properly consider constraints and that their decision making process was flawed and thus subject to being set aside by the Inspector.

3. Even if having properly applied constraints there is a need to develop in the Green Belt then specific Green Belt sites should not be included in the plan unless “exceptional circumstances” for development are proven in relation to that specific site, as stipulated repeatedly in the NPPF. The Green Belt should trump short-term considerations such as perceived housing need, as case law has established. There needs to be a specific balancing exercise conducted on each Green Belt site weighing the harm to the Green Belt against the very special circumstances which are argued in favour of development at that particular site. There is no evidence this has been done. Instead the council have appeared to say that having chosen a housing needs figure and decided it cannot be met without building on Green Belt then there is no need for any further consideration and any convenient Green Belt site can be allocated for building at will.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/1396  Respondent: 8771265 / H C MacKinnon  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. APPENDIX D

I OBJECT to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)

- The “objectively assessed need” figure of 693 homes a year is too high.
- A professional review by NMSS has concluded that, even basing the calculations on a period of stronger economic and student growth, the housing need figure should be revised down to 510 homes a year and the method changed to consider student housing need separately due to the distorting effects.
- The current SHMA inflates the proposed housing figure due to
  - failure to correct for errors in the historical data for international migration flows,
  - issues with the way it considers students and affordability and
  - flaws in the method for estimating the number of homes needed to support job growth.
- It is unacceptable that demographic and economic model assumptions have been withheld and cannot be checked making the process unaccountable.
The Plan’s proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the borough, it is over double the previous figure of 322 used in previous plans. The SHMA report methodology is I believe inaccurate; it inflates the needs of the borough by distorted student numbers. However, it is based on commercially confidential modelling assumptions that cannot be checked or reviewed. There is no transparency to this evidence base and it is therefore impossible to assess its accuracy. This is not democratic and is not appropriate for consultation of the Plan.

The National Planning Policy Framework allows the overall housing target to be reduced to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPS16/2512  **Respondent:** 8771265 / H C MacKinnon  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A25

**Do you consider this section of the document; complies with the Duty to Cooperate? ( )**, **is Sound? ( )**, **is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ( )**

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1. **POLICY A25 - Gosden Hill Farm**

I OBJECT to Policy A25 with proposals for Gosden Hill Farm.

The Green Belt at this point serves the important function of separating West Clandon from the edge of urban Guildford. Development here will cause the two to coalesce defeating one of the objectives of the Green Belt. If this development proceeds I believe the narrow strip of Green Belt remaining between Guildford and Clandon at this point will be too narrow and will come under further pressure.

It will represent an undesirable ribbon development along the A3. It will be highly visible from the A3 when approaching Guildford and will, in conjunction with A43a at Garlick's Arch give the appearance of almost continuous development from Send through to Guildford.

The Plan does not put forward any evidence that exceptional circumstances exist to justify removing this site from the Green Belt.

The development will overburden the local road network and increase congestion on the A3 and A247 through the centre of West Clandon. This is already very heavily used whilst being unsuitable for designation as an A road. In places it is too narrow for two lorries to pass causing them to mount the pavement.

Note the following accident data:

2010 –2014 from Crashmap data

- Clandon Cross Roads Area to Bulls Head - 17 incidents
- Bulls Heads Head to Bennett Way - 8 incidents
- Bennett Way to Highcots Lane - 15 incidents
- Tithebarn Lane to Portsmouth Road Birch Close - 8 incidents
2015

• 21 Oct 2015 – A247 near shell garage - Three vehicles collided causing delays

Surrey Fire and Rescue deployed.

2016

• 15 April 2016 12 year old boy injured in The Street – A247 closed in both directions
• 28 April 2016 A3 West Clandon London bound between A247 Tythebarns Lane (Burntcommon and M25J10 (Wisley Interchange) congestion on A3 to A3100 Clay Lane Burpham
• 30 6 2016 Motorcyclists with injuries airlifted to hospital Send Marsh Road

Attempts have been made over many years to reduce traffic, traffic speeds and accident risks through West Clandon, however little has been achieved as the road cannot be widened and SCC is reluctant to impose further speed limits as congestion is already very high.

I object most strongly to the proposal for a link road to bring traffic from the Gosden Hill development to the proposed 4 way junction at Burnt Common. This has the potential to generate large volumes of traffic (including commercial vehicles) on the A247 through West Clandon - a road which is already under traffic stress (see below).

The land in Gosden Hill does exactly what the Greenbelt was designed to achieve. It provides a green buffer between the Guildford Urban Area and West Clandon, gives Burpham a defined green boundary and breathing space and it hides Guildford town from visitors until they pass the off-slip to Burpham.

No exceptional circumstances have been demonstrated for building on this site and therefore it does not comply with paragraphs 87-89 of the NPPF. It stops the sprawl of Guildford town, assists in safeguarding the countryside from encroachment and assists in urban regeneration by encouraging the recycling of derelict and other urban land. All of these are requirements of the NPPF.

The scale of Gosden Hill is out of proportion to West Clandon. It would have four times the amount of housing plus shops, offices/factories, GP surgery, schools. Development on this scale would blight a historic village with a history going back to the doomsday book and beyond.

Gosden Hill is the most obvious location for the north end of an A3 tunnel. It has rising ground and is situated just before the urban area. If it is built on, it will be very difficult to construct a tunnel.

The development will generate in the region of 6,000 vehicles which will pour on to the A3 which is stationary every day during rush hours. The linking of the A3100, B2215 and A247 would channel thousands of cars through the narrow, winding road through West Clandon, a road where large lorries mount the pavement virtually every day and through Send and Ripley which are also severely constrained.

The volume of traffic will greatly increase air pollution which is particularly critical given the proposal to build two schools.

Currently, a two way junction at the site would require vehicles wanting to go north on the A3 to go through Burpham which is grid-locked every day.

Burpham’s sewers are at capacity. Sewage would have to be pumped to Slyfield for processing, a project of enormous cost.

There is inadequate fresh water in Guildford and current supplies could not meet the needs of a development of this size.

Electricity supply is also inadequate and would require a big infrastructure development.

The railway station was rejected by Guildford Borough Council in 1984 because it feared Gosden Hill would become a dormitory estate for London.
The wording of the Local Plan with regard to Gosden Hill is so loose that the developer could virtually do whatever it wants.

The remaining agricultural land between Gosden Hill and West Clandon is so small that it is highly likely to be uneconomic and therefore a prime candidate for further development which would roll the Guildford Urban Area over West Clandon towards East Clandon and Wisley.

If the Strategic Sites are developed, the north of Guildford will deliver 36%, 5,036 houses towards the total of around 14,000. The infrastructures of the existing villages and the A3 will be overwhelmed by the scale of development.

A new on-slip at Burpham would only be 1.8km from the on-slip at Burnt Common which is against Highway England’s requirement of 2km.

Development of the A3 at best will not start until after 2020 and the building of a tunnel, which is only an “aspiration” in the Local Plan, is likely to be many years after. In the meantime given that developers build houses to provide cash-flow for infrastructure, Gosden Hill will have a crippling effect on villages like West Clandon and the A3.

Gosden Hill already has surface water problems. Merrow Stream crosses the site. No hydrological survey has been carried out to assess the implications. Electricity pylons run through the centre of Gosden Hill which have health and safety issues.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
when required. Lack of current funding for the slip road is not a justification for allowing the development of this site. If the slip road is genuinely needed then government funding will be available for it. (One of the reasons for turning down the so called enabling development proposal intended to fund the rebuilding of the Howard of Effingham School was that the redevelopment of the school was not essential. As and when it became essential Government funding would become available. Accordingly enabling development was not necessary. The same principle applies here.)

The A247 running south past this site through the centre of West Clandon is already very heavily used whilst being unsuitable for designation as an A road. In places it is too narrow for two lorries to pass causing them to mount the pavement- often at speed. It has narrow bends with poor sight lines, an infants school and a hump-backed bridge concealing the entrance road to the station for southward traffic. In addition, there are no continuous footpaths which forces pedestrians to cross and re-cross the road. Development at Garlick’s Arch will only exacerbate the problem and make the road even more congested and unsafe for pedestrians.

The development will cause harm to the ancient woodland on and by the site.

Taken together with the Gosden Hill site, there will be a ribbon of development along the A3 in contrast to the current “soft” edge approach to Guildford.

Garlick’s Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8). There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).

The Plan states the preference is to making the best use of previously developed land. Yet at the 11th hour a perfectly acceptable brown field site at Burnt Common, capable of accommodating approximately 100 houses, was removed from the Plan and replaced with the Garlick’s Arch site. There was no proper consultation in relation to the inclusion of this site. Why was a brownfield site removed and replaced with a Greenfield site? There is no evidence that Section 18 of the Planning and Compulsory Purchase Act 2004, which requires local planning authorities to produce a Statement of Community Involvement, has been complied with for this site. This only came to light for local residents following a Council meeting on 11th May 2016.

Moreover, Guildford Borough Council’s own Green Belt & Countryside Report does not address Garlick’s Arch at all, so there is no evidence base to support the inclusion of this site.

National Planning Policy promotes sustainable developments, with sustainable transport. With ever reducing bus services in the area and no train station within reasonable walking distance it is impossible for any development on this site to offer a sustainable transport solution. Development on this site is wholly inappropriate (Policy I3).

The stream, which runs through the site, is identified as having a high risk of flooding by the Environment Agency. There are other sites that do not flood that can be developed and therefore this site should be removed from the Plan (Policy P4).

This site is bordered by Ancient Woodland and within it a number of trees are protected by Tree Preservation Orders (Policy D3).

The site has an abundance of wildlife, some of which are protected. It is home to many types of owls and bats, with the woods having cuckoos and woodpeckers. In addition there are regular sightings of badgers, deer and red kites. The development of the site will result in the loss of habitat. No wildlife report has been conducted on the site. (Policy I4)

It is clear that with this site being added at the 11th hours no infrastructure planning has been undertaken. The Infrastructure Schedule makes no provision for any infrastructure improvements for this site. How will the local services such as schools and doctors cope, many of which are already at capacity? (Policy I1)

Furthermore, several electricity pylon runs through the site, which will have the potential to be a health hazard for any residents.

I OBJECT to the inclusion of the land for new on/off ramps at Burnt Common (A43a)
The addition north facing ramps to the A3 at Burnt Common would be a disaster for local communities. There is no requirement for local traffic to access the A3 to the north, but the addition will draw in a huge amount of ‘through’ traffic. The route from London/M25 to Woking or would now be through Burnt Common and Send. Equally traffic from the east of Guildford (Merrow etc) and the A25 will now go through West Clandon and Burnt Common. This will cause immense damage to those areas on small roads which cannot be improved.

This Plan does not address the needs of local communities or the Borough in this regard. There has again been no Section 18 consultation on this.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPP16/5586  **Respondent:** 8771265 / H C MacKinnon  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

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1. **POLICY D3**

I OBJECT to the damage to the historic environment as a result of the scale of the proposed development (Policy D3)

I OBJECT to the local plan based on the impact it will have on the special countryside of the borough.

The proposed development at Garlick’s Arch (A43) will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPP16/5594  **Respondent:** 8771265 / H C MacKinnon  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

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1. POLICY D3

I OBJECT to Policy D3 - Historic environment

I object to this policy as it is very weak and I do not think it is clear enough in its support for the conservation of the historic environment. It provides for development which will “enhance” heritage assets which I fear is a developer’s charter as it leaves plenty of room for abuse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5595   Respondent: 8771265 / H C MacKinnon   Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. POLICY D4

I OBJECT to Policy D4 - Development in urban areas and inset villages

The policy should place much greater emphasis on residential development in the existing urban centres. In this way housing needs can be met without resorting to large developments in the Green Belt. There are urban areas in need of regeneration but these are ignored in favour of Green Belt development.

The policy should not be applied to the villages which should remain in the Green Belt. Unrestricted application of this policy to the villages intended to be inset will change their characters radically and for the worse. The development it encourages will increase traffic and congestion disproportionately.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5583   Respondent: 8771265 / H C MacKinnon   Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
1. **POLICY E1**

I OBJECT to the sustainable employment policy (Policy E1)

I object to the inclusion of a strategic employment site at Gosden Hill Farm. Employment sites should be concentrated on previously developed land in more sustainable locations with good transport links where the infrastructure can support development. Warehousing, distribution and industrial premises cause considerable commercial traffic, noise, pollution and general disruption. They are not good neighbours for schools and 2000 houses. Many of the jobs will be taken by people outside the area leading to additional congestion in Burpham and on the A3.

I object to the inclusion of a strategic employment site at Garlick’s Arch. It is in a non-sustainable location remote from any facilities of any kind and with poor public transport links. It is unlikely jobs there will be taken by local residents and it is likely all travel to and from work will be by car adding to local congestion. Employment sites should be concentrated on previously developed land in more sustainable location with good transport links where the infrastructure can support development.

The site is in any event subject to frequent flooding and unsuitable for development.

If developed, the new employment site at Garlick’s Arch, Send Marsh/Burnt Common (A43), would be treated as a Strategic Employment Site.

The proposed development of up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8) at Garlick’s Arch (A43) is in the scheme of industrial development relatively small. Just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m. The Garlick’s Arch site which is in the Green Belt should not be developed as a Strategic Employment Site when there is a suitable alternative brownfield site very close by, which is far more sustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Comment ID: PSLPP16/5584  Respondent: 8771265 / H C MacKinnon  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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1. **POLICY E2**

I OBJECT to the location for new employment floorspace (Policy E2)

I object to this policy. It would be more sensible to confine new office and research and development floor space to the urban Guildford area. I also oppose the policy of expanding the Research Park onto Blackwell Farm. No exceptional circumstances, as defined under the NPPF, have been advanced to justify incursion into this permanent and high-quality area of Green Belt.

Proposals for new industrial, warehousing and storage (use Class B1c, B2 and B8) floorspace will be directed to the Industrial Strategic Employment Sites.
There is no need for the new employment floorspace to be located at Garlick’s Arch or Gosden Hill Farm, when near to these sites at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ( )

1. **POLICY E5**

I OBJECT to the loss of rural employment (Policy E5)

Policy E5 supports the retention and development of local services and community facilities in our inset and identified villages. Yet the development at Garlick’s Arch (A43) would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises. The Plan does not promote rural employment; rather it will result in the loss of existing local rural businesses.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ( )

1. **POLICY E6**

I OBJECT to Policy E6 - The leisure and visitor experience.

The policy should acknowledge that whilst in some areas new and enhanced leisure facilities are valuable (for example the new Opera House at West Horsley Place Towers), much tourism depends on the undeveloped nature of Green Belt areas surrounding Guildford. Accordingly the policy should recognize that in many rural areas new and enhanced visitor facilities may be unnecessary and counterproductive, particularly away from existing buildings and development. For
example the attraction of Newlands Corner is its undeveloped nature. Significant development of visitor facilities there is likely to diminish rather than increase its attractions. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment. Heritage sites and the Green Belt are particularly vulnerable to harm.

Tourism and visitors do not depend on new visitor “attractions” and could actually be damaged by them, as compellingly argued in the current debate over Newlands Corner. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment/"Disneyfication”. Heritage sites and the Green Belt are particularly vulnerable to harm.

Guildford has many “leisure and visitor attractions” already. The case for creating more is not made and no examples are given. Instead, the plan’s explicit priorities should be:

1. To protect the borough’s prime leisure and tourism asset, its countryside, from inappropriate development. This is all the more valuable because of its accessibility from London, the rest of Britain and the Continent, in that order. Rural residents are its custodians and require no Council interference. Economically, the most valuable forms of tourism, such as walking and cycling, require no new development. In the overcrowded South-East of England, lack of development is a leisure and tourism asset, not a liability.

2. To help make Guildford’s river landscape less off-putting and support town-break packages for high-value tourists. To achieve this, the policy needs to define what leverage, if any, Council planners have to influence normal tourism market mechanisms.

3. To help private providers market local tourism. This need not involve extra spending. The Council could, for instance, help co-ordinate ready-made, local tourism packages under a distinctive brand at an all-in price. An “English town break” (including B&B accommodation, a walking tour of Guildford, a pub lunch in the Surrey Hills, a visit to Wisley Gardens and a National Trust property and a Southwest Trains travelcard for a day out in London) would be highly attractive to many European visitors who currently by-pass Guildford to go to Bath, Oxford or Cambridge instead.

4. To rule out the redevelopment of scarce rural hotel sites (e.g. Thatchers, East Horsley, earmarked for 40 new houses under Site A37 of the plan yet just a short walk from the new opera house).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. POLICY E7

I OBJECT to Policy E7 Guildford Town Centre

The policy “vision” describes protecting the Guildford’s unique setting and historical character and sets out some of the ways this will be done. However none of this is included in the formal Policy wording in the blue box. I suspect the Vision wording is effectively of little or any force. These principles should be included in the formal policy.

There should be a much greater focus on residential use of the town centre where many people would like to live and where the necessary amenities and infrastructure exist. The policy misses the opportunity to propose forward looking sustainable
residential development plans in, for example the Walnut Tree Close area, where very significant numbers of new homes could be provided. Such town centre sites could meet much of the housing need over the plan period without harming the countryside.

There is an urgent need for a strategy to focus on brownfield redevelopment before considering development outside the existing urban area.

The policy does not address any of the major issues raised by the Council’s own Town Centre Master Plan, the Guildford Vision Group’s proposal for new river and rail crossings or plans for the redevelopment of Guildford Station, all of which are already the subject of public discussion.

The policy also fails to provide guidance on design requirements, as required by the NPPF.

The policy and surrounding text concentrates too much on shopping without regard to its nature which risks a proliferation of dull high-street chain stores. The policy should seek to enhance Guildford’s character and encourage a wider variety of small shops including locally owned businesses and shops of use to consumers. (For example there is no butcher in Guildford.)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5590  Respondent: 8771265 / H C MacKinnon  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )

1. POLICY H1

I OBJECT to Policy H1 – Homes for all. Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan period. It fails to set rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions.

The housing mix is based on out-of-date, pre-Brexit projections and on assumptions set out in a flawed SHMA that has not been scrutinised or evaluated.

I support higher density development in the urban area, without resorting to dehumanising, high-rise buildings that developers commonly claim are necessary for financial viability. Much of Guildford town could usefully be regenerated with 4-5 storey blocks with landscaping and underground parking, as often seen on the Continent and, recently, in London.

Student accommodation should provided for 100% of new students and more than 60% of existing students, which would free up ideal family accommodation in the urban area. Other university cities (e.g. Oxford) insist on higher percentages than those proposed in the plan. In my view, the Council’s timidity is a case of “regulatory capture” by Surrey University, which has failed to use its existing planning permissions (dating from 2004) to accommodate 3,000 students or to improve the efficient development of its campus (e.g. by building on its extensive and under-used surface car parks). If all students were accommodated in this way, 2,000 homes would be freed up in town and there would be no need to build on the Hog’s Back.
It is not appropriate to release Green Belt land to house students who could be accommodated on the Surrey campus or other university sites. The plan should take account of the university's ability to house its own students and reduce the housing number accordingly.

Guildford borough has already a higher proportion of traveller sites than most comparable boroughs. Over-provision is inappropriate given other constraints.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/5591  Respondent: 8771265 / H C MacKinnon  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. POLICY H2

I OBJECT to this policy on affordable homes (Policy H2) on the grounds of feasibility and that it should be more firm and explicit on unviability in paragraph 4.2.40.

In particular a scheme is only unviable if the value of developing the land (including some allowance for development risk and a normal level of profit) falls below the sale vale of the land for alternative non-premium uses such as agriculture. The price paid for the land is not relevant. The possibility of avoiding the affordable housing obligation through use of unviability arguments only serves to inflate land values. It will become clear that developments are unviable when developers start selling land for alternative non-development uses.

It should be noted in the plan that because of Guildford's relative popularity as a place to live combined with its location close to others towns and within the London Commuter belt no amount of building will meet demand. Similarly no amount of affordable housing will ever meet demand.

In addition the definition of an ‘affordable home’ is 80% of market value. With even a 2 bedroom flat in Guildford now having a market value of +£360,000 the discounted price is still not going to be affordable to anyone on a normal income.

And at what point will ‘affordable homes’ be able to go onto the market at full market price?

As we have seen with council houses it is not long before the discounted property is sold at full market value with the original owner simply pocketing the profit.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/5596  Respondent: 8771265 / H C MacKinnon  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H3
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (

1. POLICY H3

I OBJECT to Policy H3 – Rural Exception Homes as this Trojan horse policy. It says that homes can be built anywhere near a settlement of any form (including agricultural land and the AONB). These homes are meant for people with a village connection, but they could be for anyone on the Guildford borough housing list. To make the housing viable, or to improve the “mix” this can include “market” housing (i.e. normal commercial development which in Guildford usually means large executive homes). This policy means building anywhere, and ignoring all historic planning restrictions.

The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove “exceptional circumstances.”

The wording of the policy is far too wide and drives a coach and horses though all other aspects of planning policy. As drafted the planning authority could be obliged to grant permission for inappropriate and unsuitable developments.

The wording provides no ability to balance the desirability of the development against other considerations including harm to the Green Belt or the AONB. (If the housing would meet identified need and adjoins a settlement under this policy wording permission would have to be granted even in the most sensitive AONB location, even if more suitable locations are available.) The policy should include the need for a balancing exercise including consideration whether more suitable locations exist.

The policy wording should not allow market housing. The ability to include market housing is likely to inflate land values, leading to a self-perpetuating need to include market housing. It may lead to spurious developer led proposals which will be difficult to resist.

The policy wording should define small, either in land size or number of units. I am concerned that if small is left undefined the policy could be used to justify significant developments. In the context of the plan a development of 150 homes might be argued as small. (If Wisley at 2,500 homes is a big development then 500 homes might be a medium development and 150 could be small.)

The policy wording should be restricted to adjoining sites or define the concept of being "closely related". In particular I believe adding the concept of safe and easy walking distance extends the potential radius within which sites will be argued to be “closely related” Many people would regard a mile or so as an easy walking distance. (School children are expected to walk further than that before being eligible for free school travel.)

The wording of the policy itself does not require the local connection requirement for tenants to be secured in perpetuity - only the affordability must be secured in perpetuity. (For example housing could be built for retired Cabinet Ministers under this policy so long as the first tenant was required to have a local connection.) The introduction to the policy mentions this point, but it is not part of the policy itself and may carry little weight at appeal.

The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove “exceptional circumstances.” The size and location of sites should be better defined and it should be clear market housing cannot be included.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. POLICY I1

I OBJECT, due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1)

Our villages are already suffering from severe congestion for much of the day, for example the Newark Road & Rose Lane junction in the centre of Ripley and the A247 through West Clandon. The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.

Furthermore, many of the country lanes around the villages of Ripley, Send and Clandon are narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition.

I OBJECT to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces.

Many of the affected villages, such as West Clandon, already suffer from traffic congestion. Further development around these villages will only result in more traffic and more parking problems.

With some 5,000 houses being proposed close to the village of Ripley, the roads serving the village will become even more congested. Cycling has become an ever popular past time, particularly at weekends hundreds of cyclists past through the villages on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road accidents involving cyclists as a result of the development proposed under the local plan.

The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the road becoming ever more dangerous for pedestrians.

The council has a statutory obligation to protect the public and the additional traffic flows will bring added accidents, noise, pollution and injury of the public. In the case of West Clandon the Street often only has a narrow footpath on one side of the road making it very dangerous, especially when vehicles mount the pavements.

This policy as it is inappropriate and inadequate and fails to respond to the challenges raised by the proposed significant Green belt developments. The borough’s infrastructure is already heavily strained. However the plan’s determination to build large housing estates across the Guildford countryside significantly increases the need for infrastructure investment without securing the means for its provision. Placing housing in the established urban areas would reduce the need for enhanced infrastructure as would a more realistic housing number.

The policy wording says nothing about roads and traffic. The Council’s methodology for assessing traffic congestion - averaging it over periods of several hours and ignoring the effects of junctions - simply hides the problem, which will get worse as development proceeds. The schemes referred to in this policy will not solve existing congestion and the local road network has not been given sufficient consideration. Some proposed development locations would require highway schemes that are unlikely ever to happen.

Adequate infrastructure provision is a pre-condition of sustainable development. But in this plan it is an afterthought buried away in Policy I1. By prioritizing greenfield over urban, brownfield regeneration, the plan creates insurmountable
(and unnecessary) obstacles for itself. Common sense suggests a local plan should first assess the borough’s infrastructure capacity for sustainable development, and then tailor development accordingly. This plan, however, assumes infrastructure will follow on the heels of housebuilding as if by magic. It makes implementation critically dependent on providers outside the Council’s control and on the vagaries of CIL income. Instead of recognizing this as a key constraint, the plan is based on hope. It is also highly likely that developers faced with the imposition of large infrastructure requirements will go to court to invoke the NPPF provision that prevents authorities from imposing conditions that make a development non-viable.

Policy I1 requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.

Despite the Garlick’s Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents’ in the locality will see their quality of life significantly deteriorate in many ways.

Many of the utilities in the Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers. No plans to improve these services should mean no development of the Garlick’s Arch site.

Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are already at capacity and suffering from funding cuts or freezes. Any further development without funding will place further stress upon existing health services.

Police services are seeing funding reduced. The development of the proposed 13,860 homes during the plan period will stretch the police services further and is unsustainable.

There is no provision of the increased capacity of Guildford hospital, where is this assessed and remedied?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Answer (if comment is on questions 1-7 of the questionnaire): ()

1. POLICY I2

I OBJECT due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2)

I object to this policy as it is too vague and optimistic. Significant improvements to the road infrastructure are like to be many years away even if they ever happen. The draft plan, however, commits to building massive housing estates in the countryside before any of these road improvements are in place. This is inappropriate and will lead to massive traffic disruption during the construction phase and will add permanently to an already congested network (about 3,000 private cars from the 2,100 new homes at Wisley Airfield alone).
Road infrastructure represents a major constraint that should have been applied to the housing target at a much earlier stage in the plan process and not left as an unresolved difficulty in the draft plan.

There is no certainty that either the A3 or M25 in the borough will be improved to increase capacity and reduce congestion during the Plan period. Highways England has no plans to even examine improving the A3 before 2020. I have considerable concerns that development of the large residential sites identified at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), will take place before any improvements are made to the trunk road network. The A3 & M25 are already at capacity during peak hours and any development prior to improvement of these roads will only make the situations worse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPP16/5589  **Respondent:** 8771265 / H C MacKinnon  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. **POLICY I3**

I OBJECT to poor air quality concerns (Policy I3)

Paragraph 4.6.27 of the Plan states that “Development must also mitigate its traffic impacts, including its environmental impacts and impacts on amenity and health.” The significant level of development being proposed, particularly in the north east of the borough will lead to considerable further congestion, despite any attempts to mitigate this through travel plans. This will be particularly acute in built up residential areas and will only lead to greater levels of air pollution, which will have a detrimental effect on local residents and their health and can result in early death.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPP16/5581  **Respondent:** 8771265 / H C MacKinnon  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
1. POLICY P2

I OBJECT to not protecting the Green Belt (Policy P2)

This policy does not sufficiently safeguard the Green Belt even though Green Belt constitutes 89% of the borough and should be the cornerstone of all local planning policy. The Green Belt is not the Council’s to give away and once it is gone it is gone forever. Sacrificing areas of the Green Belt to a developer influenced growth agenda is a betrayal of future generations and does not constitute sustainable development.

The Green Belt should be protected in perpetuity, but Policy P2 seeks to justify excessive development in supposedly protected areas. This is in breach of party manifesto commitments and contrary to previous responses to public consultation. It is disreputable to argue, as the Council does, that the Plan would involve the loss of “only” 1.6% of the borough’s Green Belt. Leaving aside the reliability of that statistic, the NPPF does not set an “acceptable” percentage. The fact remains that the plan proposes that 65% of the housing plus industrial development be built on land to be taken out of the Green Belt.

Paragraph 4.3.16 is seriously deficient in simply stating that the Council considers that exceptional circumstances exist to justify amendment of Green Belt boundaries. The exceptional circumstances are not identified. It is clear from national guidance that unmet housing need is not on its own an exceptional circumstance. Even to the extent that exceptional circumstances exist, these have to be balanced against the harm to the Green Belt in the specific sites proposed to be taken out of the Green Belt. This balancing exercise appears not to have been done.

The Countryside Study which the Council may argue fulfilled the need to demonstrate the exceptional circumstances required to justify removal of areas from the Green Belt was a simplistic tick box exercise. Within limits it may have answered certain questions about different attributes of different areas of Green Belt but it did not carry out the balancing exercise needed to determine whether specific exceptional circumstances justified removal of specific areas of land from the Green Belt. I believe that each of the identified Green Belt site proposed to be removed from the Green Belt should be carefully assessed against any exceptional circumstances in deciding whether it should be removed from the Green Belt in the final plan. This exercise should bear in mind that housing need in itself is not an exceptional circumstance and nor is the Council’s growth aspiration. An important consideration is that more housing need could be met on urban sites than is currently planned. The Plan has fallen into the developers’ hands and developers prefer building on undeveloped land rather than brown field sites.

I note that the Summer 2016 edition of "About Guildford" (published by the Council) on page 5 states that "... the Plan rejects any schemes that would have a detrimental impact on the Green Belt." This is demonstrably untrue and I consider this to be a deliberate untruth which compromises the consultation process. I would ask that this untruth be corrected and the consultation period restarted after the correction has been given the same distribution as the original statement. (I assume the document was delivered to most houses in the Borough.) I reserve the right to argue before the inspector that the consultation process was flawed and ineffective because of this.

I object to the “insetting” of 14 villages from the Green Belt. Contrary to assertions made in the Plan process many of these villages do contribute to the openness of the Green Belt and there is no need to inset them.

I also object to the wholesale extensions to the settlement boundaries in many villages to allow for infilling and that infilling is also proposed outside the settlement boundaries of 11 further villages. Many Guildford villages are linear. It is all too easy to square off boundaries by including countryside bounded on only one or two sides by existing development, claiming it contributes nothing to the “openness” of the Green Belt, a term which neither the plan nor the NPPF defines. The NPPF’s other 4 tests of Green Belt status, including the prevention of urban sprawl, are ignored. Effectively, this policy makes all villages within the Green Belt vulnerable to large blocks of new development and seems almost calculated to secure the rejection of the plan as a whole.

To “inset” two-thirds of the borough’s rural villages on the grounds that they no longer contribute to the purposes of the Green Belt is extreme and inherently implausible, given the borough’s location on the edge of Metropolitan London. I cannot see how such extensive areas fail to contribute to the purposes of the Green Belt under the NPPF, but this could quickly be the case if the proposed “insetting” and boundary extensions go ahead.
This policy is wildly disproportionate in terms of any foreseeable development need and has caused tidal waves of opposition from residents. It flies in the face of NPPF paragraph 17’s aim of “empowering local people to shape their surroundings” and other NPPF provisions.

Paragraph 4.3.17 states that “the general extent of the Green Belt has been retained.” I believe this should be deleted as an untruth.

In addition I OBJECT to the proposals to remove from the Green Belt the so called ‘strategic sites’ of Wisley Airfield (A35), Gosden Hill Farm (A25) and Garlick’s Arch (A43) and all other strategic sites. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these sites and villages (as mere housing need does not constitute a ‘special circumstance’) to be taken from the Green Belt. Once taken from the green belt they will be lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached.

GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site. Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

| Comment ID: | PSLPP16/5599 | Respondent: | 8771265 / H C MacKinnon | Agent: |
|-------------|---------------|-------------|-------------------------|
| Document:   | Proposed Submission Local Plan: strategy and sites 2016 / Policy P2 |

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. SITES - POLICIES A1 TO A57

I OBJECT to all strategic sites proposed in the draft Plan to be built in the Green Belt.

1. I object to the identification and allocation of sites in this plan without regard to Green Belt, infrastructure or other constraints. The plan says that “allocating these sites does not grant planning permission for development.” However, each of the sites will be removed from the Green Belt and will be available in principle for development and non-Green Belt uses. The inclusion of these sites without detailed site by site justification shows contempt for the thousands of detailed comments the Council have received about individual sites ever since the Issues and Options consultation in 2013. The plan has hardly changed since the Council received 20,000 objections to its first draft plan in 2014. The Inspector considering the plan may conclude that the consultation has not been properly conducted.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
1. **POLICY P4**

I OBJECT to development in areas which are at risk of flooding (Policy P4)

National Planning Policy states that Local Plans should take account of climate change over the longer term, including factors such as flood risk. It goes on to say that new development should be planned to avoid increased vulnerability to the range of impacts arising from climate change.

The Plan states that in accordance with national planning practice guidance, the Level 1 SFRA has been used to guide development towards areas at the lowest risk of flooding and identify areas unsuitable for development. However, the document concludes that land outside of the area of flood risk is not capable of accommodating all of the borough’s identified development needs. A Level 2 SFRA has therefore also been produced and will help the Council apply the exceptions test (as described in the NPPG) as necessary to development proposals in areas at risk of flooding.

The site at Garlick’s Arch (A43) is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. Knowing the area well I am aware that this site often floods during the winter months and the flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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1. **POLICY S1**

I OBJECT in the strongest possible terms to the Guildford Borough Proposed Submission Local Plan (June 2016). This Plan is unsustainable, unworkable and, in many provisions, unnecessary. 

I set out below my objections to specific policies and matters within the Plan.

1. **POLICY S1**
I OBJECT to this Policy as the development proposed will not be sustainable (Policy S1)

The NPPF states that the presumption in favour of sustainable development “should be seen as a golden thread running through both plan-making and decision-taking.” As the first policy in the Plan, Policy S1 ought to set a clear framework. Instead, no definition of “sustainable development” is given. The policy also fails to set out any principles for applying sustainable development in practice to local planning decisions, which often have serious long-term impacts.

The policy states that it aims “to secure development that secures the economic, social and environmental conditions in the area”. This fails to recognize that economic growth, social justice and environmental protection often conflict. The policy does not say how each element is to be weighted or conflicts resolved. As a practical guide to the planning decision to be taken in the Plan period it is seriously deficient. The policy is likely to be used by developers to justify inappropriate developments on economic grounds. Under this policy, virtually any development will qualify as “sustainable”, in breach of the NPPF’s most important guideline.

Policy S1 is also seriously deficient in making no mention of the Green Belt. The Green Belt is a long term Government policy enshrined in primary legislation to protect green areas in perpetuity. The Green Belt is a living example of sustainable development in practice and is one of the most important factors affecting sustainable development in the area covered by the Plan and should be acknowledged in this policy. Policy S1 should include a commitment to protect the Green Belt from inappropriate development and to uphold Green Belt boundaries and protections. This would set at least one clear boundary to planning decisions. The Plan and the Council have treated the Green Belt as a developable land bank rather than as a constraint to development.

The commitment to approve planning applications “wherever possible” and “without delay” reveals the pro-development bias of the plan. Countervailing references to sustainability are so vague that the NPPF presumption in favour of sustainable development becomes a presumption in favour of any development at all.

This policy also ignores, as if they are inconvenient constraints, most of the 12 Core Planning Principles set out in NPPF paragraph 17.

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill Farm (A25) are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are also unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. POLICY S2

I OBJECT to the Borough Wide Strategy (Policy S2)

The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

The housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.

The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guilford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

The assumptions and calculations in the SHMA are widely regarded as flawed and even before Brexit, produced an inflated housing needs number. The figure of 13,860 new homes is completely unsubstantiated. It has not been scrutinized by Councillors despite repeated requests for debate. The assumptions and calculations underlying the model are hidden, protected by a claim to intellectual property by a commercial sub-contractor used in preparing the SHMA. I have serious doubts about the objectivity of the SHMA because it has been produced by consultants whose website openly proclaims their pro-development agenda leading to reasonable suspicion that the figures are inflated. Guildford’s OAN is not transparent but has been taken on trust by the authors of the plan. Given that almost every element of the plan is predicated on this OAN, the plan as a whole cannot be considered “sound”.

The status of the 13,860 figure is ambiguous. The Council has said that the housing number and the OAN are identical because the OAN is “deliverable” and is by definition objective and cannot be contradicted. The OAN is only deliverable because of the Council’s cavalier approach to the Green Belt in contravention of the NPPF, ministerial statements and local and national Conservative Party manifesto commitments. The plan also states that infrastructure or other constraints may in due course affect deliverability. It is also unlikely that the number of houses can be built at the rate proposed. In recent years, housing starts have on average been less than half the proposed rate. This is not because developers do not have the land or cannot get planning permission. Constraints in the supply chain and maintaining profit levels have been more important.

The plan cannot be considered “deliverable”. In addition, the number of homes proposed, plus existing planning permissions, plus expected “windfall” sites, exceeds the total of 13,860. So how many homes (taking account of these
adjustments) do the Council want built? The plan does not say. Without this figure it is hard to see how anything else can be planned. This undermines the validity of the whole consultation. It is unreasonable to ask the public to approve a “plan” that fails to propose a target number that takes all the standard constraints and adjustments realistically into account, leaving the Council to set one without further consultation. Even if the OAN Ire not flawed, it is at best only a baseline figure and should not be passed off as a policy proposal.

It is unreasonable to embark on a radical transformation of the borough on the basis of an unclear housing target. Most of Guildford Borough is highly protected from development (89% Green Belt, 44% AONB and about 75% protected by SPA). Whether or not increasing the number of dwellings by up to a quarter is desirable, it would be a major and irreversible change, arguably turning a largely rural borough into a mainly urban or suburban one like Woking. The scale of the housing number increases the onus for it to be seen to be sound. A substantially lower number, on the other hand, would remove the need to build on Green Belt or open countryside, and instantly meet the single biggest public objection to the plan as a whole.

The Plan in general and this policy in particular does not address the point that Guildford exists as part of London’s commuter belt. Any increase in supply of housing in Guildford, particularly if the increase is proportionately greater than elsewhere in the commuter belt, will simply result in a shift of population into the area. It will not reduce prices or increase availability except imperceptibly. The Plan also ignores the point that many of those working in the area live elsewhere. Accordingly in considering the housing number the Plan should take into account that in this part of London’s commuter belt, demand for housing is, in practical terms, unlimited.

This policy does not take proper accounts of the constraints to development which exist, principally posed by the Green Belt and by infrastructure limitations. I believe the Council is under a duty to properly consider applying these constraints. It is clear the Council has failed to do this. This approach differs from all the other boroughs in Surrey. The Plan appears to have deliberately been manipulated towards a growth agenda without disclosing why this is being done. The housing that is needed should be concentrated on urban brown field sites and through increasing the housing density of existing built up urban areas.

The development of 13,860 homes in the Plan period with 65% in the Green Belt does not constitute sustainable development. It will have a permanently detrimental impact on the Borough in general and on West Clandon and surrounding area in particular. The developments at Garlick’s Arch and Gosden Hill Farm do not meet the needs of the local communities. The road infrastructure in and around West Clandon will be unable to cope with additional demand. The edge of urban Guildford will creep that much closer to West Clandon, thus negating the purposes of the Green Belt in the area which include safeguarding the countryside from encroachment, checking the unrestricted sprawl of large built up areas and preventing neighboring towns merging into one another.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill Farm (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Questions posed by Guildford Borough Council as part of its consultation.

Questions from GBC

24. Question 1: The evidence base and submission documents

The Proposed Submission Local Plan: strategy and sites is based on up-to-date evidence. The evidence base documents contributing to the preparation of the plan are listed in Appendix D and can be found on our website (links open in a new window).

Do you agree that the evidence used for the Proposed Submission Local Plan Strategy and Sites is adequate, up-to-date and relevant?

ANSWER

I do not agree that the evidence used for the Proposed Submission Local Plan Strategy and Sites is adequate, up-to-date and relevant.

The fundamental driving forces for much of the development proposed in the Plan (particularly that on Green Belt land) are based on:

1. An excessive ambition to expand the local economy which is neither warranted nor wanted by the local population. Guildford is already one of the highest ‘value creation’ areas in the country and has one of the lowest unemployment rates. There is no evidence that massive and accelerated expansion is required.

1. SHMA figures which are neither transparent nor justifiable, especially in view of previous figures set. Independent assessments of the SHMA (eg from Guildford Residents’ Association and David Reeve) show it is set far too high and so cannot be said to be adequate, up-to-date or relevant.

In addition the recent vote to leave the EU and the impact this will have on the economy and migration have not been taken into account.

The Plan should be re-assessed and the methodology for arriving at housing need figures should be fully transparent.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
24.B. Question 2: Legal Compliance

Do you consider the Proposed Submission Local Plan: strategy and sites as a whole is legally compliant? Please provide the following information being as precise as possible:

- why you consider it is or is not legally compliant and
- what change(s) (if any) you consider necessary to make it legally compliant, explaining why this is the case.

**ANSWER**

I do not consider the Proposed Submission Local Plan: strategy and sites as a whole to be legally compliant because it mainly ignores the consultation process for the 2014 draft Plan it is claimed to be based on.

That consultation process was absolutely clear by some +20,000 responses that that Plan was flawed and no development should be carried out on Green Belt land.

Instead this 2016 draft Plan actually increases the number of dwellings being built on the Green Belt, in direct contradiction to the consultation process, yet is stated to be a Regulation 19 proposal.

As a result I do not see how the 2016 draft Plan can be Legally Compliant.

The 2016 draft Plan should be re-assessed and should take into account the views of the majority of responses from the consultation process for the 2014 draft Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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24.C. Question 3: Soundness

Do you consider the Proposed Submission Local Plan: strategy and sites as a whole to be sound? Please provide the following information being as precise as possible:

- why you consider it is or is not sound and
- what change(s) (if any) you consider necessary to make it sound, explaining why this is the case.

**ANSWER**

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Comment ID: SQLP16/931  Respondent: 8771265 / H C MacKinnon  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I do not consider the Proposed Submission Local Plan: strategy and sites as a whole to be sound, because, but not limited to, the following reasons:

1. “Only sites that propose sustainable solutions have been included in the Plan and the Plan rejects any schemes that would have a detrimental effect on the green belt.” Summer 2016 edition of “About Guildford” (published by the Council) on page 5. This is demonstrably untrue and appears designed to bias the consultation process.

2. The housing OAN figure has been calculated by a process which is not transparent. It has not been properly examined by Councillors before being adopted.

3. The OAN has been adopted as the housing number without the application of any constraints to take account of Guildford's circumstances, including in particular the Green Belt, AONB and road infrastructure. National policy permits such constraints to be applied and it is inappropriate not to consider the need to do this.

4. The draft Plan does not accord with the NPPF policies on protecting the Green Belt. Exceptional circumstances need to be shown to justify removing areas from the Green Belt and this has not been done. The housing need number is not justified in itself according to published ministerial statements. Having properly calculated an OAN, constraints should be applied to it to reflect the Green Belt, AONB and infrastructure. Each proposed Green Belt site then needs to be justified on its own merits. The benefits of the proposed development need to be identified together with the harm to the Green Belt. Only if there are exceptional circumstances and following a proper balancing exercise demonstrating that these exceptional circumstances outweigh the harm to the Green Belt can the proposal proceed. The draft Plan does not demonstrate that this has been done. The housing number has been used as a blanket justification for all Green Belt sites—which amount to 65% of the proposed housing number.

1. Whatever the justification for the assumptions made in calculating the OAN, those assumptions are now almost certainly incorrect following the referendum.

2. The housing number is at least twice the achieved rate of building in the Borough over the last few years. There is no evidence in the Plan to show that this rate is achievable and sustainable.

3. Much of the infrastructure required to support the level of development proposed is outside the Council’s control. The Infrastructure Plan is long on possibilities and aspirations and very short on commitments. The infrastructure requirements placed on developers are supposed to be in place before development commences. This is utterly unrealistic and indicates a lack of knowledge of developer’s business models which depend on positive cash flow. It seems very clear that at best, infrastructure provision will seriously lag development and leave higher levels of congestion than now. This will reduce the quality of life for residents through congestion and disruption.

4. The 40-45% requirement for affordable homes together with infrastructure such as railway stations, park and ride facilities, schools and roads is highly likely to be challenged on a site by site basis by developers using the NPPF provision that Councils cannot impose conditions which make development non-viable.

1. GBC has not included details of its Town Centre Master Plan and urban development proposals in time for and as a part of the Guildford Local Plan consultation.

2. GBC has failed to provide an Infrastructure Report in time for and as a part of the Guildford Local Plan consultation.

3. GBC has proposed an OAN of 693 houses per annum in the GL Hearn West Surrey Strategic Housing Market Assessment (SHMA) which many, including independent assessors, consider unsound.

4. Highways England will not start to consider what it intends to do as regards the A3 in the vicinity of Guildford until 2018.

5. Network Rail have not made available for the public consultation any plans for a new railway station at Merrow with an adjacent Park & Ride for 1,000 cars.

6. The GBC proposals for Gosden Hill Farm do not appear to be in coordination with the Neighbourhood Plan for Burpham.

7. The draft Local Plan will cause further linear development along the A3 between Burpham and West Clandon PC and encroachment onto open Green Belt countryside in clear conflict with the National Planning Policy Framework.

8. The proposal for Garlick’s Arch was added to the draft Local Plan without any prior consultation under Regulation 18.

9. The Land Availability Assessment (LAA) indicates a range of planning difficulties for Gosden Hill Farm and Burpham which have to be met by the developer involved. These include Electricity Grid supply problems and
foul sewage and surface water issues that suggest the development proposed cannot easily be implemented both technically and financially.

10. No adequate explanation is given as to how the aspirational proposal for a tunnel will be used to overcome traffic issues relating to the quality of life and amenity of Burpham, West Clandon, Send and Ripley citizens.

11. In common with many others I do not believe the housing figure has been properly calculated and I believe it overstates housing need. The Council has prevented councilors or others from properly considering the SHMA by refusing to make public the basis on which it was drawn up.

12. The housing figure, when properly recalculated, should be subject to constraints to reflect Guildford’s circumstances, including in particular the Green Belt and road infrastructure. National policy permits such constraints to be applied and it is inappropriate not to consider the need to do this.

13. Even once a housing number has been calculated it cannot be used to justify taking land out of the Green Belt on a wholesale basis.

14. Cast iron commitment should be included in the plan that development can only commence when required infrastructure improvements have been secured.

15. The status of the text which accompanies each policy box is not clear. If the accompanying text does not have the force of policy a number of the policies (i.e. the text in blue) are so vague and general that they commit the Council to very little.

The draft Plan should be re-assessed with housing on brownfield sites made a priority over commercial development and Greenfield sites and each of the above points addressed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: SQLP16/932  Respondent: 8771265 / H C MacKinnon  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 4: Duty to cooperate

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

24.D. Question 4: Duty to cooperate

Do you consider the Proposed Submission Local Plan: strategy and sites as a whole has complied with the Duty to cooperate? Please provide the following information being as precise as possible:

- why you consider it has or has not complied with the Duty to cooperate and
- what change(s) (if any) you consider necessary to make it comply with the duty to cooperate, explaining why this is the case.

ANSWER

I do not consider the Proposed Submission Local Plan: strategy and sites as a whole has complied with the Duty to cooperate.

This 2016 draft of the Local Plan clearly demonstrates Guildford Borough Council’s refusal to co-operate with the wishes and requirements of the vast majority of the residents in its Borough.
The Council has failed to co-operate with the results of the consultation process for the 2014 draft Plan which was meant to inform and guide this 2016 draft Plan.

Despite campaigning on a clear statement ‘Conservatives Say Green Belt To Stay’, the ruling party on GBC is now intent on pushing through a Plan which will devastate Green Belt land and extend the Guildford Urban Area to further merge into surrounding rural villages.

This is not cooperation by any definition.

In addition the Council has failed to cooperate in providing any transparency to the housing need figures commissioned by the Council from GL Hearn.

The 2016 draft Local Plan should be reassessed with a reviewed and transparent SHMA and revised to reflect the views of the residents of the Borough, who pay for Guildford Borough Council to act in their interests, and not those of developers and central government.

I trust that the objections made above are fully taken into consideration and that the 2016 draft Local Plan is amended accordingly.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/271  Respondent: 8772097 / Duncan Wilkinson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - East Horsley

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I am writing to make clear my objections to the six main development sites in East and West Horsley.

To build this many new buildings in our area will completely ruin our village atmosphere and put unacceptable pressure on the roads and amenities.

In my mind Green Belt means the land is protected against unwanted building and this is why we chose to live in this lovely area, and paid a premium to do so.

NO to 533 new homes in the Horsleys !

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/641  Respondent: 8772289 / Sheila Mellstrom  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North
I would like to register my heartfelt objection to your "new local plan" for East and West Horsley.

1) Our 2 villages are over crowded already. We have congestion on our narrow roads through the villages especially at certain times of the day when schools open and close. With the 533 proposed new houses we could have at least 1000 more cars trying to use the Ockham Road, East Lane and The Street, as well as the A246.

2) Commuters cannot find parking spaces at the station already and it is often difficult to park at the shops.

3) Our medical centre is already over stretched with several weeks waiting time to see a doctor

4) Our 2 local state schools are full to capacity - where are all the poor children going to find school places and how, as our Borough Council, can you sort that out?

5) In addition to all this there is a proposal to build 2000 houses on Wisley airfield.

6) Have any of the planners given any thought to how all this could cause flooding, pollution, not to mention ruin the lives of the people who already live here?

7) Finally, we were promised categorically by the Government that the Green Belt would be [text unreadable]. I was at a meeting when Paul Beresford made that promise. What has happened to that promise?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp173/256  Respondent: 8772289 / Sheila Mellstrom  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Appendix H: Maps - East Horsley

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Despite there having been 30,000 objections to the plans to build new homes on 6 sites in the Horsleys, the amended plans have only removed 2 of those proposed sites!!

Anyone who drives out on the local roads at rush hour will agree that there are already far too many cars for the size, width and capacity of our village roads. We simply cannot cope with any additional traffic.

Our local schools, trains and station and station car park, surgery and infrastructure cannot cope with the additional amount of people such a scheme will produce

Whilst acceptable there are bound to be some limited amount of new houses, such as “fill-ins” and on brownfield sites, we nevertheless reject the demands to make us into a “New Town” instead of a village and above all to remove any of the Green Belt.
It seems iniquitous that after receiving 30,000 protests against these proposals, our Guildford Borough Council, does not support us, and can go on bombarding us with amendments. Do we have no right to a rural village life, protected by the Green Belt which we chose when we came to live in the Horsleys?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<tr>
<th>Comment ID:</th>
<th>PSLPS16/6223</th>
<th>Respondent:</th>
<th>8772449 / Pamela Thomas</th>
<th>Agent:</th>
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<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Introduction</td>
<td>Do you consider this section of the document; complies with the Duty to Cooperate?</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire):</td>
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I wish to comment on the Guildford Local Plan. My main "objections" are to the proposed developments at site allocation A26 Blackwell Farm and site allocation A35 th former Wisley Airfield.

Blackwell Farm is sited off the Hogs Back and the proposed development would totally ruin the scenery/ views from the Hogs Back. The area is a green space for horse riders and ramblers and a "breathing space". A development of this size would create huge traffic problems. It would totally spoil the character of Guildford.

Likewise Wisley Airfield is situated in an area where the proposed development would create traffic problems. The existing surrounding roads are too narrow for increased traffic and large vehicles eg buses, causing difficulties in getting to local railway stations. Wisley Common, next to the airfield, is a site of scientific interest.

There is already enough concreting over the south east of England without any more. There could be further problems with flooding. The M25 and A3 are often congested and more traffic joining them will not help matters.

We need green spaces for peace of mind! I am also against taking land out of the green belt. The green belt was put in place to prevent urban sprawl and we should think of future generations. Once it is gone, it is gone!

I have kept my objections brief but feel that I have to comment on such an important issue. I accept that some additional housing is needed but not in the numbers these two sites are proposed. I have commented on these sites as I know them both well.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<tr>
<th>Comment ID:</th>
<th>pslp172/548</th>
<th>Respondent:</th>
<th>8772449 / Pamela Thomas</th>
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<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2017 / Policy A26</td>
<td>Do you consider this section of the document; complies with the Duty to Cooperate?</td>
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</table>
We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<tr>
<th>Comment ID: PSLPA16/4026</th>
<th>Respondent: 8772801 / David French</th>
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<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the proposed Infrastructure Schedule (Appendix C)

The Infrastructure Schedule sets out the key infrastructure requirements on which the delivery of the plan depends. For each of the Key Allocated Sites in the borough it identifies infrastructure projects that are required, except for Garlick’s Arch (A43) which is not mentioned. It is clear that the Plan takes no account of the infrastructure required for this site and is therefore not fit for purpose.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
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<tr>
<th>Comment ID: PSLPA16/4028</th>
<th>Respondent: 8772801 / David French</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I OBJECT to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)

- The “objectively assessed need” figure of 693 homes a year is too high.
- A professional review by NMSS has concluded that, even basing the calculations on a period of stronger economic and student growth, the housing need figure should be revised down to 510 homes a year and the method changed to consider student housing need separately due to the distorting effects.
- The current SHMA inflates the proposed housing figure due to
  - failure to correct for errors in the historical data for international migration flows,
  - issues with the way it considers students and affordability and
  - flaws in the method for estimating the number of homes needed to support job growth.
- It is unacceptable that demographic and economic model assumptions have been withheld and cannot be checked making the process unaccountable.

The Plan’s proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the borough, it is over double the previous figure of 322 used in previous plans. The SHMA report methodology is I believe inaccurate; it inflates the needs of the borough by distorted student numbers. However, it is based on commercially confidential modelling assumptions that cannot be checked or reviewed. There is no transparency to this evidence base and it is therefore impossible to assess its accuracy. This is not democratic and is not appropriate for consultation of the Plan.

The National Planning Policy Framework allows the overall housing target to be reduced to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/7496  Respondent: 8772801 / David French  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A25

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Gosden Hill development being in the Local Plan. The land in Gosden Hill does exactly what the Greenbelt was designed to achieve. It provides a green buffer between the Guildford Urban Area and West Clandon, gives Burpham a defined green boundary and breathing space and it hides Guildford town from visitors until they pass the off-slip to Burpham.

No exceptional circumstances have been demonstrated for building on this site and therefore it does not comply with paragraphs 87-89 of the NPPF. It stops the sprawl of Guildford town, assists in safeguarding the countryside from encroachment and assists in urban regeneration by encouraging the recycling of derelict and other urban land. All requirements of the NPPF.

The scale of Gosden Hill is out of proportion to West Clandon. It would have four times the amount of housing plus shops, offices/factories, GP surgery, schools. Development on this scale would blight a historic village with a history going back to the doomsday book and beyond.
Gosden Hill is the most obvious location for the north end of an A3 tunnel. It has rising ground and is situated just before the urban area. If it is built on, it will be very difficult to construct a tunnel.

The development will generate in the region of 6,000 vehicles which will pour on to the A3 which is stationary every day during rush hours. The linking of the A3100, B2215 and A247 would channel thousands of cars through the narrow, winding road through West Clandon, a road where large lorries mount the pavement virtually every day and through Send and Ripley which are also severely constrained.

The volume of traffic will greatly increase air pollution which is particularly critical given the proposal to build two schools.

Currently, a two way junction at the site would require vehicles wanting to go north on the A3 to go through Burpham which is grid-locked every day.

Burpham’s sewers are at capacity. Sewage would have to be pumped to Slyfield for processing, a project of enormous cost.

There is inadequate fresh water in Guildford and current supplies could not meet the needs of a development of this size.

Electricity supply is also inadequate and would require a big infrastructure development.

The railway station was rejected by Guildford Borough Council in 1984 because it feared Gosden Hill would become a dormitory estate for London.

The wording of the Local Plan with regard to Gosden Hill is so loose that the developer could virtually do whatever it wants.

The remaining agricultural land between Gosden Hill and West Clandon is so small that it is highly likely to be uneconomic and therefore a prime candidate for further development which would roll the Guildford Urban Area over West Clandon towards East Clandon and Wisley.

If the Strategic Sites are developed, the north of Guildford will deliver 36%, 5,036 houses towards the total of around 14,000. The infrastructures of the existing villages and the A3 will be overwhelmed by the scale of development.

A new on-slip at Burpham would only be 1.8km from the on-slip at Burnt Common which is against Highway England’s requirement of 2km.

Development of the A3 at best will not start until after 2020 and the building of a tunnel, which is only an “aspiration” in the Local Plan is likely to be many years after. In the meantime given that developers build houses to provide cash-flow for infrastructure, Gosden Hill will have a crippling effect on villages like West Clandon and the A3.

Gosden Hill already has surface water problems. Merrow Stream crosses the site. No hydrological survey has been carried out to assess the implications. Electricity pylons run through the centre of Gosden Hill which have health and safety issues.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID:</th>
<th>PSLPS16/7497</th>
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<tr>
<td>Document:</td>
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<td>Do you consider this section of the document; complies with the Duty to Cooperate?</td>
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I OBJECT to the inclusion of the land at Garlick’s Arch, Send Marsh/Burnt Common and Ripley (A43)

Garlick’s Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8). There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).

The Plan states the preference is to making the best use of previously developed land. Yet at the 11th hour a perfectly acceptable brown field site at Burnt Common, capable of accommodating approximately 100 houses, was removed from the Plan and replaced with the Garlick’s Arch site. There was no proper consultation in relation to the inclusion of this site. Why was a brownfield site removed and replaced a Greenfield site? There is no evidence that Section 18 of the Planning and Compulsory Purchase Act 2004, which requires local planning authorities to produce a Statement of Community Involvement, has been complied with for this site. This only came to light for local residents following a Council meeting on 11th May 2016.

Moreover, Guildford Borough Council’s own Green Belt & Countryside Report does not address Garlick’s Arch at all, so there is no evidence base to support the inclusion of this site.

National Planning Policy promotes sustainable developments, with sustainable transport. With ever reducing bus services in the area and no train station within reasonable walking distance it is impossible for any development on this site to offer a sustainable transport solution. Development on this site is wholly inappropriate (Policy I3).

The stream, which runs through the site, is identified as having a high risk of flooding by the Environment Agency. There are other sites that do not flood that can be developed and therefore this site should be removed from the Plan (Policy P4).

This site is bordered by Ancient Woodland and within it a number of trees are protected by Tree Preservation Orders (Policy D3).

The site has an abundance of wildlife, some of which are protected. It is home to many types of owls and bats, with the woods having cuckoos and woodpeckers. In addition there are regular sightings of badgers, deer and red kites. The development of the site will result in the loss of habitat. No wildlife report has been conducted on the site. (Policy I4)

It is clear that with this site being added at the 11th hours no infrastructure planning has been undertaken. The Infrastructure Schedule makes no provision for any infrastructure improvements for this site. How will the local services such as schools and doctors cope, many of which are already at capacity? (Policy I1)

Furthermore, several electricity pylon runs through the site, which will have the potential to be a health hazard for any residents.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the inclusion of the land for new on/off ramps at Burnt Common (A43a) The addition north facing ramps to the A3 at Burnt Common would be a disaster for local communities. There is no requirement for local traffic to access the A3 to the north, but the addition will draw in a huge amount of ‘through’ traffic. The route from London/M25 to Woking or would now be through Burnt Common and Send. Equally traffic from the east of Guildford (Merrow etc) and the A25 will now go through West Clandon and Burnt Common. This will cause immense damage to those areas on small roads which cannot be improved. This Plan does not address the needs of local communities or the Borough in this regard. There has again been no Section 18 consultation on this.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: PSLPP16/16695</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3</td>
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I OBJECT to the damage to the historic environment as a result of the scale of the proposed development (Policy D3) I OBJECT to the local plan based on the impact it will have on the special countryside of the borough. The proposed development at Garlick’s Arch (A43) will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: PSLPP16/16692</th>
<th>Respondent: 8772801 / David French</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E1</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the sustainable employment policy (Policy E1)

If developed, the new employment site at Garlick’s Arch, Send Marsh/Burnt Common (A43), would be treated as a Strategic Employment Site.

The proposed development of up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8) at Garlick’s Arch (A43) is in the scheme of industrial development relatively small. Just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m. The Garlick’s Arch site which is in the Green Belt should not be developed as a Strategic Employment Site when there is a suitable alternative brownfield site very close by, which is far more sustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5867  Respondent: 8772801 / David French  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT to the location for new employment floorspace at Garlick’s Arch – Site A43 (Policy E2)

Proposals for new industrial, warehousing and storage (use Class B1c, B2 and B8) floorspace will be directed to the Industrial Strategic Employment Sites.

There is no need for the new employment floorspace to be located at Garlick’s Arch, when just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16693  Respondent: 8772801 / David French  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E2
I OBJECT to the location for new employment floorspace at Garlick’s Arch – Site A43 (Policy E2)

Proposals for new industrial, warehousing and storage (use Class B1c, B2 and B8) floorspace will be directed to the Industrial Strategic Employment Sites.

There is no need for the new employment floorspace to be located at Garlick’s Arch, when just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16694  Respondent: 8772801 / David French  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the loss of rural employment (Policy E5)

Policy E5 supports the retention and development of local services and community facilities in our inset and identified villages. Yet the development at Garlick’s Arch (A43) would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises. The Plan does not promote rural employment; rather it will result in the loss of existing local rural businesses.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16703  Respondent: 8772801 / David French  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E6

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
POLICY E6 - The leisure and visitor experience

I OBJECT. Tourism and visitors do not depend on new visitor “attractions” and could actually be damaged by them, as compellingly argued in the current debate over Newlands Corner. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment/“Disneyfication”. Heritage sites and the Green Belt are particularly vulnerable to harm.

Guildford has many “leisure and visitor attractions” already. The case for creating more is not made and no examples are given. Instead, the plan’s explicit priorities should be:

1. To protect the borough’s prime leisure and tourism asset, its countryside, from inappropriate development. This is all the more valuable because of its accessibility from London, the rest of Britain and the Continent, in that order. Rural residents are its custodians and require no Council interference. Economically, the most valuable forms of tourism, such as walking and cycling, require no new development. In the overcrowded South-East of England, lack of development is a leisure and tourism asset, not a liability.

2. To help make Guildford’s river landscape less off-putting and support town-break packages for high-value tourists. To achieve this, the policy needs to define what leverage, if any, Council planners have to influence normal tourism market mechanisms.

3. To help private providers market local tourism. This need not involve extra spending. The Council could, for instance, help co-ordinate ready-made, local tourism packages under a distinctive brand at an all-in price. An “English town break” (including B&B accommodation, a walking tour of Guildford, a pub lunch in the Surrey Hills, a visit to Wisley Gardens and a National Trust property and a SouthWest Trains travelcard for a day out in London) would be highly attractive to many European visitors who currently by-pass Guildford to go to Bath, Oxford or Cambridge instead.

4. To rule out the redevelopment of scarce rural hotel sites (e.g. Thatchers, East Horsley, earmarked for 40 new houses under Site A37 of the plan yet just a short walk from the new opera house).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Student accommodation should provided for 100% of new students and more than 60% of existing students, which would free up ideal family accommodation in the urban area. Other university cities (e.g. Oxford) insist on higher percentages than those proposed in the plan. In my view, the Council’s timidity is a case of “regulatory capture” by Surrey University, which has failed to use its existing planning permissions (dating from 2004) to accommodate 3,000 students or to improve the efficient development of its campus (e.g. by building on its extensive and under-used surface car parks). If all students were accommodated in this way, 2,000 homes would be freed up in town and there would be no need to build on the Hog’s Back.

Guildford borough has already a higher proportion of traveller sites than most comparable boroughs. Over-provision is inappropriate given other constraints.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16702  Respondent: 8772801 / David French  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY H3 – Rural Exception Homes

I OBJECT This is a Trojan horse policy. It says that homes can be built anywhere near a settlement of any form (including agricultural land and the AONB). These homes are meant for people with a village connection, but they could be for anyone on the Guildford borough housing list. To make the housing viable, or to improve the “mix” this can include “market” housing (i.e. normal commercial development which in Guildford usually means large executive homes). This policy means building anywhere, and ignoring all historic planning restrictions.

The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove “exceptional circumstances.”

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16696  Respondent: 8772801 / David French  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I OBJECT, due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1)

Our villages are already suffering from severe congestion for much of the day, for example the Newark Road & Rose Lane junction in the centre of Ripley. The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.

Furthermore, many of the country lanes around the villages of Ripley, Send and Clandon are narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition.

I OBJECT to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces.

Many of the affected villages, such as West Clandon, already suffer from traffic congestion. Further development around these villages will only result in more traffic and more parking problems.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16698  Respondent: 8772801 / David French  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the lack of proper infrastructure planning for sites (Policy I1)

Policy I1 requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.

Despite the Garlick’s Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents’ in the locality will see their quality of life significantly deteriorate in many ways.

Many of the utilities in the Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers. No plans to improve these services should mean no development of the Garlick’s Arch site.

Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are already at capacity and suffering from funding cuts or freezes. Any further development without funding will place further stress upon existing health services.

Police services are seeing funding reduced. The development of the proposed 13,860 homes during the plan period will stretch the police services further and is unsustainable.

There is no provision of the increased capacity of Guildford hospital, where is this assessed and remedied?
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16699  Respondent: 8772801 / David French  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2)

There is no certainty that either the A3 or M25 in the borough will be improved to increase capacity and reduce congestion during the Plan period. Highways England has no plans to even examine improving the A3 before 2020. I have considerable concerns that development of the large residential sites identified at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), will take place before any improvements are made to the trunk road network. The A3 & M25 are already at capacity during peak hours and any development prior to improvement of these roads will only make the situations worse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16697  Respondent: 8772801 / David French  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

With some 5,000 houses being proposed close to the village of Ripley, the roads serving the village will become even more congested. Cycling has become an ever popular past time, particularly at weekends hundreds of cyclists past through the villages on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road accidents involving cyclists as a result of the development proposed under the local plan.

The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the road becoming ever more dangerous for pedestrians.
The council has a statutory obligation to protect the public and the additional traffic flows will bring added pollution and risk to injury of the public. In the case of West Clandon the Street often only has a narrow footpath on one side of the road making it very dangerous, especially when vehicles mount the pavements.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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I OBJECT to poor air quality concerns (Policy I3)

Paragraph 4.6.27 of the Plan states that “Development must also mitigate its traffic impacts, including its environmental impacts and impacts on amenity and health.” The significant level of development being proposed, particularly in the north east of the borough will lead to considerable further congestion, despite any attempts to mitigate this through travel plans. This will be particularly acute in built up residential areas and will only lead to greater levels of air pollution, which will have a detrimental effect on local residents and their health and can result in early death.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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I OBJECT to not protecting the Green Belt (Policy P2)

I OBJECT to the proposals to remove the villages of Ripley, Send and Clandon from the Green Belt, together with sites of Wisley Airfield (A35) and Garlick’s Arch (A43). National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these villages (as mere housing need does not constitute a ‘special circumstance’ and the land to be taken from the Green Belt. Once taken the green belt is lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and
the countryside encroached. GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no
evidence base to support including this site.

Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common,
with surplus land that could accommodate a further development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16691  Respondent: 8772801 / David French  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally
Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to development in areas which are at risk of flooding (Policy P4)

National Planning Policy states that Local Plans should take account of climate change over the longer term, including
factors such as flood risk. It goes on to say that new development should be planned to avoid increased vulnerability to the
range of impacts arising from climate change.

The Plan states that in accordance with national planning practice guidance, the Level 1 SFRA has been used to guide
development towards areas at the lowest risk of flooding and identify areas unsuitable for development. However, the
document concludes that land outside of the area of flood risk is not capable of accommodating all of the borough’s
identified development needs. A Level 2 SFRA has therefore also been produced and will help the Council apply the
exceptions test (as described in the NPPG) as necessary to development proposals in areas at risk of flooding.

The site at Garlick’s Arch (A43) is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a
river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood
risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual
probability of river flooding. Knowing the area well I am aware that this site often floods during the winter months and the
flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-
commissioned to accurately reflect the actual flooding risks of each site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16688  Respondent: 8772801 / David French  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally
Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I OBJECT to the Local Plan as the development proposed will not be sustainable (Policy S1)

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are just unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick’s Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16689  Respondent: 8772801 / David French  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the Borough Wide Strategy (Policy S2)

a. The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

b. The Housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.

c. The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere;
 Unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guilford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/4563  

Respondent: 8772801 / David French  

Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A25

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to the changed policy A25 Gosden Hill for the development of 1700 homes which is still far too much.
2. There is no need for housing on this site because the local plan housing target is incorrect and inflated and ignores constraints.
3. Gosden Hill is located entirely within the Green Belt. No exceptional circumstances have been demonstrated for building on this site and therefore development here does not meet paragraphs 87-89 of the NPPF. Furthermore, Gosden Hill performs all five functions of green belt.
4. The site has no provision for foul or surface water sewerage and adjoining sewerage is at capacity.
5. The Green Belt at this point serves the important function of separating West Clandon from the edge of urban Guildford. Development here will cause the two to coalesce defeating one of the objectives of the Green Belt. If this development proceeds I believe the narrow strip of Green Belt remaining between Guildford and Clandon at this point will be too narrow and will come under further pressure. It will represent an undesirable ribbon development along the A3. It will be highly visible from the A3 when approaching Guildford and will, in conjunction with A43a at Garlick’s Arch give the appearance of almost continuous development from Send through to Guildford.
6. The development of this site cannot be sustainable and will cause massive congestion onto surrounding roads. The development will generate in the region of 6,000 vehicles which will exit straight on to the A3 which is stationary every day during rush hours. The linking of the A3100, B2215 and A247 would channel thousands of cars through the narrow, winding road through West Clandon.

7. I object to the proposal for a link road to bring traffic from the Gosden Hill development to the proposed 4 way junction at Burnt Common. This has the potential to generate large volumes of traffic (including commercial vehicles) on the A247 through Send and West Clandon - a road which is already under traffic stress (see below).

8. The volume of traffic will greatly increase air pollution which is particularly critical given the proposal to build two schools.

9. A new on-slip at Burpham would only be 1.8km from the on-slip at Burnt Common which is against Highway England’s requirement of 2km.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/4564  Respondent: 8772801 / David French  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to the changed policy A43 Garlick’s Arch for 400 homes and 6 travelling show people pitches
2. It ignores all the thousands of previous objections made by local people
3. There is no proven demand for travelling show people plots in this location
4. There is no need for putting houses on this site because the local plan housing target is incorrect and inflated and ignores constraints.
5. The allocation of 28.9 ha is an excessive land grab into the Green Belt. If we take a normal density of 30 homes per ha and it is at the end of the day proven that there is a need for 400 homes in this location the land requirement is 13 ha not 28.9 ha which is more than double. This replicates a similar over land grab at Burnt Common where the factor is 7 times the land required.
6. This confirms the worrying impression that GBC have a pre-determined policy of building on the Green Belt at every opportunity. The arithmetic does not stack up. One would have thought that they would as custodians of the green Belt be intent on conserving it rather than exploiting it.
7. The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.
8. Garlick’s Arch (A43) is in an unsustainable location. It does not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. The site is unsuitable due to lack of access to sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be dependent on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.
9. The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.
10. I object to the proposal to remove Garlick’s Arch from the Green Belt. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for this land to be taken from the Green Belt. Once taken the green belt
is lost forever. There is a real danger that the loss of this Green Belt will result in urban sprawl and the neighbouring villages merging into one another. The significant development in West Clandon, Send and Ripley will result in the character of these villages being lost and the countryside encroached.

11. I object to the development at Garlick’s Arch because of flood risk. The site at Garlick’s Arch is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. Knowing the area well I am aware that this site often floods during the winter months and the flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.

12. I object to the loss of rural employment on the site. The development at Garlick’s Arch would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises.

13. I object to the potential loss of Ancient Woodland on the site. The proposed development at Garlick’s Arch will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees that existed in the year 1600.

14. I object due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1). Our villages are already suffering from severe congestion for much of the day, for example the Newark Road and Rose Lane junction in the centre of Ripley and the A247 through West Clandon. The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.

15. Furthermore, many of the country lanes around the villages of West Clandon, East Clandon, Ripley, and Send are narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition. I object to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces.

16. Many of the affected villages, such as West Clandon, East Clandon, Send and Ripley, already suffer from parking problems. Further development around these villages will only result in more traffic and more parking problems.

17. With some 5000 houses being proposed close to the villages of West Clandon, East Clandon, Send and Ripley, the roads serving the village will become even more congested. Cycling has become a popular past time, particularly at weekends hundreds of cyclists past through the village on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road accidents involving cyclists as a result of the development proposed under the local plan.

18. The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the roads becoming ever more dangerous for pedestrians.

19. I object to the lack of proper infrastructure planning for sites (Policy I1). Policy I1 requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.

20. Despite the Garlick’s Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents’ in the locality will see their quality of life significantly deteriorate in many ways.

21. Many of the utilities in the West Clandon, East Clandon, Burpham, Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers. No plans to improve these services should mean no development of the Garlick’s Arch site.

22. Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are already at capacity and suffering from funding cuts or freezes. Any further development without funding will place further stress upon existing health services.

23. I object due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2). There is no certainty that either the A3 or M25 in the borough will be improved to increase capacity and reduce congestion during the Plan period. Highways England has no plans to even examine improving the A3 before 2020. I have considerable concerns that development of the large residential sites identified at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), will take place before any improvements are made to the trunk road network. The A3 & M25 are already at capacity during peak hours and any development prior to improvement of these roads will only make the situations worse.
24. I object to poor air quality concerns (Policy I3). Paragraph 4.6.27 of the Plan states that “Development must also mitigate its traffic impacts, including its environmental impacts and impacts on amenity and health.” The significant level of development being proposed, particularly in the north east of the borough will lead to considerable further congestion, despite any attempts to mitigate this through travel plans. This will be particularly acute in built up residential areas and will only lead to greater levels of air pollution, which will have a detrimental effect on local residents and their health.

25. I object to the inclusion of the land at Garlick’s Arch, Send Marsh/Burnt Common and Ripley (A43). Garlick’s Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8). There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).

26. It is clear that with this site being added at the eleventh hour and no infrastructure planning has been undertaken. The Infrastructure Schedule makes no provision for any infrastructure improvements for this site. How will the local services such as schools and doctors cope, many of which are already at capacity? (Policy I1)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to Policy A 58 at Burnt Common and to the proposed inclusion of Burnt Common as an Industrial Strategic Employment Site
2. This previous allocation for B1c, B2 and B8 development was removed from the 2014 draft due to all the objections made previously.
3. The word “minimum” is a change from the previous “maximum” in the 2016 plan and since that time there has been a decline in demand for industrial land. This change alone is unacceptable since even if there was a need to build 7,000 sq m at Burnt Common this development would only require 1.4 ha at a standard plot ratio density of 50% not 9.26 ha. There is no justification for zoning an additional 7.86 ha in the Green Belt.
4. There is in fact no justification for building any more industrial development in the borough particularly at Burnt Common. The current industrial pipeline of granted consents of 38,357sqm in B1c, B2 or B8 use class space is double the 19,000 sq m said to be needed by Aecom who justify the need for new space on top of the existing pipeline by a completely unsubstantiated suggestion that “there is the possibility that some pipeline developments may not come forward at all, or be developed in different quantities by use class than has been consented.”
5. There is no need to build industrial or warehouse development in the middle of the Green Belt when Slyfield and Guildford still have empty sites and industrial units.
6. The 2017 Employment Land Need Assessment shows a reduction in demand to 3.9 hectares for industrial land for the whole borough not a huge over allocation of 9.26 hectares at Send in the Green Belt.
7. The Employment Land Needs Assessment update 2017 (ELNA) states “that the pipeline for employment floorspace defined by planning permissions yet to be implemented and prior approvals suggests the potential for an additional 33,607sqm of B use class floorspace to come forward. This figure comprises a net loss of 4,750sqm of B1a use class floorspace and a net gain of 38,357sqm in B1c, B2 or B8 use class space.”
8. 38,357 sq m of B1c, B2 or B8 use class is quite sufficient supply for the plan period and is in fact more space than the 3.9 ha of industrial land that is said to be needed for the plan period by Aecom. Since if you were to develop 3.9 ha at a plot ratio of 50% it would provide new industrial development of 19,000 sq m approximately.
half of current planning permissions granted. This does not justify the need for new development of industrial space on the Green Belt in such areas as Burnt Common.

9. The reality of demand for industrial space is that it is both nationally and locally in decline and this is evidenced by old existing permissions that have not been taken up and developed. The ELNA alludes incorrectly to the poor quality of existing space being a “constraint” on supply and fails to acknowledge that this assertion cannot apply to potential newly developed space e.g. the undeveloped pipeline of 38,357sqm.

10. The impact on small surrounding roads will create traffic gridlock.

11. It will join up existing villages and defeat the purpose of the Green Belt.

12. The ongoing poor quality of the updated research undertaken by Aecom in the Employment Land Needs Assessment 2017 does not support industrial development on land in the Green Belt at Burnt Common.

13. The Aecom research is generally superficial and lacks sufficient detail and analysis between B1c, B2 and B8 use classes and no reliable individual analysis has been undertaken of the widely different supply and demand dynamics of light industrial, general industrial and warehousing and distribution floor space.

14. The potential inclusion of a waste management facility mentioned at paragraph 4.4.23a lacks enough detail for proper consultation and is completely inappropriate.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
The NPPF states para 155: “Early and meaningful engagement and collaboration with neighbourhoods, local organisations and businesses is essential. A wide section of the community should be proactively engaged, so that Local Plans, as far as possible, reflect a collective vision and a set of agreed priorities for the sustainable development of the area, including those contained in any neighbourhood plans that have been made.”

The changes in this latest version of the Guildford Local Plan show little or no willingness of Guildford Borough Council to reflect a collective vision. Despite the many thousands of responses to previous versions of the Plan which overwhelmingly rejected building on Green Belt land this latest version has as much, if not more, building on the Green Belt and increased problems of infrastructure and traffic which will bring increased noise and air pollution and danger to residents.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/2221  Respondent: 8773217 / Russell Burgess  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A42

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (

I object to the Policy A42 change at Clockbarn in Tannery Lane because:

• The increase to 60 homes in place of 45 homes is 33% more and too much
• It ignores all the hundreds of previous objections made by local people
• It will worsen access and traffic problems in Tannery Lane and at the A247 junction
• It will make erosion of the Green Belt in our village worse
• It will make surface water flooding, which is already bad, even worse
• It will impact open countryside views from the River Wey Navigation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/2225  Respondent: 8773217 / Russell Burgess  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (}
object to the Policy A43 change at Garlick’s Arch because:

- It ignores all the thousands of previous objections made by local people
- There is no proven demand for Travelling Showpeople plots in this location
- It is beautiful permanent Green Belt and no “exceptional circumstances” exist
- It will cause over-development of our village and the number of homes is excessive
- It is exquisite ancient woodland that existed at the time of Elizabeth 1
- It will join up Ripley and Send and defeat the key purpose of Green Belt
- It is subject to frequent flooding and is currently a flood zone 2 allocation
- It is contaminated by lead shot accumulated over fifty years
- It will generate excessive traffic that will block up the local roads of Send and Ripley.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/2226  Respondent: 8773217 / Russell Burgess  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A58

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to Policy A 58 at Burnt Common because:

It was deleted from the 2014 draft because of all the objections made previously

- The word “minimum” is a change from the previous “maximum” in the 2016 plan and since that time there has been a decline in demand for industrial land
- There is no need to build industrial or warehouse development in the middle of the Green Belt when Slyfield and Guildford still have empty sites and industrial units
- The 2017 Employment Land Need Assessment shows a reduction in demand to 3.9 hectares for industrial land for the whole borough not a huge over allocation of 10 hectares at Send in the Green Belt
- The impact on small surrounding roads will create traffic gridlock
- It will join up existing villages and defeat the purpose of the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/939  Respondent: 8773281 / Mel Beynon  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
It is with a very heavy heart that I find myself yet again having to complain and object to the most unbelievably stupid proposals featured in the current Proposed Local Plan.

We are a Green Belt village. It is then, by definition, a rural village. The idea of removing us from the Green Belt is hideous and wholly unjustified. Quite apart from the significant environmental impact of such an event, there can be no justification for it based on the flawed evidence on which this proposal has been made.

It seems there is a need, if the plan is to be believed, for huge numbers of houses to be built in our village. A recent local survey (taken in 2014) found, in fact, that we had a need for possibly no more than 20 or 30 houses (max) of one and two bedrooms. Possibly including a handful of three bedroomed homes too. I acknowledge that such development might indeed have to happen. But we might, surely, be able to find areas of brown-field sites within our village to allow such building to have minimum impact on our community.

Our need is for a small number of SMALL homes. Guildford has consistently ignored the small swelling principle which has exacerbated our local situation. Small dwellings have been allowed to be knocked down to be replaced by five bedroomed “Des Res”. Our small dwelling stock has been “raped” and with it some of our architectural history and all for greedy development of which we have no need.

Given that we are situated at a convenient distance from London, ANY housing would be instantly swallowed up by those who wish to move out of the city to live in a quieter, more rural environment. Of course, the rural environment would be gradually whittled away and within the six years in which it is proposed to build 600+ in our village, we would no longer be rural, but distinctly urban. The proposal is ill-conceived and foolish. indeed it is environmentally criminal.

Such development, were it allowed to happen, would be change enough but given that our roads are very dangerous because of serious surface damage and too many motorists, the whole area would become a nightmare in which to move around. There is no mention of infrastructure in the plan except that it might be something that developers would be expected to contribute to in return for the right to build. No mention either of flood control. We suffer considerably from long lengths of road which become flooded and impassable with even a modest rainfall. If we have flash flooding, it is sometimes impossible to move in or out of the village.

Our schools are just about able to cope with the current population of our village and so it is with the medical centre and the car parking in the station in the adjacent village of East Horsley.

Movement through the village is difficult at peak times. Walking is not a safe option especially for unaccompanied young children because the pavements are irregular, uneven and very narrow. There is no way of widening either road or pavement and absolutely no possibility of introducing safe cycling routes.

An obvious answer would be better public transport, but that is not an option either, since subsidies to bus companies have been reduced and we have but a skeleton bus service which is absolutely useless to the work force as the buses do not in any way coincide with times when the work force needs them.

Much mention is made of the need for “Affordable Housing”. In the mind of many, this equates with cheaper housing. How can this be when affordability is based on 80% of the average house price, which in this area is somewhere in the region of £375,000/ £400,000? Anyway, the rules which demand that developers should provide a percentage of “Affordable Housing” in any development are far too flimsy and vague and left to the pleading power of greedy developers.

Despite the pages of dense prose and miles of "difficult to get your head around" statistics, there is no doubt whatever that this Local Plan is ill-considered, ill-conceived, inaccurate and flawed. It is wholly unacceptable that the very council which should be protecting the environment for its residents is now turned major facilitator of a cruel destruction of the kind of
landscape and lifestyle that makes our borough desirable as a tourist and visitor destination. We stand to see our borough scarred beyond recognition, and we will also find our economic wellbeing seriously damaged.

The greatest insult of all is that this proposed plan is to be inflicted upon us by a Conservative council, whose government pledged to protect the Green Belt!!!!!!

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/617  Respondent: 8773313 / Susie Harkness  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Ripley

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The threat that the Local Plan poses to my village of Ockham and the subsequent detrimental impact on its property.

The horrific impact such development would have on transport bearing in mind the narrow unlit lanes which are dangerous enough already. This would increase the volume of car traffic to an estimated 4000 additional cars plus wider vehicles like buses resulting in congestion both in the villages and the A3 and M25. There are no cycling paths and few pavements which would further compromise the safety of cyclists and pedestrians.

There is a lack of public transport and Horsley and Effingham stations are full to capacity already as are the station car parks.

There is insufficient consideration given to the environmental and ecological value of the site.

Air pollution in many parts of the borough is in excess of EU permitted levels, especially at the M25/A3 junction.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/933  Respondent: 8773313 / Susie Harkness  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
The removal of the Former Wisley Airfield from the Green Belt which will result in an urban corridor stretching from London to Guildford.

Finally, I object in the strongest possible terms to the continued inclusion of the Former Wisley Airfield now known as Three Farm Meadows where the planning application has already been unanimously rejected by GBC’s Planning Committee. Many authoritative sources across the UK have indicated concern to such a development on this site (eg Highways England, Thames Water, NATS and the Environment Agency.

I trust that these objections will be fully considered and that the Former Wisley Airfield now known as Three Farms Meadows Allocation A35, is removed from the Local Plan with immediate effect.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/1913  Respondent: 8773313 / Susie Harkness  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I am writing to object to the Guildford Borough Council Proposed Local Plan (June 2016) and to the continued inclusion in the plan of the Former Wisley Airfield, now known as Three Farms Meadows – Allocation A35 – for the phased development of a new settlement of up to 2100 dwellings.

My objections to the draft Local Plan read as follows :-

The proposal that over 70% of new housing be built within the Green Belt rather than utilising brownfield land in urban areas needing regeneration.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/1914  Respondent: 8773313 / Susie Harkness  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
The proposed number of 693 houses per year which is far too high and double the figure used in previous plans.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/3107  Respondent: 8773377 / Anthony & Anne Bond  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Appx d- The evidence for just excessive expansion is flawed. A report by the GRA lays out the case that the plan exaggerate the need for such development.

Appx d- Finally, in light of the decision to leave Europe, I feel strongly that we should pause and consider what course this country takes in such issues as immigration and growth.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12860  Respondent: 8773377 / Anthony & Anne Bond  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Brownfield development opportunities are being ignored. We need more homes for students and the elderly in the centre, not more retail space.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12858  Respondent: 8773377 / Anthony & Anne Bond  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Guildford, unlike towns around us, will see unconstrained housing growth. We already have a congested town, with unresolved issues surrounding traffic flow in the centre of the town.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14454  Respondent: 8773377 / Anthony & Anne Bond  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Guildford is already extremely congested and there is little evidence that sufficient improvement to the town centre infrastructure is part of this inadequate plan

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12859  Respondent: 8773377 / Anthony & Anne Bond  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Allowing unjustified Green Belt development (yet another broken promise) to pay for transport schemes will just generate more traffic from more homes, causing yet more congestion.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14453  Respondent: 8773377 / Anthony & Anne Bond  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

development on this scale on Green Belt is a betrayal and indicates that Brownfield alternatives are being ignored.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12857  Respondent: 8773377 / Anthony & Anne Bond  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I wish to register a strong objection to the proposal that Guildford add an astonishing 13,860 new homes accompanied by a 40% increase in retail space.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12861  Respondent: 8773377 / Anthony & Anne Bond  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The plan that you are proposing will completely ruin the nature of Guildford, so I suggest that you reconsider.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<td>the need for expansion appears flawed and, in the light of Brexit, surely needs to be seriously re-examined</td>
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<td>protecting the character of Guildford and the surrounding area is the biggest responsibility of the Borough Council. You owe it to future generations to address the needs of the people in a balanced and coherent manner. This plan needs revisiting!</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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The method used to establish that 13,860 new houses are required, by a sub-contractor not being disclosed to residents (or councillors?) paid for out of our taxes!

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The plan does not adequately state additional facilities that will be required to cope with the increased population (e.g. hospitals, schools, GP surgeries, public car parking, etc.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Our taxes are paying for this completely destructive plan when currently money cannot be found to repair the current disgusting state of our roads in the village

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
The roads in the village will not be adequate for the extremely increased traffic. (A visual check on the current cars per house in the village is 2. Equals an increase of some 28,000 cars!!!)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Pre-election promises were to protect the Green Belt. Why is the Green Belt being invaded now?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

There are several other aspects that show this Draft Local Plan to be ridiculous, bordering on reprehensible destruction

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the plan to use brownfield sites in and around Guildford primarily for new industrial developments. These sites should be used primarily to provide low cost accommodation or social housing that is affordable for lower paid workers in Guildford that will allow them easy access to their work places without putting further strain on road traffic and public transport into Guildford, which are already overloaded.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6406  Respondent: 8773953 / Robin Garnett  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the proposal to keep most of the current brownfield sites within Guildford for commercial use. Guildford should be catering for high end businesses that require minimum floor space thus allowing more brownfield area for residential development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6408  Respondent: 8773953 / Robin Garnett  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Any business development in rural areas must be limited to businesses with maximum 100 m2 floor space such as high tech businesses and be confined within the current village boundaries. High speed broadband should be made available to these sites. It is important to continue to support all forms of agricultural business.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<td>I object to this policy as worded. The vague wording does not clearly define the limits of any new housing developments within or around existing rural communities.</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<td>I object to this policy as worded. It is the excessive number of new houses proposed in the plan that would lead to an unsustainable increase of traffic around Guildford and there is no guarantee that Highways England would be able to budget for or provide the necessary improvements to the A3 during the plan's timespan.</td>
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<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P1</td>
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I object to this policy as currently worded. A policy to conserve the AONB is welcome but it must be clearer and firmer about restricting any new developments in this area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6413  Respondent: 8773953 / Robin Garnett  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

I object to this policy. The presumption of 13,860 new homes required by 2033 is unsubstantiated and highly unlikely in view of the Brexit decision which is likely to reduce economic growth and the demand for housing in the area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6403  Respondent: 8773953 / Robin Garnett  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Vision and ambition

I object to the plan being based on an assumed requirement for 13,860 new homes by 2033. This assumes a much greater rate of population increase than seen in the last ten years. In view of Guildford's position in the Green Belt I believe that it is inappropriate to try and develop it into a larger industrial centre when there are other areas in the UK that have far greater need to develop industries and provide employment. Also the uncertain future due to the Brexit decision may well lead to reduced growth and demand for housing.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: pslp171/1777  Respondent: 8773953 / Robin Garnett  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the deletion of paragraph 4.2.8 regarding Density of housing. It is important that the housing density is appropriate to the area. Brown field sites should be used for high density housing while any developments in rural areas should be in keeping with the existing communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp171/1776  Respondent: 8773953 / Robin Garnett  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the deletion of the following tests that all proposed developments were to be judged against.

- Conserve or enhance the setting and views of the AONB
- Conserve wildlife, historic objects or natural phenomena within it
- Promote its enjoyment by the community and visitors to the area
- Support the rural economy of the Surrey Hills area
- Provide and maintain public access to the AONB

I also OBJECT to the deletion of ‘protect it from inappropriate development’ in paragraph (1) and the inclusion of paragraph (2). These changes weaken the protection of the AONB.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/1916  Respondent: 8774113 / Ian Elliott  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I totally disagree for the plan to remove the Horsleys from the Green Belt. There is no corresponding plan for infra-structure and this is currently over-loaded as it is. This means schools, roads including speeding cars and the lack of Surrey CC money to do anything about any of it. The rail station car park is full.

The proposals are totally out of kilter in terms of proportionate increase.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Guildford BC need to listen to what people want and react accordingly. We all know what happened when the Government didn’t listen regarding Europe.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** pslp172/2176  **Respondent:** 8774113 / Ian Elliott  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy A36

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

Overall comment – the local plan has adopted a ‘lazy’ policy of developing green belt at the expense of sourcing and maximising brownfield sites in urban areas.

Specific comment – Horsley area - the removal of the A36 ‘Thatchers’ hotel site makes no planning sense and causes an adverse knock-on effect to other local areas. As a previously developed ‘brownfield’ site this is a perfect location to add housing at little detriment. It is unclear why this site has been removed.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** pslp172/2177  **Respondent:** 8774113 / Ian Elliott  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy A41

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

The removal of the site A41 which would have been used as a sustainable location for a new school is short sighted and indicates that the council have little feel for the needs of local people. In turn the development of the present school site would have alleviated the pressure on other more contentious sites.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** PSLPA16/2007  **Respondent:** 8774369 / Gary Cooper  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Send
I object to the proposal to remove Send and Ripley from the Green Belt.

Removal of Send and Ripley from the Green Belt is almost certain to result in one massive development area on both sides of the A3 road, all the way from the M25, down to the North Downs. The villages will be entirely swallowed up to become like those to our North East at Surbiton, New Maldon, Worcester Park and all the way through to Sutton and beyond.

For Guildford to retain its current charm, it is vital that the village environments should be maintained for future generations.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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I support the development of Wisley Airfield

There is no doubt we have to provide some new homes and they have to go somewhere. Wisley airfield is in my view suitable, but only if the site is provided with direct access to junction 10 of the M25

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to the inclusion of Garlick's Arch site.

This proposal has been included at a very late stage and has not been consulted upon previously. It was not included in the Regulation 18 draft.

There are no exceptional circumstances to warrant the development, but there are such circumstances which make it unacceptable, such as its conservation sensitivity, being covered with ancient woodland, with trees dating back to the 16th century.

According to the Land Needs Assessment 2015 (ELNA) required employment space has reduced by 80% since the previous draft plan, so is no need for the proposed 7000 sq m of industrial development on this site. If there is eventually such need, it should be situated at Slyfield.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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I object to the proposed new 4 way A3 junction

The proposed new junction could help parts of the area such as the centre of Ripley, but that benefit is entirely outweighed by the hitherto unimaginable volumes of traffic which would cause gridlock at Burnt Common roundabout as well as on the entire section of A247 from West Clandon to Woking. With these areas gridlocked, traffic would need to find alternative routes and the previously little known lanes around the area would be ruined also. This one singular act of folly would cause immeasurable damage to a wide area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to the proposal to remove Send and Ripley from the green belt

Removal of Send and Ripley from the Green Belt is almost certain to result in one massive development area on both sides of the A3 road, all the way from the M25, down to the North Downs. The villages will be entirely swallowed up to become like those to our North East at Surbiton, New Maldon, Worcester Park and all the way through to Sutton and beyond.

For Guildford to retain its current charm, it is vital that the village environments should be maintained for future generations.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/9770  Respondent: 8774369 / Gary Cooper  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the overall strategy

The proposal to develop 693 new homes per year for the next 15 years is unsustainable, given that this area is densely populated and the infrastructure is already creaking at the seams. Even half of the proposed number would be difficult to accommodate.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/8392  Respondent: 8774369 / Gary Cooper  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the overall strategy.

The proposal to develop 693 new homes per year for the next 15 years is unsustainable, given that this area is densely populated and the infrastructure is already creaking at the seams. Even half of the proposed number would be difficult to accommodate.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
I object to the 2016 draft local plan for the following reasons

I object to the overall strategy

The proposal to develop 693 new homes per year for the next 15 years is unsustainable, given that this area is densely populated and the infrastructure is already creaking at the seams. Even half of the proposed number would be difficult to accommodate.

I object to the proposal to remove Send and Ripley from the green belt

Removal of Send and Ripley from the Green Belt is almost certain to result in one massive development area on both sides of the A3 road, all the way from the M25, down to the North Downs. The villages will be entirely swallowed up to become like those to our North East at Surbiton, New Maldon, Worcester Park and all the way through to Sutton and beyond.

For Guildford to retain its current charm, it is vital that the village environments should be maintained for future generations.

I object to the inclusion of the Garlick's Arch site

This proposal has been included at a very late stage and has not been consulted upon previously. It was not included in the Regulation 18 draft.

There are no exceptional circumstances to warrant the development, but there are such circumstances which make it unacceptable, such as its conservation sensitivity, being covered with ancient woodland, with trees dating back to the 16th century.

According to the Land Needs Assessment 2015 (ELNA) required employment space has reduced by 80% since the previous draft plan, so is no need for the proposed 7000 sq m of industrial development on this site. If there is eventually such need, it should be situated at Slyfield.

I object to the proposed new 4 way A3 junction

The proposed new junction could help parts of the area such as the centre of Ripley, but that benefit is entirely outweighed by the hitherto unimaginable volumes of traffic which would cause gridlock at Burnt Common roundabout as well as on the entire section of A247 from West Clandon to Woking. With these areas gridlocked, traffic would need to find alternative routes and the previously little known lanes around the area would be ruined also. This one singular act of folly would cause immeasurable damage to a wide area.
I support the development of Wisley Airfield

There is no doubt we have to provide some new homes and they have to go somewhere. Wisley airfield is in my view suitable, but only if the site is provided with direct access to junction 10 of the M25.

Your consideration of the above points would be appreciated

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/467  Respondent: 8774593 / Rod & Jan Gerrard  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Objections to Guildford Borough Council Proposed Local Plan (June 2016) and to the continued inclusion in the plan of the Former Wisley Airfield (FWA), now known as Three Farms Meadows (TFM) – Allocation A35 - for the phased development of a new settlement of up to 2100 dwellings

I strongly object to the draft Local Plan for the following key reasons:

1) I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.

2) I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.

3) I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans.

4) I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).

5) I object to the threat the Local Plan poses to the historic rural village of Ockham and the blight on properties there. The plan calls for a village of 159 residences (with narrow lanes, no streetlights, very few pavements and many listed houses) to be subsumed into a 2,000+ dwelling development, with urban-style buildings up to five storeys high and a population density higher than most London boroughs.

6) I object to the detrimental impact on transport, local roads and road safety. I specifically object to:

   1. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars.
b. The increased volume of car traffic. A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them). The increase in the already severe congestion on the Strategic Road Network of the A3 and M25. A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest. The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity.

7) I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCl).

8) I object to the fact that air quality concerns have not been taken seriously – air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.

9) I object to the fact that the proposed plan does not meet the needs and desires of local communities, as evidenced through the Ockham Parish Plan. The top two responses as to why local residents enjoy life in Ockham are (1) access to the countryside and clean air and (2) the peace and quiet afforded by wide open spaces. Over 90% wish to see both the historic features of the village maintained and the village’s green spaces, including the FWA/TFM, protected.

10) I object to the continued inclusion of a site (the former Wisley Airfield, - now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC’s Planning Committee.

After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd’s (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter.

Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Hi Neville. My computer is playing up—I hope that you can decipher my objections to Blackwell farm being built on. Apart having a town being built on attractive countryside—there is absolutely no sense in increasing traffic to Guildford’s roads. As everybody knows the roads here cannot take any more traffic as they are at standstill much of the time. Why does Guildford need 1800 new houses? Just to satisfy the University’s greedy ambitions attracting more and more foreign students. The more foreign students we train—the better their work force will be in the future—to the detriment of our work force. So should we be keen to attract too many foreign students here?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/861  Respondent: 8774625 / Graham Block  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

• disregards an independent expert landscape study, which demonstrates that part of the site merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
• directs more office space to an extended business park [Policy E4], which will increase peak time congestion—particularly around the hospital and A&E—and will also encourage rat-running through residential areas
• ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
• adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/434  Respondent: 8774689 / Penny Walker  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I am writing to object to the Local Plan proposals for West Horsley on the following grounds:

1. **Objection to Removing West Horsley from the Green Belt**

   The Local Plan states the “we will continue to protect the Metropolitan Green Belt” yet the Local Plan is taking West Horsley out of the Green Belt. West Horsley is a distinctive rural village and its green belt status is essential to ensuring the character of the village remains.

   What is the exceptional circumstance for removing the village from the green belt as required under government guidelines? It cannot be justified on the basis of unfulfilled housing. There is no explanation as to why West Horsley has been chosen to be removed and no justification for doing so.

2. **Objection to the Number of Houses being built in the 4 Proposed Sites (Policy A41/Policy A40/Policy A38 and Policy A37)**

   The Local Plan has suggested a 35% increase in housing for West Horsley by 2022. What is the justification for this?

   The Guildford Borough Economic Strategy document makes no case for locating large numbers of new homes in West Horsley – this is a village with no shops, no post office, no petrol station, no train station, no medical centre and a very limited bus service. It also offers no employment opportunities for residents. The National Planning Policy Framework requires that new residential development must be limited in quantity by the availability of infrastructure and local facilities – this policy has been ignored in the Local Plan.

   The density of houses on the proposed sites is completely out of keeping with the rest of the village and will change the character of the village forever. The National Planning Policy Framework requires that new residential development must respect the character and density of housing in the area – this policy has been ignored in the Local Plan.

   My house is currently backed by open fields and looks over open fields. If the new plan is implemented I will have 135 homes built at the bottom of my garden and 90 across the road from my front door – this will be like living in a completely different community in a different area of the country and is a step too far. It definitely will not be respecting “the character and density of housing in this area”.

3. **Specific Objection to Policy A41**

   I am horrified that the Local Plan has included this new site with a proposal to build 90 homes on the open fields (green belt land) of West Horsley (Policy A41).

   This new site – Policy A41 – is one of the most important rural aspects of the village and if allowed to continue will totally destroy the character of West Horsley. West Horsley is a rural village and one of its main features is that on the entry roads to the village (mainly Long Reach in this instance) there is a vista across fields as there is only development on one side of the road. These fields do not abut the currently defined village settlement on any side and so cannot be considered an extension of the settlement or infill at all. I cannot understand why this piece of land would have been picked for development at all as it does not satisfy any of the criteria for development. If allowed to develop 90 homes on a current site of open fields surrounded by undeveloped countryside it makes a mockery of the consultation process and the government’s guidelines on building in the green belt.

   I trust you will take these objections seriously and reconsider your plans for West Horsley.

   **What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

   **Attached documents:**
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

3) I find is disgusting that with only two weeks notice the number of proposed houses was increase so significantly, It almost looks corrupt as they were added in at the last moments when the majority of residents were looking and discussing the EU referendum to be aware of a local issues that had changed so significantly from the original proposal.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/177  Respondent: 8775137 / Annette Clark  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Send

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I am really concerned and I know many residents are in the local area to this unrealistic and extremely large expansion plan in the local area of Send, Ripley and Clandon, which are the areas that effect me most.

I have been a resident for over 15 years and have on several occasions completed objection emails and letters regarding building excessive houses and developments in the local area. It seems that every few years we have to keep objecting tot he very same issue and my opinions don't and wont change!!

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/525  Respondent: 8775137 / Annette Clark  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
6) I object to the overall look of the plans and the building projects. It appears that there will be almost no countryside left for my family and friends. This will change the county of Surrey forever and I do not want to live and support a counsel that sees money as more important than people.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/524  Respondent: 8775137 / Annette Clark  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

2) I object to the additional pressure the increased residents will have on GP and NHS services. At the current time it is almost impossible to get a GP appointment on the same day and recently had a 6 hour wait at Surrey County Hosp. Things will not improve with additional residents!!

4) Although I do not have children of my own my friends and neighbours are specifically effected by the level of current school places again I object to the increase housing and building and the additional residents will put additional pressure on exiting schools.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/523  Respondent: 8775137 / Annette Clark  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The specific areas that I object to are as follows:

1) I strongly object to the increased housing estates and buildings on Green Belt land. I brought my house in this area for this specific reason that the local area would not be build on and don't want to move. It is simply wrong to build on this land that is established green belt area.

I have lived in both Ripley Village and Send the whole essence and feel of a village is based on the quality of the space. The very special area that is Ripley and Send needs to be retained as it is. I understand the issues with housing however there are many other options and it does not have to be built on our doorsteps!! Please keep our green belt intact.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/215  Respondent: 8775137 / Annette Clark  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

5) I object to the very limited consultation period specifically as I and my family are extremely busy working and managing family issues. there is very little time to spend researching this current proposal.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/192  Respondent: 8775169 / Shaun Cheyne  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Please see documented below my objections to the final draft local plan (consultation period 6 June to 17 July). Please ensure that my comments are referred to the Inspector.

I object to the lack of evidence supporting future housing needs (which need further review in light of Brexit)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/193  Respondent: 8775169 / Shaun Cheyne  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Needs assessment:

I questioned the scale of housing demand on which the revised draft local plan was based when first published. With the recent decision to leave the EU, and better control over immigration being a key argument in favour of this, I cannot see how the current demand forecasts are remotely reliable. I trust the study will need to be revised in light of the Brexit decision.

Evidence base and Infrastructure:

GBC have failed to provide sound evidence in terms of the Employment Land Needs Assessment 2015 (ELNA) which shows c. 80% reduction in employment space from the previous ELNA carried out by GBC in 2013. I simply cannot see why industrial space is needed at Burnt Common. With the proximity of the housing and industrial sites to the motorway, I expect that these will not serve the local community but rather be suited to those commuting in (to work) and out (if housed) of Send. This does not fit the objectives of providing housing for future requirements of the local community.

I want to point out that the GBC’s Transport Assessment was not available to Councillors for the vote taken on 24 May 2016, being published on 6 June. The plan does not have enough consideration for infrastructure overload. The road network in the Send area, particularly Send Marsh Road and the A247 linking Portsmouth Road and the A3 to Woking cannot handle any more that it already does. It is impossible at the moment particularly during peak times. The proposal of a 4 way interchange onto the A3 would mean that the roads through Send Marsh and Send would become the main link between the A3 and Woking, completely changing the village into a thoroughfare.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/264  Respondent: 8775169 / Shaun Cheyne  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Specific objections to Policy A43 and A43a: Garlick’s Arch / Burnt Common / North Facing Slip Roads:

The proposal is for 400 houses and 7,000 sq m of industrial and warehousing space. I object to this proposal on the basis of the following:

- This site has appeared very recently, it was not included in the Regulation 18 Draft and has not previously been consulted upon
- It falls within green belt permanently protected by the NPPF which prevents merging of settlements
- The site is particularly sensitive from a conservation stand point, as it has ancient woodland with trees dating back to the 16th century.

- This will add significant traffic to the local road infrastructure around Send and Send Marsh; these roads are already heavily over loaded, and there is no space to widen given the residential surrounds.

No amount of expert studies can replace personal experience; I urge anyone considering these proposals to try and travel on the A247 road through Send at peak times to see how impossible it already is to travel between the A3 and Woking. The B368 through Send Marsh is used as an alternative when the A247 is overloaded, and this will become the next constraint. The surrounding proposed developments such as Gosden Hill Farm will without doubt also want to use the slip road and increase traffic through these already constrained and overloaded village roads.

- Services such as doctors are already overloaded in the Send / Send Marsh / Ripley area. It is close to impossible to get a doctor’s appointment within a 3 – 4 day window at the Villages Medical Practice as it stands with current population; where has this been considered, what is the plan to provide services to this significant addition of people?

- Flood risk: Over recent years the flooding in Send Marsh has become progressively worse with changing weather conditions. As example I quote winter of 2013 / 2014. Adding such as significant amount of development can only make this situation more severe.

- Nature of the village will be forever changed; Send and Send Marsh will no longer be rural villages given the scale of this development.

If there is a need for more industrial space (which I still question particularly in light of Brexit), then why would this not be an extension of the existing Slyfield Industrial Estate?

I trust my objections will be considered.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/630  **Respondent:** 8775169 / Shaun Cheyne  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ()**

I object to the lack of plans for provision of services eg. doctors, schools

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/628  **Respondent:** 8775169 / Shaun Cheyne  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to all erosion of the Green Belt

I object to any “in setting” of villages from the Green Belt

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Respondent:</th>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Specific objections to Policy P2: Proposed Removal of Send from the Green Belt

Send provides a buffer between Woking and Guildford. This is sensitive land on the banks of the Wey River, and I cannot see how it can be permitted.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<tr>
<th>Comment ID:</th>
<th>PSLPP16/629</th>
<th>Respondent:</th>
<th>8775169 / Shaun Cheyne</th>
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<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the disproportionate amount of development in one area of the Borough

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
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<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<tr>
<td>I object to the limited consultation period</td>
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<tr>
<td>I object to the late inclusion of new sites (eg. Garlick’s Arch)</td>
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<tr>
<td>Since 2014, GBC have changed major sites in Send proposed for development, and now a significant new road junction has been added. The 2014 proposal for 430 new houses went down in April 2016, then recently up again to 485. These significant changes require consultation under Regulation 18, which to date I’m not aware of having happened.</td>
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<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
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<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2017 / Appendix H: Maps - Send</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<td>(4) I object to the proposal to inset Send Business Park from the Green Belt (Policy 2 at paragraph 4.3.15) because:</td>
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<tr>
<td>1. This is an area with prolific birds and wildlife</td>
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<td>2. It is effectively an old non-conforming user in an area of outstanding countryside adjacent to the beautiful Wey Navigation</td>
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<td>3. There is highly restricted vehicular access along Tannery Lane in both directions</td>
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<td>4. Further expansion or development at this location detracts from the openness of the Green Belt and is inappropriate</td>
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<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
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<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2017 / Policy A42</td>
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</table>
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

(1) I object to the Policy A42 change at Clockbarn in Tannery Lane because:

The latest draft plan proposes 60 homes in place of 45 homes is 33% more than previously proposed. This shows a completed disregard for the previous comments and objections of the community.

Now more homes than previously proposed means all impacts previously stated will be greater, including:

1. This is an area with prolific birds and wildlife
2. Future access and traffic problems in Tannery Lane and at the A247 junction
3. Erosion of the Green Belt in our village
4. Surface water flooding, which is already a problem, will become even worse
5. It will impact open countryside views from the River Wey Navigation

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/1698  Respondent: 8775169 / Shaun Cheyne  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

(2) I object to the Policy A43 change at Garlick’s Arch because:

This again is an increase in number of houses and now inclusion of 6 Travelling Showpeople plots.

1. This is an area with prolific birds and wildlife
2. There is no proven demand for Travelling Showpeople plots in this location
3. It is beautiful permanent Green Belt and no “exceptional circumstances” have been stated or proven
4. Separation of villages is a key objective of the green belt. This development will join up Ripley and Send and defeat the key purpose of Green Belt
5. It is subject to frequent flooding and is currently a flood zone 2 allocation; I personally experienced this during heavy rains on recent years where the entire area is left flooded for days afterward.

6. It will generate excessive traffic in an area that is already struggling to cope with the volume of cars on the road.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** pslp172/1699  **Respondent:** 8775169 / Shaun Cheyne  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy A58

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

(3) I object to Policy A 58 at Burnt Common because:

This proposal was previously deleted from the 2014 draft as a result of the objections. I’m unclear as to why these have now been ignored. I object to these changes in the latest draft local plan on the basis that:

1. This is an area with prolific birds and wildlife
2. There is no need to build industrial or warehouse development in the middle of the Green Belt when only a few miles away Slyfield and Guildford are under utilised (they still have empty sites and industrial units)

1. The 2017 Employment Land Need Assessment shows a reduction in demand to 3.9 hectares for industrial land for the whole borough. The proposal is out of kilter with this demand.
2. The impact on small surrounding roads will create more traffic problems in an area already struggling
3. It will join up existing villages and defeat the purpose of the Green Belt

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPA16/3772  **Respondent:** 8775201 / Nick Harrison  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I wish to register objections to the Local Plan due to the number of homes (SHMA) to be built according to the Local plan. The number of homes (SHMA) to be built according to the plan is nearly 14,000 (690 per year for the duration of the plan). This number excludes any permissions that have already been granted, as well as windfall sites.

My objections are based on a number of reasons:

1. The SHMA number is resulting in Guildford Borough Council encroaching into the Greenbelt without special circumstances.
2. There is no justification of the figure or how it has been calculated.
3. The growth value is too high
4. Guildford Borough Council has not applied any constraints to the SHMA figure to allow for the lack of appropriate infrastructure or to protect our countryside from development.

With reference to the number of issues I have listed above it is clear that the number of homes (SHMA) included within the plan is far too high and needs reviewing by Guildford Borough Council As Soon As Possible.

Please acknowledge receipt of my letter

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/4166  Respondent: 8775201 / Nick Harrison  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

With reference to the number of issues I have listed above it is clear that the number of homes (SHMA) included within the plan is far too high and needs reviewing ASAP.

I am also very concerned about Guildford Borough Council’s unwillingness to reveal how the figures were calculated despite requests by the public.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17134  Respondent: 8775201 / Nick Harrison  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
The number of homes (SHMA) to be built according to the plan is nearly 14,000 (690 per year for the duration of the plan). This excludes any permissions that have already been granted, as well as windfall sites.

I object for a number of reasons:

1. There is no justification of the figure whatsoever
2. The growth is too high
3. Guildford Borough Council has not applied any constraints to this figure to allow for the lack of appropriate infrastructure or to protect our countryside from development.
4. This number is resulting in Guildford Borough Council encroaching into the Greenbelt without special circumstances.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/642  Respondent: 8775937 / Alan Patrick  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The existing infrastructure of the villages is already overloaded. The roads already inadequate for the traffic using them now and are in poor condition, with many potholes. Many drains are blocked or in poor condition, while the pavements are narrow and in poor condition.

There is insufficient parking space at the shops, village hall, surgery and station.

The number of new houses proposed can be expected to add some 1500 more people to the numbers in the villages and generate an equal number of vehicle movements daily. The majority will not be employed locally, thus adding further to the commuter congestion.

There are insufficient school spaces for the number of local children needing them, forcing them to add to the road congestion by travelling to schools some distance away from Horsley.

The Medical Centre in East Horsley is already full in terms of patient numbers.

The proposals to alleviate these infrastructure problems appear to be more of a "Wish List" than a positive action list and, unless the many objections are heeded, the existing residents, plus the incoming new residents, will just be expected to put up with the problems arising while an existing pair of villages will have been despoiled for the short term gain and the long term future.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/641  Respondent: 8775937 / Alan Patrick  Agent:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I wish to submit my objections to the Proposed Submission Local Plan as it relates to The Horsleys on the following grounds:

Firstly and foremost, the greater majority of the proposed developments encroach on existing green belt land. This land should be sacrosanct, but once it has been developed in the manner suggested it will be lost to the green belt forever. Furthermore, once this principle has been set aside there can never be valid objection to further encroachment this green belt in the future.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/6182  Respondent: 8776257 / Euan Harkness  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I am writing to object to the Guildford Borough Council Proposed Local Plan (June 2016) and to the continued inclusion in the plan of the Former Wisley Airfield, now known as Three Farms Meadows – Allocation A35 – for the phased development of a new settlement of up to 2100 dwellings.

My objections to the draft Local Plan read as follows:-

The proposal that over 70% of new housing be built within the Green Belt rather than utilising brownfield land in urban areas needing regeneration.

The removal of the Former Wisley Airfield from the Green Belt which will result in an urban corridor stretching from London to Guildford.

The proposed number of 693 houses per year which is far too high and double the figure used in previous plans.

The threat that the Local Plan poses to my village of Ockham and the subsequent detrimental impact on its property.

The horrific impact such development would have on transport bearing in mind the narrow unlit lanes which are dangerous enough already. This would increase the volume of car traffic to an estimated 4000 additional cars plus wider vehicles like buses resulting in congestion both in the villages and the A3 and M25. There are no cycling paths and few pavements which would further compromise the safety of cyclists and pedestrians.
There is a lack of public transport and Horsley and Effingham stations are full to capacity already as are the station car parks.

To develop this site would involve a massive infrastructure project.

The current owners have zero intention of developing the site and are telling their investors they will immediately sell the property for a substantial profit once they have planning permission. As a consequence we would then have to go through the whole process with the new owners.

The property is registered in the Cayman Islands for secrecy and tax reasons this does not deter our representatives GBC.

There is insufficient consideration given to the environmental and ecological value of the site.

Air pollution in many parts of the borough is in excess of EU permitted levels, especially at the M25/A3 junction.

Finally, I object in the strongest possible terms to the continued inclusion of the Former Wisley Airfield now known as Three Farm Meadows where the planning application has already been unanimously rejected by GBC’s Planning Committee. Many authoritative sources across the UK have indicated concern to such a development on this site (eg Highways England, Thames Water, NATS and the Environment Agency).

I trust that these objections will be fully considered and that the Former Wisley Airfield now known as Three Farms Meadows Allocation A35, is removed from the Local Plan with immediate effect.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/6163  Respondent: 8776321 / Cath Cuin  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

My other concern is that the Green Belt is no longer being protected and by developing these areas not only are these green sites lost for ever but by their very position yet more traffic is created. The distinctive nature of Guildford with its green spaces and views across the town are what sets Guildford apart from the urban sprawl inside the M25. This is what has attracted so many to choose Guildford to live in. Please do not allow this to be ruined.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/6161  Respondent: 8776321 / Cath Cuin  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

My overriding concern is that at the **unacceptably high level of expansion**. Why are constraints to the overall housing target not being applied so as to protect the character of Guildford? The severe levels of traffic congestion, insufficient parking in Guildford town and pressures on services are already causing problems and strains without the addition of such an extreme number of houses.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<td>Document:</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I find it unacceptable that unlike other towns and areas, Guildford is not choosing to constrain its overall housing growth. Roads such as the A25/A246 Epsom Road, the A25 Boxgrove Road, A3100 London Road and A25 Ladymead are congested and at a standstill on an almost daily basis. The pressure of so many new homes outside the centre of the town will make this unbearable even with the highway schemes in the Plan. Please can a reduced and more realistic housing target be set.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
10. I am unhappy about the proposed highway schemes that involve demolishing property and road-widening in residential areas to solve the resultant congestion. The A3 improvements are not guaranteed to take place but they are being used to justify removing large areas from the Green Belt before detailed traffic assessments have taken place. Improvements and changes to the Junction 10/Heathrow stretch of the M25, will also take years to agree and complete. The draft plan, however, commits to building massive housing estates in the countryside before any road improvements are in place. Transport cannot be an afterthought. The proposed sites are often miles from the nearest railway station. Bus services even in the largest villages are almost non-existent and rural buses are too slow anyway for busy people. Many roads flood badly and have no footpaths making walking an dangerous option. The proposed permanent road closures and diversions will create longer journey times and increase the carbon footprint which is becoming increasingly bad with the number of vehicles using Ockham Road.

I hope you will give careful consideration to the draft proposal before leaping in and enabling irreversible change when other areas can be explored first.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/377  Respondent: 8776417 / Nici Holland  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. The proposal to build 13,860 new homes is based on pre-Brexit projections for economic and population growth, including migration which now need to be revised downwards. It should also be noted that many people (looking at research statistics) work further afield thus the need for local housing becomes unimportant for the local population. We need development that meets the needs of the present and that does not compromise future generations. Local people should be empowered to shape their surroundings, understanding the character of their own unique areas (eg protecting the Green Belt). What about constraints and density?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/379  Respondent: 8776417 / Nici Holland  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
The figure of 13,860 new homes is unsubstantiated. Guildford proposes to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. I

It should be noted that, the number of homes proposed, plus existing planning permission, plus expected “windfall” sites, exceeds the total of 13,860 which undermines the validity of the consultation. There is no clear Housing Target.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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1. We should be supporting the move to a low carbon environment, reducing pollution, reusing previously developed land (brownfield sites), conserving heritage assets, making the fullest use of public transport and cycling.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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</table>

1. Tourism and visitors do not depend on new visitor “attractions”.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
1. We live in the Surrey Hills Area of Outstanding Natural Beauty and as such, any developments should be carefully considered and alternatives taken where possible. Rather than building upon a new site, Guildford town could usefully be regenerated with 4-5 storey blocks with landscaping and underground parking. I understand that new homes are needed for University students but Surrey University, has failed to use its existing planning consents (dating from 2004) to accommodate 3,000 students or development its campus (e.g. build on its extensive and underused car parks). If students were accommodated in this way, 2,000 homes would be freed up in town Building more homes in Guildford cannot make houses more affordable, given the proximity of the London market.

2. Local people should be consulted and not ignored. Villages need protecting in terms of both design and scale.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to the Local Plan for a number of reasons.

1. No definition of “sustainable development” is given. The policy does not outline the long-term impact on economic, social and environmental issues in the area. Under this policy, any development will qualify as “sustainable”. The Green Belt is an example of sustainable development in practice and should be protected. It would be a major and irreversible change, if the Green Belt is built upon and would turn our fairly rural borough into an urban/suburban one like Woking. Once gone it is gone forever and it is not the Council’s right to give it away.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/512  Respondent: 8787297 / Alison Bird  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy A21

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I support the Policy 21 that this site is allocated for extra allotments.

I think this is important because

• it encourages healthy exercise
• it provides a community and so helps to combat loneliness
• it encourages healthy eating
• it helps with positive mental health
• it increases biodiversity
• it provides an outdoor space for people to cultivate who do not have their own garden
• school children use a plot on the site which educates them in growing plants, an important skill for the future as food production will need to increase to provide food for an expanding population.
• encourages good relations with people of all ages, cultures and backgrounds.
• decreases 'food miles'

I have personally benefited from having an allotment. It gives a sense of relaxation and achievement when I grow something successfully. It also helps me feel part of a community.

It is important to me that vehicular access and parking for the allotments is retained at the bottom of the site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/4129  Respondent: 8787969 / K Britton  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule
I OBJECT to the proposed Infrastructure Schedule (Appendix C)

The Infrastructure Schedule sets out the key infrastructure requirements on which the delivery of the plan depends. For each of the Key Allocated Sites in the borough it identifies infrastructure projects that are required, except for Garlick’s Arch (A43) which is not mentioned. It is clear that the Plan takes no account of the infrastructure required for this site and is therefore not fit for purpose.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

1. The housing needs assessment is flawed in various respects and overstates housing need. In addition since it was produced, the referendum Brexit decision has almost certainly reduced future housing need and rendered the previous assessment seriously out of date. As a result any assessment of Green Belt sites which took place to consider whether “exceptional circumstances” existed to outweigh the harm to the Green Belt was based on false premises and should be reconsidered.

2. Having determined housing need the Council was entitled to consider constraints before determining the housing number. I believe that as Ill as being entitled to do this the Council was required to give proper consideration to constraints. The scarcity of sites outside the Green Belt as Ill as infrastructure (most notable roads) considerations all represented constraints which should have been taken into account in determining the final housing number. Accordingly in this regard our objection to the allocation of Green Belt sites is twofold. First I believe constraints should have been applied. Secondly I believe the Council did not properly consider constraints and that their decision making process was flawed and thus subject to being set aside by the Inspector.

3. Even if having properly applied constraints there is a need to develop in the Green Belt then specific Green Belt sites should not be included in the plan unless “exceptional circumstances” for development are proven in relation to that specific site, as stipulated repeatedly in the NPPF. The Green Belt should trump short-term considerations such as perceived housing need, as case law has established. There needs to be a specific balancing exercise conducted on each Green Belt site weighing the harm to the Green Belt against the very special circumstances which are argued in favour of development at that particular site. There is no evidence this has been done. Instead the council have appeared to say that having chosen a housing needs figure and decided it cannot be met without building on Green Belt then there is no need for any further consideration and any convenient Green Belt site can be allocated for building at will.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I OBJECT to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)

- The “objectively assessed need” figure of 693 homes a year is too high.
- A professional review by NMSS has concluded that, even basing the calculations on a period of stronger economic and student growth, the housing need figure should be revised down to 510 homes a year and the method changed to consider student housing need separately due to the distorting effects.
- The current SHMA inflates the proposed housing figure due to
  - failure to correct for errors in the historical data for international migration flows,
  - issues with the way it considers students and affordability and
  - flaws in the method for estimating the number of homes needed to support job growth.
- It is unacceptable that demographic and economic model assumptions have been withheld and cannot be checked making the process unaccountable.

The Plan’s proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the borough, it is over double the previous figure of 322 used in previous plans. The SHMA report methodology is I believe inaccurate; it inflates the needs of the borough by distorted student numbers. However, it is based on commercially confidential modelling assumptions that cannot be checked or reviewed. There is no transparency to this evidence base and it is therefore impossible to assess its accuracy. This is not democratic and is not appropriate for consultation of the Plan.

The National Planning Policy Framework allows the overall housing target to be reduced to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I OBJECT to Policy A25 with proposals for Gosden Hill Farm.

The Green Belt at this point serves the important function of separating West Clandon from the edge of urban Guildford. Development here will cause the two to coalesce defeating one of the objectives of the Green Belt. If this development proceeds I believe the narrow strip of Green Belt remaining between Guildford and Clandon at this point will be too narrow and will come under further pressure.

It will represent an undesirable ribbon development along the A3. It will be highly visible from the A3 when approaching Guildford and will, in conjunction with A43a at Garlick's Arch give the appearance of almost continuous development from Send through to Guildford.

The Plan does not put forward any evidence that exceptional circumstances exist to justify removing this site from the Green Belt.

The development will overburden the local road network and increase congestion on the A3 and A247 through the centre of West Clandon. This is already very heavily used whilst being unsuitable for designation as an A road. In places it is too narrow for two lorries to pass causing them to mount the pavement.

Note the following accident data:

2010 –2014 from Crashmap data

- Clandon Cross Roads Area to Bulls Head - 17 incidents
- Bulls Heads Head to Bennett Way - 8 incidents
- Bennett Way to Highcotts Lane - 15 incidents
- Tithebarn Lane to Portsmouth Road Birch Close - 8 incidents

2015

- 21 Oct 2015 – A247 near shell garage - Three vehicles collided causing delays
  Surrey Fire and Rescue deployed.

2016

- 15 April 2016 12 year old boy injured in The Street – A247 closed in both directions
- 28 April 2016 A3 West Clandon London bound between A247 Tythebarns Lane (Burntcommon and M25J10 (Wisley Interchange) congestion on A3 to A3100 Clay Lane Burpham
- 30 6 2016 Motorcyclists with injuries airlifted to hospital Send Marsh Road

Attempts have been made over many years to reduce traffic, traffic speeds and accident risks through West Clandon, however little has been achieved as the road cannot be widened and SCC is reluctant to impose further speed limits as congestion is already very high.

I object most strongly to the proposal for a link road to bring traffic from the Gosden Hill development to the proposed 4 way junction at Burnt Common. This has the potential to generate large volumes of traffic (including commercial vehicles) on the A247 through West Clandon - a road which is already under traffic stress (see below).

The land in Gosden Hill does exactly what the Greenbelt was designed to achieve. It provides a green buffer between the Guildford Urban Area and West Clandon, gives Burpham a defined green boundary and breathing space and it hides Guildford town from visitors until they pass the off-slip to Burpham.

No exceptional circumstances have been demonstrated for building on this site and therefore it does not comply with paragraphs 87-89 of the NPPF. It stops the sprawl of Guildford town, assists in safeguarding the countryside from encroachment and assists in urban regeneration by encouraging the recycling of derelict and other urban land. All of these are requirements of the NPPF.
The scale of Gosden Hill is out of proportion to West Clandon. It would have four times the amount of housing plus shops, offices/factories, GP surgery, schools. Development on this scale would blight a historic village with a history going back to the doomsday book and beyond.

Gosden Hill is the most obvious location for the north end of an A3 tunnel. It has rising ground and is situated just before the urban area. If it is built on, it will be very difficult to construct a tunnel.

The development will generate in the region of 6,000 vehicles which will pour on to the A3 which is stationary every day during rush hours. The linking of the A3100, B2215 and A247 would channel thousands of cars through the narrow, winding road through West Clandon, a road where large lorries mount the pavement virtually every day and through Send and Ripley which are also severely constrained.

The volume of traffic will greatly increase air pollution which is particularly critical given the proposal to build two schools.

Currently, a two way junction at the site would require vehicles wanting to go north on the A3 to go through Burpham which is grid-locked every day.

Burpham’s sewers are at capacity. Sewage would have to be pumped to Slyfield for processing, a project of enormous cost.

There is inadequate fresh water in Guildford and current supplies could not meet the needs of a development of this size.

Electricity supply is also inadequate and would require a big infrastructure development.

The railway station was rejected by Guildford Borough Council in 1984 because it feared Gosden Hill would become a dormitory estate for London.

The wording of the Local Plan with regard to Gosden Hill is so loose that the developer could virtually do whatever it wants.

The remaining agricultural land between Gosden Hill and West Clandon is so small that it is highly likely to be uneconomic and therefore a prime candidate for further development which would roll the Guildford Urban Area over West Clandon towards East Clandon and Wisley.

If the Strategic Sites are developed, the north of Guildford will deliver 36%, 5,036 houses towards the total of around 14,000. The infrastructures of the existing villages and the A3 will be overwhelmed by the scale of development.

A new on-slip at Burpham would only be 1.8km from the on-slip at Burnt Common which is against Highway England’s requirement of 2km.

Development of the A3 at best will not start until after 2020 and the building of a tunnel, which is only an “aspiration” in the Local Plan, is likely to be many years after. In the meantime given that developers build houses to provide cash-flow for infrastructure, Gosden Hill will have a crippling effect on villages like West Clandon and the A3.

Gosden Hill already has surface water problems. Merrow Stream crosses the site. No hydrological survey has been carried out to assess the implications. Electricity pylons run through the centre of Gosden Hill which have health and safety issues.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/7699   Respondent: 8787969 / K Britton   Agent:  

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy A43 and A43a on Garlick’s Arch.

The site was only inserted in the draft plan at a late stage just before publication of the consultation draft which is a shabby way for the Council to proceed. The site is not a sustainable site being far from any infrastructure facilities and transport links. The bus service is infrequent and it is almost certain any future residents will rely almost entirely on cars for journeys. Similarly any employees at the employment areas will almost undoubtedly arrive and leave by car.

The site is susceptible to flooding and will not make a suitable site.

The Green Belt at this point serves the important function of separating West Clandon from Send. Building here will cause the two to coalesce defeating one of the objectives of the Green Belt.

I have seen no evidence that exceptional circumstances exist to justify removing this site from the Green Belt or that this important issue has been addressed. The Green Belt and Countryside study did not even consider this site.

It is understood the Council's eyes may have been turned by the possibility of receiving for free the land which might be used for new A3 slip roads in return for allowing this development, thus justifying it as some form of enabling development. However the slip road land if needed could be safeguarded in the plan and acquired by compulsory purchase when required. Lack of current funding for the slip road is not a justification for allowing the development of this site. If the slip road is genuinely needed then government funding will be available for it. (One of the reasons for turning down the so called enabling development proposal intended to fund the rebuilding of the Howard of Effingham School was that the redevelopment of the school was not essential. As and when it became essential Government funding would become available. Accordingly enabling development was not necessary. The same principle applies here.)

The A247 running south past this site through the centre of West Clandon is already very heavily used whilst being unsuitable for designation as an A road. In places it is too narrow for two lorries to pass causing them to mount the pavement- often at speed. It has narrow bends with poor sight lines, an infants school and a hump-backed bridge concealing the entrance road to the station for southward traffic. In addition, there are no continuous footpaths which forces pedestrians to cross and re-cross the road. Development at Garlick’s Arch will only exacerbate the problem and make the road even more congested and unsafe for pedestrians.

The development will cause harm to the ancient woodland on and by the site.

Taken together with the Gosden Hill site, there will be a ribbon of development along the A3 in contrast to the current “soft” edge approach to Guildford.

Garlick’s Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8). There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).

The Plan states the preference is to making the best use of previously developed land. Yet at the 11th hour a perfectly acceptable brown field site at Burnt Common, capable of accommodating approximately 100 houses, was removed from the Plan and replaced with the Garlick’s Arch site. There was no proper consultation in relation to the inclusion of this site. Why was a brownfield site removed and replaced with a Greenfield site? There is no evidence that Section 18 of the Planning and Compulsory Purchase Act 2004, which requires local planning authorities to produce a Statement of Community Involvement, has been complied with for this site. This only came to light for local residents following a Council meeting on 11th May 2016.
Moreover, Guildford Borough Council’s own Green Belt & Countryside Report does not address Garlick’s Arch at all, so there is no evidence base to support the inclusion of this site.

National Planning Policy promotes sustainable developments, with sustainable transport. With ever reducing bus services in the area and no train station within reasonable walking distance it is impossible for any development on this site to offer a sustainable transport solution. Development on this site is wholly inappropriate (Policy I3).

The stream, which runs through the site, is identified as having a high risk of flooding by the Environment Agency. There are other sites that do not flood that can be developed and therefore this site should be removed from the Plan (Policy P4).

This site is bordered by Ancient Woodland and within it a number of trees are protected by Tree Preservation Orders (Policy D3).

The site has an abundance of wildlife, some of which are protected. It is home to many types of owls and bats, with the woods having cuckoos and woodpeckers. In addition there are regular sightings of badgers, deer and red kites. The development of the site will result in the loss of habitat. No wildlife report has been conducted on the site. (Policy I4)

It is clear that with this site being added at the 11th hours no infrastructure planning has been undertaken. The Infrastructure Schedule makes no provision for any infrastructure improvements for this site. How will the local services such as schools and doctors cope, many of which are already at capacity? (Policy I1)

Furthermore, several electricity pylon runs through the site, which will have the potential to be a health hazard for any residents.

I OBJECT to the inclusion of the land for new on/off ramps at Burnt Common (A43a)

The addition north facing ramps to the A3 at Burnt Common would be a disaster for local communities. There is no requirement for local traffic to access the A3 to the north, but the addition will draw in a huge amount of ‘through’ traffic.

The route from London/M25 to Woking or would now be through Burnt Common and Send. Equally traffic from the east of Guildford (Merrow etc) and the A25 will now go through West Clandon and Burnt Common. This will cause immense damage to those areas on small roads which cannot be improved.

This Plan does not address the needs of local communities or the Borough in this regard. There has again been no Section 18 consultation on this.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I OBJECT to the damage to the historic environment as a result of the scale of the proposed development (Policy D3)

I OBJECT to the local plan based on the impact it will have on the special countryside of the borough.

The proposed development at Garlick’s Arch (A43) will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

I OBJECT to Policy D3 - Historic environment

I object to this policy as it is very weak and I do not think it is clear enough in its support for the conservation of the historic environment. It provides for development which will “enhance” heritage assets which I fear is a developer’s charter as it leaves plenty of room for abuse.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

I OBJECT to Policy D4 - Development in urban areas and inset villages

The policy should place much greater emphasis on residential development in the existing urban centres. In this way housing needs can be met without resorting to large developments in the Green Belt. There are urban areas in need of regeneration but these are ignored in favour of Green Belt development.

The policy should not be applied to the villages which should remain in the Green Belt. Unrestricted application of this policy to the villages intended to be inset will change their characters radically and for the worse. The development it encourages will increase traffic and congestion disproportionately.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/17023  Respondent: 8787969 / K Britton  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the sustainable employment policy (Policy E1)

I object to the inclusion of a strategic employment site at Gosden Hill Farm. Employment sites should be concentrated on previously developed land in more sustainable locations with good transport links where the infrastructure can support development. Warehousing, distribution and industrial premises cause considerable commercial traffic, noise, pollution and general disruption. They are not good neighbours for schools and 2000 houses. Many of the jobs will be taken by people outside the area leading to additional congestion in Burpham and on the A3.

I object to the inclusion of a strategic employment site at Garlick’s Arch. It is in a non-sustainable location remote from any facilities of any kind and with poor public transport links. It is unlikely jobs there will be taken by local residents and it is likely all travel to and from work will be by car adding to local congestion. Employment sites should be concentrated on previously developed land in more sustainable location with good transport links where the infrastructure can support development.

The site is in any event subject to frequent flooding and unsuitable for development.

If developed, the new employment site at Garlick’s Arch, Send Marsh/Burnt Common (A43), would be treated as a Strategic Employment Site.

The proposed development of up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8) at Garlick’s Arch (A43) is in the scheme of industrial development relatively small. Just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m. The Garlick’s Arch site which is in the Green Belt should not be developed as a Strategic Employment Site when there is a suitable alternative brownfield site very close by, which is far more sustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/17024  Respondent: 8787969 / K Britton  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the location for new employment floorspace (Policy E2)

I object to this policy. It would be more sensible to confine new office and research and development floor space to the urban Guildford area. I also oppose the policy of expanding the Research Park onto Blackwell Farm. No exceptional circumstances, as defined under the NPPF, have been advanced to justify incursion into this permanent and high-quality area of Green Belt.

Proposals for new industrial, warehousing and storage (use Class B1c, B2 and B8) floorspace will be directed to the Industrial Strategic Employment Sites.

There is no need for the new employment floorspace to be located at Garlick’s Arch or Gosden Hill Farm, when near to these sites at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17025  Respondent: 8787969 / K Britton  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the loss of rural employment (Policy E5)

Policy E5 supports the retention and development of local services and community facilities in our inset and identified villages. Yet the development at Garlick’s Arch (A43) would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises. The Plan does not promote rural employment; rather it will result in the loss of existing local rural businesses.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17036  Respondent: 8787969 / K Britton  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E6
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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I OBJECT to Policy E6 - The leisure and visitor experience.

The policy should acknowledge that whilst in some areas new and enhanced leisure facilities are valuable (for example the new Opera House at West Horsley Place Towers), much tourism depends on the undeveloped nature of Green Belt areas surrounding Guildford. Accordingly the policy should recognize that in many rural areas new and enhanced visitor facilities may be unnecessary and counterproductive, particularly away from existing buildings and development. For example the attraction of Newlands Corner is its undeveloped nature. Significant development of visitor facilities there is likely to diminish rather than increase its attractions. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment. Heritage sites and the Green Belt are particularly vulnerable to harm.

Tourism and visitors do not depend on new visitor “attractions” and could actually be damaged by them, as compellingly argued in the current debate over Newlands Corner. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment/”Disneyfication”. Heritage sites and the Green Belt are particularly vulnerable to harm.

Guildford has many “leisure and visitor attractions” already. The case for creating more is not made and no examples are given. Instead, the plan’s explicit priorities should be:

1. To protect the borough’s prime leisure and tourism asset, its countryside, from inappropriate development. This is all the more valuable because of its accessibility from London, the rest of Britain and the Continent, in that order. Rural residents are its custodians and require no Council interference. Economically, the most valuable forms of tourism, such as walking and cycling, require no new development. In the overcrowded South-East of England, lack of development is a leisure and tourism asset, not a liability.

2. To help make Guildford’s river landscape less off-putting and support town-break packages for high-value tourists. To achieve this, the policy needs to define what leverage, if any, Council planners have to influence normal tourism market mechanisms.

3. To help private providers market local tourism. This need not involve extra spending. The Council could, for instance, help co-ordinate ready-made, local tourism packages under a distinctive brand at an all-in price. An “English town break” (including B&B accommodation, a walking tour of Guildford, a pub lunch in the Surrey Hills, a visit to Wisley Gardens and a National Trust property and a Southwest Trains travelcard for a day out in London) would be highly attractive to many European visitors who currently by-pass Guildford to go to Bath, Oxford or Cambridge instead.

4. To rule out the redevelopment of scarce rural hotel sites (e.g. Thatchers, East Horsley, earmarked for 40 new houses under Site A37 of the plan yet just a short walk from the new opera house).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Page 2687 of 3335
I OBJECT to Policy E7 Guildford Town Centre

The policy “vision” describes protecting the Guildford’s unique setting and historical character and sets out some of the ways this will be done. However none of this is included in the formal Policy wording in the blue box. I suspect the Vision wording is effectively of little or any force. These principles should be included in the formal policy.

There should be a much greater focus on residential use of the town centre where many people would like to live and where the necessary amenities and infrastructure exist. The policy misses the opportunity to propose forward looking sustainable residential development plans in, for example the Walnut Tree Close area, where very significant numbers of new homes could be provided. Such town centre sites could meet much of the housing need over the plan period without harming the countryside.

There is an urgent need for a strategy to focus on brownfield redevelopment before considering development outside the existing urban area.

The policy does not address any of the major issues raised by the Council’s own Town Centre Master Plan, the Guildford Vision Group’s proposal for new river and rail crossings or plans for the redevelopment of Guildford Station, all of which are already the subject of public discussion.

The policy also fails to provide guidance on design requirements, as required by the NPPF.

The policy and surrounding text concentrates too much on shopping without regard to its nature which risks a proliferation of dull high-street chain stores. The policy should seek to enhance Guildford’s character and encourage a wider variety of small shops including locally owned businesses and shops of use to consumers. (For example there is no butcher in Guildford.)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17030  Respondent: 8787969 / K Britton  Agent: PSLPP16/17030

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )

I OBJECT to Policy H1 – Homes for all. Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan period. It fails to set rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions.

The housing mix is based on out-of-date, pre-Brexit projections and on assumptions set out in a flawed SHMA that has not been scrutinised or evaluated.

I support higher density development in the urban area, without resorting to dehumanising, high-rise buildings that developers commonly claim are necessary for financial viability. Much of Guildford town could usefully be regenerated with 4-5 storey blocks with landscaping and underground parking, as often seen on the Continent and, recently, in London.
Student accommodation should be provided for 100% of new students and more than 60% of existing students, which would free up ideal family accommodation in the urban area. Other university cities (e.g. Oxford) insist on higher percentages than those proposed in the plan. In my view, the Council’s timidity is a case of “regulatory capture” by Surrey University, which has failed to use its existing planning permissions (dating from 2004) to accommodate 3,000 students or to improve the efficient development of its campus (e.g. by building on its extensive and under-used surface car parks). If all students were accommodated in this way, 2,000 homes would be freed up in town and there would be no need to build on the Hog’s Back.

It is not appropriate to release Green Belt land to house students who could be accommodated on the Surrey campus or other university sites. The plan should take account of the university's ability to house its own students and reduce the housing number accordingly.

Guildford borough has already a higher proportion of traveller sites than most comparable boroughs. Over-provision is inappropriate given other constraints.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17031  Respondent: 8787969 / K Britton  Agent:  

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to this policy on affordable homes (Policy H2) on the grounds of feasibility and that it should be more firm and explicit on unviability in paragraph 4.2.40.

In particular a scheme is only unviable if the value of developing the land (including some allowance for development risk and a normal level of profit) falls below the sale value of the land for alternative non-premium uses such as agriculture. The price paid for the land is not relevant. The possibility of avoiding the affordable housing obligation through use of unviability arguments only serves to inflate land values. It will become clear that developments are unviable when developers start selling land for alternative non-development uses.

It should be noted in the plan that because of Guildford's relative popularity as a place to live combined with its location close to others towns and within the London Commuter belt no amount of building will meet demand. Similarly no amount of affordable housing will ever meet demand.

In addition the definition of an ‘affordable home’ is 80% of market value. With even a 2 bedroom flat in Guildford now having a market value of +£360,000 the discounted price is still not going to be affordable to anyone on a normal income.

And at what point will ‘affordable homes’ be able to go onto the market at full market price?

As we have seen with council houses it is not long before the discounted property is sold at full market value with the original owner simply pocketing the profit.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I OBJECT to Policy H3 – Rural Exception Homes as this Trojan horse policy. It says that homes can be built anywhere near a settlement of any form (including agricultural land and the AONB). These homes are meant for people with a village connection, but they could be for anyone on the Guildford borough housing list. To make the housing viable, or to improve the “mix” this can include “market” housing (i.e. normal commercial development which in Guildford usually means large executive homes). This policy means building anywhere, and ignoring all historic planning restrictions.

The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove “exceptional circumstances.”

The wording of the policy is far too wide and drives a coach and horses though all other aspects of planning policy. As drafted the planning authority could be obliged to grant permission for inappropriate and unsuitable developments.

The wording provides no ability to balance the desirability of the development against other considerations including harm to the Green Belt or the AONB. (If the housing would meet identified need and adjoins a settlement under this policy wording permission would have to be granted even in the most sensitive AONB location, even if more suitable locations were available.) The policy should include the need for a balancing exercise including consideration whether more suitable locations exist.

The policy wording should not allow market housing. The ability to include market housing is likely to inflate land values, leading to a self-perpetuating need to include market housing. It may lead to spurious developer led proposals which will be difficult to resist.

The policy wording should define small, either in land size or number of units. I am concerned that if small is left undefined the policy could be used to justify significant developments. In the context of the plan a development of 150 homes might be argued as small. (If Wisley at 2,500 homes is a big development then 500 homes might be a medium development and 150 could be small.)

The policy wording should be restricted to adjoining sites or define the concept of being "closely related". In particular I believe adding the concept of safe and easy walking distance extends the potential radius within which sites will be argued to be “closely related” Many people would regard a mile or so as an easy walking distance. (School children are expected to walk further than that before being eligible for free school travel.)

The wording of the policy itself does not require the local connection requirement for tenants to be secured in perpetuity - only the affordability must be secured in perpetuity. (For example housing could be built for retired Cabinet Ministers under this policy so long as the first tenant was required to have a local connection.) The introduction to the policy mentions this point, but it is not part of the policy itself and may carry little weight at appeal.

The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove “exceptional circumstances.” The size and location of sites should be better defined and it should be clear market housing cannot be included.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT, due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1)

Our villages are already suffering from severe congestion for much of the day, for example the Newark Road & Rose Lane junction in the centre of Ripley and the A247 through West Clandon. The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.

Furthermore, many of the country lanes around the villages of Ripley, Send and Clandon are narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition.

I OBJECT to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces.

Many of the affected villages, such as West Clandon, already suffer from traffic congestion. Further development around these villages will only result in more traffic and more parking problems.

With some 5,000 houses being proposed close to the village of Ripley, the roads serving the village will become even more congested. Cycling has become an ever popular past time, particularly at weekends hundreds of cyclists past through the villages on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road accidents involving cyclists as a result of the development proposed under the local plan.

The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the road becoming ever more dangerous for pedestrians.

The council has a statutory obligation to protect the public and the additional traffic flows will bring added accidents, noise, pollution and injury of the public. In the case of West Clandon the Street often only has a narrow footpath on one side of the road making it very dangerous, especially when vehicles mount the pavements.

This policy as it is inappropriate and inadequate and fails to respond to the challenges raised by the proposed significant Green belt developments. The borough’s infrastructure is already heavily strained. However the plan’s determination to build large housing estates across the Guildford countryside significantly increases the need for infrastructure investment without securing the means for its provision. Placing housing in the established urban areas would reduce the need for enhanced infrastructure as would a more realistic housing number.

The policy wording says nothing about roads and traffic. The Council’s methodology for assessing traffic congestion - averaging it over periods of several hours and ignoring the effects of junctions - simply hides the problem, which will get worse as development proceeds. The schemes referred to in this policy will not solve existing congestion and the local road network has not been given sufficient consideration. Some proposed development locations would require highway schemes that are unlikely ever to happen.

Adequate infrastructure provision is a pre-condition of sustainable development. But in this plan it is an afterthought buried away in Policy I1. By prioritizing greenfield over urban, brownfield regeneration, the plan creates insurmountable (and unnecessary) obstacles for itself. Common sense suggests a local plan should first assess the borough’s infrastructure capacity for sustainable development, and then tailor development accordingly. This plan, however, assumes infrastructure
will follow on the heels of housebuilding as if by magic. It makes implementation critically dependent on providers outside the Council’s control and on the vagaries of CIL income. Instead of recognizing this as a key constraint, the plan is based on hope. It is also highly likely that developers faced with the imposition of large infrastructure requirements will go to court to invoke the NPPF provision that prevents authorities from imposing conditions that make a development non-viable.

Policy I1 requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.

Despite the Garlick’s Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents’ in the locality will see their quality of life significantly deteriorate in many ways. Many of the utilities in the Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers. No plans to improve these services should mean no development of the Garlick’s Arch site.

Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are already at capacity and suffering from funding cuts or freezes. Any further development without funding will place further stress upon existing health services.

Police services are seeing funding reduced. The development of the proposed 13,860 homes during the plan period will stretch the police services further and is unsustainable.

There is no provision of the increased capacity of Guildford hospital, where is this assessed and remedied?

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/17028 **Respondent:** 8787969 / K Britton **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy ID2

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ()**

I OBJECT due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2)

I object to this policy as it is too vague and optimistic. Significant improvements to the road infrastructure are like to be many years away even if they ever happen. The draft plan, however, commits to building massive housing estates in the countryside before any of these road improvements are in place. This is inappropriate and will lead to massive traffic disruption during the construction phase and will add permanently to an already congested network (about 3,000 private cars from the 2,100 new homes at Wisley Airfield alone).

Road infrastructure represents a major constraint that should have been applied to the housing target at a much earlier stage in the plan process and not left as an unresolved difficulty in the draft plan.

There is no certainty that either the A3 or M25 in the borough will be improved to increase capacity and reduce congestion during the Plan period. Highways England has no plans to even examine improving the A3 before 2020. I have
considerable concerns that development of the large residential sites identified at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), will take place before any improvements are made to the trunk road network. The A3 & M25 are already at capacity during peak hours and any development prior to improvement of these roads will only make the situations worse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<td>Document:</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to poor air quality concerns (Policy I3)

Paragraph 4.6.27 of the Plan states that “Development must also mitigate its traffic impacts, including its environmental impacts and impacts on amenity and health.” The significant level of development being proposed, particularly in the north east of the borough will lead to considerable further congestion, despite any attempts to mitigate this through travel plans. This will be particularly acute in built up residential areas and will only lead to greater levels of air pollution, which will have a detrimental effect on local residents and their health and can result in early death.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to not protecting the Green Belt (Policy P2)

This policy does not sufficiently safeguard the Green Belt even though Green Belt constitutes 89% of the borough and should be the cornerstone of all local planning policy. The Green Belt is not the Council’s to give away and once it is gone it is gone forever. Sacrificing areas of the Green Belt to a developer influenced growth agenda is a betrayal of future generations and does not constitute sustainable development.

The Green Belt should be protected in perpetuity, but Policy P2 seeks to justify excessive development in supposedly protected areas. This is in breach of party manifesto commitments and contrary to previous responses to public
consultation. It is disreputable to argue, as the Council does, that the Plan would involve the loss of “only” 1.6% of the borough’s Green Belt. Leaving aside the reliability of that statistic, the NPPF does not set an “acceptable” percentage. The fact remains that the plan proposes that 65% of the housing plus industrial development be built on land to be taken out of the Green Belt.

Paragraph 4.3.16 is seriously deficient in simply stating that the Council considers that exceptional circumstances exist to justify amendment of Green Belt boundaries. The exceptional circumstances are not identified. It is clear from national guidance that unmet housing need is not on its own an exceptional circumstance. Even to the extent that exceptional circumstances exist, these have to be balanced against the harm to the Green Belt in the specific sites proposed to be taken out of the Green Belt. This balancing exercise appears not to have been done.

The Countryside Study which the Council may argue fulfilled the need to demonstrate the exceptional circumstances required to justify removal of areas from the Green Belt was a simplistic tick box exercise. Within limits it may have answered certain questions about different attributes of different areas of Green Belt but it did not carry out the balancing exercise needed to determine whether specific exceptional circumstances justified removal of specific areas of land from the Green Belt. I believe that each of the identified Green Belt site proposed to be removed from the Green Belt should be carefully assessed against any exceptional circumstances in deciding whether it should be removed from the Green Belt in the final plan. This exercise should bear in mind that housing need in itself is not an exceptional circumstance and nor is the Council’s growth aspiration. An important consideration is that more housing need could be met on urban sites than is currently planned. The Plan has fallen into the developers’ hands and developers prefer building on undeveloped land rather than brown field sites.

I note that the Summer 2016 edition of "About Guildford" (published by the Council) on page 5 states that "... the Plan rejects any schemes that would have a detrimental impact on the Green Belt." This is demonstrably untrue and I consider this to be a deliberate untruth which compromises the consultation process. I would ask that this untruth be corrected and the consultation period restarted after the correction has been given the same distribution as the original statement. (I assume the document was delivered to most houses in the Borough.) I reserve the right to argue before the inspector that the consultation process was flawed and ineffective because of this.

I object to the “insetting” of 14 villages from the Green Belt. Contrary to assertions made in the Plan process many of these villages do contribute to the openness of the Green Belt and there is no need to inset them.

I also object to the wholesale extensions to the settlement boundaries in many villages to allow for infilling and that infilling is also proposed outside the settlement boundaries of 11 further villages. Many Guildford villages are linear. It is all too easy to square off boundaries by including countryside bounded on only one or two sides by existing development, claiming it contributes nothing to the “openness” of the Green Belt, a term which neither the plan nor the NPPF defines. The NPPF’s other 4 tests of Green Belt status, including the prevention of urban sprawl, are ignored. Effectively, this policy makes all villages within the Green Belt vulnerable to large blocks of new development and seems almost calculated to secure the rejection of the plan as a whole.

To “inset” two-thirds of the borough’s rural villages on the grounds that they no longer contribute to the purposes of the Green Belt is extreme and inherently implausible, given the borough’s location on the edge of Metropolitan London. I cannot see how such extensive areas fail to contribute to the purposes of the Green Belt under the NPPF, but this could quickly be the case if the proposed “insetting” and boundary extensions go ahead.

This policy is wildly disproportionate in terms of any foreseeable development need and has caused tidal waves of opposition from residents. It flies in the face of NPPF paragraph 17’s aim of “empowering local people to shape their surroundings” and other NPPF provisions.

Paragraph 4.3.17 states that “the general extent of the Green Belt has been retained.” I believe this should be deleted as an untruth.

In addition I OBJECT to the proposals to remove from the Green Belt the so called ‘strategic sites’ of Wisley Airfield (A35), Gosden Hill Farm (A25) and Garlick’s Arch (A43) and all other strategic sites. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt.
There are no exceptional circumstances for these sites and villages (as mere housing need does not constitute a ‘special circumstance’) to be taken from the Green Belt. Once taken from the green belt they will be lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached.

GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site.

Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17037  Respondent: 8787969 / K Britton  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to all strategic sites proposed in the draft Plan to be built in the Green Belt.

1. I object to the identification and allocation of sites in this plan without regard to Green Belt, infrastructure or other constraints. The plan says that “allocating these sites does not grant planning permission for development.” However, each of the sites will be removed from the Green Belt and will be available in principle for development and non-Green Belt uses. The inclusion of these sites without detailed site by site justification shows contempt for the thousands of detailed comments the Council have received about individual sites ever since the Issues and Options consultation in 2013. The plan has hardly changed since the Council received 20,000 objections to its first draft plan in 2014. The Inspector considering the plan may conclude that the consultation has not been properly conducted.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17022  Respondent: 8787969 / K Britton  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I OBJECT to development in areas which are at risk of flooding (Policy P4)

National Planning Policy states that Local Plans should take account of climate change over the longer term, including factors such as flood risk. It goes on to say that new development should be planned to avoid increased vulnerability to the range of impacts arising from climate change.

The Plan states that in accordance with national planning practice guidance, the Level 1 SFRA has been used to guide development towards areas at the lowest risk of flooding and identify areas unsuitable for development. However, the document concludes that land outside of the area of flood risk is not capable of accommodating all of the borough’s identified development needs. A Level 2 SFRA has therefore also been produced and will help the Council apply the exceptions test (as described in the NPPG) as necessary to development proposals in areas at risk of flooding.

The site at Garlick’s Arch (A43) is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. Knowing the area well I am aware that this site often floods during the winter months and the flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to this Policy as the development proposed will not be sustainable (Policy S1)

The NPPF states that the presumption in favour of sustainable development “should be seen as a golden thread running through both plan-making and decision-taking.” As the first policy in the Plan, Policy S1 ought to set a clear framework. Instead, no definition of “sustainable development” is given. The policy also fails to set out any principles for applying sustainable development in practice to local planning decisions, which often have serious long-term impacts.

The policy states that it aims “to secure development that secures the economic, social and environmental conditions in the area”. This fails to recognize that economic growth, social justice and environmental protection often conflict. The policy does not say how each element is to be weighted or conflicts resolved. As a practical guide to the planning decision to be taken in the Plan period it is seriously deficient. The policy is likely to be used by developers to justify inappropriate developments on economic grounds. Under this policy, virtually any development will qualify as “sustainable”, in breach of the NPPF’s most important guideline.

Policy S1 is also seriously deficient in making no mention of the Green Belt. The Green Belt is a long term Government policy enshrined in primary legislation to protect green areas in perpetuity. The Green Belt is a living example of sustainable development in practice and is one of the most important factors affecting sustainable development in the area covered by the Plan and should be acknowledged in this policy. Policy S1 should include a commitment to protect the Green Belt from inappropriate development and to uphold Green Belt boundaries and protections. This would set at least
one clear boundary to planning decisions. The Plan and the Council have treated the Green Belt as a developable land bank rather than as a constraint to development.

The commitment to approve planning applications “wherever possible” and “without delay” reveals the pro-development bias of the plan. Countervailing references to sustainability are so vague that the NPPF presumption in favour of sustainable development becomes a presumption in favour of any development at all.

This policy also ignores, as if they are inconvenient constraints, most of the 12 Core Planning Principles set out in NPPF paragraph 17.

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact on existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill Farm (A25) are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are also unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick’s Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17020  Respondent: 8787969 / K Britton  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the Borough Wide Strategy (Policy S2)

The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

The housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.
The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guilford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

The assumptions and calculations in the SHMA are widely regarded as flawed and even before Brexit, produced an inflated housing needs number. The figure of 13,860 new homes is completely unsubstantiated. It has not been scrutinized by Councillors despite repeated requests for debate. The assumptions and calculations underlying the model are hidden, protected by a claim to intellectual property by a commercial sub-contractor used in preparing the SHMA. I have serious doubts about the objectivity of the SHMA because it has been produced by consultants whose website openly proclaims their pro-development agenda leading to reasonable suspicion that the figures are inflated. Guildford’s OAN is not transparent but has been taken on trust by the authors of the plan. Given that almost every element of the plan is predicated on this OAN, the plan as a whole cannot be considered “sound”.

The status of the 13,860 figure is ambiguous. The Council has said that the housing number and the OAN are identical because the OAN is “deliverable” and is by definition objective and cannot be contradicted. The OAN is only deliverable because of the Council’s cavalier approach to the Green Belt in contravention of the NPPF, ministerial statements and local and national Conservative Party manifesto commitments. The plan also states that infrastructure or other constraints may in due course affect deliverability. It is also unlikely that the number of houses can be built at the rate proposed. In recent years, housing starts have on average been less than half the proposed rate. This is not because developers do not have the land or cannot get planning permission. Constraints in the supply chain and maintaining profit levels have been more important.

The plan cannot be considered “deliverable”. In addition, the number of homes proposed, plus existing planning permissions, plus expected “windfall” sites, exceeds the total of 13,860. So how many homes (taking account of these adjustments) do the Council want built? The plan does not say. Without this figure it is hard to see how anything else can be planned. This undermines the validity of the whole consultation. It is unreasonable to ask the public to approve a “plan” that fails to propose a target number that takes all the standard constraints and adjustments realistically into account, leaving the Council to set one without further consultation. Even if the OAN were not flawed, it is at best only a baseline figure and should not be passed off as a policy proposal.

It is unreasonable to embark on a radical transformation of the borough on the basis of an unclear housing target. Most of Guildford Borough is highly protected from development (89% Green Belt, 44% AONB and about 75% protected by SPA). Whether or not increasing the number of dwellings by up to a quarter is desirable, it would be a major and irreversible change, arguably turning a largely rural borough into a mainly urban or suburban one like Woking. The scale of the housing number increases the onus for it to be seen to be sound. A substantially lower number, on the other hand, would remove the need to build on Green Belt or open countryside, and instantly meet the single biggest public objection to the plan as a whole.

The Plan in general and this policy in particular does not address the point that Guildford exists as part of London's commuter belt. Any increase in supply of housing in Guildford, particularly if the increase is proportionately greater than elsewhere in the commuter belt, will simply result in a shift of population into the area. It will not reduce prices or increase availability except imperceptibly. The Plan also ignores the point that many of those working in the area live elsewhere.
Accordingly in considering the housing number the Plan should take into account that in this part of London’s commuter belt, demand for housing is, in practical terms, unlimited.

This policy does not take proper accounts of the constraints to development which exist, principally posed by the Green Belt and by infrastructure limitations. I believe the Council is under a duty to properly consider applying these constraints. It is clear the Council has failed to do this. This approach differs from all the other boroughs in Surrey. The Plan appears to have deliberately been manipulated towards a growth agenda without disclosing why this is being done. The housing that is needed should be concentrated on urban brown field sites and through increasing the housing density of existing built up urban areas.

The development of 13,860 homes in the Plan period with 65% in the Green Belt does not constitute sustainable development. It will have a permanently detrimental impact on the Borough in general and on West Clandon and surrounding area in particular. The developments at Garlick’s Arch and Gosden Hill Farm do not meet the needs of the local communities. The road infrastructure in and around West Clandon will be unable to cope with additional demand. The edge of urban Guildford will creep that much closer to West Clandon, thus negating the purposes of the Green Belt in the area which include safeguarding the countryside from encroachment, checking the unrestricted sprawl of large built up areas and preventing neighboring towns merging into one another.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill Farm (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/1880  Respondent: 8787969 / K Britton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I do not agree that the evidence used for the Proposed Submission Local Plan Strategy and Sites is adequate, up-to-date and relevant.

The fundamental driving forces for much of the development proposed in the Plan (particularly that on Green Belt land) are based on:
1. An excessive ambition to expand the local economy which is neither warranted nor wanted by the local population. Guildford is already one of the highest ‘value creation’ areas in the country and has one of the lowest unemployment rates. There is no evidence that massive and accelerated expansion is required.

1. SHMA figures which are neither transparent nor justifiable, especially in view of previous figures set. Independent assessments of the SHMA (eg from Guildford Residents’ Association and David Reeve) show it is set far too high and so cannot be said to be adequate, up to date or relevant.

In addition the recent vote to leave the EU and the impact this will have on the economy and migration have not been taken into account.

The Plan should be re-assessed and the methodology for arriving at housing need figures should be fully transparent.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/1881  Respondent: 8787969 / K Britton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 2: Legal compliance

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I do not consider the Proposed Submission Local Plan: strategy and sites as a whole to be legally compliant because it mainly ignores the consultation process for the 2014 draft Plan it is claimed to be based on.

That consultation process was absolutely clear by some +20,000 responses that that Plan was flawed and no development should be carried out on Green Belt land.

Instead this 2016 draft Plan actually increases the number of dwellings being built on the Green Belt, in direct contradiction to the consultation process, yet is stated to be a Regulation 19 proposal.

As a result I do not see how the 2016 draft Plan can be Legally Compliant.

The 2016 draft Plan should be re-assessed and should take into account the views of the majority of responses from the consultation process for the 2014 draft Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/1882  Respondent: 8787969 / K Britton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I do not consider the Proposed Submission Local Plan: strategy and sites **as a whole** to be sound, because, but not limited to, the following reasons:

1. "Only sites that propose sustainable solutions have been included in the Plan and the Plan rejects any schemes that would have a detrimental effect on the green belt." Summer 2016 edition of "About Guildford" (published by the Council) on page 5. This is demonstrably untrue and appears designed to bias the consultation process.
2. The housing OAN figure has been calculated by a process which is not transparent. It has not been properly examined by Councillors before being adopted.
3. The OAN has been adopted as the housing number without the application of any constraints to take account of Guildford's circumstances, including in particular the Green Belt, AONB and road infrastructure. National policy permits such constraints to be applied and it is inappropriate not to consider the need to do this.
4. The draft Plan does not accord with the NPPF policies on protecting the Green Belt.

**Exceptional circumstances need to be shown to justify removing areas from the Green Belt and this has not been done. The housing number is not justication in itself according to published ministerial statements** Having properly calculated an OAN, constraints should be applied to it to reflect the Green Belt, AONB and infrastructure. Each proposed Green Belt site then needs to be justified on its own merits. The benefits of the proposed development need to be identified together with the harm to the Green Belt. Only if there are exceptional circumstances and following a proper balancing exercise demonstrating that these exceptional circumstances outweigh the harm to the Green Belt can the proposal proceed. The draft Plan does not demonstrate that this has been done. The housing number has been used as a blanket justification for all Green Belt sites-which amount to 65% of the proposed housing number.

1. Whatever the justification for the assumptions made in calculating the OAN, those assumptions are now almost certainly incorrect following the referendum.
2. The housing number is at least twice the achieved rate of building in the Borough over the last few years. There is no evidence in the Plan to show that this rate is achievable and sustainable.
3. Much of the infrastructure required to support the level of development proposed is outside the Council’s control. The Infrastructure Plan is long on possibilities and aspirations and very short on commitments. The infrastructure requirements placed on developers are supposed to be in place before development commences. This is utterly unrealistic and indicates a lack of knowledge of developer’s business models which depend on positive cash flow. It seems very clear that at best, infrastructure provision will seriously lag development and leave higher levels of congestion than now. This will reduce the quality of life for residents through congestion and disruption.
4. The 40-45% requirement for affordable homes together with infrastructure such as railway stations, park and ride facilities, schools and roads is highly likely to be challenged on a site by site basis by developers using the NPPF provision that Councils cannot impose conditions which make development non-viable.

1. GBC has not included details of its Town Centre Master Plan and urban development proposals in time for and as a part of the Guildford Local Plan consultation
2. GBC has failed to provide an Infrastructure Report in time for and as a part of the Guildford Local Plan consultation
3. GBC has proposed an OAN of 693 houses per annum in the GL Hearn West Surrey Strategic Housing Market Assessment (SHMA) which many, including independent assessors, consider unsound
4. Highways England will not start to consider what it intends to do as regards the A3 in the vicinity of Guildford until 2018
5. Network Rail have not made available for the public consultation any plans for a new railway station at Merrow with an adjacent Park & Ride for 1,000 cars
6. The GBC proposals for Gosden Hill Farm do not appear to be in coordination with the Neighbourhood Plan for Burpham
7. The draft Local Plan will cause further linear development along the A3 between Burpham and West Clandon PC and encroachment onto open Green Belt countryside in clear conflict with the National Planning Policy Framework.

8. The proposal for Garlick’s Arch was added to the draft Local Plan without any prior consultation under Regulation 18.

9. The Land Availability Assessment (LAA) indicates a range of planning difficulties for Gosden Hill Farm and Burpham which have to be met by the developer involved. These include Electricity Grid supply problems and foul sewage and surface water issues that suggest the development proposed cannot easily be implemented both technically and financially.

10. No adequate explanation is given as to how the aspirational proposal for a tunnel will be used to overcome traffic issues relating to the quality of life and amenity of Burpham, West Clandon, Send and Ripley citizens.

11. In common with many others I do not believe the housing figure has been properly calculated and I believe it overstates housing need. The Council has prevented councilors or others from properly considering the SHMA by refusing to make public the basis on which it was drawn up.

12. The housing figure, when properly recalculated, should be subject to constraints to reflect Guildford's circumstances, including in particular the Green Belt and road infrastructure. National policy permits such constraints to be applied and it is inappropriate not to consider the need to do this.

13. Even once a housing number has been calculated it cannot be used to justify taking land out of the Green Belt on a wholesale basis.

14. Cast iron commitment should be included in the plan that development can only commence when required infrastructure improvements have been secured.

15. The status of the text which accompanies each policy box is not clear. If the accompanying text does not have the force of policy a number of the policies (i.e. the text in blue) are so vague and general that they commit the Council to very little.

The draft Plan should be re-assessed with housing on brownfield sites made a priority over commercial development and Greenfield sites and each of the above points addressed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/1883   Respondent: 8787969 / K Britton   Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 4: Duty to cooperate

Do you consider this section of the document; complies with the Duty to Cooperate? (), is Sound? (), is Legally Compliant? ()

Answer (if comment is on questions 1-7 of the questionnaire): ()

I do not consider the Proposed Submission Local Plan: strategy and sites as a whole has complied with the Duty to cooperate.

This 2016 draft of the Local Plan clearly demonstrates Guildford Borough Council’s refusal to co-operate with the wishes and requirements of the vast majority of the residents in its Borough.

The Council has failed to co-operate with the results of the consultation process for the 2014 draft Plan which was meant to inform and guide this 2016 draft Plan.
Despite campaigning on a clear statement ‘Conservatives Say Green Belt To Stay’, the ruling party on GBC is now intent on pushing through a Plan which will devastate Green Belt land and extend the Guildford Urban Area to further merge into surrounding rural villages.

This is not cooperation by any definition.

In addition the Council has failed to cooperate in providing any transparency to the housing need figures commissioned by the Council from GL Hearn.

The 2016 draft Local Plan should be reassessed with a reviewed and transparent SHMA and revised to reflect the views of the residents of the Borough, who pay for Guildford Borough Council to act in their interests, and not those of developers and central government.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to the changed policy A25 Gosden Hill for the development of 1700 homes which is still far too much.
2. There is no need for housing on this site because the local plan housing target is incorrect and inflated and ignores constraints.
3. Gosden Hill is located entirely within the Green Belt. No exceptional circumstances have been demonstrated for building on this site and therefore development here does not meet paragraphs 87-89 of the NPPF. Furthermore, Gosden Hill performs all five functions of green belt,
4. The site has no provision for foul or surface water sewerage and adjoining sewerage is at capacity
5. The Green Belt at this point serves the important function of separating West Clandon from the edge of urban Guildford. Development here will cause the two to coalesce defeating one of the objectives of the Green Belt. If this development proceeds I believe the narrow strip of Green Belt remaining between Guildford and Clandon at this point will be too narrow and will come under further pressure. It will represent an undesirable ribbon development along the A3. It will be highly visible from the A3 when approaching Guildford and will, in conjunction with A43a at Garlick's Arch give the appearance of almost continuous development from Send through to Guildford.
6. The development of this site cannot be sustainable and will cause massive congestion onto surrounding roads. The development will generate in the region of 6,000 vehicles which will exit straight on to the A3 which is stationary every day during rush hours. The linking of the A3100, B2215 and A247 would channel thousands of cars through the narrow, winding road through West Clandon.
7. I object to the proposal for a link road to bring traffic from the Gosden Hill development to the proposed 4 way junction at Burnt Common. This has the potential to generate large volumes of traffic (including commercial vehicles) on the A247 through Send and West Clandon - a road which is already under traffic stress (see below).
8. The volume of traffic will greatly increase air pollution which is particularly critical given the proposal to build two schools.
9. A new on-slip at Burpham would only be 1.8km from the on-slip at Burnt Common which is against Highway England’s requirement of 2km.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp172/4579  Respondent: 8787969 / K Britton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to the changed policy A43 Garlick’s Arch for 400 homes and 6 travelling show people pitches
2. It ignores all the thousands of previous objections made by local people
3. There is no proven demand for travelling show people plots in this location
4. There is no need for putting houses on this site because the local plan housing target is incorrect and inflated and ignores constraints.
5. The allocation of 28.9 ha is an excessive land grab into the Green Belt. If we take a normal density of 30 homes per ha and it is at the end of the day proven that there is a need for 400 homes in this location the land requirement is 13 ha not 28.9 ha which is more than double. This replicates a similar over land grab at Burnt Common where the factor is 7 times the land required.
6. This confirms the worrying impression that GBC have a pre-determined policy of building on the Green Belt at every opportunity. The arithmetic does not stack up. One would have thought that they would as custodians of the green Belt be intent on conserving it rather than exploiting it.
7. The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.
8. Garlick’s Arch (A43) is in an unsustainable location. It does not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. The site is unsuitable due to lack of access to sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be dependent on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.
9. The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.
10. I object to the proposal to remove Garlick’s Arch from the Green Belt. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for this land to be taken from the Green Belt. Once taken the green belt is lost forever. There is a real danger that the loss of this Green Belt will result in urban sprawl and the neighbouring villages merging into one another. The significant development in West Clandon, Send and Ripley will result in the character of these villages being lost and the countryside encroached.
11. I object to the development at Garlick’s Arch because of flood risk. The site at Garlick’s Arch is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. Knowing the area well I am aware that this site often floods during the winter months and the flooding
is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-
commissioned to accurately reflect the actual flooding risks of each site.

12. I object to the loss of rural employment on the site. The development at Garlick’s Arch would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises.

13. I object to the potential loss of Ancient Woodland on the site. The proposed development at Garlick’s Arch will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees that existed in the year 1600.

14. I object due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1). Our villages are already suffering from severe congestion for much of the day, for example the Newark Road and Rose Lane junction in the centre of Ripley and the A247 through West Clandon. The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.

15. Furthermore, many of the country lanes around the villages of West Clandon, East Clandon, Ripley, and Send are narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition. I object to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces.

16. Many of the affected villages, such as West Clandon, East Clandon, Send and Ripley, already suffer from parking problems. Further development around these villages will only result in more traffic and more parking problems.

17. With some 5000 houses being proposed close to the villages of West Clandon, East Clandon, Send and Ripley, the roads serving the village will become even more congested. Cycling has become a popular past time, particularly at weekends hundreds of cyclists past through the village on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road accidents involving cyclists as a result of the development proposed under the local plan.

18. The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the roads becoming ever more dangerous for pedestrians.

19. I object to the lack of proper infrastructure planning for sites (Policy I1). Policy I1 requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.

20. Despite the Garlick’s Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents’ in the locality will see their quality of life significantly deteriorate in many ways.

21. Many of the utilities in the West Clandon, East Clandon, Burpham, Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers. No plans to improve these services should mean no development of the Garlick’s Arch site.

22. Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are already at capacity and suffering from funding cuts or freezes. Any further development without funding will place further stress upon existing health services.

23. I object due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2). There is no certainty that either the A3 or M25 in the borough will be improved to increase capacity and reduce congestion during the Plan period. Highways England has no plans to even examine improving the A3 before 2020. I have considerable concerns that development of the large residential sites identified at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), will take place before any improvements are made to the trunk road network. The A3 & M25 are already at capacity during peak hours and any development prior to improvement of these roads will only make the situations worse.

24. I object to poor air quality concerns (Policy I3). Paragraph 4.6.27 of the Plan states that “Development must also mitigate its traffic impacts, including its environmental impacts and impacts on amenity and health.” The significant level of development being proposed, particularly in the north east of the borough will lead to considerable further congestion, despite any attempts to mitigate this through travel plans. This will be particularly acute in built up residential areas and will only lead to greater levels of air pollution, which will have a detrimental effect on local residents and their health.

25. I object to the inclusion of the land at Garlick’s Arch, Send Marsh/Burnt Common and Ripley (A43). Garlick’s Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site
will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8). There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).

26. It is clear that with this site being added at the eleventh hour and no infrastructure planning has been undertaken. The Infrastructure Schedule makes no provision for any infrastructure improvements for this site. How will the local services such as schools and doctors cope, many of which are already at capacity? (Policy I1)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/4580  Respondent: 8787969 / K Britton Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A58

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to Policy A 58 at Burnt Common and to the proposed inclusion of Burnt Common as an Industrial Strategic Employment Site
2. This previous allocation for B1c, B2 and B8 development was removed from the 2014 draft due to all the objections made previously.
3. The word “minimum” is a change from the previous “maximum” in the 2016 plan and since that time there has been a decline in demand for industrial land. This change alone is unacceptable since even if there was a need to build 7,000 sq m at Burnt Common this development would only require 1.4 ha at a standard plot ratio density of 50% not 9.26 ha. There is no justification for zoning an additional 7.86 ha in the Green Belt.
4. There is in fact no justification for building any more industrial development in the borough particularly at Burnt Common. The current industrial pipeline of granted consents of 38,357sqm in B1c, B2 or B8 use class space is double the 19,000 sq m said to be needed by Aecom who justify the need for new space on top of the existing pipeline by a completely unsubstantiated suggestion that “there is the possibility that some pipeline developments may not come forward at all, or be developed in different quantities by use class than has been consented.”
5. There is no need to build industrial or warehouse development in the middle of the Green Belt when Slyfield and Guildford still have empty sites and industrial units.
6. The 2017 Employment Land Need Assessment shows a reduction in demand to 3.9 hectares for industrial land for the whole borough not a huge over allocation of 9.26 hectares at Send in the Green Belt.
7. The Employment Land Needs Assessment update 2017 (ELNA) states “that the pipeline for employment floorspace defined by planning permissions yet to be implemented and prior approvals suggests the potential for an additional 33,607sqm of B use class floorspace to come forward. This figure comprises a net loss of 4,750sqm of B1a use class floorspace and a net gain of 38,357sqm in B1c, B2 or B8 use class space.”
8. 38,357 sq m of B1c, B2 or B8 use class is quite sufficient supply for the plan period and is in fact more space than the 3.9 ha of industrial land that is said to be needed for the plan period by Aecom. Since if you were to develop 3.9 ha at a plot ratio of 50% it would provide new industrial development of 19,000 sq m approximately half of current planning permissions granted. This does not justify the need for new development of industrial space on the Green Belt in such areas as Burnt Common.
9. The reality of demand for industrial space is that it is both nationally and locally in decline and this is evidenced by old existing permissions that have not been taken up and developed. The ELNA alludes incorrectly to the poor quality of existing space being a “constraint” on supply and fails to acknowledge that this assertion cannot apply to potential newly developed space e.g. the undeveloped pipeline of 38,357sqm.
10. The impact on small surrounding roads will create traffic gridlock.
11. It will join up existing villages and defeat the purpose of the Green Belt.
12. The ongoing poor quality of the updated research undertaken by Aecom in the Employment Land Needs Assessment 2017 does not support industrial development on land in the Green Belt at Burnt Common.

13. The Aecom research is generally superficial and lacks sufficient detail and analysis between B1c, B2 and B8 use classes and no reliable individual analysis has been undertaken of the widely different supply and demand dynamics of light industrial, general industrial and warehousing and distribution floor space.

14. The potential inclusion of a waste management facility mentioned at paragraph 4.4.23a lacks enough detail for proper consultation and is completely inappropriate.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/3009  Respondent: 8787969 / K Britton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The Plan now states: “the presumption in favour of sustainable development will not automatically apply to policies relating to sites protected under the Birds and Habitats Directives and/or designated as Sites of Special Scientific Interest (SSSIs), land designated as Green Belt, Local Green Space, the Surrey Hills Area of Outstanding Natural Beauty, designated heritage assets and locations identified as at risk of flooding.”

Gosden Hill and Blackwell Farm (both currently in the green belt) are called “urban extensions” surely a euphemism for urban sprawl? Garlick’s Arch and Burnt Common developments take land from the green belt to extend Ripley/Send. One of the important specific purposes of the green belt is to prevent urban sprawl.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp17q/592  Respondent: 8787969 / K Britton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Question 4: Duty to cooperate

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
The NPPF states para 155: “Early and meaningful engagement and collaboration with neighbourhoods, local organisations and businesses is essential. A wide section of the community should be proactively engaged, so that Local Plans, as far as possible, reflect a collective vision and a set of agreed priorities for the sustainable development of the area, including those contained in any neighbourhood plans that have been made.”

The changes in this latest version of the Guildford Local Plan show little or no willingness of Guildford Borough Council to reflect a collective vision. Despite the many thousands of responses to previous versions of the Plan which overwhelmingly rejected building on Green Belt land this latest version has as much, if not more, building on the Green Belt and increased problems of infrastructure and traffic which will bring increased noise and air pollution and danger to residents.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/10592   Respondent: 8788097 / Alan Cadge   Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I support the Guildford Residents Association response and oppose the expansion of Guildford.

I do not agree that there is an inherent need for so many additional homes, as I said in my earlier feedback.

The demand for homes is due to Guildford being a desirable place to live, and I wish to keep it that way. 25% increase will not keep it that way, will not protect the character of the town.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/3088   Respondent: 8788129 / Claire Attard   Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I attended the meeting on 8th April regarding The Wisley Property Investments Ltd (WPIL) planning application of January 2015 (Ref: 15/P/00012) and this was unanimously rejected by GBC following the recommendation of the GBC Planning Officers.

The reasons for the refusal of the application were many but included that the proposed development:
(a) was an inappropriate development within the Green Belt;
(b) would have a clear and substantial detrimental impact on the openness of the Green Belt and conflict with the purposes of including land within the Green Belt;
(c) failed to demonstrate that the benefits amounted to very special circumstances such as to clearly outweigh the harm to the Green Belt and the other harm identified;
(d) failed to comply with the objectives of policy RE2 of the Guildford Borough Local Plan 2003 (as saved by CLG Direction dated 24/09/2007) and chapter 9 of the National Planning Policy Framework;
(e) was within the 0 -400m and the 400m to 5km zones of the Thames Basin Heaths Special Protection Area, etc.
(f) would have a severe adverse impact on the safe and efficient operation of the strategic road network, and a severe impact on the efficient operation of the local road network;
(g) failed to deliver the required transport sustainability measures;
(h) failed to secure an appropriate provision of affordable housing;
(i) was detrimental to the viability and vitality of the existing district and local centres in the vicinity of the site;
(j) would result in loss of the safeguarded waste site;
(k) presented a dense and urban form of development owing to its quantum and scale;
(l) had an adverse impact on the setting and significance of a designated heritage asset;
(m) had an unacceptable air quality impact;
(n) impacted on education infrastructure;
(o) impacted on policing infrastructure;
(p) impacted on health infrastructure;

So I was completely baffled when we went to the next meeting at the GBC Millmead, on 24th May, to be told that they were going to go ahead with the plan anyway!! So why are we continually writing our objections when they are completely ignored?

Anyway, I object very strongly to the submission of the local plan, specifically for The Three Farm Meadows (the former Wisley Airfield). I could rewrite my objections from all my previous emails/letters, but I cannot see that they will make a difference!!

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I would like to object to GBC’s Proposed Submission Local Plan unreservedly. As a local resident I have objected to all the proposals the GBC has put forward along with thousands of others in our area. It really is appalling that our objections have been completely ignored and the Local Plan has failed in the number of key areas to take into account or to answer our valid comments and criticisms submitted by thousands of residents and organisations in respect of the previous 2013 Draft Local Plan. What is the point of us all objecting whole-heartedly if we are just ignored. I have to say that in my opinion it raises questions about your governance and vested interests.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I would like to object to the plans on the following bases:

The Green Belt was set up in law to provide for the maintenance and care of an area of countryside between villages to maintain not only the countryside but the individualism of the villages. If this is changed then the spread of conurbations will clearly mean the Surrey area ends up being a further extension of the London suburbs.

The well being of the countryside is paramount to the health, economy and lifestyle of many thousands of people now and in the future in Surrey. The loss of habitat will be irreversible and has huge consequences for the ecology of the remaining countryside.

The village of West Horsley in particular will not cater for large numbers of extra houses being added to it. There is only one over-subscribed State Primary School, a heavily over-subscribed Health Centre and youth facilities are few. The infrastructure of roads is already poorly maintained and certainly will be unable to cope with much more traffic without considerable change. Changes would be difficult since there is linear development of housing along many of the roads preventing widening.

The increase in the provision of low cost housing maybe a worthy ideal in theory but in practice it would put even greater pressure on the health and educational facilities of the village since these families would be the very ones most likely to use the educational facilities in particular. At least if the housing were of the more typical market range in Horsley the numbers would be less and the use of facilities would be less onerous.

The land in the Northern section of West Horsley (A40) is a most unsuitable site for development.

The southerly portion of it is in fact used and rented by me for my sheep and I have maintained it for the 20 years I have lived here in the house that was the former farmhouse attached to this land.
I can verify that this land is poorly drained and that the inclusion of this in Flood Zone 1 (low risk) is potentially an under assessment of the risk to it. Every year I have lived here the fields, particularly towards the northern sector of the half I use are both splashy and muddy for many winter months. I have attached photos showing a quite typical outcome of heavy rains, and these are in the southern sector where my house is.

You will note that my front drive that leads off the end of Nightingale Avenue receives the bulk of the run-off water from the road and many of the gardens. The field clearly acts as a sump and drainage area for this to soak away and infiltrate but development of the fields would aggravate that very drainage effect creating further problems for my garden, and possibly house, and ultimately others in the lower portion of the road.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. The proposed plan also includes for the development of Wisley airfield. This would have serious adverse effects on the surrounding villages;
   - The additional 5,000 residents is the equivalent of doubling the population of East and West Horsley combined
   - The proposed housing density is completely out of keeping with the surrounding rural area – five storey buildings are not appropriate in a rural environment
   - The resulting impact on light pollution, traffic and infrastructure has been gravely underestimated and proposed mitigation measures are totally inadequate
   - The cumulative impact of development in the borough and in the neighbouring boroughs of Woking, Waverley and Elmbridge has not been taken into account
   - The air quality surrounding the site gives grave cause for concern as levels of NO2 already exceed the EU limit
   - There is insufficient information on the impact on the water table and flooding in the area – the whole of the surrounding area is prone to flooding, and the impact of the River Mole is considerable.
   - Additional traffic will have a negative impact and cause irreparable damage to historic houses and other buildings in Ockham, Ripley, Downside and further afielde.
   - The development will impact the listed buildings adjacent to it such as Yarne, Bridge End House and Upton Farm
   - The closure of a number of local roads coupled with a massive increase in traffic will impact a large number of road users from Cranleigh to Cobham and everywhere in between.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/358  Respondent: 8790529 / Nigel Carter  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. The proposed development of the old Wisley airfield will also generate a considerable knock on effect on Horsley infrastructure – particularly roads, railway station, shops, medical facilities, schools etc. – this has not been properly considered either.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/761  Respondent: 8790529 / Nigel Carter  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D1
1. The proposed density of housing proposed is also out of step with the existing density within East and East Horsley – it being considerably higher - and will put untold strain on the existing residents and the environment and infrastructure. There is no proven justification for this.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The Draft plan does not include for any upgrade of infrastructure, and the current infrastructure will not be able to cope with the proposed increase in housing. Horsley has insufficient infrastructure to cope with the additional housing and people who would move into the area – roads, buses, schools, shops, and medical facilities are limited in the area as it is. Any increase in population would put an impossible load on these local services.

The increase in proposed homes in the area from 1111 to 1644, represents a 67% increase in dwellings for a small village. This kind of development will put an unreasonable strain on roads, drainage, utilities, parking at the station etc. which will not be able to cope.

Roads are generally in poor condition as it is with considerable damage during the past winter which has still not been effectively repaired some 8 months later – particularly East Lane and Ockham Road North and South. These are heavily trafficked as it is and a 67% increase in traffic will mean roads will soon collapse. There was extensive flooding in the area last winter – not only will that have detrimental effect on the roads but on the proposed houses too.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
1. The railway station whilst providing a good service, already has a good sized car park, which is always full during the week. As many people commute to London, a 67% increase in population will almost certainly lead to more people using the station. If this was in proportion, then the car park would not be able to cope. Also there is no scope to increase the size of this car park.

1. Public transport in the area is limited – the bus service is infrequent and would not be able to cope with an increase in public using the service.

1. It is likely though that most people will have a car, or more than one car. This will generate a huge increase in traffic and will have a knock on effect to other villages nearby such as Ockham, Clandon, and Effingham.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/760  Respondent: 8790529 / Nigel Carter  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I wish to object to the proposed development of the East and West Horsley areas, and proposal to create 821 homes in the next 5 years.

My reasons for objecting are;

1. The Plan suggests that a significant area of East and West Horsley are removed from the Green Belt area, which is intended to limit development to preserve the natural environment and beauty of the countryside. I have yet to see any convincing argument that removing Green Belt status is in the best interests of the residents Guildford Borough Council or the environment for which we are all responsible, when other options for development have not been more fully explored within the borough, which would negate the need to move the boundaries of the Green Belt.

2. In most cases for development a Business case would have to prove a Need, and then options to meet that need. I do not believe that Guildford Borough Council has satisfactorily explored all options for development within the Borough excluding the requirement to redraw the boundaries of Green Belt land. Neither do I believe that the Need has been properly defined – merely it is a theoretical quota that GBC thinks it should apply – this is inadequate for a robust business case.

3. The boundaries of the Green Belt should be preserved – there is no case proven for this to be changed.

4. Horsley, being within the Green Belt, is also adjacent to the Surrey Hills, an Area of Outstanding Natural Beauty. Any change to the Green Belt status, and possible future development will have a detrimental knock on effect to the surrounding countryside.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/765  Respondent: 8790529 / Nigel Carter  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2
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<td>1. Any development in this area could set a precedent for the whole of Green Belt Land and render the principle meaningless.</td>
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<td>1. Much of the proposed areas for development are in low lying areas, and will be subject to flooding. The introduction of more hard surfaces – houses and driveways – will only increase the amount of surface water, and inhibit the ability of the land to drain naturally. The council seems to have overlooked the effect of the River Mole which is very close by, and which does flood.</td>
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1. Guildford BC should consider other brownfield sites, and sites within existing towns, rather than villages, where infrastructure, transport and communications can more easily cope.

1. Finally there is little or no mention of the One Public Estate initiative backed by the Cabinet Office. This initiative seeks to aid Local Authorities to make more efficient use of its buildings and land. It aims to increase efficiencies, reduce footprint and release surplus land and buildings back to the community for housing.

Guildford Council needs to explore this potential before pushing forward with any changes to the Green Belt.

For these reasons, I urge the Council to maintain the Green Belt status and retain the current boundaries, and reject this proposed development plan, and re-examine the options outside of Horsley.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I am writing to object to the local plan, and the proposed development in East and West Horsley.

- Green Belt - the proposed policy re the green belt is totally inappropriate. The Green belt forms the cornerstone of the region, and should be used a basis of planning. We should be celebrating it, it is one of the highlights of the region, not trying to destroy it. The villages are a huge part of that, and there should be no removal of the villages, particularly the Horsleys, from the Green Belt. No ‘exceptional circumstances’ concerning this have been demonstrated, and I totally oppose the plan to inset the villages.

- Extending the boundaries of the settlement area is unjustified. No sound, evidence-based reasons have been given for this, and this seems only to be used to earmark land for a totally inappropirate amount fo additional development.
  - The Horsleys offer a rich and varied mix of well established low housing density settlements with a considerable number of historic buildings.
  - Positioned on the north side of the North Downs, partly in the Surrey Hills AONB, it attracts a considerable number of recreational visitors (walkers and cyclists) through the seasons each year.
  - This is also a reason why many of the residents have chosen the area in the first place, and the proposals would destroy the communities and countryside loved and nurtured by residents.

- I believe the evidence for the proposal is flawed.
  - For example, the key Evidence document ‘Guildford Borough Economic Strategy 2013-2031’ makes no case for locating large numbers of homes in West and East Horsley or neighbouring villages.
  - Station Parade is designated as a “District Centre” This classification results form a complete misreading of the character and nature of facilities in the (very small) vilage centre, and would inappropriately target the area for future urban development. I think some of the figures, eg the number of post offices used to come to this conclusion were just wrong
  - The inflated number of houses proposed, flows from a Strategic Housing Market Assessment, the modelling of which is not revealed to the public, nor I believe to GBC. The target is then further inflated by GBC to give a population growth over 2/3 higher than official national population estimates for population growth in the Borough. Can you review these numbers?

- Flooding: The site behind Ockham Road North in East Horsley is partially a level 3 flood risk area, and local residents are well aware of how much standing water there is in their gardens after rain. Building on such land will only exacerbate the problem. We already know what happens to local roads when it rains – the drains can’t cope

- Pollution: The large increase in volume of traffic will cause an increase in nitrogen dioxide and particulates in the environment – already a cause for concern in several areas in the Borough

- The impact on infrastructure and facilities, which are already stretched to breaking point, does not appear to have been considered.
  - Local Road Network: The impact does not appear to have been considered, for example int he case of the Wisley Airfield the SCC report states that “consequently, it indicates that further thought may have to be given to managing traffic in this area as part of a transport assessment should the development be progressed”. Surely the infratsrue and any changes need to be considered before signing off a development proposal
  - Traffic and parking: Assuming that every new house has at least 2 cars, this means potentially 6,000 more cars within a three mile radius of the villages. The impact on local roads will be tremendous. Parking at Horsley & Effingham junction stations (which are already full), at the shops , at the medical centre and at the village hall will all be affected.
  - Schools: Local schools are already at capacity – where will newcomers go to school? No extra places are planned in the Horsleys, and the school places proposed at Wisley Airfield will not planned until many years into the project.
  - Medical facilities: Similar situation to the schools.
The total number of houses proposed in the Horsleys, over 500, is on such a vast scale compared with the size of the villages currently. Surely, a reexamination of the number and proposed sites is required. If it wasn’t so sad, it would be laughable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/7986  Respondent: 8791265 / Rachel Mc Knight

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Development of over 2000 houses (former Wisley Airfield), would have a huge and detrimental impact on the Horsleys, The mixed development, including retail, commercial and traveller development, would have a huge impact on the character and infrastructure of the Horsleys. They would inevitably get sucked into a kind of urbanization by the back door.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/645  Respondent: 8791393 / B C Howe

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I am 21 years old and I have lived in Horsley all my life and I write to object to the above proposed local plan and what you propose to do within taking land out of the green belt for future housing in East and West Horsley.

This is totally unfair for everyone that lives in East and West Horsley, I love my village and it is completely unnecessary to seek to increase our village by over 500 residential homes. These proposals will have a massive detrimental effect on our homes and our lives. All the initial consultation on the strategy and the various objections appear to have been ignored.

East and West Horsley as villages do not have the facilities for their population to be doubled. Our school is oversubscribed and so is our medical centre.
I therefore strongly object to your proposals.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** pslp172/2952  **Respondent:** 8791393 / B C Howe  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I also object to the proposal for approximately 2000 houses plus sheltered/care homes, Gypsy/Traveller pitches, employment/retail spaces and two schools on the former Wisley Airfield and fields, which is at odds with the revised policy 1D3. It is impossible to offer a sustainable transport policy for a site which is located in the middle of nowhere with no amenities, narrow country roads and no public transport facilities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** pslp171/1341  **Respondent:** 8791393 / B C Howe  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I have lived with my parents in Horsley for number of years and I write to object to the revisions to the new local plan and taking the I lorsleys out of the Green Belt. I note that with the amended 2017 plan that four of the original proposed housing developments sites remain. This is unacceptable to increase our village, by nearly 400 proposed residential units against an existing supply of circa 1,000 residential units. The evidence that exists is exaggerating the need for expansion as shown clearly by the GRA report on housing. Exceptional circumstances must be demonstrated in order to develop in the Green Belt and this is not an exception. It is wrong to take these sites out of the Green Belt in a single plan. What about our future generations such as mine? In addition why is Guildford choosing not to constrain its overall housing growth unlike other local authorities?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: pslp171/1042  Respondent: 8791393 / B C Howe  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I have lived with my parents in Horsley for number of years and I write to object to the revisions to the new local plan and taking the Horsley out of the Green Belt. I note that with the amended 2017 plan that four of the original proposed housing developments sites remain. This is unacceptable to increase our village, by nearly 400 proposed residential units against an existing supply of circa 1,000 residential units. The evidence that exists is exaggerating the need for expansion as shown clearly by the GRA report on housing.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/1357  Respondent: 8791425 / L J Howe  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I have lived in Horsley with my husband for 20 years and I write to object to the above proposed new local plan and you proposals to enlarge the boundaries of the villages of East and West Horsley and for the village areas inside these boundaries to be removed from the Green Belt.

This is unacceptable to all the existing residents who live in East and West Horsley, we treasure and enjoy our village environment and it is completely ridiculous to consider increasing our village by approximately 533 residential homes against an existing supply of circa 1,000 residential homes.

No-one in our village is in agreement with amending the green belt and it is simply unacceptable and undemocratic that this is even being considered.

It will have a detrimental effect on our homes and our lives. And any consultation to date has been ignored. Your proposed Local Plan is also contrary to Central Government Policy on how the Green Belt should be treated. It has been stated by Nick Boles the minister formerly responsible for planning that exceptional circumstances are required for any changes to Green Belt boundaries

- unmet housing need is not such a circumstance.

West Horsley as you are aware does not have the infrastructure or facilities for its population to be doubled. The only school is oversubscribed and it is impossible to make an appointment at the village medical centre because there are too many people in the village already.
The identification of the various sites has been undertaken in a very amateur way - with little thought to access/egress, topography or risk of flooding.

I therefore strongly object to your proposals.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** pslp172/2966  **Respondent:** 8791425 / L J Howe  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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I also object to the proposal for approximately 2000 houses plus sheltered/care homes, Gypsy/Traveller pitches, employment/retail spaces and two schools on the former Wisley Airfield and fields, which is clearly at odds with the revised policy 1D3. It is impossible to offer a sustainable transport policy for a site which is located in the middle of nowhere with no amenities, narrow country roads and no public transport facilities.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** pslp171/1344  **Respondent:** 8791425 / L J Howe  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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I have lived in I lorslcy for 22 years and I write to object to the revisions to the new local plan and to the extension of the settlement boundaries of the I-lorsleys into the Green Belt and the removal of the extended villages of Fast and West Jiorslev From the Green Belt. My concerns of the amended 2017 plan are that four of’ the original proposed housing developments sites remain. This is unacceptable to increase our village, by nearly 400 proposed residential units against an existing supply of circa 1,000 residential units. Incorrect evidence is exaggerating the need for expansion as shown clearly by the GRA report oil Exceptional circumstances must be demonstrated in order to develop in the Green Belt and by definition this is not an exception. It is incorrect to squander these Green Belt sites in a single plan, robbing future generations. In addition unlike other places, Guildford is choosing not to constrain its overall housing growth.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
Comment ID: PSLPA16/638  Respondent: 8791457 / C M Howe  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I have lived in Horsley for most of my life and I am writing to object to the above proposed local plan and in particular to the proposals for future housing in West Horsley involving taking land out of the green belt.

This is unacceptable to all who live in West Horsley, we love our village environment and we are not prepared to accept an increase of potentially 400 residential homes, a massive increase in the size of our village.

No-one in the village wants this nor does anyone living locally want the village removed from the Green Belt, it is unacceptable and undemocratic that this is even being considered.

This will have a terrible effect on our homes and our lives. You need to listen to the views of local people, it is our village and we are not going to accept these proposals.

West Horsley as a village does not have the infrastructure or facilities for its population to be increased like this. The school is full and it is impossible to make an appointment at the medical centre.

The identification of the various sites has been undertaken in a cavalier unprofessional fashion with no thought to access/egress, topography or risks of flooding.

I therefore strongly object to your proposals.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/49  Respondent: 8791521 / Richard McClean  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Ripley

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I have followed the recent development plan in some detail. I was therefore very surprised when Ripley was proposed to be removed from the Green belt and the latest proposal to Build Some 400 houses near Burnt Common. Why is it that after so many hours of work has been put in to the major plan that this new proposal suddenly is put forward?

I have lived in the Ripley area for many years and have seen its development which have I believe generally been very sympathetic to the Green Belt. However you will know that the infrastructure is already incapable of handling further major housing developments. Anyone who tries to commute find schools, let alone park a car at our stations knows only too well of the problem.

I believe there are sufficient brown field sites in the Guildford area for several hundred houses and I do not include the Wisley proposal now "put back on in the plan" if this is true why are you not using these sites? I am against the Wisley proposal from its Cayman Islands Owner and to remove Ripley from a green belt status is quite unacceptable. Is this a political decision from no 10? if it is many of us will despair of the democratic process but will continue to fight for Ripley to remain in the Green Belt.

Finally I would like to know why Wisley has been put back into the plan, and why the committee feels it appropriate to remove Ripley's status. I would like to see the minutes of the meeting that took this decision, that probably would be too much to hope for.

I had expected better of the council I voted for and am profoundly disappointed with this latest proposal that you have slipped in.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** SQLP16/619  **Respondent:** 8792001 / Graham Moore  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

In view of the uncertainties caused by "Brexit" in relation to the state of the Economy and the effect on population growth, the long term plan should be replaced by a shorter term plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPA16/40  **Respondent:** 8792193 / Brian Wolfe  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
Ref The Proposed Submissive Local Plan

1. I would like to express my concerns about a number of the proposals in this revised Local Plan, and the evidence and assumptions on which it is based. In particular, I am concerned over the number of homes proposed over the period of the plan. The Plan calls for a 25% increase in the housing stock across the borough. This is set against the Office of National Statistics (“ONS”) projections of a population increase of only 15% for Guildford Borough over this same period.

2. Statement by all political parties and candidates in last year's election said that “We will continue to protect the Metropolitan Green Belt” this has proved clearly not to be the case. That view was fully supported by the now majority party. A similar statement is still retained in the “proposed plan”. However, GBC appears now to be totally disregarding these undertakings, with the policies it has set out in the Local Plan, whereby some 65% (see Appendix A) of proposed new developments will take place on land which is currently Green Belt. The infrastructure proposals education, transport, waste water treatment, to support this level of development are completely inadequate even to meet the needs of what is there at the moment, as a result of underinvestment in the past let alone the proposed new developments.

3. I therefore OBJECT to the Local Plan as a whole.

In order to expand upon and emphasise points a more detail analysis is provided in the following paragraphs, together with a number of other more detailed points of particular concerns.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/41  Respondent: 8792193 / Brian Wolfe  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. Strategic Highway Assessment Reports

The comments set out below relate to the above report. All heading and numbers relate to that document. The text in black is taken from Strategic Highways Assessment Report, the text in blue are my comments and or objections.

1.1.1 Guildford Borough Council (GBC) has prepared a Guildford borough Proposed Submission Local Plan: strategy and sites (June 2016), hereafter referred to as the Proposed Submission Local Plan. Given the similar timescales, a joint modelling assessment was undertaken by Surrey County Council (SCC), GBC and Waverley Borough Council. The absence of any cooperation, involvement, with other Boroughs mainly those to the East including Elmbridge and Mole Valley it is impossible to determine the true impact of traffic flows through the Borough. For example how much of the traffic entering Guildford from the east flows through the borough, or end it journey in the borough. In a similar way how much traffic entering from Waverley flow through the borough and or end it journey in the borough. This may have been
captured in respect to Waverley but is not clearly identified from the east. The impact of the Wisley development will have significant impact on SRN & LRN in other boroughs on Guildford north east borders.

1.1.3 The assessment made use of SCC’s strategic transport model, SINTRAM. It has been acknowledged by SCC that the SINTRAM model is not suited for measuring the detailed impact of developments on traffic on SRN or LRN in a localised area. It even has some limitations when used on a county wide basis. It is not fit for purpose in the local planning scenarios; This has been pointed out by a number of transport consultants including one who prepared a recent report for Waverley.

1.1.4 This document sets out details of the transport model, the forecasting methodology, as well as the results and analysis of the traffic impacts of the potential development sites and future highway mitigation proposals.

If you are to achieve the objective set out in 1.1.4 how can you make the statement below?

1.1.5 This study does not consider aspects such as:

• Accessibility to facilities and services by either car or non-car modes from the potential development sites;
• The impact on existing public transport services such as passenger overcrowding and possible delays to services as a result of increased traffic congestion;
• What opportunities there might be for reducing the number of car trips to and from any potential new developments by enhancing sustainable transport facilities and services; and Perhaps this one is best discounted as perceived mode changes expectations are now being discredited by a number of recent studies.
• What additional highway mitigation might be required to address the identified impacts?

1.1.6 Accessibility issues and impacts on public transport services might have to be considered in separate study work. The consideration of increasing sustainable travel and identifying additional highway mitigation could be done at a later stage, potentially to support submission to the Secretary of State or Examination in Public. This report will act as useful starting point for undertaking such additional study work.

Without the above work in 1.1.5 and 1.1.6 the Guildford Borough Proposed Submission Local Plan in is not fit for purpose as there is no evidence to suggest it is deliverable. And it is questionable that it even identifies what is needed. The evidence to support its deliverability has to be part of the public consultation now, not in the future.

2.1.4 This makes SINTRAM a suitable tool for Guildford Borough Proposed Submission Local Plan assessing the potential traffic impacts of the potential developments and future highway mitigation proposals at this initial review stage. It is the assessing of the potential traffic impacts of potential developments that in the local context SINTRAM is unable to do. It is at best a ball park assessment tool.

3.2.3 Proposed improvements

• A3 southbound off slip and northbound on slip at Burnt common accompanied by traffic management through Ripley.

The junction at which the most disruptive impact will be felt as a result of the Wisley site is in Ripley and this is "dismissed with a traffic management solution". The developers of Wisley and their various consultants together with SCC have not been able to come up with a satisfactory solution in over 3 years of discussion!! Could it be that there is no viable solution!!

Old Lane converted to one-way northbound between the Wisley access and Common car park; This proposal has been objected to by local residents and would require separate consultation. The conversion of old lane to one way will place an increased load on Painshill roundabout which already causes tailbacks onto the A3. More traffic going into Cobham and increased in traffic on Horsley Road which is classified the same as Old Lane. If this proposal were to go ahead it would simple move an even greater problem somewhere else. This will not benefit local residents in any way.

• A3 Ockham Interchange improvements;
The details produced for these improvements were not approved by HE or SCC. as there were road safety issues.

Figure 3.1a: Outline of scenarios

The defined development has changed from those defined for scenario 2 in 3.2.1 with no satisfactory explanation as to why.

3.2.8 The potential future development sites that have been identified by GBC have been captured in 2031 scenario 2 onwards.

Not consistent with fig 3.1a. which definition is correct?

3.4.1 Vehicle trips generated by each committed and potential development site were calculated using the information contained within the pro-forma and the Trip Rate Information Computer System (TRICS) version 2012(b) 6.10.2. But no information is provided on the comparable locations in TRICS. This is critical particularly when dealing with new town isolated developments that are not regarded as urban extensions. The ones chosen by the developer for Wisley were totally inappropriate and not accepted by SCC. who requested a 20 % uplift was required.

3.4.8 A cumulative summary of the trip generation for the scenarios and time periods for the whole of Guildford borough has also been provided in Table 3.5.

<table>
<thead>
<tr>
<th>Taken from Table 3.1 to 3.4</th>
<th>Vehicle Arrival Trips</th>
<th>Vehicle Departure Trips</th>
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<td>LGV</td>
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<td>Effingham-Horsley</td>
<td>AM</td>
</tr>
<tr>
<td></td>
<td>Scenario 1</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Effingham-Horsley</td>
<td>AM</td>
</tr>
<tr>
<td></td>
<td>Scenario 2</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Effingham-Horsley</td>
<td>PM</td>
</tr>
<tr>
<td></td>
<td>Scenario 1</td>
<td></td>
</tr>
<tr>
<td></td>
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<td></td>
<td>Scenario 2</td>
<td></td>
</tr>
</tbody>
</table>

Data from Table 3.1 to 3.4

<table>
<thead>
<tr>
<th>Vehicle Arrival Trips</th>
<th>Vehicle Departure Trips</th>
</tr>
</thead>
<tbody>
<tr>
<td>Total</td>
<td></td>
</tr>
<tr>
<td>Effingham-Horsley</td>
<td></td>
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<tr>
<td>Scenario 1</td>
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<td>Scenario 1</td>
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<tr>
<td>Effingham-Horsley</td>
<td></td>
</tr>
<tr>
<td>Scenario 2</td>
<td></td>
</tr>
</tbody>
</table>

Page 2726 of 3335
It is noted that the zone definitions have changed from those set out in table 3.5 zone 119 North Horsley & Effingham

2.5.2 The borough of Guildford is split into 68 zones

119: East Horsley & Effingham borough of Guildford zones

502: Horsley – West Horsley –

There is no such location as North Horsley. Development is planned to take place in both East & West Horsley.

It is also interesting to note that more traffic is generated in zone 119 in scenario 1 than when development takes place in scenario 2 see table above. How can this be the case?

The high level of arrivals in West Horsley am in scenario 1 could be accounted for by school runs but again why do they reduce by nearly 100% when the developments are built?

The two railway station at Effingham and East Horsley will serve the Wisley development yet the scenario 2 AM traffic arrivals in zone 119 and 502 both show lower level of traffic than scenario 1 with no development. How can this be the case?

Table 3.3: 2031 scenario 2, weekday average AM peak hour (1600 – 1900) correction 0700- 1000 or are they in fact the PM figures they might make more sense if they were.

3.6.1 The origin and destinations of trips travelling to and from the development sites, known as trip distribution, were derived from the 2011 Census journey to work dataset. However, GBC instructed SCC to apply a different distribution for the proposed development at Wisley Airfield, specifically the distribution developed for the site specific transport assessment as documented in ‘Wisley Airfield Transport Assessment’ (WSP, December 2014).
How can GBC justify instructing SCC to apply a different basis for determining trip origin and trip destinations? How can they justify using a third party assessment with a vested interest in the outcome. SCC had questioned the outcome and methodology of the original TA submitted by WSP

3.6.4 Table 3.6 details the modelled zones that formed the six distributions.

Separate average distributions were developed for each of these areas using the journey to work dataset.

It is unclear why Zone 119 was not included in the journey to work dataset used in the analysis East Horsley with two railway stations and little if any internalisation (little of no local employment) was not used as it would have shown unique profile compared to other locations, This is a serious omission.

4.1.5 The strategic highway assessment therefore accounts for the transport demand from all planned development proposed in the Proposed Submission Local Plan in the period to 2033, including the new homes, employment space, retail space and schools. It also accounts for all planned development proposed in Waverley Borough Council’s forthcoming draft Local Plan in the period to 2032, and all transport demand in the rest of the United Kingdom to 2031.

This is not true as the trip generation used for the Wisley development is not correct nor has it been agreed with SCC it does not included the school and have used unsupported internalisation data.

4.1.7 firstly, in Scenario 3, those key highway schemes providing access to the large development sites and local highway schemes in both Guildford and Waverley boroughs, are tested;

This is not correct as it does not include the works associated with the Wisley development and Wisley should be regarded as a large development.

4.1.8...... The strategic highway assessment also makes no allowance for any internalisation of trips within the larger sites. The figures used for trip generation on the Wisley site TA did take account of an internalisation adjustments of 20%. So how it is the trip figure you using that does not include internalisation are currently is lower than that in the TA. Also on the Wisley site no account was taken for trip generation to the secondary school from the catchment area off site

4.1.11 More detailed modelled forecast traffic impacts for the average PM peak hour can be set out in an addendum report at a later date. This is not acceptable with your current knowledge of the sensitivities surrounding existing traffic flow close to the Wisley site The detailed analysis is required now. It is acknowledged that the SINTRAM modelling is a broad brush tool that requires more in-depth work before the full impact locally of development can be assessed. If the Local Plan is approved in its current format planning permission would be presumed as approved with little incentive to agree or consult over detail. Developer's lawyers will be doing cartwheel and back flaps in anticipation.

Figure 4.1: Initial assessment: assigning Local Plan related average AM peak hour trips to an uncongested network to show preferred routes of travel.

4.1.3 However, it should be noted that this assessment assumes all drivers will follow the least cost route as perceived in uncongested conditions. Furthermore it assumes that there is no highway mitigation in place. Why have no alternative scenarios been modelled e.g. drivers following the quickest route, or least congested.

4.2.1 Tables 4.1a and 4.1b show the network summary statistics for highways in the study area of Guildford borough only, for the weekday average AM and PM peak hours, broken down by road type for each model scenario. The potential traffic impacts are reflected in changes in vehicle kilometres travelled vehicle hours and average speed.

The conclusions reached cannot be validated or relied upon as the above tables 4.1a and 4.1b contains over 100 arithmetical and computing errors this is clearly the result of cutting and pasting spreadsheet results from numerous runs of data resulting in a mismatch of inconclusive and unreliable data.

I would like to add to these comments following a more in-depth analysis of the numerical data.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
5.5.POLICY A35: Land at former Wisley Airfield

5.5.1. Proposes approximately 2,000 homes to be built on the site of the former Wisley Airfield. This will lead to the creation of the largest settlement in Guildford Borough outside of Guildford town. In effect it is proposing to create a New Town in the heart of the Surrey Green Belt.

5.5.2. I have major concerns about this proposed development and have objected against both recent planning applications. I consider this proposed development to be a severe contravention of Metropolitan Green Belt policy. It will result in a New Town being created of very low sustainability. It will have a major adverse impact on infrastructure across a widespread area, including East Horsley. Above all it will create a devastating impact on traffic on both LRN & SRN in the area and irreversible destruction to the character of one of the most picturesque and historic areas of the country. Development at the proposed density and building mass that will create an urban enclave in the countryside visible from mile. Yet for those who have to live there no private open space, gardens or allotments miles from any social entertainment, miles from any employment. Everybody jumping into car to overcome the isolation how does that fit with the NPPF. There is no evidence that travel mode changes will prevent that happening.

5.5.3. I would like to record my objection to the inclusion of Wisley site within the local plan as a potential housing site the planning application 15/P/00012 | AMENDED DESCRIPTION: was rightly turned down because it was in the green belt and that the developer had failed to satisfy the HE and Surrey County Councils over this development likely impact on the road network. Nothing in the Local Plan has changed that position.

5.5.4. A Local Authority cannot rely on future investment commitment by third parties to deliver the infrastructure requirements that are required to support their Plan. Without that certainty A Local Authority under the latest updates in the Housing and Planning Bill could leave themselves with an obligation to provide the required infrastructure simply because the site was included in the local plan with presumed approval. This was previously the case when planning permission was granted a developer could for example requisition a sewer and a Water Authority was obliged to provide said sewer at their cost.

5.5.5. The same could apply where a site if included in a LP (with its presumed approved status) the LA would need to have the supporting infrastructure either in place or fully designed and costed proposals in place to support any development. Clearly this is not the case with GBC local Plan there is no proof, evidence that for example the transport infrastructure proposed will let alone work, can be delivered, or have been fully costed. In the plan are costing for some projects range from £100m to £250m hardly a well thought out budget planning advanced for a programme of work. 58 Projects out with only 4 committed!! How can a local plan go forward with so much uncertainty? Developments, more importantly people will be dependent on all packages being delivered. It like saying to somebody, you have the car now but the wheels will come next year. You acknowledge what underinvestment in infrastructure has done in the past. You plan will provide the same result as in the past, caused by the very same reasons, pushing forward with growth and homes
without the infrastructure being there to support it. Get the infrastructure in place first the rest will follow the funding can still be obtained from the developers at least by that time you will know the full cost.

5.5.6. The comments made by Natural England and there apparent approval of Air Quality issues on this site are being legally challenged.

5.5.7. The proposed one way restriction on Old Lane south of the A3 as proposed in the TA from the developer and seemingly repeated in the local plan evidence base is apparently acceptable to the Highways Agency. This restriction will however not occur adjacent to the A3 but some distance from the slip road. The impact of this closure to southbound traffic will impact on minor roads in the area not controlled by HE but by SCC and no closure notice is approved nor have SCC approved such a restriction.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/100  Respondent: 8792193 / Brian Wolfe  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A36

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions I-7 of the questionnaire): ()

5 Site Allocation Policies

5.1. There are 5 East Horsley sites identified in the LAA, two of which are allocated under Local Plan policies, whilst the adjacent parish of West Horsley has 6 sites identified in the LAA, four of which are allocated in the Local Plan. I would comments on these site policies are as follows:

5.2. Policy A36 Hotel, Guildford Road proposes to re-develop the current Thatcher’s Hotel for housing. Whilst I do not object to housing development on this landmark site located at the entrance of the village, it is absolutely essential that it is developed in a manner that is in keeping with its prominent location. The site is close to the East Horsley Conservation Area and housing designs and site configuration must reflect the sensitivity of this setting. There is some concern over the loss of employment of which there is very little in the village and the also the loss of the hotel as a base for tourists. My principal concern is over the number of houses proposed for this site - approximately 48 dwellings. (Original SHLA said 32)At 48 units it gives an implied gross housing density of 37 dwellings per hectare, which is exceptionally high for this site. The average housing density across the East Horsley Settlement Area is 8.1 dwellings per hectare and the highest density found in any of the roads around this location is 13 dwellings per hectare and that included some semi-detached homes. Less than 30 units would be more appropriate for this location

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/102  Respondent: 8792193 / Brian Wolfe  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A37
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

### 5.4.Policies A37, A38, A40 & A41 in West Horsley

5.4.1. The LAA has identified 6 sites in West Horsley for potential development, the four largest having allocation policies within the Local Plan. The total housing number arising from these 6 sites is 405 homes in total. For a village which had 1,124 dwellings at the 2011 Census, this represents a significant increase of 36% over the plan period, an enormous proportional increase by any standards.

5.4.2. The four policy sites are all located within the Green Belt. One is a partly Brownfield development but the other three sites are all open fields used for agriculture and all lie within the current Green Belt at the edge of the Settlement Area. The reasons presented by the consultants, Pegasus, in the Green Belt & Countryside Study to justify these Settlement Boundary movements appear highly questionable and in no way meet the requirements of the NPPF that such boundary movements are only to be made in exceptional circumstances. These movements clearly represent a deliberate pushing back of Settlement Boundaries in order to provide more Greenfield sites for housing development.

5.4.3. The only point in favour relates two of the sites one being partly brown field and back infill of earlier ribbon development and the other are small paddocks used for grazing horses. It is stretching the rules nevertheless to justify removing them from the Green belt. The infilling proposed will create a hard edge interface with the countryside for which there could be little justification or mitigation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Respondent: 8792193 / Brian Wolfe</th>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

### 5.3.Policy A39: Land behind Ockham Road North, near Horsley railway station.

Proposes a housing development of some 100 dwellings on a 5.7 hectare site that is well hidden behind the houses on the western side of Ockham Road North. Access is to be secured by demolishing the first two houses next to the railway bridge. This site will provide a good location for housing including affordable homes as it is centrally located in the village close to shops and railway station. The site is partly in flood zone 3 and would restrict numbers of units built. Because of its central location it could provide some employment opportunities in the form of offices and as an extension to the station car park.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

| Comment ID: PSLPP16/104 | Respondent: 8792193 / Brian Wolfe | Agent: |
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. Housing

Policy H2 Affordable Homes

2.1. Whilst I support the principle that developers and landowners should be required to contribute part of their profit or windfall towards the cost of social housing in the borough. However, there is a ‘one-size-fits-all’ policy that is seriously flawed and likely to prove highly inefficient, if not unworkable, in the longer term. As mentioned above the DCLG advice to those assessing need was to not just consider need in the old way ("it is not an old style needs survey") formed part of the advice given. It asked for the survey to take in viability, deliverability of both market and affordable homes. GBC commissioned a study on affordable housing needs and viability the study undertaken by consultants who had access to a stakeholder's panel of mainly those with a vested interest in some of the outcomes. It is hardly surprising it did not come up with the best results as there would have been too much influence from the development lobby lead to the following mix for affordable housing and a level of 40% on all developments. This does not mean that affordable homes have to be built on every site but that a contribution towards affordable homes has to be provided on every site. They can be built elsewhere a route taken my many local authorities who see it as an opportunity to build homes where they are most needed.

2.2. The Local Plan also indicates that 40% of all new affordable homes should be 1 bedroom. Now if the same question is put to those seeking affordable homes only 26% are looking for 1 bed. The information taken from Home Choice indicates what the customer wants. Between 46% & 50% say they want 2 bed accommodation. The information contained in the local plan is what the developer wants to deliver

<table>
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<tr>
<th>No of bedrooms</th>
<th>Local Plan</th>
<th>Home Choice data mix</th>
<th>most recent bidding information</th>
<th>Home Choice data mix taken as the historic level of bidding</th>
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<td>2 bedroom</td>
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<td>16</td>
</tr>
<tr>
<td>4+ bedroom</td>
<td>5</td>
<td>8</td>
<td></td>
<td>8</td>
</tr>
</tbody>
</table>
2.3. Whilst the consultants who undertook the SHMA and the Viability Study were given access to GBC waiting list it is not known by senior housing management staff if this information was taken into account in the conclusion reached. It has subsequently been confirmed by GBC own Housing Management that **2bed accommodation is the one most needed**. So why does the plan say more 1 bed are required **are GBC happy to allow the developer to determine the mix?**

2.4. Also in this policy GBC have taken no account whatsoever of the differences in affordable housing need across the borough. It is to be applied at 40% in all locations, ok to get the money for 40% but why build them where they are not required. This policy and it inflexibility has significant consequences in East Horsley, whilst scoring high in the sustainability hierarchy is the area with the lowest demand for affordable housing in the borough. I support the building of a few affordable homes in East Horsley and other rural areas, however, East Horsley is not protected as a ‘rural area’ under the 1997 Housing Order and therefore is not exempt from the right to acquire or enfranchise entitlement. In other words tenants can acquire,( buy) or enfranchise any affordable properties built in the village– a factor which may limit the number of housing associations wishing to take on new affordable properties in our village. Housing Association whose tenants do exercise the right to buy their housing association property this will be funded by GBC having to selling off some of its own more expensive properties. This sounds like a loose - loose rather than a win - win situation if cash payment in lieu are maximised and land is bought and homes were built in areas where they are most needed. A large number of GBC own properties in East Horsley have already been bought by tenants.

2.5. Under Policy H2, 40% of all but the smallest development sites less than 10 units in East Horsley will be required to have affordable housing built upon them, irrespective of whether they are in an appropriate location and irrespective of whether there is actually a demand for more social housing in that area. As a result of this policy, a significant volume of social housing is likely to be built in places where it is not needed and offered to tenants who do not want to live there nor have jobs near that location. Research undertaken at Oxford University has indicated that people who are housed in remote rural communities migrate back to urban areas for recreation and work. This involves the increased reliance on a motor vehicle and increase traffic results something the NPPF rejects as unacceptable.

2.6. Policy H2 thereby fails the test of sustainability and should be radically revised. If not, the outcome will be serious ineffective in the provision of social housing in the borough. In an area such as East Horsley this is likely to be manifested in a buying-up of properties for investment purposes, quick re-sale or to re let at market rent all of which point to these homes become lost to the affordable market sector.

2.7. There is a problem in East Horsley with average house prices exceeding £1m a shortage of smaller homes and I would support any policy that would prevent any new development containing 5 bed homes with developers encouraged to build more 2&3 bed market homes for young families and downsizers, the latter currently house blocking many 4, 5, 6 bed homes which they no longer need.

2.8. I therefore **OBJECT to policy H2.**

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

---

**Comment ID:** PSLPP16/108  **Respondent:** 8792193 / Brian Wolfe  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()
1. **Infrastructure and delivery**

4.1. The Infrastructure and delivery section of the Local Plan sets out that the fundamental rationale of what is proposed to support the delivery of the Local Plan and in particular it is about the provision of the infrastructure needed to support the development. There are however serious deficiencies in the infrastructure as it is. The infrastructure does not adequately support what is already here.

4.2. In East Horsley:

4.2.1. The roads are in poor condition with many potholes, and are generally unable to sustain the current levels of traffic, particularly the increasing levels of HGV traffic;

4.2.2. The principal through roads traversing the village are narrow and winding, have a series of pinch points, have sections without any pavements and are generally unlit. As a senior SCC councillor remarked at a recent public meeting in the village hall: “East Horsley has lanes, not roads.” East Horsley’s ‘lanes’ are totally unsuitable for high volumes of traffic, in particular for the volume of HGV’s now using them;

4.2.3. Many of the drains are blocked or otherwise in poor condition giving rise to frequent surface water or flooding when it rains;

4.2.4. The pavements are in poor condition. As well as being narrow, they are often uneven and/or cracked making it difficult for example for people with pushchairs or prams or in wheelchairs; Because of poor road drainage road edges become flooded or turn into min streams and pedestrian are regularly covered in water as traffic passes by.

4.2.5. There are insufficient school spaces for the number of local children needing to go to both Primary and Secondary schools with the result that children are often allocated to schools some significant distance away such as Dorking; Merrow; or Leatherhead

4.2.6. The Medical Centre in East Horsley is already at capacity in terms of its number of patients.

4.3. It is recognised that, as stated in the Local Plan, that maintenance of adequate infrastructure and its expansion to meet growing needs is the responsibility of the relevant infrastructure provider. This is often not Guildford Borough Council itself but is for example Surrey County Council or utility companies.

4.4. In respect of East Horsley, there are only two specific proposals in Appendix C: LRN 25 - East Horsley and West Horsley traffic management and environmental improvement scheme. It is not clear what is proposed here, and its timing and funding have to be considered uncertain. It is stated that funding will, at least in part, come from developer contribution. However, it is not at all clear what development is likely to give rise to such a contribution, but it certainly implies that funding could only come if there were a development; and

4.5. HSC 5 - Expansion of East Horsley Medical Centre to provide additional capacity and services for future population in years 5 – 15 of the plan.

4.6. There are no proposals in respect of all the existing problems with for example roads, pavements, drainage, and schools. Furthermore, it is inevitable that the proposed developments in East Horsley itself and nearby, particularly in West Horsley and the proposals for Wisley, will put further strain on the existing infrastructure. There are no proposals at all to cater for this.

4.7. The issue of local primary schooling illustrates the issue very clearly. The 11 sites identified in the LAA for East and West Horsley taken together would result in the building of 593 new houses in the two parishes, which are today served by a single primary school, i.e. The Raleigh, in West Horsley. Planning guides suggest that this number will require the provision of around 150 new primary school places to accommodate such a population increase. Yet today there is no capacity at The Raleigh at all and no proposals are made in the Local Plan to provide for any more schooling in the Horsley’s. It was suggested in a local planning application that primary school children will be expected to travel to Merrow for schooling yet even more traffic on the roads

More comment is made on the transport implication of the Local plan under a separate heading.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/105  Respondent: 8792193 / Brian Wolfe  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. Protecting POLICY P2: Green Belt

3.1. Local Plan Policy P2 states that “We will continue to protect the Metropolitan Green Belt”. I fully and support this policy which I believe was in the manifesto of all the candidates in last year’s local election. It is also the policy of the current government. Unfortunately GBC appears to think it should not apply to them. Through their housing policies as set out in the Local Plan, they plan some 65% of new developments to be on land which is currently

3.2. Green Belt – the table at Appendix A sets out these figure.

Planned Delivery between 2018 and 2033 Appendix A

<table>
<thead>
<tr>
<th>Settlement</th>
<th>Homes (net increase)</th>
<th>Currently Greenbelt?</th>
</tr>
</thead>
<tbody>
<tr>
<td>Guildford Town Centre</td>
<td>1,172</td>
<td></td>
</tr>
<tr>
<td>Guildford urban area (excluding Town Centre, including SARP)</td>
<td>1,570</td>
<td></td>
</tr>
<tr>
<td>Ash and Tongham</td>
<td>91</td>
<td></td>
</tr>
<tr>
<td>Inset villages and infill development within identified Green Belt villages</td>
<td>431</td>
<td>Y</td>
</tr>
<tr>
<td>Rural exception housing</td>
<td>90</td>
<td>Y</td>
</tr>
<tr>
<td>Description</td>
<td>Acres</td>
<td>Y/N</td>
</tr>
<tr>
<td>-----------------------------------------------------------------------------</td>
<td>-------</td>
<td>-----</td>
</tr>
<tr>
<td>Previously developed land in the Green Belt</td>
<td>299</td>
<td>Y</td>
</tr>
<tr>
<td>Ash and Tongham strategic location of growth</td>
<td>1,241</td>
<td></td>
</tr>
<tr>
<td>Urban extensions to Guildford including Gosden Hill Farm, and Blackwell Farm (Policies A25 and A26)</td>
<td>3,940</td>
<td>Y</td>
</tr>
<tr>
<td>Former Wisley airfield (Policy A35)</td>
<td>2,100</td>
<td>Y</td>
</tr>
<tr>
<td>Normandy and Flexford village expansion (Policy A46)</td>
<td>1,100</td>
<td>Y</td>
</tr>
<tr>
<td>Village extensions (including Ash Green southern site)</td>
<td>993</td>
<td></td>
</tr>
<tr>
<td>Ash Green southern site (Site A27)</td>
<td>58</td>
<td></td>
</tr>
<tr>
<td>Village extensions (excluding Ash Green southern site)</td>
<td>935</td>
<td>Y</td>
</tr>
<tr>
<td>Windfall</td>
<td>625</td>
<td></td>
</tr>
<tr>
<td>Totals:</td>
<td>13,652</td>
<td>8,895</td>
</tr>
<tr>
<td>Proportions:</td>
<td>100%</td>
<td>65%</td>
</tr>
</tbody>
</table>

3.3. There are a number of other issues in the detailed implementation of this policy to which I also object, as set out below:

3.3.1. Paragraph 4.3.13: Proposal to inset East Horsley from the Green Belt Policy P2

3.3.2. East Horsley is in a rural location and the village has the look and feel of a rural village. Its Green Belt status has been a key factor in preserving that character. Being washed over by the Green Belt has been a constraint on the urbanisation of the village, it has prevented excessive infilling unlike Cobham where 3 or 4 new homes in gated communities have replaced 1 larger property.

3.3.3. GBC argues the need to inset East Horsley is based on a NPPF requirements, arguing that the test for insetting is that the village should make an important contribution to the openness of the Green Belt. This is not judged by viewing the village from Google Earth or on local maps. It is more than that, no less than 37% of East Horsley is composed of woodlands. When driving through the village the size of village is not evident, the scale of the development is not evident. When you pass by houses you can see between them when you do you do not see more houses but trees and openness.
Within the settlement area there is an average housing density of just 8.1 dwellings per hectare (‘dph’). Woodlands and larger than average residential gardens make a vital contribution towards bio-diversity, provide wildlife corridors, and provide those open spaces that are vital to the character of the greenbelt. East Horsley was regarded by the majority of residents as a small village in a recent survey that is how it is seen it has openness it has few if any hard edges and its irregular boundary helps to soften its profile with the countryside. Being washed over by the Green Belt has preserved the rural character and openness of this village.

3.3.4. Today East Horsley is a picturesque and flourishing rural community, which has and continues to experience a steady incremental growth with new properties being built on mainly Brownfield sites. I would encourage this to continue but with some restriction on the size of new homes with a focus on 2,3& 4 bed on any new of over 5 units. This can all be achieved with East Horsley still being washed over by the Greenbelt. There are no reasons to make any change as I can see no benefit from EH being inset within the green belt.

3.3.5. GBC are proposing to make a number of changes to the Settlement Boundaries of East Horsley and so expand the Settlement Area, as set out in the Proposals Map, with the justifications provided in the Green Belt & Countryside Study prepared by the consultants, Pegasus.

3.4. I comment on the proposed boundary changes, as follows:

3.4.1. There is a proposal to move the East Horsley Settlement Boundary westwards from behind the houses on the west side of Ockham Road North up to the eastern boundary of Lollesworth Wood. This proposal removes over 5 hectares of an isolated agricultural fields from the Green Belt. The present boundary line is defined by a deep and well-maintained drainage ditch which is classified by the Environment Agency as a ‘main river line’ and needs to be well maintained as it is in a flood zone 3. It ongoing ease of maintenance could be compromised if it were to become individual gardens. I am not opposed to moving this boundary west to the edge of woodland but am unsure of the ‘exceptional circumstances’ that justify the move.

3.4.2. There is also a proposal to move the East Horsley Settlement Boundary westwards from behind the houses on the west side of Kingston Avenue up to a tree line running along the Parish Boundary at the western edge of Kingston Meadows. The result is to take all of Kingston Meadows out of the Green Belt. Kingston Meadows is the main public recreational space of East Horsley, comprising various sports facilities and playing fields. The present Settlement Boundary is clearly defined by a deep and well-maintained drainage ditch running along its eastern side. It therefore represents a very defensible Green Belt boundary. Moving this boundary westwards to the edge of woodland in no way improves its defensibility. Under NPPF rules Green Belt boundaries should only be changed in ‘exceptional circumstances’. I cannot believe there are an exceptional circumstance that justify any change I it current defensible position it protect the openness of the greenbelt, the village, by presenting an irregular profile to the western edge of the village there is significant green indents to the western boundary and by having an irregular rather than a straight line softens the edge.

3.4.3. The same argument applies to the field north of Framgate Manor Farm a site included in the LAA which serves the same purpose of a fragmented profile to the western boundary which will be lost if developed with housing that will harden the edge to the village which will no longer meld with countryside.

3.4.4. As such I OBJECT to this proposed boundary change at Framgate Manor Farm and Kingston Meadows.

3.4.5. Proposal to remove Wisley Airfield from the Green Belt and to build 2000 Homes I OBJECTS to the proposal to remove Wisley Airfield from the Green Belt. The only justification for this proposed change is unfulfilled housing need which is not considered an exceptional circumstance. The proposed Wisley development is discussed further below.

3.5. d) POLICY P2: Limited In-filling

3.5.1. A new planning designation has been introduced called ‘the identified boundary of the village’. For East Horsley this covers a number of roads south of the A246. It is a sizeable area, covering 45 hectares, the equivalent of 23% of the present Settlement Area of the village. I find it difficult to understand why this is required it would appear that on the one hand East Horsley will be inset in the Green Belt and the area to the south of the A246 will be given similar protection currently enjoyed by the rest of East Horsley. This is sizeable area that if included within the settlement boundary leaving the whole
of the village washed over by the Green Belt. In my opinion there is no justification to inset East Horsley in the Greenbelt being washed over does not prevent limited infilling. Including the area to the south of the A246 within the settlement boundary could be justified providing the whole of East Horsley still remains washed over by the Greenbelt...

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/103  Respondent: 8792193 / Brian Wolfe  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1.0 Strategic

1.1. Policy S2: Borough Wide Strategy

1.2. Policy S2 sets out the objective of adding 13,860 new homes to Guildford Borough over the 2013-2033 period of the Local Plan, equating to an annual build of 693 new homes per annum.

1.3. I have concerns about the enormous scale of this building program, represents, as already mentions above a net 25% increase in the housing stock of Guildford Borough, a remarkable rate of increase even for a borough in the English Home Counties. This is against a background projection of the Office of National Statistics (“ONS”) of a population growth of only 15% for Guildford Borough over this same period.

1.4. Some explanation for this mismatch may partly be found in the conclusion of the West Surrey Strategic Housing Market Assessment, (“SHMA”), which looks at how the annual housing target of 693 homes is comprised. It estimates that 517 homes per annum arise from ‘the demographic starting point’ – effectively what the official statisticians at the ONS and the Department of Communities and Local Government (“DLCG”) are predicting Guildford actually requires. To this is added in the SHMA another 120 homes per annum in order to ‘support economic growth’, a further 31 homes per annum to ‘improve affordability’ and 25 homes due to ‘student growth’, all of which totals up to 693 homes per annum target.

1.5. Economic growth is already factored into the statistics produced by ONS and DLCG, so what GBC are proposing actually comes on top of the official household growth forecasts for the borough.

1.6. Furthermore, DLCG research has concluded that there is on average a 97% correlation between population growth and household formation. Therefore, if GBC’s target of a 25% increase in housing stock were actually realised, effectively it would mean that Guildford Borough would see its population rise by around 25% over this period. This would mean that the actual population growth rate for Guildford Borough would actually come out at a level that is 67% above official forecasts.

1.7. Another concerns in reviewing the Local Plan is that the impression is conveyed to the reader that GBC’s housing targets are effectively needed to fulfil NPPF requirements, or because of central government policy – in other words that GBC has no real choice but to put forward these expansionists projections, unpalatable though they might be because they are being forced to do so. However, the reality is very different. GBC has voluntarily chosen to pursue a policy of massive civic and economic expansion – one might perhaps term it a policy of ‘Imposed Growth’ – in order to underpin all of the
housing policies in the Local Plan. In short, the difference between the official statisticians’ forecasts and GBC’s target of a 25% increase in housing stock is entirely down to a choice made by GBC for which it has no mandate.

1.8. The SHMA set out to establish the objectively assessed need and guidance from DCLG was that it was not just another 'needs survey' but it was to look at market and affordable need. I will come back to this point in relation to affordable housing in a separate item. The other key point set out by DCLG was that in undertaking the assessment they were to ignore any constraints like Greenbelt, AONB, land availability and land cost etc. The idea was to get the best information on need LA were then expected to take into account matters of constraint in determining the number to go forward with in their Local Plans

1.9. There is no indication in the "Proposed Submission Local Plan" that they have taken any note of the constraints of the Greenbelt, land availability in fact they have added to the numbers in total disregard to their undertaking to protect at all cost the Greenbelt. The Expansionist Growth policy of the GBC and it proposals in this policy documents were not made clearly and explicitly to majority at the election.

1.10. I therefore OBJECT to the Expansionist Growth Policy and to the borough housing targets set out in Policy S2.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/5235  Respondent: 8792193 / Brian Wolfe  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A36

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy Site 36 Land Former Thatchers Hotel East Horsley site no longer in Local Plan

I support the removal of this site for housing development.

- It could if re developed with housing [as pointed by the inspector] result in the over development of a key edge of village site.
- There is a case for retaining the current use as a Hotel.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/3290  Respondent: 8792193 / Brian Wolfe  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy H2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Policy H2: Affordable homes

- The policy states that GBC will seek affordable on sites providing five or more homes or on sites of 0.17 ha or more, regardless of the number of homes. GBC will seek at least 40 per cent of the homes as affordable homes.
- **I object to the above policy**

**Justification**

- The government following a high court ruling in their favour have changed the threshold from 5 or more to more than 10 homes before the 40 % provision of affordable is required.
- GBC insistence of using the 5 or more figure are reducing the viability of small developments and therefore preventing or delaying the development of housing on small site.
- Many sites contained in the SLAA in Guildford urban areas did not make it through LAA or to the plan because they were regarded as unviable because of the 5 unit rule. Many of the sites were assessed as only suitable for houses, when flats would have been more appropriate. This was a deliberate attempt to reduce the number of viable site in Guildford urban areas for inclusion within the plan.
- Affordable housing at the level suggested built in East Horsley would soon be lost to the market by right to buy or enfranchise. It would be more appropriate to seek payment in lieu.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** pslp171/3293  **Respondent:** 8792193 / Brian Wolfe **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy H3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

POLICY H3: Rural exception homes

- The policy states small affordable housing developments, including pitches for travellers, will be permitted to meet identified local affordable housing needs provided that:
  - (a) the site adjoins or is closely related to, and in safe and easy reasonable walking distance of a defined or a non-defined rural settlement, and
  - (b) the number, size and tenure of homes would be appropriate to meet, or to contribute to meeting, the identified local affordable housing needs of the local community, and
  - (c) The affordable homes are all secured as affordable homes in perpetuity

**GBC justification statement**

- States that there are fewer opportunities to build new homes in our small rural settlements surrounded by, or designated as Green Belt than there are in and around the towns of Guildford, and Ash and Tongham due to more restrictive policies on housing in countryside and particularly in the Green Belt. Reflecting this reduced opportunity, legislation enables us to secure affordable housing in perpetuity in and around most of the villages in the borough. In the villages and parishes listed in the legislation we can secure rural exception housing in perpetuity, secured by planning obligation. In the parishes of East Horsley and Send, rural exception housing may be delivered providing the protection is in place to secure these permanently as affordable housing
I object to the wording of the Policy H3 and the wording of GBC justification statement 4.2.47 as they are not only confusing but are factually incorrect.

Justification

- In GBC justification it makes reference to legislation that enables GBC to secure housing in perpetuity as affordable. The legislation referred to I suspect is the statutory instrument The Order Housing (Right to Enfranchise) (Designated Protected Areas) (England) Order 2009 No 2098. Under schedule 11 part 7 is a list of villages in Surrey where the whole village is protected from the right to enfranchise. Under schedule 12 part 7 it shows those village in Surrey that are only partly protected and the areas protected are identified on a map. The protection status are also used to identify village where the right to buy is also not permitted.
- As correctly stated East Horsley is not protected from the right to buy or right to enfranchise. However GBC have failed to notice that a major part of West Horsley (north) is also not protected and is listed under schedule 12 part 7. This legislation does not relate to rural exception housing.
- There appears some lack of clarity and/or understanding over “protected areas” and “rural exception housing” they are not the same and both cover different issues. For example any social housing built in protected areas (villages) is protected from the right to buy or enfranchise and can be retained in perpetuity as such, it is not “Rural exception housing.”
- “Rural exception housing” is a definition given to a special form of affordable housing that can be provided in small rural communities and on land that would not normally be considered for housing it is often outside a village settlement on the green belt. Housing built can be protected in perpetuity and not lost to the market. They are also designed specifically for local people or somebody who works in the village.
- This means however that all social housing built in East Horsley and West Horsley (north) would be subject to such the right to buy or enfranchise. It cannot be protected in perpetuity by and planning directive. If however, housing were to be built outside the village settlement boundary and as “rural exception housing” it would then be possible for it to be protected in perpetuity by a planning directive.
- The concern here in East Horsley is that any new affordable housing could rapidly be lost to the market. With East Horsley being the least popular area in the borough for tenants of social housing and has the lowest level of applicants. An in lieu contribution from a developer would be better payback in the long term.
- The wording in GBC Policy is not correct and needs to be thought through more carefully. This also has a link to their Policy P2 which is bent on expanding the village settlement.
- The final sentence in 4.2.47 is also wrong. Rural exception housing cannot be delivered in East Horsley it can only be provided if the site is outside the parish boundary. Then and only then would it be protected in perpetuity.
- Two current affordable housing sites in East Horsley at Chown Court and Frenchlands Gate are rural exception development. They are both outside the settlement boundary. I am not sure of their status if the settlement boundary is moved.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
1. Policy P2 Transfer

I object to:-The Green Belt policy P2 in the Local Plan states that “The Metropolitan Green Belt will continue to be protected”.

Justification for objection

- Under Paragraph 4.3.13 which proposes to inset the village of East Horsley from the Green Belt. Whilst some village will now no longer be inset, into the green belt, East Horsley is proposed to be inset. It is suggested in NPPF that where a village is currently washed over by the green belt it can be inset where they makes no contribution to the openness of the greenbelt. As most of the studies of the greenbelt would appear to have been made from looking at map or sitting at a desk one can see why some very important issues have been missed. A recent survey of residents in East Horsley resulted in the majority of residents referring to East Horsley as small village. With over 4000 residents it can hardly be regarded as small but to those living in the village and for those who passing through the ‘built form’ does not dominate, it is not what leaves an impression. The predominance of trees hedgerows and the low density of housing add to it rural feel its openness. The current settlement boundary is irregular allowing fields and woods to enter the village and allowing trees rather than roofs to dominate. The insetting of the village will destroy it current character and it openness by allowing greater infill and creating an urbanized hard edge to the village.

- It is also proposed to revise settlement boundaries many of them becoming straight line resulting in gaps being filled and yet another urbanized hard edge. By insetting villages, re defining settlement boundaries GBC are ignoring the latest planning guidance and recent amendments that the re defining of green belt boundaries and changing the lands status can only be done in ‘very special circumstances’. No compliant justification has been put forward by GBC in their plan for these undertakings. The Green Belt & Countryside Study produced for GBC by the consultants Pegasus proposes numerous changes in Green Belt boundaries prior to these planning changes and therefore without due justification or the ‘very special circumstances’ now required. The exercise undertaken by Pegasus was to deliver land for housing to use in the Local Plan. Pegasus suggested that because East Horsley was surrounded by trees was a justification for it not contributing to the openness of the greenbelt. How they reached such a ludicrous conclusion is unclear. It is the many trees that act as a screen that maintain the rural feel and openness in the surrounding countryside. The fact that you are unable to see East Horsley from surrounding field because of trees is in its favour and does contribute to the openness of the greenbelt. This would be in stark contrast to the hard edge likely to result from insetting and the resultant urbanisation of the village.

- The loss of greenbelt cannot be justified when it only involves moving the boundary for no other reason than from one equally defensible position to another.

- A further concern is the fact that a significant portion of building land identified in the Local plan is located in the eastern part of the borough. This is at the opposite end of the borough from where most employment and commercial growth is anticipated. There are therefore serious questions over it long term sustainability unless you have a car. It is also land that is closer to London, and represents the most vital part of the Green Belt needed to prevent the encroachment of the Metropolitan sprawl. Throughout the Local Plan consultations many thousands of residents across the borough have written to object to GBC’s approach towards this fundamental issue, there were over 25,000 comments in the 2016 consultation, mostly opposing the plan. Judging by the revised 2017 Local Plan now proposed by GBC it seems that these voices have once again been ignored.

- Amendment 4 in Appendix H maps Policy P2 There has been no earlier consultation on the proposed change to the designation of the land south of the A246. Change made to the proposed settlement boundaries of East Horsley under the revised 2017 local plan, as Appendix 4 H maps for East Horsley (South).

The Amendment 4 on this map shows land south of the A246 as part of the village and is designated as being within ‘the identified boundary of the village’ and designated Green Belt land outside of the settlement Boundary. Under Amendment 4 the settlement boundary is to be extended in this area. This is land which is close to and in some parts directly adjacent to the Surrey Hills AONB. It is a very low density part of the village located in a highly distinctive rural setting including in Chalk Lane a sunken single track road lined with chalk slopes and which dates back many hundreds of years. To bring such land within the settlement area of the village is not in any way justifiable and is very likely to lead to development that is
inappropriate to the Green Belt. This area of the village has benefitted from Green Belt protection for many years but this proposed change would have a significant adverse impact and lead to the destruction on its character.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/3288  Respondent: 8792193 / Brian Wolfe  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the borough housing targets set out in Policy S2.

The revised policy proposes a target for new housing in Guildford borough of 12,426 homes, a reduction from 13,860 homes proposed an annualised figure of 654 dwellings per annum a reduction of only 5.6% because of the different time periods considered by the revised plan.

I consider this revised target for the borough housing target as still very high and should be reduced significantly further.

The main reasons for this are set out below:

The conclusions drawn from the revised SHMA are seriously flawed. The West Surrey Strategic Housing Market Assessment: Guildford Addendum Report, 2017 ['SHMA Addendum'] issued by consultants GL Hearn in March 2017 provides an update on the previous SHMA issued in 2016. [This was in itself also flawed]. Much has happened in those 12 months, particularly the imminent prospect of Brexit, which is likely to result in major changes in economic growth, population trends, and migration patterns requiring a far more cautious approach than that currently put forward in the revised Local Plan.

Justification for objection

GL Hearn presented four alternative scenarios for their models, based upon different assumptions on the population projections. Their four scenarios resulted in projections of overall growth of Guildford borough housing needs over the plan period based on demographic trends of between 10.4% and 15.3% dependent upon the scenario used. Whilst the lowest of the figures, 10.4%, uses projections based upon a 10 year migration trend and making an UPC adjustment as proposed by the ONS in order to take account of various statistical anomalies in sampling sizes, etc. This growth of 10.4% provides a housing need for Guildford borough estimated at 521 dwellings per annum. GL Hearn recommends that GBC adopt the higher end figure of their scenarios, but no reasoning is given for this assumption this has resulted in a proposed, and now questionable ‘demographically-based’ housing need of 559 dwellings per annum, this figure is used as the base figure in the Local Plan.

GL Hearn [as in their 2016 SHMA report], proceeded to raise this figure further with a series of adjustments to reflect higher levels of projected economic growth, additional student housing and also an adjustment for affordable housing. In my earlier comments to GBC, I was critical of this approach, pointing out this is highly speculative, as these factors of economic growth are already included within the household growth projections put forward by the Department of Communities & Local Government. Whilst GL Hearn have made some minimal adjustment to their tuning of economic growth in projections of housing need, possibly to adjust for Brexit. They are still effectively double counting. They have
increased their proposed overall housing need figure to 654 dwellings per annum, an increase of 95 dwelling above their own top end demographic trend figure. Whilst it is acceptable for adjustments to be made to the base SHMA. I make the following observations and would challenge their weak arguments

**Affordability** GL Hearn in the SHMA notes that housing in Guildford is significantly less affordable than in England as a whole and therefore made an adjustment for extra homes each year to reflect this. However, the Government’s Planning Practice Guidance [PPG] notes say that, “Prices or rents rising faster than the national/local average may well indicate particular market undersupply relative to demand.” The issue here being, is not whether prices are high but whether that they are rising faster than elsewhere. The data for the affordability of homes in Guildford relative to earnings suggests that it is no worse than other parts of Surrey and it has not seen a faster deterioration than in other boroughs in Surrey. There are some that have seen a worse deterioration. By increasing housing supply beyond the level suggested by the demographic OAN would not result in any noticeable improvement in affordability but simply in more people who can afford high prices homes moving to the area. On this basis affordability uplift for Guildford would not be justified.

**Students** The other reason GL Hearn felt warranted an upward adjustment was to increase the provision for student housing. However, extra student homes are already included in the official projections and at a level that is possibly more than will be needed. There is evidence in the SNPP of a significant upward blip at age [18/19] that the student age group in Guildford has distorted the population projections and this distortion has fed through into the DCLG household projections. Given that there are reasons to believe that the SHMA’s calculation may overestimate the homes needed for students, there is not a case for adding additional student housing. Indeed, there is a possibility that the adjustment for students should be negative, not positive i.e. that too many student households have been included in the projections. This analysis of the impact of potential increases in student numbers may have on the overall housing needs of Guildford is complex and I guess would be best carried out separately from a general demographic analysis that has been used.

**Economic Growth** GL Hearn’s analysis is an adjusted projected housing need of 654 homes per annum, which if built would represent an overall increase of 22% in the housing stock of the borough. This compares to the ONS projection of 521 homes 10.4% GBC in their Local Plan are therefore proposing a housing figure which is more than twice this level of projected population growth. The final nail in the coffin of these projections by GL Hearn whilst acknowledging the influence of UPC when they used the latest 2014 Sub-national Population Projections they did not identify and take into account any Unattributable Population Change UPC which has been estimated to reduce the final number by up to 80 units.

Now is not the time to be double a commitment to future growth. GBC have chosen to adopt the highest forecasts on offer.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:
• Strategic Housing Market Assessments [SHMA] are relatively new in that it looks at the needs for all tenures of housing as opposed to the earlier Housing Needs Assessment which only looked at Social Housing Need.
• Guidance given to Plan Makers made it clear that the SHMA needed to be an objective assessment of need based on facts and unbiased evidence. That Plan Makers should not apply constraints to the overall assessment of need, such as limitations imposed by the supply of land for new development, greenbelt, historic under performance, infrastructure or environmental constraints.
• It went on to state that these considerations will need to be addressed when bringing the evidence bases together to identify specific policies within the development plans. i.e. the housing policy targets. So GBC are supposed to take the SHMA and then set it against any constraints that apply within the borough.
• GBC have failed to make or document any adjustments to accommodate for planning constraints, in particularly, the Green Belt, supply of land, AONB and flooding etc. The housing need projections of GL Hearn have been taken by GBC directly as the housing targets figure for the Local Plan.
• They therefore fail to take into account any of the significant and relevant constraints which do limit the supply of housing land across the borough, in particular the large proportion of land which currently falls within the Metropolitan Green Belt.
• We find nevertheless that over 58% of proposed development plan proposes to build on Greenbelt Land. That does not include areas in villages inset from the greenbelt that will be open to greater infill and wind fold type development.
• They have also failed to allow for limitation imposed by the already overstretched infrastructure including transport issues by using inappropriate and discredited transport assessments.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7874  Respondent: 8792545 / Surrey Chambers of Commerce (Louise Punter)  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Surrey Chambers has supported the Borough throughout the process of securing a sound plan. This note is to extend that support by writing to again to re-enforce the Chamber’s support for the current pre submission plan in its final Section 19 consultation.

Guildford is an important town in Surrey, termed a growth town by the EMj LEP, where the University of Surrey and its Park are located that are an important part of the economy. The Borough needs to secure an adopted plan to enable its business community to continue to have a clear planning landscape to ensure that they can lay down investment plans.

I am writing on behalf of the Chamber to add to our existing support for the Borough in delivery of its plan. In specific terms, this support is for:

- Planning the provision of 13,680 houses across a range of tariffs and tenures
- Improvement of the transport infrastructure in the town
• Help in supporting the educational base in the town
• Provision of additional land for the growth of employment
• Recognition of the importance of the employment base in the Borough which needs support if its strategic role is to be met fully

A plan which
• Meets national planning policy
• Has been subject to intense scrutiny
• Has the support of the elected members of the council
• It is important to put in place a sound plan that can be used by the community at large, organisations such as the LEP and by business themselves to support further investment in the town

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<tr>
<th>Comment ID: SQLP16/410</th>
<th>Respondent: 8792545 / Surrey Chambers of Commerce (Louise Punter)</th>
<th>Agent:</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents</td>
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Please register this support, which reflects a broadly held view by business.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
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<tr>
<th>Comment ID:</th>
<th>PSLPS16/80</th>
<th>Respondent:</th>
<th>8793025 / Janet Manktelow</th>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy A43

This particular site is set partly on farmed land and part in ancient woodland which is used for many country pursuits such as shooting, clay pigeon shooting and dog walking.

The land abuts the East Clandon Stream which floods most winters. The land is bordered on one side by the A3 and this very busy road would not make a good neighbour. The proposal is to place 400 houses on one part of the land and a range of industrial buildings to be placed on the rest. Furthermore, with so many buildings being added the run off the land onto the stream will be aggravated. I understand that the site is built on London Clay. This means that every time there is the potential for the stream to raise, the land floods. In addition the trees that are being removed will also exacerbate the problem. The copse is home to and regular visiting place for deer, foxes, owls, bats, rabbits, hares not to mention a carpet of bluebells in spring.

The wooded part of this land contains ancient oaks. Many of these oaks are hundreds of years old. The land is bordered on other sides by Kiln Lane and Burnt Common Lane, both are narrow residential lanes and totally unsuitable for large amounts of traffic. Both lanes exit onto the B2215 Portsmouth Road. This road is a feeder road to the A3 and M25 which is heavily congested both night and morning.

Policy A43a This policy relates to a four way junction giving North and South bound entrances and exits to the A3. Whilst many local people would welcome easier access to the A3, the local feeder roads are all narrow and already congested. The Clandon Road A247 is again already heavily congested night and morning. When the road reaches the village of West Clandon where it becomes The Street, it narrows down even further. It is totally unsuitable as an access to the A3.

The Northbound access would run over a piece of Manorial land owned by the Manor of Dedswell and Papworth, surely such land should be preserved.

The implications for traffic are dramatic. Every day Portsmouth Road is stacked back from the M25 to the Send traffic lights on the A247 from 8.00am to about 9.15am every day and then the flow is reversed in the evening. As there are no improvement planned for the A247 and other surrounding feeder roads this is an unsuitable change.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Policy A44 Land to the west of Winds ridge and Send Hill

It is proposed to build forty houses and two traveller pitches.

This land is predominantly an infilled sand and gravel pit. It was filled over several years and still has venting points. The land is now partly farmed and grazed. It is a beautiful site which affords distant view from Potters Lane, Send. These lovely views would be totally altered. From the Send Hill side footpath there are distant views of the Surrey Hills. It probably represents backland development.

Send Hill is a very narrow lane and access to a small estate would be unsuitable. The site is not a sensible place for traveller pitches either as the access would be even worse for long vehicles. It is a mile from the village shops and bus stops.

Insetting the settlement boundary at both the St Bedes School site and the Wey Navigation at Send Road is totally unreasonable. This change would remove both areas from the Green Belt and render it open to permitting even more development in the village.

The land adjacent to Heath Drive is also part of the Wey Navigation Corridor. It is currently home to a great deal of wildlife. Fox, deer, badgers, owls and many other birds are found here on a frequent basis. The pleasant views when cruising on the Navigation will be totally lost if this change takes place.

The land at St Bedes School off of Bush Lane will be prime development land if this is allowed to happen. Again a valuable piece of Green Belt is involved here. A footpath runs through and allows the sight of nature in the wild. Buzzards, Kites, Skylarks and many other species along with deer, foxes etc., can be seen here. The time expired Junior school is currently being rebuilt on a nearby site and the current Junior school plan states it is to be returned to a green field. There is no exceptional reason for this to be changed.

I am disappointed that these sites have been included in the Local Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

OBJECTION

Whilst I accept that every village has to grow and evolve, the proposals for Send Village are enormous and far reaching. Until about 10 days before the proposed Local Plan was launched the proposals for Send Village were comparatively low and with a few exceptions could possibly have been supported. However, as stated, 10 days before the approval a site was withdrawn and another, Garlick’s Arch (Policy 43a) was substituted. This adjusted the number of proposed houses from 185 to 485. This is almost a 25% increase over the current number of houses in the village. This vast change cannot be tolerated or justified.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/2716  Respondent: 8793089 / Michael Mortimer  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We object to Guildford Borough Council's draft Local Plan proposals 10 build 1,800 houses, an industrial park and a highway on the slopes of the Hog's Back at Blackwell Farm, which will:

- destroy views from the Hog's Back ridge – a nationally designated Area of Outstanding Natural Beauty
- remove 72 hectares of scenic farmland and additional ancient woodland from the green bell
- increase tailbacks on the A31 and traffic congestion
- result in rat-running through local roads
- add to Guildford's pollution.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17464  Respondent: 8793281 / Robert Smith  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID4
Question…With the proposed large housing developments such as Blackwell Farm, Gosden Hill, Wisley, Normandy, will they include on site recreational open green space in the planning applications. Meaning no further SANG would be required in respect of large developments. Will this also apply to any development of 25 homes more.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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<tr>
<th>Comment ID:</th>
<th>PSLPS16/8045</th>
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<th>8794529 / Paul Tubman</th>
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<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy A43</td>
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- I object to the development of Garlick's Arch off the Portsmouth Road to include the building of 400 houses and 7000 m2 of industrial space. This site floods on occasion and is covered by ancient woodland, including trees dating from the 16th century.

The 'Housing Delivery' document in the draft local plan suggests that this site is required to facilitate the provision of a northbound on and a southbound off slip road onto the A3 from the A247, which will provide significant improvements to the highway network and is fully supported by Surrey County Council. This document then goes on to state that 'On this basis we consider that the benefits of developing this site outweigh the harm that may be caused by removing this land from medium sensitivity Green Belt. This constitutes the exceptional circumstances required to amend Green Belt boundaries...' The addition of two slip roads providing access to and from the A3 does not constitute 'exceptional circumstances' and I object to Guildford Borough Council using this as a justification to modify the Green Belt in this area.

- I object to the area at Garlick's Arch having an additional 7000m2 of industrial space added as the latest Employment Lands Needs Assessment 2015 shows a reduction in required floorspace of 80% from the previous plan made in 2013. If any additional floorspace is required this should be located at Slyfield Industrial Estate which has had valid plans to expand since 2014.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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<th>Comment ID:</th>
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<td><strong>Document:</strong></td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a</td>
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</table>
I object to the creation of a new interchange between the A247 and the A3 at Burnt Common. Whilst this is seen as providing access to the A3 for the new development at Wisley, it will inevitably provide easier access from the developments at Wisley, and Gosden Hill to Woking, thereby significantly increasing traffic through Send in to Old Woking on the A247, a route that is already very congested and not able to cope during peak periods. Noise and pollution levels will exceed the already high levels.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: PSLPP16/17856</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2</td>
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I object to the insetting of the villages of Send, Send Marsh / Burnt Common and Ripley and their resulting removal from the Green Belt. The NPPF (paragraph 80) sets out five main purposes of the Green Belt, including:

- To check the unrestricted sprawl of large built-up areas,
- To prevent neighbouring towns merging into one another,
- To assist in safeguarding the countryside from encroachment

The three villages of Send, Send Marsh / Burnt Common and Ripley both together and including the green spaces in between ensures that there is a buffer against the towns of Guildford and Woking becoming one continuous conurbation. The insetting of these villages would make it far easier to make future developments in and around these villages, thereby making the future merging of Woking and Guildford conurbations more likely, and thereby going against the main reasons for having the Green Belt in the first place. There are no obvious special circumstances given in the Local Plan to justify removing this restriction.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: SQLP16/2049</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination</td>
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</table>
I object to the lack of due process that Guildford Borough Council have followed in reaching the decision to add the development of Garlick's Arch at the last minute, prior to including in the latest draft Local Plan. Since 2014 every proposed major development in Send and Send Marsh has been changed, with the original proposal for an additional 430 houses in 2014 being reduced to 185 by April 2016, and suddenly being increased to 485 in May 2016. Such large changes require full consultation under Regulation 19 of the planning process - this process has not been followed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

I am writing to object to the Local Plan re proposal to build 1100 houses at Normandy, because it seems to ignore several local factors. It does not seem sustainable, as the area is already struggling.

The roads in Normandy are in a very bad state of disrepair, and are not coping with the existing traffic, so extra housing will make this even worse. A31 from Puttenham to Guildford is almost at stand still from 7.00am to 9.30am each weekday. There seems to be no plan to repair or upgrade the roads. There are 2 buses a day from Flexford, (& these are to be cut from September), so it is essential to run a car, meaning probably at least another 2200 cars on the local roads!

There are no shops in Normandy, so another reason why a car is a necessity.

The GP surgery has not been able to cope with the local population for some time, and this is getting worse. One cannot get an appointment within 3 weeks, so one may be better (or dead) by that time. There is no capacity for an increase in population.

The suggested reason for building 1100 new homes is the need to build a new secondary school. How is this necessary when most of the secondary schools in the area are far from full? Also, it is increasingly difficult to recruit secondary school teachers in Surrey area, so how will a new school be staffed?

Has anyone consulted the utility companies about supplying so many extra homes? Water and electricity are essentials.

We have fought hard to get a reasonable broadband speed in Normandy. Will this be maintained to us as well as the new houses?

While accepting that people need somewhere to live, I cannot accept that 1100 new houses in a small village is a practical option, and I urge you to reconsider all the factors listed above.
**Comment ID:** PSLP172/2246  **Respondent:** 8794657 / Diana Delahoy  **Agent:**  
**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy A46

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Just to say that I am very pleased and relieved to learn that site A46 has been removed from the Guildford Local Plan.

The proposal to build over 1000 new houses in the Normandy/Flexford area was horrific because the roads, Gp surgeries, utilities etc do not cope with the current population.

Increasing the population would take facilities beyond breaking point.

However, I understand there is still a commitment to build 10,000 homes in the Guildford area, and I urge you to carefully consider what improvements will be needed (roads, GPs, utilities etc) to support this, BEFORE agreement is given to go ahead with building.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

**Comment ID:** PSLPA16/3982  **Respondent:** 8794753 / Andrew Beckett  **Agent:**  
**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the proposed Infrastructure Schedule (Appendix C)

The Infrastructure Schedule sets out the key infrastructure requirements on which the delivery of the plan depends. For each of the Key Allocated Sites in the borough it identifies infrastructure projects that are required, except for Garlick’s Arch (A43) which is not mentioned. It is clear that the Plan takes no account of the infrastructure required for this site and is therefore not fit for purpose.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
1. The housing needs assessment is flawed in various respects and overstates housing need. In addition since it was produced, the referendum Brexit decision has almost certainly reduced future housing need and rendered the previous assessment seriously out of date. As a result any assessment of Green Belt sites which took place to consider whether “exceptional circumstances” existed to outweigh the harm to the Green Belt was based on false premises and should be reconsidered.

2. Having determined housing need the Council was entitled to consider constraints before determining the housing number. I believe that as Ill as being entitled to do this the Council was required to give proper consideration to constraints. The scarcity of sites outside the Green Belt as Ill as infrastructure (most notable roads) considerations all represented constraints which should have been taken into account in determining the final housing number. Accordingly in this regard our objection to the allocation of Green Belt sites is twofold. First I believe constraints should have been applied. Secondly I believe the Council did not properly consider constraints and that their decision making process was flawed and thus subject to being set aside by the Inspector.

3. Even if having properly applied constraints there is a need to develop in the Green Belt then specific Green Belt sites should not be included in the plan unless “exceptional circumstances” for development are proven in relation to that specific site, as stipulated repeatedly in the NPPF. The Green Belt should trump short-term considerations such as perceived housing need, as case law has established. There needs to be a specific balancing exercise conducted on each Green Belt site weighing the harm to the Green Belt against the very special circumstances which are argued in favour of development at that particular site. There is no evidence this has been done. Instead the council have appeared to say that having chosen a housing needs figure and decided it cannot be met without building on Green Belt then there is no need for any further consideration and any convenient Green Belt site can be allocated for building at will.

I OBJECT to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)

- The “objectively assessed need” figure of 693 homes a year is too high.
- A professional review by NMSS has concluded that, even basing the calculations on a period of stronger economic and student growth, the housing need figure should be revised down to 510 homes a year and the method changed to consider student housing need separately due to the distorting effects.
- The current SHMA inflates the proposed housing figure due to
  - failure to correct for errors in the historical data for international migration flows,
  - issues with the way it considers students and affordability and
  - flaws in the method for estimating the number of homes needed to support job growth.
- It is unacceptable that demographic and economic model assumptions have been withheld and cannot be checked making the process unaccountable.
The Plan’s proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the
borough, it is over double the previous figure of 322 used in previous plans. The SHMA report methodology is I believe
inaccurate; it inflates the needs of the borough by distorted student numbers. However, it is based on commercially
confidential modelling assumptions that cannot be checked or reviewed. There is no transparency to this evidence base and
it is therefore impossible to assess its accuracy. This is not democratic and is not appropriate for consultation of the Plan.

The National Planning Policy Framework allows the overall housing target to be reduced to take account of protected
wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant
infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored
these factors.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Respondent: 8794753 / Andrew Beckett</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A25</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally
Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy A25 with proposals for Gosden Hill Farm.

The Green Belt at this point serves the important function of separating West Clandon from the edge of urban Guildford.
Development here will cause the two to coalesce defeating one of the objectives of the Green Belt. If this development
proceeds I believe the narrow strip of Green. Belt remaining between Guildford and Clandon at this point will be too
narrow and will come under further pressure.

It will represent an undesirable ribbon development along the A3. It will be highly visible from the A3 when approaching
Guildford and will, in conjunction with A43a at Garlick's Arch give the appearance of almost continuous development from
Send through to Guildford.

The Plan does not put forward any evidence that exceptional circumstances exist to justify removing this site from the
Green Belt.

The development will overburden the local road network and increase congestion on the A3 and A247 through the centre of
West Clandon. This is already very heavily used whilst being unsuitable for designation as an A road. In places it is too
narrow for two lorries to pass causing them to mount the pavement.

Note the following accident data:

2010 –2014 from Crashmap data

- Clandon Cross Roads Area to Bulls Head - 17 incidents
- Bulls Heads Head to Bennett Way - 8 incidents
- Bennett Way to Highcotts Lane - 15 incidents
- Tithebarn Lane to Portsmouth Road Birch Close - 8 incidents

2015
21 Oct 2015 – A247 near shell garage - Three vehicles collided causing delays

Surrey Fire and Rescue deployed.

2016

- 15 April 2016 12 year old boy injured in The Street – A247 closed in both directions
- 28 April 2016 A3 West Clandon London bound between A247 Tythebarns Lane (Burntcommon and M25J10 (Wisley Interchange) congestion on A3 to A3100 Clay Lane Burpham
- 30 6 2016 Motorcyclists with injuries airlifted to hospital Send Marsh Road

Attempts have been made over many years to reduce traffic, traffic speeds and accident risks through West Clandon, however little has been achieved as the road cannot be widened and SCC is reluctant to impose further speed limits as congestion is already very high.

I object most strongly to the proposal for a link road to bring traffic from the Gosden Hill development to the proposed 4 way junction at Burnt Common. This has the potential to generate large volumes of traffic (including commercial vehicles) on the A247 through West Clandon - a road which is already under traffic stress (see below).

The land in Gosden Hill does exactly what the Greenbelt was designed to achieve. It provides a green buffer between the Guildford Urban Area and West Clandon, gives Burpham a defined green boundary and breathing space and it hides Guildford town from visitors until they pass the off-slip to Burpham.

No exceptional circumstances have been demonstrated for building on this site and therefore it does not comply with paragraphs 87-89 of the NPPF. It stops the sprawl of Guildford town, assists in safeguarding the countryside from encroachment and assists in urban regeneration by encouraging the recycling of derelict and other urban land. All of these are requirements of the NPPF.

The scale of Gosden Hill is out of proportion to West Clandon. It would have four times the amount of housing plus shops, offices/factories, GP surgery, schools. Development on this scale would blight a historic village with a history going back to the doomsday book and beyond.

Gosden Hill is the most obvious location for the north end of an A3 tunnel. It has rising ground and is situated just before the urban area. If it is built on, it will be very difficult to construct a tunnel.

The development will generate in the region of 6,000 vehicles which will pour on to the A3 which is stationary every day during rush hours. The linking of the A3100, B2215 and A247 would channel thousands of cars through the narrow, winding road through West Clandon, a road where large lorries mount the pavement virtually every day and through Send and Ripley which are also severely constrained.

The volume of traffic will greatly increase air pollution which is particularly critical given the proposal to build two schools.

Currently, a two way junction at the site would require vehicles wanting to go north on the A3 to go through Burpham which is grid-locked every day.

Burpham’s sewers are at capacity. Sewage would have to be pumped to Slyfield for processing, a project of enormous cost.

There is inadequate fresh water in Guildford and current supplies could not meet the needs of a development of this size.

Electricity supply is also inadequate and would require a big infrastructure development.

The railway station was rejected by Guildford Borough Council in 1984 because it feared Gosden Hill would become a dormitory estate for London.

The wording of the Local Plan with regard to Gosden Hill is so loose that the developer could virtually do whatever it wants.
The remaining agricultural land between Gosden Hill and West Clandon is so small that it is highly likely to be uneconomic and therefore a prime candidate for further development which would roll the Guildford Urban Area over West Clandon towards East Clandon and Wisley.

If the Strategic Sites are developed, the north of Guildford will deliver 36%, 5,036 houses towards the total of around 14,000. The infrastructures of the existing villages and the A3 will be overwhelmed by the scale of development.

A new on-slip at Burpham would only be 1.8km from the on-slip at Burnt Common which is against Highway England’s requirement of 2km.

Development of the A3 at best will not start until after 2020 and the building of a tunnel, which is only an “aspiration” in the Local Plan, is likely to be many years after. In the meantime given that developers build houses to provide cash-flow for infrastructure, Gosden Hill will have a crippling effect on villages like West Clandon and the A3.

Gosden Hill already has surface water problems. Merrow Stream crosses the site. No hydrological survey has been carried out to assess the implications. Electricity pylons run through the centre of Gosden Hill which have health and safety issues.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/7419  Respondent: 8794753 / Andrew Beckett  Agent: 

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy A43 and A43a on Garlick’s Arch.

The site was only inserted in the draft plan at a late stage just before publication of the consultation draft which is a shabby way for the Council to proceed. The site is not a sustainable site being far from any infrastructure facilities and transport links. The bus service is infrequent and it is almost certain any future residents will rely almost entirely on cars for journeys. Similarly any employees at the employment areas will almost undoubtedly arrive and leave by car.

The site is susceptible to flooding and will not make a suitable site.

The Green Belt at this point serves the important function of separating West Clandon from Send. Building here will cause the two to coalesce defeating one of the objectives of the Green Belt.

I have seen no evidence that exceptional circumstances exist to justify removing this site from the Green Belt or that this important issue has been addressed. The Green Belt and Countryside study did not even consider this site.

It is understood the Council's eyes may have been turned by the possibility of receiving for free the land which might be used for new A3 slip roads in return for allowing this development, thus justifying it as some form of enabling development. However the slip road land if needed could be safeguarded in the plan and acquired by compulsory purchase when required. Lack of current funding for the slip road is not a justification for allowing the development of this site. If the slip road is genuinely needed then government funding will be available for it. (One of the reasons for turning down the so called enabling development proposal intended to fund the rebuilding of the Howard of Effingham School was that the redevelopment of the school was not essential. As and when it became essential Government funding would become available. Accordingly enabling development was not necessary. The same principle applies here.)
The A247 running south past this site through the centre of West Clandon is already very heavily used whilst being unsuitable for designation as an A road. In places it is too narrow for two lorries to pass causing them to mount the pavement- often at speed. It has narrow bends with poor sight lines, an infants school and a hump-backed bridge concealing the entrance road to the station for southward traffic. In addition, there are no continuous footpaths which forces pedestrians to cross and re-cross the road. Development at Garlick’s Arch will only exacerbate the problem and make the road even more congested and unsafe for pedestrians.

The development will cause harm to the ancient woodland on and by the site.

Taken together with the Gosden Hill site, there will be a ribbon of development along the A3 in contrast to the current “soft” edge approach to Guildford.

Garlick’s Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8). There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).

The Plan states the preference is to making the best use of previously developed land. Yet at the 11th hour a perfectly acceptable brown field site at Burnt Common, capable of accommodating approximately 100 houses, was removed from the Plan and replaced with the Garlick’s Arch site. There was no proper consultation in relation to the inclusion of this site. Why was a brownfield site removed and replaced with a Greenfield site? There is no evidence that Section 18 of the Planning and Compulsory Purchase Act 2004, which requires local planning authorities to produce a Statement of Community Involvement, has been complied with for this site. This only came to light for local residents following a Council meeting on 11th May 2016.

Moreover, Guildford Borough Council’s own Green Belt & Countryside Report does not address Garlick’s Arch at all, so there is no evidence base to support the inclusion of this site.

National Planning Policy promotes sustainable developments, with sustainable transport. With ever reducing bus services in the area and no train station within reasonable walking distance it is impossible for any development on this site to offer a sustainable transport solution. Development on this site is wholly inappropriate (Policy I3).

The stream, which runs through the site, is identified as having a high risk of flooding by the Environment Agency. There are other sites that do not flood that can be developed and therefore this site should be removed from the Plan (Policy P4).

This site is bordered by Ancient Woodland and within it a number of trees are protected by Tree Preservation Orders (Policy D3).

The site has an abundance of wildlife, some of which are protected. It is home to many types of owls and bats, with the woods having cuckoos and woodpeckers. In addition there are regular sightings of badgers, deer and red kites. The development of the site will result in the loss of habitat. No wildlife report has been conducted on the site. (Policy I4)

It is clear that with this site being added at the 11th hours no infrastructure planning has been undertaken. The Infrastructure Schedule makes no provision for any infrastructure improvements for this site. How will the local services such as schools and doctors cope, many of which are already at capacity? (Policy I1)

Furthermore, several electricity pylon runs through the site, which will have the potential to be a health hazard for any residents.

I OBJECT to the inclusion of the land for new on/off ramps at Burnt Common (A43a)

The addition north facing ramps to the A3 at Burnt Common would be a disaster for local communities. There is no requirement for local traffic to access the A3 to the north, but the addition will draw in a huge amount of ‘through’ traffic.

The route from London/M25 to Woking or would now be through Burnt Common and Send. Equally traffic from the east of Guildford (Merrow etc) and the A25 will now go through West Clandon and Burnt Common. This will cause immense damage to those areas on small roads which cannot be improved.
This Plan does not address the needs of local communities or the Borough in this regard. There has again been no Section 18 consultation on this.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16498  Respondent: 8794753 / Andrew Beckett  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the damage to the historic environment as a result of the scale of the proposed development (Policy D3)

I OBJECT to the local plan based on the impact it will have on the special countryside of the borough.

The proposed development at Garlick’s Arch (A43) will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16505  Respondent: 8794753 / Andrew Beckett  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy D3 - Historic environment

I object to this policy as it is very weak and I do not think it is clear enough in its support for the conservation of the historic environment. It provides for development which will “enhance” heritage assets which I fear is a developer’s charter as it leaves plenty of room for abuse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16506  Respondent: 8794753 / Andrew Beckett  Agent:
I OBJECT to Policy D4 - Development in urban areas and inset villages

The policy should place much greater emphasis on residential development in the existing urban centres. In this way housing needs can be met without resorting to large developments in the Green Belt. There are urban areas in need of regeneration but these are ignored in favour of Green Belt development.

The policy should not be applied to the villages which should remain in the Green Belt. Unrestricted application of this policy to the villages intended to be inset will change their characters radically and for the worse. The development it encourages will increase traffic and congestion disproportionately.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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I OBJECT to the sustainable employment policy (Policy E1)

I object to the inclusion of a strategic employment site at Gosden Hill Farm. Employment sites should be concentrated on previously developed land in more sustainable locations with good transport links where the infrastructure can support development. Warehousing, distribution and industrial premises cause considerable commercial traffic, noise, pollution and general disruption. They are not good neighbours for schools and 2000 houses. Many of the jobs will be taken by people outside the area leading to additional congestion in Burpham and on the A3.

I object to the inclusion of a strategic employment site at Garlick’s Arch. It is in a non-sustainable location remote from any facilities of any kind and with poor public transport links. It is unlikely jobs there will be taken by local residents and it is likely all travel to and from work will be by car adding to local congestion. Employment sites should be concentrated on previously developed land in more sustainable location with good transport links where the infrastructure can support development.

The site is in any event subject to frequent flooding and unsuitable for development.

If developed, the new employment site at Garlick’s Arch, Send Marsh/Burnt Common (A43), would be treated as a Strategic Employment Site.

The proposed development of up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8) at Garlick’s Arch (A43) is in the scheme of industrial development relatively small. Just to the
south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m. The Garlick’s Arch site which is in the Green Belt should not be developed as a Strategic Employment Site when there is a suitable alternative brownfield site very close by, which is far more sustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/16496  Respondent: 8794753 / Andrew Beckett  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the location for new employment floorspace (Policy E2)

I object to this policy. It would be more sensible to confine new office and research and development floor space to the urban Guildford area. I also oppose the policy of expanding the Research Park onto Blackwell Farm. No exceptional circumstances, as defined under the NPPF, have been advanced to justify incursion into this permanent and high-quality area of Green Belt.

Proposals for new industrial, warehousing and storage (use Class B1c, B2 and B8) floorspace will be directed to the Industrial Strategic Employment Sites.

There is no need for the new employment floorspace to be located at Garlick’s Arch or Gosden Hill Farm, when near to these sites at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/16497  Respondent: 8794753 / Andrew Beckett  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I OBJECT to the loss of rural employment (Policy E5)

Policy E5 supports the retention and development of local services and community facilities in our inset and identified villages. Yet the development at Garlick’s Arch (A43) would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises. The Plan does not promote rural employment; rather it will result in the loss of existing local rural businesses.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16508  Respondent: 8794753 / Andrew Beckett  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E6

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy E6 - The leisure and visitor experience.

The policy should acknowledge that whilst in some areas new and enhanced leisure facilities are valuable (for example the new Opera House at West Horsley Place Towers), much tourism depends on the undeveloped nature of Green Belt areas surrounding Guildford. Accordingly the policy should recognize that in many rural areas new and enhanced visitor facilities may be unnecessary and counterproductive, particularly away from existing buildings and development. For example the attraction of Newlands Corner is its undeveloped nature. Significant development of visitor facilities there is likely to diminish rather than increase its attractions. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment. Heritage sites and the Green Belt are particularly vulnerable to harm.

Tourism and visitors do not depend on new visitor “attractions” and could actually be damaged by them, as compellingly argued in the current debate over Newlands Corner. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment/“Disneyfication”. Heritage sites and the Green Belt are particularly vulnerable to harm.

Guildford has many “leisure and visitor attractions” already. The case for creating more is not made and no examples are given. Instead, the plan’s explicit priorities should be:

1. To protect the borough’s prime leisure and tourism asset, its countryside, from inappropriate development. This is all the more valuable because of its accessibility from London, the rest of Britain and the Continent, in that order. Rural residents are its custodians and require no Council interference. Economically, the most valuable forms of tourism, such as walking and cycling, require no new development. In the overcrowded South-East of England, lack of development is a leisure and tourism asset, not a liability.
2. To help make Guildford’s river landscape less off-putting and support town-break packages for high-value tourists. To achieve this, the policy needs to define what leverage, if any, Council planners have to influence normal tourism market mechanisms.
3. To help private providers market local tourism. This need not involve extra spending. The Council could, for instance, help co-ordinate ready-made, local tourism packages under a distinctive brand at an all-in price. An “English town break” (including B&B accommodation, a walking tour of Guildford, a pub lunch in the Surrey Hills, a visit to Wisley Gardens and a National Trust property and a Southwest Trains travelcard for a day out in...
London) would be highly attractive to many European visitors who currently by-pass Guildford to go to Bath, Oxford or Cambridge instead.

4. To rule out the redevelopment of scarce rural hotel sites (e.g. Thatchers, East Horsley, earmarked for 40 new houses under Site A37 of the plan yet just a short walk from the new opera house).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16504 Respondent: 8794753 / Andrew Beckett Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E7

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy E7 Guildford Town Centre

The policy “vision” describes protecting the Guildford’s unique setting and historical character and sets out some of the ways this will be done. However none of this is included in the formal Policy wording in the blue box. I suspect the Vision wording is effectively of little or any force. These principles should be included in the formal policy.

There should be a much greater focus on residential use of the town centre where many people would like to live and where the necessary amenities and infrastructure exist. The policy misses the opportunity to propose forward looking sustainable residential development plans in, for example the Walnut Tree Close area, where very significant numbers of new homes could be provided. Such town centre sites could meet much of the housing need over the plan period without harming the countryside.

There is an urgent need for a strategy to focus on brownfield redevelopment before considering development outside the existing urban area.

The policy does not address any of the major issues raised by the Council’s own Town Centre Master Plan, the Guildford Vision Group’s proposal for new river and rail crossings or plans for the redevelopment of Guildford Station, all of which are already the subject of public discussion.

The policy also fails to provide guidance on design requirements, as required by the NPPF.

The policy and surrounding text concentrates too much on shopping without regard to its nature which risks a proliferation of dull high-street chain stores. The policy should seek to enhance Guildford’s character and encourage a wider variety of small shops including locally owned businesses and shops of use to consumers. (For example there is no butcher in Guildford.)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16502 Respondent: 8794753 / Andrew Beckett Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy H1 – Homes for all. Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan period. It fails to set rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions.

The housing mix is based on out-of-date, pre-Brexit projections and on assumptions set out in a flawed SHMA that has not been scrutinised or evaluated.

I support higher density development in the urban area, without resorting to dehumanising, high-rise buildings that developers commonly claim are necessary for financial viability. Much of Guildford town could usefully be regenerated with 4-5 storey blocks with landscaping and underground parking, as often seen on the Continent and, recently, in London.

Student accommodation should provided for 100% of new students and more than 60% of existing students, which would free up ideal family accommodation in the urban area. Other university cities (e.g. Oxford) insist on higher percentages than those proposed in the plan. In my view, the Council’s timidity is a case of “regulatory capture” by Surrey University, which has failed to use its existing planning permissions (dating from 2004) to accommodate 3,000 students or to improve the efficient development of its campus (e.g. by building on its extensive and under-used surface car parks). If all students were accommodated in this way, 2,000 homes would be freed up in town and there would be no need to build on the Hog’s Back.

It is not appropriate to release Green Belt land to house students who could be accommodated on the Surrey campus or other university sites. The plan should take account of the university's ability to house its own students and reduce the housing number accordingly.

Guildford borough has already a higher proportion of traveller sites than most comparable boroughs. Over-provision is inappropriate given other constraints.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16503  Respondent: 8794753 / Andrew Beckett  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to this policy on affordable homes (Policy H2) on the grounds of feasibility and that it should be more firm and explicit on unviability in paragraph 4.2.40.

In particular a scheme is only unviable if the value of developing the land (including some allowance for development risk and a normal level of profit) falls below the sale vale of the land for alternative non-premium uses such as agriculture. The price paid for the land is not relevant. The possibility of avoiding the affordable housing obligation through use of
unviability arguments only serves to inflate land values. It will become clear that developments are unviable when developers start selling land for alternative non-development uses.

It should be noted in the plan that because of Guildford's relative popularity as a place to live combined with its location close to others towns and within the London Commuter belt no amount of building will meet demand. Similarly no amount of affordable housing will ever meet demand.

In addition the definition of an ‘affordable home’ is 80% of market value. With even a 2 bedroom flat in Guildford now having a market value of +£360,000 the discounted price is still not going to be affordable to anyone on a normal income.

And at what point will ‘affordable homes’ be able to go onto the market at full market price?

As we have seen with council houses it is not long before the discounted property is sold at full market value with the original owner simply pocketing the profit.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16507
Respondent: 8794753 / Andrew Beckett
Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy H3 – Rural Exception Homes as this Trojan horse policy. It says that homes can be built anywhere near a settlement of any form (including agricultural land and the AONB). These homes are meant for people with a village connection, but they could be for anyone on the Guildford borough housing list. To make the housing viable, or to improve the “mix” this can include “market” housing (i.e. normal commercial development which in Guildford usually means large executive homes). This policy means building anywhere, and ignoring all historic planning restrictions.

The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove “exceptional circumstances.”

The wording of the policy is far too wide and drives a coach and horses though all other aspects of planning policy. As drafted the planning authority could be obliged to grant permission for inappropriate and unsuitable developments.

The wording provides no ability to balance the desirability of the development against other considerations including harm to the Green Belt or the AONB. (If the housing would meet identified need and adjoins a settlement under this policy wording permission would have to be granted even in the most sensitive AONB location, even if more suitable locations were available.) The policy should include the need for a balancing exercise including consideration whether more suitable locations exist.

The policy wording should not allow market housing. The ability to include market housing is likely to inflate land values, leading to a self-perpetuating need to include market housing. It may lead to spurious developer led proposals which will be difficult to resist.

The policy wording should define small, either in land size or number of units. I am concerned that if small is left undefined the policy could be used to justify significant developments. In the context of the plan a development of 150
homes might be argued as small. (If Wisley at 2,500 homes is a big development then 500 homes might be a medium development and 150 could be small.)

The policy wording should be restricted to adjoining sites or define the concept of being "closely related". In particular I believe adding the concept of safe and easy walking distance extends the potential radius within which sites will be argued to be "closely related" Many people would regard a mile or so as an easy walking distance. (School children are expected to walk further than that before being eligible for free school travel.)

The wording of the policy itself does not require the local connection requirement for tenants to be secured in perpetuity - only the affordability must be secured in perpetuity. (For example housing could be built for retired Cabinet Ministers under this policy so long as the first tenant was required to have a local connection.) The introduction to the policy mentions this point, but it is not part of the policy itself and may carry little weight at appeal.

The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove “exceptional circumstances.” The size and location of sites should be better defined and it should be clear market housing cannot be included.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16499  Respondent: 8794753 / Andrew Beckett  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT, due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1)

Our villages are already suffering from severe congestion for much of the day, for example the Newark Road & Rose Lane junction in the centre of Ripley and the A247 through West Clandon. The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.

Furthermore, many of the country lanes around the villages of Ripley, Send and Clandon are narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition.

I OBJECT to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces.

Many of the affected villages, such as West Clandon, already suffer from traffic congestion. Further development around these villages will only result in more traffic and more parking problems.

With some 5,000 houses being proposed close to the village of Ripley, the roads serving the village will become even more congested. Cycling has become an ever popular past time, particularly at weekends hundreds of cyclists past through the villages on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and
with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road accidents involving cyclists as a result of the development proposed under the local plan.

The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the road becoming ever more dangerous for pedestrians.

The council has a statutory obligation to protect the public and the additional traffic flows will bring added accidents, noise, pollution and injury of the public. In the case of West Clandon the Street often only has a narrow footpath on one side of the road making it very dangerous, especially when vehicles mount the pavements.

This policy as it is inappropriate and inadequate and fails to respond to the challenges raised by the proposed significant Green belt developments. The borough’s infrastructure is already heavily strained. However the plan’s determination to build large housing estates across the Guildford countryside significantly increases the need for infrastructure investment without securing the means for its provision. Placing housing in the established urban areas would reduce the need for enhanced infrastructure as would a more realistic housing number.

The policy wording says nothing about roads and traffic. The Council’s methodology for assessing traffic congestion - averaging it over periods of several hours and ignoring the effects of junctions - simply hides the problem, which will get worse as development proceeds. The schemes referred to in this policy will not solve existing congestion and the local road network has not been given sufficient consideration. Some proposed development locations would require highway schemes that are unlikely ever to happen.

Adequate infrastructure provision is a pre-condition of sustainable development. But in this plan it is an afterthought buried away in Policy I1. By prioritizing greenfield over urban, brownfield regeneration, the plan creates insurmountable (and unnecessary) obstacles for itself. Common sense suggests a local plan should first assess the borough’s infrastructure capacity for sustainable development, and then tailor development accordingly. This plan, however, assumes infrastructure will follow on the heels of housebuilding as if by magic. It makes implementation critically dependent on providers outside the Council’s control and on the vagaries of CIL income. Instead of recognizing this as a key constraint, the plan is based on hope. It is also highly likely that developers faced with the imposition of large infrastructure requirements will go to court to invoke the NPPF provision that prevents authorities from imposing conditions that make a development non-viable.

Policy I1 requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.

Despite the Garlick’s Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents’ in the locality will see their quality of life significantly deteriorate in many ways.

Many of the utilities in the Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers. No plans to improve these services should mean no development of the Garlick’s Arch site.

Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are already at capacity and suffering from funding cuts or freezes. Any further development without funding will place further stress upon existing health services.

Police services are seeing funding reduced. The development of the proposed 13,860 homes during the plan period will stretch the police services further and is unsustainable.

There is no provision of the increased capacity of Guildford hospital, where is this assessed and remedied?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: PSLPP16/16500  Respondent: 8794753 / Andrew Beckett  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2)

I object to this policy as it is too vague and optimistic. Significant improvements to the road infrastructure are like to be many years away even if they ever happen. The draft plan, however, commits to building massive housing estates in the countryside before any of these road improvements are in place. This is inappropriate and will lead to massive traffic disruption during the construction phase and will add permanently to an already congested network (about 3,000 private cars from the 2,100 new homes at Wisley Airfield alone).

Road infrastructure represents a major constraint that should have been applied to the housing target at a much earlier stage in the plan process and not left as an unresolved difficulty in the draft plan.

There is no certainty that either the A3 or M25 in the borough will be improved to increase capacity and reduce congestion during the Plan period. Highways England has no plans to even examine improving the A3 before 2020. I have considerable concerns that development of the large residential sites identified at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), will take place before any improvements are made to the trunk road network. The A3 & M25 are already at capacity during peak hours and any development prior to improvement of these roads will only make the situations worse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16501  Respondent: 8794753 / Andrew Beckett  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to poor air quality concerns (Policy I3)

Paragraph 4.6.27 of the Plan states that “Development must also mitigate its traffic impacts, including its environmental impacts and impacts on amenity and health.” The significant level of development being proposed, particularly in the north east of the borough will lead to considerable further congestion, despite any attempts to mitigate this through travel plans. This will be particularly acute in built up residential areas and will only lead to greater levels of air pollution, which will have a detrimental effect on local residents and their health and can result in early death.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
I OBJECT to not protecting the Green Belt (Policy P2)

This policy does not sufficiently safeguard the Green Belt even though Green Belt constitutes 89% of the borough and should be the cornerstone of all local planning policy. The Green Belt is not the Council’s to give away and once it is gone it is gone forever. Sacrificing areas of the Green Belt to a developer influenced growth agenda is a betrayal of future generations and does not constitute sustainable development.

The Green Belt should be protected in perpetuity, but Policy P2 seeks to justify excessive development in supposedly protected areas. This is in breach of party manifesto commitments and contrary to previous responses to public consultation. It is disreputable to argue, as the Council does, that the Plan would involve the loss of “only” 1.6% of the borough’s Green Belt. Leaving aside the reliability of that statistic, the NPPF does not set an “acceptable” percentage. The fact remains that the plan proposes that 65% of the housing plus industrial development be built on land to be taken out of the Green Belt.

Paragraph 4.3.16 is seriously deficient in simply stating that the Council considers that exceptional circumstances exist to justify amendment of Green Belt boundaries. The exceptional circumstances are not identified. It is clear from national guidance that unmet housing need is not on its own an exceptional circumstance. Even to the extent that exceptional circumstances exist, these have to be balanced against the harm to the Green Belt in the specific sites proposed to be taken out of the Green Belt. This balancing exercise appears not to have been done.

The Countryside Study which the Council may argue fulfilled the need to demonstrate the exceptional circumstances required to justify removal of areas from the Green Belt was a simplistic tick box exercise. Within limits it may have answered certain questions about different attributes of different areas of Green Belt but it did not carry out the balancing exercise needed to determine whether specific exceptional circumstances justified removal of specific areas of land from the Green Belt. I believe that each of the identified Green Belt site proposed to be removed from the Green Belt should be carefully assessed against any exceptional circumstances in deciding whether it should be removed from the Green Belt in the final plan. This exercise should bear in mind that housing need in itself is not an exceptional circumstance and nor is the Council’s growth aspiration. An important consideration is that more housing need could be met on urban sites than is currently planned. The Plan has fallen into the developers’ hands and developers prefer building on undeveloped land rather than brown field sites.

I note that the Summer 2016 edition of "About Guildford" (published by the Council) on page 5 states that "... the Plan rejects any schemes that would have a detrimental impact on the Green Belt." This is demonstrably untrue and I consider this to be a deliberate untruth which compromises the consultation process. I would ask that this untruth be corrected and the consultation period restarted after the correction has been given the same distribution as the original statement. (I assume the document was delivered to most houses in the Borough.) I reserve the right to argue before the inspector that the consultation process was flawed and ineffective because of this.
I object to the “insetting” of 14 villages from the Green Belt. Contrary to assertions made in the Plan process many of these villages do contribute to the openness of the Green Belt and there is no need to inset them.

I also object to the wholesale extensions to the settlement boundaries in many villages to allow for infilling and that infilling is also proposed outside the settlement boundaries of 11 further villages. Many Guildford villages are linear. It is all too easy to square off boundaries by including countryside bounded on only one or two sides by existing development, claiming it contributes nothing to the “openness” of the Green Belt, a term which neither the plan nor the NPPF defines. The NPPF’s other 4 tests of Green Belt status, including the prevention of urban sprawl, are ignored. Effectively, this policy makes all villages within the Green Belt vulnerable to large blocks of new development and seems almost calculated to secure the rejection of the plan as a whole.

To “inset” two-thirds of the borough’s rural villages on the grounds that they no longer contribute to the purposes of the Green Belt is extreme and inherently implausible, given the borough’s location on the edge of Metropolitan London. I cannot see how such extensive areas fail to contribute to the purposes of the Green Belt under the NPPF, but this could quickly be the case if the proposed “insetting” and boundary extensions go ahead.

This policy is wildly disproportionate in terms of any foreseeable development need and has caused tidal waves of opposition from residents. It flies in the face of NPPF paragraph 17’s aim of “empowering local people to shape their surroundings” and other NPPF provisions.

Paragraph 4.3.17 states that “the general extent of the Green Belt has been retained.” I believe this should be deleted as an untruth.

In addition I OBJECT to the proposals to remove from the Green Belt the so called ‘strategic sites’ of Wisley Airfield (A35), Gosden Hill Farm (A25) and Garlick’s Arch (A43) and all other strategic sites. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these sites and villages (as mere housing need does not constitute a ‘special circumstance’) to be taken from the Green Belt. Once taken from the green belt they will be lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached.

GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site.

Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I OBJECT to all strategic sites proposed in the draft Plan to be built in the Green Belt.

1. I object to the identification and allocation of sites in this plan without regard to Green Belt, infrastructure or other constraints. **The plan says that “allocating these sites does not grant planning permission for development.”** However, each of the sites will be removed from the Green Belt and will be available in principle for development and non-Green Belt uses. The inclusion of these sites without detailed site by site justification shows contempt for the thousands of detailed comments the Council have received about individual sites ever since the Issues and Options consultation in 2013. The plan has hardly changed since the Council received 20,000 objections to its first draft plan in 2014. The Inspector considering the plan may conclude that the consultation has not been properly conducted.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/16494  Respondent: 8794753 / Andrew Beckett  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to development in areas which are at risk of flooding (Policy P4)

National Planning Policy states that Local Plans should take account of climate change over the longer term, including factors such as flood risk. It goes on to say that new development should be planned to avoid increased vulnerability to the range of impacts arising from climate change.

The Plan states that in accordance with national planning practice guidance, the Level 1 SFRA has been used to guide development towards areas at the lowest risk of flooding and identify areas unsuitable for development. However, the document concludes that land outside of the area of flood risk is not capable of accommodating all of the borough’s identified development needs. A Level 2 SFRA has therefore also been produced and will help the Council apply the exceptions test (as described in the NPPG) as necessary to development proposals in areas at risk of flooding.

The site at Garlick’s Arch (A43) is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. Knowing the area well I am aware that this site often floods during the winter months and the flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/16491  Respondent: 8794753 / Andrew Beckett  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to this Policy as the development proposed will not be sustainable (Policy S1)

The NPPF states that the presumption in favour of sustainable development “should be seen as a golden thread running through both plan-making and decision-taking.” As the first policy in the Plan, Policy S1 ought to set a clear framework. Instead, no definition of “sustainable development” is given. The policy also fails to set out any principles for applying sustainable development in practice to local planning decisions, which often have serious long-term impacts.

The policy states that it aims “to secure development that secures the economic, social and environmental conditions in the area”. This fails to recognize that economic growth, social justice and environmental protection often conflict. The policy does not say how each element is to be weighted or conflicts resolved. As a practical guide to the planning decision to be taken in the Plan period it is seriously deficient. The policy is likely to be used by developers to justify inappropriate developments on economic grounds. Under this policy, virtually any development will qualify as “sustainable”, in breach of the NPPF’s most important guideline.

Policy S1 is also seriously deficient in making no mention of the Green Belt. The Green Belt is a long term Government policy enshrined in primary legislation to protect green areas in perpetuity. The Green Belt is a living example of sustainable development in practice and is one of the most important factors affecting sustainable development in the area covered by the Plan and should be acknowledged in this policy. Policy S1 should include a commitment to protect the Green Belt from inappropriate development and to uphold Green Belt boundaries and protections. This would set at least one clear boundary to planning decisions. The Plan and the Council have treated the Green Belt as a developable land bank rather than as a constraint to development.

The commitment to approve planning applications “wherever possible” and “without delay” reveals the pro-development bias of the plan. Countervailing references to sustainability are so vague that the NPPF presumption in favour of sustainable development becomes a presumption in favour of any development at all.

This policy also ignores, as if they are inconvenient constraints, most of the 12 Core Planning Principles set out in NPPF paragraph 17.

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill Farm (A25) are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are also unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick’s Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16492  Respondent: 8794753 / Andrew Beckett  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the Borough Wide Strategy (Policy S2)

The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

The housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.

The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guilford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

The assumptions and calculations in the SHMA are widely regarded as flawed and even before Brexit, produced an inflated housing needs number. The figure of 13,860 new homes is completely unsubstantiated. It has not been scrutinized by Councillors despite repeated requests for debate. The assumptions and calculations underlying the model are hidden, protected by a claim to intellectual property by a commercial sub-contractor used in preparing the SHMA. I have serious doubts about the objectivity of the SHMA because it has been produced by consultants whose website openly proclaims their pro-development agenda leading to reasonable suspicion that the figures are inflated. Guildford’s OAN is not transparent but has been taken on trust by the authors of the plan. Given that almost every element of the plan is predicated on this OAN, the plan as a whole cannot be considered “sound”.

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The status of the 13,860 figure is ambiguous. The Council has said that the housing number and the OAN are identical because the OAN is “deliverable” and is by definition objective and cannot be contradicted. The OAN is only deliverable because of the Council’s cavalier approach to the Green Belt in contravention of the NPPF, ministerial statements and local and national Conservative Party manifesto commitments. The plan also states that infrastructure or other constraints may in due course affect deliverability. It is also unlikely that the number of houses can be built at the rate proposed. In recent years, housing starts have on average been less than half the proposed rate. This is not because developers do not have the land or cannot get planning permission. Constraints in the supply chain and maintaining profit levels have been more important.

The plan cannot be considered “deliverable”. In addition, the number of homes proposed, plus existing planning permissions, plus expected “windfall” sites, exceeds the total of 13,860. So how many homes (taking account of these adjustments) do the Council want built? The plan does not say. Without this figure it is hard to see how anything else can be planned. This undermines the validity of the whole consultation. It is unreasonable to ask the public to approve a “plan” that fails to propose a target number that takes all the standard constraints and adjustments realistically into account, leaving the Council to set one without further consultation. Even if the OAN is not flawed, it is at best only a baseline figure and should not be passed off as a policy proposal.

It is unreasonable to embark on a radical transformation of the borough on the basis of an unclear housing target. Most of Guildford Borough is highly protected from development (89% Green Belt, 44% AONB and about 75% protected by SPA). Whether or not increasing the number of dwellings by up to a quarter is desirable, it would be a major and irreversible change, arguably turning a largely rural borough into a mainly urban or suburban one like Woking. The scale of the housing number increases the onus for it to be seen to be sound. A substantially lower number, on the other hand, would remove the need to build on Green Belt or open countryside, and instantly meet the single biggest public objection to the plan as a whole.

The Plan in general and this policy in particular does not address the point that Guildford exists as part of London’s commuter belt. Any increase in supply of housing in Guildford, particularly if the increase is proportionately greater than elsewhere in the commuter belt, will simply result in a shift of population into the area. It will not reduce prices or increase availability except imperceptibly. The Plan also ignores the point that many of those working in the area live elsewhere. Accordingly in considering the housing number the Plan should take into account that in this part of London’s commuter belt, demand for housing is, in practical terms, unlimited.

This policy does not take proper accounts of the constraints to development which exist, principally posed by the Green Belt and by infrastructure limitations. I believe the Council is under a duty to properly consider applying these constraints. It is clear the Council has failed to do this. This approach differs from all the other boroughs in Surrey. The Plan appears to have deliberately been manipulated towards a growth agenda without disclosing why this is being done. The housing that is needed should be concentrated on urban brown field sites and through increasing the housing density of existing built up urban areas.

The development of 13,860 homes in the Plan period with 65% in the Green Belt does not constitute sustainable development. It will have a permanently detrimental impact on the Borough in general and on West Clandon and surrounding area in particular. The developments at Garlick’s Arch and Gosden Hill Farm do not meet the needs of the local communities. The road infrastructure in and around West Clandon will be unable to cope with additional demand. The edge of urban Guildford will creep that much closer to West Clandon, thus negating the purposes of the Green Belt in the area which include safeguarding the countryside from encroachment, checking the unrestricted sprawl of large built up areas and preventing neighbouring towns merging into one another.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill Farm (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.
The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<th>Respondent: 8794753 / Andrew Beckett</th>
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I do not agree that the evidence used for the Proposed Submission Local Plan Strategy and Sites is adequate, up-to-date and relevant.

The fundamental driving forces for much of the development proposed in the Plan (particularly that on Green Belt land) are based on:

1. An excessive ambition to expand the local economy which is neither warranted nor wanted by the local population. Guildford is already one of the highest ‘value creation’ areas in the country and has one of the lowest unemployment rates. There is no evidence that massive and accelerated expansion is required.

1. SHMA figures which are neither transparent nor justifiable, especially in view of previous figures set. Independent assessments of the SHMA (eg from Guildford Residents’ Association and David Reeve) show it is set far too high and so cannot be said to be adequate, up-to-date or relevant.

In addition the recent vote to leave the EU and the impact this will have on the economy and migration have not been taken into account.

The Plan should be re-assessed and the methodology for arriving at housing need figures should be fully transparent.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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I do not consider the Proposed Submission Local Plan: strategy and sites as a whole to be legally compliant because it mainly ignores the consultation process for the 2014 draft Plan it is claimed to be based on.

That consultation process was absolutely clear by some +20,000 responses that that Plan was flawed and no development should be carried out on Green Belt land.

Instead this 2016 draft Plan actually increases the number of dwellings being built on the Green Belt, in direct contradiction to the consultation process, yet is stated to be a Regulation 19 proposal.

As a result I do not see how the 2016 draft Plan can be Legally Compliant.

The 2016 draft Plan should be re-assessed and should take into account the views of the majority of responses from the consultation process for the 2014 draft Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** SQLP16/1830  **Respondent:** 8794753 / Andrew Beckett  **Agent:**

**Document:**  Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ()**

I do not consider the Proposed Submission Local Plan: strategy and sites as a whole to be sound, because, but not limited to, the following reasons:

1. “Only sites that propose sustainable solutions have been included in the Plan and the Plan rejects any schemes that would have a detrimental effect on the green belt.” Summer 2016 edition of “About Guildford” (published by the Council) on page 5. This is demonstrably untrue and appears designed to bias the consultation process.

2. The housing OAN figure has been calculated by a process which is not transparent. It has not been properly examined by Councillors before being adopted.

3. The OAN has been adopted as the housing number without the application of any constraints to take account of Guildford's circumstances, including in particular the Green Belt, AONB and road infrastructure. National policy permits such constraints to be applied and it is inappropriate not to consider the need to do this.

4. The draft Plan does not accord with the NPPF policies on protecting the Green Belt.

Exceptional circumstances need to be shown to justify removing areas from the Green Belt and this has not been done. The housing need number is not justification in itself according to published ministerial statements. Having properly calculated an OAN, constraints should be applied to it to reflect the Green Belt, AONB and infrastructure. Each proposed Green Belt site then needs to be justified on its own merits. The benefits of the proposed development need to be identified together with the harm to the Green Belt. Only if there are exceptional circumstances and following a proper balancing exercise demonstrating that these exceptional circumstances outweigh the harm to the Green Belt can the proposal proceed. The draft Plan does not demonstrate that this has been done. The housing number has been used as a blanket justification for all Green Belt sites-which amount to 65% of the proposed housing number.

1. Whatever the justification for the assumptions made in calculating the OAN, those assumptions are now almost certainly incorrect following the referendum.
1. The housing number is at least twice the achieved rate of building in the Borough over the last few years. There is no evidence in the Plan to show that this rate is achievable and sustainable.

2. Much of the infrastructure required to support the level of development proposed is outside the Council’s control. The Infrastructure Plan is long on possibilities and aspirations and very short on commitments. The infrastructure requirements placed on developers are supposed to be in place before development commences. This is utterly unrealistic and indicates a lack of knowledge of developer’s business models which depend on positive cash flow. It seems very clear that at best, infrastructure provision will seriously lag development and leave higher levels of congestion than now. This will reduce the quality of life for residents through congestion and disruption.

3. The 40-45% requirement for affordable homes together with infrastructure such as railway stations, park and ride facilities, schools and roads is highly likely to be challenged on a site by site basis by developers using the NPPF provision that Councils cannot impose conditions which make development non-viable.

1. GBC has not included details of its Town Centre Master Plan and urban development proposals in time for and as a part of the Guildford Local Plan consultation
2. GBC has failed to provide an Infrastructure Report in time for and as a part of the Guildford Local Plan consultation
3. GBC has proposed an OAN of 693 houses per annum in the GL Hearn West Surrey Strategic Housing Market Assessment (SHMA) which many, including independent assessors, consider unsound
4. Highways England will not start to consider what it intends to do as regards the A3 in the vicinity of Guildford until 2018
5. Network Rail have not made available for the public consultation any plans for a new railway station at Merrow with an adjacent Park & Ride for 1,000 cars
6. The GBC proposals for Gosden Hill Farm do not appear to be in coordination with the Neighbourhood Plan for Burpham
7. The draft Local Plan will cause further linear development along the A3 between Burpham and West Clandon PC and encroachment onto open Green Belt countryside in clear conflict with the National Planning Policy Framework
8. The proposal for Garlick’s Arch was added to the draft Local Plan without any prior consultation under Regulation 18.
9. The Land Availability Assessment (LAA) indicates a range of planning difficulties for Gosden Hill Farm and Burpham which have to be met by the developer involved. These include Electricity Grid supply problems and foul sewage and surface water issues that suggest the development proposed cannot easily be implemented both technically and financially.
10. No adequate explanation is given as to how the aspirational proposal for a tunnel will be used to overcome traffic issues relating to the quality of life and amenity of Burpham, West Clandon, Send and Ripley citizens
11. In common with many others I do not believe the housing figure has been properly calculated and I believe it overstates housing need. The Council has prevented councilors or others from properly considering the SHMA by refusing to make public the basis on which it was drawn up.
12. The housing figure, when properly recalculated, should be subject to constraints to reflect Guildford's circumstances, including in particular the Green Belt and road infrastructure. National policy permits such constraints to be applied and it is inappropriate not to consider the need to do this.
13. Even once a housing number has been calculated it cannot be used to justify taking land out of the Green Belt on a wholesale basis.
14. Cast iron commitment should be included in the plan that development can only commence when required infrastructure improvements have been secured.
15. The status of the text which accompanies each policy box is not clear. If the accompanying text does not have the force of policy a number of the policies (i.e. the text in blue) are so vague and general that they commit the Council to very little.

The draft Plan should be re-assessed with housing on brownfield sites made a priority over commercial development and Greenfield sites and each of the above points addressed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I do not consider the Proposed Submission Local Plan: strategy and sites as a whole has complied with the Duty to cooperate.

This 2016 draft of the Local Plan clearly demonstrates Guildford Borough Council’s refusal to co-operate with the wishes and requirements of the vast majority of the residents in its Borough.

The Council has failed to co-operate with the results of the consultation process for the 2014 draft Plan which was meant to inform and guide this 2016 draft Plan.

Despite campaigning on a clear statement ‘Conservatives Say Green Belt To Stay’, the ruling party on GBC is now intent on pushing through a Plan which will devastate Green Belt land and extend the Guildford Urban Area to further merge into surrounding rural villages.

This is not cooperation by any definition.

In addition the Council has failed to cooperate in providing any transparency to the housing need figures commissioned by the Council from GL Hearn.

The 2016 draft Local Plan should be reassessed with a reviewed and transparent SHMA and revised to reflect the views of the residents of the Borough, who pay for Guildford Borough Council to act in their interests, and not those of developers and central government.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
**Comment ID:** pslp172/1378  **Respondent:** 8794881 / Leslie Garthwaite  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy A28

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Correct title of Policy A28 to say Ash Green, and not Ash.
- Policies A27, A28 and A29 collectively increase Ash Green village by 50%. Opportunity exists under Policy A28 to provide a village/community hall and recreational area which would provide Ash Green with much needed community and social space.

Opportunities (1) Should read: “To create a centre for the village by including a village hall with associated recreational space providing much needed facilities for the Ash Green community. A mix of homes (C3) and accommodation for older people (C2) could be appropriate for this site.”

- Ash Green is not part of the Ash & Tongham Urban Area and therefore the ATUA boundary must not extend south of Ash Green Road and Foreman Road.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Correct title of Policy A28 to say Ash Green, and not Ash.
- Policies A27, A28 and A29 collectively increase Ash Green village by 50%. Opportunity exists under Policy A28 to provide a village/community hall and recreational area which would provide Ash Green with much needed community and social space. Opportunities (1) Should read: “To create a centre for the village by including a village hall with associated recreational space providing much needed facilities for the Ash Green community. A mix of homes (C3) and accommodation for older people (C2) could be appropriate for this site.”
- Ash Green is not part of the Ash & Tongham Urban Area and therefore the ATUA boundary must not extend south of Ash Green Road and Foreman Road.

**Attached documents:**

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**Comment ID:** pslp172/1377  **Respondent:** 8794881 / Leslie Garthwaite  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy A29

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the increase from 1200 to 1750 homes as this would result in the coalescence of the Ash & Tongham Urban Area and Ash Green Village. This is contrary to Policy P3 (Countryside). Therefore Requirement 6 of this Policy, which attempts to protect the “historic location of Ash Green”, is inadequate and would need rewording to prevent this increased potential for coalescence.

“Development proposals in the vicinity of Ash Green to have recognition of the historic location of Ash Green village and...”
the intrinsic rural character of its countryside location. The properties along Ash Green Road have historically been considered to form part of Ash Green village. Whilst this land is now proposed to be included within the Ash and Tongham urban area, Proposals for the land west of this road and to the south east of Foreman Road / White Lane should must respect the historical context of this area by preventing the coalescence of Ash, Tongham and Ash Green. Any development as a whole will not be of a size and scale that would detract from the character of the rural landscape. This should must include the provision of a green buffer that seeks to maintain a sense of separation between the any proposed new development and the properties fronting onto Ash Green Road, Foreman Road and White Lane. This will also help soften the edges of the strategic development location and provide a transition between the built up area and the countryside beyond.”

Requirement 8 does not sufficiently protect Ash Manor, a historical farmstead of three listed buildings including a medieval hall house and should be amended as follows:
“Sensitive design at site boundaries with the adjacent complex of listed buildings at Ash Manor. Views to and from this heritage asset, including their approach from White Lane, must be protected.”
• Infrastructure before development. Requirement 9 (Land and provision for a new road bridge at Ash Station to enable closure of the level crossing) must be competed before any development of Policy A29 commences.
• Requirement 9 fails to address the other significant transport infrastructure improvements that are required to cope with the increases in traffic generated by Policy A29. Therefore solutions to the following areas are also required before any development of A29 is permitted.
  a) The Street in Tongham
  b) A331/A323 intersection
  c) A31/White Lane junction
• Ash Green is not part of the Ash & Tongham Urban Area and therefore the ATUA boundary must not extend south of Ash Green Road and Foreman Road.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

“Development proposals in the vicinity of Ash Green to have recognition of the historic location of Ash Green village and the intrinsic rural character of its countryside location. The properties along Ash Green Road form part of Ash Green village. Proposals for the land west of this road and to the south east of Foreman Road / White Lane must respect the historical context of this area by preventing the coalescence of Ash, Tongham and Ash Green. Any development as a whole will not be of a size and scale that would detract from the character of the rural landscape. This must include the provision of a green buffer that maintains separation between any proposed new development and the properties fronting onto Ash Green Road, Foreman Road and White Lane. This will also help soften the edges of the strategic development location and provide a transition between the built up area and the countryside beyond”
“Sensitive design at site boundaries with the adjacent complex of listed buildings at Ash Manor. Views to and from this heritage asset, including their approach from White Lane, must be protected.”

Attached documents:

Comment ID: pslp171/328  Respondent: 8794881 / Leslie Garthwaite  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Ash Green is not part of the Ash & Tongham Urban Area and therefore the ATUA boundary must not extend south of Ash Green Road and Foreman Road

4.3.29 Amend: “Originally consisting of the three small rural villages of Ash, Ash Vale and Tongham, the Ash and Tongham urban area has grown considerably in size and now forms Guildford borough’s second largest urban area. Given its relative sustainability, countryside to the south and east of the urban area within the urban area to the south and east is allocated as a strategic location for development. However to make this growth sustainable, suitable infrastructure must be implemented before further development.”

4.3.30 Amend: “We do however wish to ensure that whilst accommodating this growth, we are able to protect the remaining countryside around it from inappropriate development in order to protect its intrinsic character and preserve the role it plays in maintaining the separate identity of Ash, Tongham and Ash Green.”

Policy P3 Amend: (1) (c) should be amended to read “does not lead to greater physical or visual coalescence between the Ash and Tongham urban area, Ash Green and Aldershot.”

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

4.3.29 Amend: “Originally consisting of the three small rural villages of Ash, Ash Vale and Tongham, the Ash and Tongham urban area has grown considerably in size and now forms Guildford borough’s second largest urban area. Countryside within the urban area to the south and east is allocated as a strategic location for development. However to make this growth sustainable, suitable infrastructure must be implemented before further development.”

4.3.30 Amend: “We do however wish to ensure that whilst accommodating this growth, we are able to protect the remaining countryside around it from inappropriate development in order to protect its intrinsic character and preserve the role it plays in maintaining the separate identity of Ash, Tongham and Ash Green.”

Policy P3 Amend: (1) (c) should be amended to read “does not lead to greater physical or visual coalescence between the Ash and Tongham urban area, Ash Green and Aldershot.”

Attached documents:

Comment ID: PSLPS16/4158  Respondent: 8795265 / Neill Grieve  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Objections to Guildford Borough Council Proposed Local Plan (June 2016) and to the continued inclusion in the plan of the Former Wisley Airfield (FWA), now known as Three Farms Meadows (TFM) – Allocation A35 - for the phased development of a new settlement of up to 2100 dwellings

In regards to the draft Local Plan and for the following key reasons:

1) I object to the use of Green Belt land for development. Green Belt areas should not be reduced by development for any reasons as once taken, they are gone forever and this allows a dangerous precedent that will proceed to render the principle and overarching natural, cultural, health, tourist and environmental benefits that it currently provides. Housing ‘need’ in a Borough must not be seen as a justification for ‘exceptional circumstances.’ Green Belt is critical to the region as a whole and needs to remain intact.
2) I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There are ample infill sites within cities, towns and villages including a rich resource of brownfield land in the urban areas, which needs to be regenerated, without the need to encroach into protected Green Belt land.

3) I object to the proposed removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt and for consideration for its development. The site serves a vital role in protecting against urban sprawl from London. Development on the site will help develop an urban corridor stretching from London to Guildford. Under the NPPF, no ‘exceptional circumstances’ have been established to warrant removing the land from the Metropolitan Green Belt.

4) I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans.

5) I object to the disproportionate allocation of housing in this particular part of the borough. Over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC). I see the inclusion of FWA/TFM as pure political development providing a massive amount of a wayward and misleading housing target.

6) I object to the threat the Local Plan poses to the historic rural village of Ockham and the blight on properties there. The plan calls for a village of 159 residences (with narrow lanes, no streetlights, very few pavements and many listed houses) to be subsumed into a 2,000+ dwelling development, with urban-style buildings up to five storeys high and a population density higher than most London boroughs.

7) I object to the detrimental impact on transport, local roads and road safety. I specifically object to:
   a. Severe negative impact on rural life and character, forever changing the makeup of the area to that of a suburb.
   b. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars.
   c. The increased volume of car traffic. A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads.
   d. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements.
   e. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them).
   f. The increase in the already severe congestion on the Strategic Road Network of the A3 and M25. A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest.
   g. The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity.

8) I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).

9) I object to the fact that air quality concerns have not been taken seriously – air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.

10) I object to the fact that the proposed plan does not meet the needs and desires of local communities, as evidenced through the Ockham Parish Plan. The top two responses as to why local residents enjoy life in Ockham are (1) access to the countryside and clean air and (2) the peace and quiet afforded by wide open spaces. Over 90% wish to see both the historic features of the village maintained and the village’s green spaces, including the FWA/TFM, protected.

11) I object to the continued inclusion of a site (the former Wisley Airfield, - now known as Three Farm Meadows) for its development. The site serves a vital role in protecting against urban sprawl from London. Development on the site would add additional congestion at the A3 and M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest.

Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

I did not work hard and chose carefully to take residency in this unique, beautiful, special area to have it ruined by a Plan, which is clearly being promoted by development minded politicians and investors. Please redraft the Plan to spend my hard-earned taxes on developing housing on appropriate sites within cities and towns with existing infrastructure and...
the appropriate urban character and not by the misleading, convenient rationalisation of handing our irreplaceable countryside and cherished Green Belt to irresponsible developers who have no invested interest whatsoever in this region or its intrinsic value, which we must maintain at all costs for generations to come. Once precedent would be set to take Green Belt, it would not cease until Green Belt itself is gone. This cannot happen. I trust that these objections will be fully considered, the Plan altered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, removed from the Local Plan with immediate effect.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/3997  
Respondent: 8795329 / Nicholas Williams  
Agent: 

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object because the SHMA figure of 693 houses per annum is too high. The figure has been show to be flawed and the housing target would result in the population increasing at more than 4 times the rate of population increase between 2001 and 2011. This is completely unsustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/16565  
Respondent: 8795329 / Nicholas Williams  
Agent: 

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E7

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the expansion of commercial land in the urban area. This is complete insanity. Online retail is growing and high street stores declining. This land should be used for housing.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/16567  
Respondent: 8795329 / Nicholas Williams  
Agent: 

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy H2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

**Brownfield land available.** The is enough brownfield land in the town centre to meet real needs for affordable homes.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: PSLPP16/16562</th>
<th>Respondent: 8795329 / Nicholas Williams</th>
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1. I object because development will cause considerable and dangerous congestion to the local roads. Traffic levels are already too high on roads that already cannot cope and are in a poor state of repair.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Respondent: 8795329 / Nicholas Williams</th>
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<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy P2</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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I object because the Green Belt needs to be protected. Policy P2 is completely flawed. Almost no one was in support at the last consultation and those that were, were organisations with their own business interests at heart.

No exceptional circumstances. No exceptional circumstances (a requirement by the NPPF for any change of Green Belt boundaries) have been demonstrated for the building of new homes on Green Belt land.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: PSLPP16/16559  Respondent: 8795329 / Nicholas Williams  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the Local Plan for the following reasons.

I object because The proposed development is not sustainable. The volume of proposed new houses will damage local communities which have no need for these houses. Public transport is totally inadequate, meaning a huge increase in the number of cars. Why not develop in urban areas, on brownfield sites?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16564  Respondent: 8795329 / Nicholas Williams  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object due to poor quality air concerns. The enormous developments will further pollute the air and be detrimental to the health of the local residents.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/59  Respondent: 8795361 / Steven Whitaker  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (No)
This new plan does not adequately take into account the feedback on the previous draft. Feedback from hundreds of residents has been unashamedly ignored. In particular there was widespread objection to the construction of a new town at Ockham (referred to as Wisley airfield in the plan) and significant new development at East and West Horsley.

If the huge new town at Ockham is ever built this would represent unprecedented destruction of green belt land and alter forever the character of our borough. The council has understated the strain a new town would place on infrastructure and services in the Borough - many of these problems were identified by the borough's own Planning Department in its refusal to grant permission for a new town at Ockham earlier this year.

The planned development of East and West Horsley would swamp these two villages with new housing and ruin their rural character.

In summary the new local plan is a bitter disappointment.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/511  Respondent: 8795553 / Robert Taylor  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policies A37, A38, A40 and A41. There are four policies proposed for development sites in West Horsley involving the potential construction of 405 homes in total and resulting in an increase in the village housing stock of 36%. All of these four sites are currently in the Green Belt. This proposal is totally excessive for a small rural village. It will lead to the total destruction of the character of this pretty and historic village and pose an enormous strain on local infrastructure. Accordingly, I OBJECT to these four policies.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/711  Respondent: 8795553 / Robert Taylor  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Policy A35, Land at former Wisley Airfield. I OBJECT to this policy. This policy will lead to the creation of a new settlement, the largest in the borough outside of Guildford town, to be set in the heart of picturesque Surrey countryside, surrounded by small villages of charm, character and history. This proposal shows town planning at its very worst. A previous planning application for this site was rejected by GBC earlier this year and the fact that GBC have kept this policy within the Local Plan is atrocious. Development at this site is totally contrary to the rules and spirit of the Metropolitan Green Belt, the site has very low sustainability (the worst ranked of any of the larger sites in the Local Plan), it will have a major adverse impact on local infrastructure, it will cause harm to protected wildlife within the SSSI next to this site and it will involve the creation of a high-density high-rise settlement that is total alien to this part of rural Surrey. This site has no redeeming features and should be consigned to the dust-bin. The fact that UK law allows such a large site to be proposed on an effectively anonymous basis is a sad testimony to English planning law. Accordingly, I OBJECT to this policy. I strongly encourage GBC to withdraw its draft Local Plan in the light of the Brexit vote and re-cast a substantially less ambitious plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/709  Respondent: 8795553 / Robert Taylor  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A36

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy A36: Hotel, Guildford Road: I OBJECT to this policy. The housing numbers proposed in this policy are far too high for this prominent landmark location, resulting in a housing density that is out of keeping with this area and the village of East Horsley in general.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/710  Respondent: 8795553 / Robert Taylor  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A39

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Policy A39: Land behind Ockham Road North, near Horsley railway station. I OBJECT to this policy. The movement in Green Belt boundaries needed to bring this site within the Settlement Area is not valid. There are no exceptional circumstances to justify it, the boundary move proposed is to shift from a 'main river line' to the edge of a piece of woodland - effectively moving from a strong defensive barrier to a weaker one. The proposed policy also involves the loss of prime agricultural land. Moreover, around 30% of this site is designated as Flood Zone 3. Accordingly, this move is not supportable and this site should be dropped as a policy from the Local Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1438  Respondent: 8795553 / Robert Taylor  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy H2: I OBJECT to this policy. It is seriously flawed since it fails to take into account the differences in the need for affordable housing across different parts of the Borough. GBC's 'one-size-fits-all' solution will merely see the wrong kind of affordable homes being built in the wrong areas and used to house the wrong people. GBC should totally re-think this policy which as it stands will lead to wholesale inefficiencies in the supply of social housing.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1439  Respondent: 8795553 / Robert Taylor  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy P2: I OBJECT to this policy. Although GBC professes to protect the Green Belt it utterly fails to do so. Fully 65% of the housing development proposed in the Local Plan is to be built on land that is currently Green Belt. I also OBJECT to a number of the details given within this plan as follows:

Para 4.3.13  I OBJECT to the proposal to inset East Horsley from the Green Belt. The Green Belt rules have protected East Horsley and allowed it to flourish as a rural village whilst retaining its sense of openness. This policy will change that. It is an unnecessary policy and one that will impact negatively on the village of East Horsley.

Para 4.3.16  GBC is proposing to make 8 changes in the Settlement Boundaries of East Horsley. I OBJECT to all of these changes. There are no exceptional circumstances to justify any of these boundary movements and in not a single case is the
defensive nature of the Green Belt boundary enhanced. All these changes are motivated solely by the desire to bring more land into the settlement area so that it may be developed for housing.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLP16/1437  Respondent: 8795553 / Robert Taylor  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I am writing to give my comments on the Proposed Submission Local Plan, issued June 2016, as a part of GBC's consultation process.

I OBJECT to the Local Plan overall. My reasons are that the housing targets proposed for Guildford Borough are much too high. In my opinion they represent an overly aggressive plan that has no real foundation. The supporting analyses given as justification for these proposals are seriously flawed. Moreover, I do not believe that the proposed policy of aggressive expansion in Guildford Borough's housing stock is supported by a majority of its residents.

My objections to specific policies within the Local Plan are detailed below:

Policy S2: I OBJECT to the Borough wide housing target which is set out in this policy. The ONS population growth projections for Guildford Borough are for a 15% growth over the plan period but GBC proposes a 25% growth in its housing stock. This is unjustified. It also completely fails to take into account the constraints of the Green Belt which prevents such expansion from taking place other than by the wholesale consumption of Green Belt land. GBC justify their additional housing proposal based upon the need to support the high levels of economic growth expected in the Borough, on the need to house more students and on the need for more affordable housing. Firstly, economic growth at official projections is already included in the ONS population projections; secondly, there is ample affordable housing proposed in GBC's affordable housing policy; thirdly, following the Brexit vote it is clear that official government population and household projections will need to be seriously reduced, as will official economic forecasts, nationally and within the borough. GBC should either withdraw its Local Plan proposal entirely in the face of this important new factor, or else it should make its own estimates for the reduction needed to take account of the Brexit factor. My suggestion would be to cut the Borough's housing target by 50% from that indicated in the Local Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp172/1690  Respondent: 8795553 / Robert Taylor  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the Local Plan overall. My reasons are that the housing targets proposed for Guildford Borough are much too high. In my opinion they represent an overly aggressive plan that has no real foundation. The supporting analyses given as justification for these proposals are seriously flawed. Moreover, I do not believe that the proposed policy of aggressive expansion in Guildford Borough's housing stock is supported by a majority of its residents.

My objections to specific policies within the Local Plan are detailed below:

Policy S2: I OBJECT to the Borough wide housing target which is set out in this policy. The ONS population growth projections for Guildford Borough are for a 15% growth over the plan period but GBC proposes a 25% growth in its housing stock. This is unjustified. It also completely fails to take into account the constraints of the Green Belt which prevents such expansion from taking place other than by the wholesale consumption of Green Belt land. GBC justify their additional housing proposal based upon the need to support the high levels of economic growth expected in the Borough, on the need to house more students and on the need for more affordable housing. Firstly, economic growth at official projections is already included in the ONS population projections; secondly, there is ample affordable housing proposed in GBC's affordable housing policy; thirdly, following the Brexit vote it is clear that official government population and household projections will need to be seriously reduced, as will official economic forecasts, nationally and within the borough. GBC should either withdraw its Local Plan proposal entirely in the face of this important new factor, or else it should make its own estimates for the reduction needed to take account of the Brexit factor. My suggestion would be to cut the Borough's housing target by 50% from that indicated in the Local Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Policy A35  Land at former Wisley airfield

There are some minor changes proposed in the revised draft Local Plan to Site Policy A35, land at the former Wisley airfield. However, these changes do not address the many fundamental weaknesses of this proposed site for development, including its very poor sustainability, its total lack of transport sustainability, its destructive impact on local wildlife and ecology, the illegal air quality, the major destruction of the Green Belt at a critical location outside the M25 circle, the severe harm caused to local traffic and traffic on the A3, and the major impact on already over-stretched social infrastructure in the locality.

The proposed urban-style high-density development would be inserted in the midst of five rural villages and be totally incongruous to the character of this historic rural area, which would suffer irreparable harm.

In the revised draft 2017 Local Plan GBC a number of sites which removed which had been in the 2016 plan. As such I seriously question the site selection criteria which has been employed by GBC and that results in a number of major sites being removed whilst a site such as Wisley remains - a site with such poor site sustainability and many other major deficiencies.

For the reasons above therefore: **I OBJECT TO SITE POLICY A35, LAND AT FORMER WISLEY AIRFIELD**

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Policy P2 Green Belt Policy

The revised Policy P2 totally fails to protect the Green Belt, with 57% of the new housing developments proposed in the local plan being located on land currently designated as Green Belt. To remove such large areas from the Green Belt and then propose a policy which states “*The Metropolitan Green Belt will continue to be protected*” is simple hypocrisy.

Paragraph 4.3.13 of this policy proposes to ‘inset’ the East Horsley settlement area from the Green Belt. This move will change the applicable planning policies in operation for new developments within East Horsley and will fundamentally impact on the character of this countryside village. East Horsley is a low density rural village which contributes importantly to the openness, biodiversity and variety of the Green Belt. The insetting of the village will harm all of this.

For the reasons above therefore: **I OBJECT TO THE INSETTING OF EAST HORLSEY FROM THE GREEN BELT AS PROPOSED UNDER POLICY P2.**
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: pslp171/463</th>
<th>Respondent: 8795553 / Robert Taylor</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy S2</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy S2 Borough wide strategy

The housing targets for the borough set out in the plan are still much too high, despite the small reduction of 5.6% made in the annual housing target in the revised plan. The SHMA which underpins this target number is seriously flawed and fails to give due recognition to the impact of Brexit on future population forecasts. Despite considering a range of different methods for assessing future forecasts the SHMA study by GL Hearn dismisses the more conservative ONS projection based on a 10 year population trend analysis, (one which gives a projected population increase of 10.4% over the plan period), and makes a series of unjustifiable adjustments above the demographically-derived projection. This results in a proposed housing target which would see an increase of 22% in the overall housing stock of the borough. This increase is more than double the ONS population growth forecast. Given the strong likelihood that following Brexit the population growth will be further reduced this proposed target is not justifiable.

In my opinion the high housing targets proposed appear to reflect the political objectives of certain officers in GBC, more than the needs of Guildford borough residents or the views of over 30,000 residents who have registered their previous opposition to the target housing numbers proposed in the previous local plan.

The scale and locations proposed for new housing also fail to take into account the many constraints on development across the borough, in particular the major impact of Green Belt restrictions and the inadequacies of borough infrastructure.

For the reasons above therefore: I OBJECT TO THE HOUSING TARGETS SET IN POLICY S2

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: PSLPA16/486</th>
<th>Respondent: 8795649 / G Pask</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base</td>
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</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/676  Respondent: 8795649 / G Pask  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/680  Respondent: 8795649 / G Pask  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the continued inclusion of a site (the former Wisley Airfield, - now known as Three Farm Meadows)- where the planning application has already been unanimously rejected by GBC's Planning Committee.

After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd's (WPIL) planning application was unanimously rejected by GBC on 13th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter.

Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is immediately removed from the Local Plan.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/3898   Respondent: 8795649 / G Pask   Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Objections to Guildford Borough Council Proposed Local Plan (June 2016) and to the Continued inclusion in the plan of the Former Wisley Airfield (FWA), now known as Three Farms Meadows (TFM)-

AllocationA35- for the phased development of a newsettlement of up to 2100 dwellings

I object to the draft local Plan for the following key reasons:

1) I object to a plan which proposes that over 70% of new housing be built within the GreenBelt. There is ample brownfield land in the urban are as which needs to be regenerated, without the need to encroach on protected GreenBelt land. Election manifesto promises to the electorate are being ignored.

2) I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.

3) I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans.

4) I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan's new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).

5) I object to the threat the local Plan poses to the historic rural village of Ockham and the blight on properties there. The plan calls for a village of 159 residences (with narrow lanes, no streetlights, very few pavements and many listed houses) to be subsumed into a 2,000+ dwelling development, with urban-style buildings up to five storeys high and a population density higher than most London boroughs.

6) I object to the detrimental impact on transport, local roads and road safety. I specifically object to:

a. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars
b. The increased volume of car traffic. A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads.

c. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements.

d. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them).

e. The increase in the already severe congestion on the Strategic Road Network of the A3 and M25. A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest.

f. The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity.

7) I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).

8) I object to the fact that air quality concerns have not been taken seriously-air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and their reversible impact of the habitat degradation.

9) I object to the fact that the proposed plan does not meet the needs and desires of local communities, as evidenced through the Ockham Parish Plan. The top two responses as to why local residents enjoy life in Ockham are (1) access to the countryside and clean air and (2) the peace and quiet afforded by wide open spaces. Over 90% wish to see both the historic features of the village maintained and the village's green spaces, including the FWA/TFM, protected.

10) I object to the continued inclusion of a site (the former Wisley Airfield, now known as Three Farm Meadows) where the planning application has already been unanimously rejected by GBC's Planning Committee. After 14 months of consideration and various extensions and amendments, Wisley Property Investments Ltd's (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter.

Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPP16/1354  **Respondent:** 8795649 / G Pask  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy D1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the threat the Local Plan poses to the historic rural village of Ockham and the blight on properties there. The plan calls for a village of 159 residences (with narrow lanes, no streetlights, very few pavements and many listed houses) to be subsumed into a development of more than 2,000 dwellings, with five storey high urban-style buildings and a population density higher than most London boroughs.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1511  Respondent: 8795649 / G Pask  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

5) I object to the threat the Local Plan poses to the historic rural village of Ockham and the blight on properties there. The plan calls for a village of 159 residences (with narrow lanes, no streetlights, very few pavements and many listed houses) to be subsumed into a 2,000+ dwelling development, with urban-style buildings up to five storeys high and a population density higher than most London boroughs.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1359  Respondent: 8795649 / G Pask  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the detrimental impact on transport, local roads and road safety. I specifically object to:

1. The assertion that the development will result in a meaningful shift to cycling and The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars;
2. The increased volume of car A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads;
3. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements;
4. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them);
5. The increase in the already severe congestion on the Strategic Road Network of the A3 and M25. A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest;
6. The lack of suitable public The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Objections to Guildford Borough Council Proposed Local Plan (June 2016) and to the continued inclusion in the plan of the Former Wisley Airfield (FWA), now known as Three Farms Meadows (TFM).

Allocation A35 - for the phased development of a new settlement of up to 2100 dwellings

I strongly object to the draft Local Plan for a number of reasons, namely:

I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/1360  Respondent: 8795649 / G Pask  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/1510  Respondent: 8795649 / G Pask  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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4) I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
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<th>Respondent: 8796129 / D M McFarlane</th>
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<td><strong>Answer (if comment is on questions 1-7 of the questionnaire):</strong> ()</td>
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I wish to object to the removal of the Airfield from the Green Belt, in order to build 2000+ dwellings there. I consider that available urban brown field land should be used.

I wish to object because:

1. The local roads near Ockham are too narrow to take increased traffic.
   1. The A3 and M25 are inadequate for more heavy
   2. Local facilities - schools, doctors, shops, - would be seriously Cobham already has daily parking problems and there is at present no site for a secondary school in Cobham.
   3. Air pollution near Wisley RHS gardens would be further

I hope the planning department is able to find a more acceptable solution to the need for housing in Guildford.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

<table>
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<th>Comment ID: PSLPA16/1024</th>
<th>Respondent: 8796321 / Nick Etches</th>
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<td><strong>Answer (if comment is on questions 1-7 of the questionnaire):</strong> ()</td>
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8. I **object** that there has not been and **demand** that (a) there should be a significant challenge to the GBC scenario planning and (b) the housing and growth numbers should be revised and especially in the light of uncertainty and change which will accompany Britain’s withdrawal from the EU.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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<th>Comment ID: PSLPA16/1022</th>
<th>Respondent: 8796321 / Nick Etches</th>
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<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - East Clandon</td>
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2798
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

2. I object to the Settlement Boundary which has been imposed on East Clandon without any consultation. This imposition provides no protection to further development outside of the settlement boundary (Policy P2 para 4.3.25) and is deemed by me as being unnecessary in an already tightly developed ancient and rural conservation village with high archaeological merit. I demand that this proposal be removed as it will endanger the openness of the Green Belt, the views in and out of the AONB (protection of the AONB Policy P1) and the character of our village.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: PSLPP16/3380</th>
<th>Respondent: 8796321 / Nick Etches</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D4</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

9. Policy D4: I object to the insetting of villages (meaning in fact, removal of villages from Green Belt protections) and the fact that they will suffer from higher density development and the resulting increase in traffic, increased use of infrastructure which is already under pressure. I object in particular to the insetting of West Clandon, Send and the Horsleys. This will have a detrimental impact on Green Belt openness and the views in and out of the AONB in direct contravention of Policy P1 and P2.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
14. I object to the fact that infrastructure has not been properly assessed and is inadequate to deal with current housing levels – roads, doctors, schools will not be able to cope.

15. I object that housing being proposed on the Green Belt will increase traffic bringing increased danger and pollution and slower journey times on our already overcrowded village roads.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/3377  Respondent: 8796321 / Nick Etches  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

3. Policy P2 – Green Belt: I object to this significant erosion of the Green Belt with the proposals for large towns being developed on Green Belt land thereby removing the openness of the Green Belt. I note in particular the huge developments proposed for the North East quadrant of the borough which will adversely affect our amenity, but also unfairly targets our tranquil rural villages because we can provide ‘dormitory’ facilities for commuters to London. The developments directly affecting our villages are the proposals for Wisley Airfield, Gosden Hill Farm, various farms and tracts in the Horsleys and Garlicks Arch at Send.

4. Further, on the erosion of Green Belt and I object that Policy P2 is not met where it states that Green Belt should be protected. I object to the disproportionate use of Green Belt land for housing – some 65% of the housing proposed is on Green Belt and with little consideration being given to redevelopment of brown field sites.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/3381  Respondent: 8796321 / Nick Etches  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
10. I object that GBC are contravening the NPPF framework stipulation in paragraph 87 with the proposed developments at Gosden Hill Farm, Ripley, East and West Horsley and Garlicks Arch, Send. Paragraph 87 states “As with previous Green Belt policy, inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances.” and GBC have not proven any special circumstance for developing on these Green Belt areas.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/3383  Respondent: 8796321 / Nick Etches  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

12. I object to building on the Green Belt because the essential characteristic of Green Belt is its openness and permanence (National Planning Policy Framework paragraph 79).

13. I object to all other strategic sites in the Local Plan, Blackwell Farm, 3 Farms Meadows, Garlick’s Arch, West Horsley and Hog’s Back. All are out of proportion to the surrounding area and none qualify for the exceptional circumstances required to take them out of the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/3379  Respondent: 8796321 / Nick Etches  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

5. I object to Policy S1 not offering sustainable development as regards roads and rail infrastructure which currently does not cope with demand, congestion on the A3 in particular, but also other A roads in the area such as the A247, the A246 and then there is the already overcrowded and slow train system for those currently living in the borough and needing to commute to London. No pre-emptive planning has been made to alleviate these real problems which will be much exacerbated by any large increases in housing.

I specifically want you to note the winding, narrow and dangerous route via the A247 through West Clandon which then drives people to use a short-cut the even narrower rural road, the Ripley Road, through East Clandon to and from the A3. This will be much exacerbated with the large increase in housing twinned with large increase in cars and travel.
6. Continuing with Policy S1 (Presumption in favour of Sustainable Development) I object that this is not being met and that GBC are contravening this when it is clear that no fixed plans are available to improve the provision of shops, medical facilities, schools in our immediate area (besides roads and rail already mentioned) to service us. If the GBC were serious about improving the infrastructure and sustainability of our communities, they would have secured plans and funding to ensure these facilities are available and not just at the behest and hoped-for goodwill from the developers. Further, how will developers be held accountable to their promises to build infrastructure? Stories are legion of developers reneging on commitments as the ‘money runs out’ even though vast profits will be made from turning agricultural and Green Belt land into highly valuable housing land.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3376  Respondent: 8796321 / Nick Etches  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Objections to the Guildford 2016 Local Plan

I am currently overseas so am writing to you by email in respect of the above. Accordingly this letter will not be hand signed.

I object to the 2016 Draft Local Plan as a whole and in particular I object to the specific issues (listed below). I believe that this deeply flawed Local Plan will have a direct and detrimental effect on the amenity currently enjoyed by my family and other residents of East Clandon and to the even greater detriment to our neighbouring villages of West Clandon, Ripley, West and East Horsley. It erodes the openness of the Green Belt and endangers the beauty and views in and out of the Surrey Hills AONB.

My specific points are:

1. I object to Policy S2 for the proposed provision of the very high overall housing numbers of 13,800 new homes (690 new dwellings being built every year for 20 years) and I object on two grounds; these housing numbers have been imposed on the borough with no real consultation being undertaken with the residents of East Clandon and the borough as a whole. Secondly, the housing numbers are based on a high-growth economic development plan which in itself has had no consultation with us and this combined with estimated demand from London residents will turn Guildford into a dormitory town for London.

Further, I object to the fact that no real economic or housing demand factors have been provided by the borough planners to substantiate the very high housing target of 13,800 new dwellings over the next 20 years. This is in direct contravention of the NPPF’s requirement for the planning authority to provide meaningful consultation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/683  Respondent: 8796321 / Nick Etches  Agent:
7. I **object** to the fact that GBC have not met the requirements of the NPPF Paragraph 155 which imposes an explicit obligation to have early and meaningful consultation. This has not been met in a number of areas by GBC. We have not had a meaningful consultation on imposing a settlement boundary on East Clandon, on the absence of meaningful economic and population growth figures for Guildford showing various scenarios with high, medium and low growth scenarios being offered.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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Comment ID: SQLP16/684  
**Respondent:** 8796321 / Nick Etches  
**Agent:**

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

11. I note that there were over 20,000 responses objecting to the 2014 draft Plan and therefore I **object** that the Consultation Process has not been properly followed for this Plan which is not materially different from that plan.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

---

Comment ID: pslp171/693  
**Respondent:** 8796321 / Nick Etches  
**Agent:**

Document: Proposed Submission Local Plan: strategy and sites 2017 / Key facts

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()
I object to the population growth figures in section 2.3, which have actually increased by almost 5000. By returning to a 2014 evidence base, I feel this does not account for more recent political and economic changes.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/2211  Respondent: 8796321 / Nick Etches  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A25

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to Policy A25 Gosden Hill Farm, in that even though housing numbers at this site on the surface seem to have been revised slightly downward to 1700 from 2000, in actual fact the wording in Policy A25 now states 'Approximately 2,000 homes of which a minimum of 1,700 homes will be delivered within the plan period'. This seems to be attempting to indicate a change which in reality may not exist, and is misleading.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/2212  Respondent: 8796321 / Nick Etches  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to site A35, Former Wisley Airfield, as the overall area of the site has increased to 95.9 ha, which implies loss of more open countryside to development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/2218  Respondent: 8796321 / Nick Etches  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A43a
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

In policies SRN9 and SRN10 I note the change in responsibility for delivering new A3 slip roads at Burnt Common from Surrey County Council to either Highways England or developer. I have concerns that if delivered by Highways England alone there would be no local level control over if/when/how the scheme was delivered. This is an existing concern for other schemes including SRN2 and SRN3 (Stoke interchange and M25 J10/A3 interchange), where Highways England have sole responsibility.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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I object to site A58 Burnt Common, which has now become a 'Strategic Employment Site'. The overall burden on Send (and West Clandon) of the minimum of 7000sq m of industrial space (i.e. could be much larger) is greater than the now deleted up-to 7000 sq m from the neighbouring site A43 Garlick’s Arch. This is a net gain in traffic and congestion in this area. The proposed insetting of Send Business Park from the Green Belt indicates GBC’s increased emphasis and ambition for growth of this village.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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I also have concerns over the changes in funding in policies SRN2 and SRN3. While I strongly welcome developer ‘funded’ (which implies more financial commitment than ‘contribution’) for road network improvements which are required as a direct result of new housing, I am concerned this may lead to a reduction of the affordable housing percentage delivered (which should be 40% in most cases). This concern is in part due to a change in Section 4.2.40, where there is in my view some softening of the language around the issue of developers needing to demonstrate lack of economic viability of affordable homes in order to reduce their standard quota (40%). This concern applies to other developer funded projects including Wisley cycle networks.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/685  Respondent: 8796321 / Nick Etches  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to POLICY P2 (6), specifically the new phrasing ‘Limited infilling may also be appropriate outside the inset or identified settlement boundaries, where it can be demonstrated that the site is as a matter of fact on the ground within the village’ referring to Ockham and Wisley, and by extension to other villages with settlement boundaries. I feel this change in language creates less clarity around the purpose of settlement boundaries as regards development policy. This objection is made in the context of the fact that there is no change to POLICY P2 (5), the intention for East Clandon to have a settlement boundary for the first time, which I have previously and still object to.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/687  Respondent: 8796321 / Nick Etches  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object that GBC are contravening the NPPF framework stipulation in paragraph 87 which states “As with previous Green Belt policy, inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances.” (Policy P2, P3, E5). The Guildford Green Belt Group have stated that 70% of new housing will be in countryside and 58% of this is on Green Belt (Gosden Hill, Wisley, Blackwell Farm). This is exceptional in size and thus does not meet the criteria to demonstrate exceptional circumstances. I support instead developing and densification of brown belt and urban areas. According to Policy H13, developments should have a maximum (and...
minimum) densification policy to prevent developers from using land inefficiently which leads to countryside erosion and ineffective use of brownfield sites.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** pslp171/684  **Respondent:** 8796321 / Nick Etches  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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I object to Policy S2 for the proposed provision of the very high overall housing numbers of 12,426 new homes, which is only a small reduction on the previous figure of 13,860. These numbers are still based on an overly high-growth economic development plan which in itself has had no direct consultation. They remain too high as shown by an objective assessment made by the report made for the Guildford Residents Association (GRA) by Neil MacDonald (independent adviser and commentator on housing demographics).

Also in Policy S2 housing numbers, I object to the fact that downward economic pressures (including Brexit) have not been adequately accounted for. Additionally in Policy E1, E2 there is too much emphasis on providing retail and commercial space in Guildford town centre, when the pattern of business is changing and more town centre housing is needed rather than retail. This would ease the pressure on housing on the Green Belt.

Furthermore, I object to Policy S2 because I believe the 12,426 homes includes estimated demand from London, and also now possibly from Woking’s perceived unmet need, and I feel Guildford will become a dormitory town for London and the surrounding areas, rather than meeting the needs of residents of Guildford Borough.

I object to the fact that in Policy S2, despite the afore-mentioned slight apparent reduction in overall housing numbers and industrial space; the reduction is mostly in Normandy/Flexford and the load on the East of the borough is still disproportionate and has even increased.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** PSLPA16/526  **Respondent:** 8796481 / Sally Erhardt  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Objection to Guildford Borough Council proposed Local Plan (June 2016)

I object most strongly to the Guildford Borough Council proposed Local Plan (June 2016). The plan is unworkable and unsustainable and seems to have several errors.

I object to the SHMA numbers. The figures for housing needs are pre-Brexit and so need to be adjusted, however we have not been able to scrutinise the methodology used to establish the numbers so question their validity.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/727  Respondent: 8796481 / Sally Erhardt  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the inclusion of the Wisley site. Why is this still in the local plan, it has already been rejected by GBC as unsuitable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/728  Respondent: 8796481 / Sally Erhardt  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the last minute inclusion of the Garlick’s Arch site. This is extending the ribbon development of Ripley and will result in urban sprawl it is also on the site of an ancient woodland and is in the green belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/729  Respondent: 8796481 / Sally Erhardt  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the building of a new junction at Send/Burnt common. I cannot see how this could possibly be proposed when it was turned down a few years ago, by the council and highways, when requested by the Newark Lane Residents Association, for its detrimental effects on the traffic on the A3- how have these effects changed? This junction can only have a detrimental effect on Ripley, pulling in traffic from Woking, Shere and many surrounding areas. The Street in West Clandon and Ripley High Street along with the road from Send will become congested rat runs.

There seems to be little that I agree with in this plan. Presumably because of Brexit it will need to be rethought and I do hope that the comments made to this and the previous draft will receive more thorough consideration.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1475   Respondent: 8796481 / Sally Erhardt   Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the suggestion of the provision of affordable houses. I very much doubt if any of the houses/ flats to be built will actually be affordable for young key workers. This is used a great deal as the justification for building so many in the first place.

I would suggest that the Local Plan will have the effect of drawing in many new people to the area whilst leaving existing residents still unable to afford housing of their own.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1474   Respondent: 8796481 / Sally Erhardt   Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to the lack of provision of infrastructure. Who will be paying for the major infrastructure investment that will be demanded with such a high number of extra housing planned? There is no provision for this and with our antiquated, congested and over stressed position now there will be a terrible collapse in education, medical provision, energy, water, communications and transport systems.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1478  Respondent: 8796481 / Sally Erhardt  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the lack of environmental and ecological safeguarding. Not enough thought has been given to protect the SPA, SSSI AND SNCI. Air quality concerns should be greater. The air quality is already poor.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1473  Respondent: 8796481 / Sally Erhardt  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the planned changes to the Green Belt. How can it be justified to take many villages, including Ripley, out of the green belt? The green belt is the envy of many countries and is there to protect our green areas in perpetuity. England is the most densely populated county in Europe and Surrey is the most densely populated county in England, the green belt was established for very sound reasons, which have not changed. Once lost the Green belt is never to be regained, the council should protect the Green Belt for our children and future generations.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/1476  Respondent: 8796481 / Sally Erhardt  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2
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<td>I object to the excessive number of houses to be built in this part of the borough. The Green belt is not up for grabs. Ripley has built well over its fair share of houses already. The urban areas of the borough should be able to produce space for housing in the same way as Ripley has done in the last few years.</td>
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<td>I object to the impact of the plan on transport, local roads and road safety. Ripley is already over congested and at rush hours often at a standstill. The A3 must be near full capacity already.</td>
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<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<td>I object to the removal of Brown field site A34 and A44 from the plan – whilst the plan claims to have adopted a ‘brownfield first approach,’ this is clearly not the case and is contrary to national guidelines.</td>
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<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
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Comment ID: pslp172/2786  Respondent: 8796481 / Sally Erhardt  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I would like to register my continued objection to the inclusion of Policy A35, Three Farm Meadows in the Draft Local Plan for many reasons.

1. I object to the change of boundaries which are identified incorrectly on the plan.
2. I strongly object to the removal of an additional 3.1 ha from the green belt – this is completely lacking in justification.
3. I object to the council not listening to previous representations and wasting tax payers time and money.
4. I object to the disregard of constraints of designated green belt land, infrastructure, air quality etc.
5. I object on the grounds that this site is the furthest from railway stations than any other possible site identified.
6. I object in relation to traffic associated with the RHS site opposite – the increases in traffic associated with this tourist attraction have not been taken into consideration.
7. There is a lack of employment on site – so most residents will travel to work. This will mean an increase in traffic – people will not regularly walk/cycle.
8. Local roads are at capacity and there are regular hold ups already.
9. I object to the lack of consideration regarding the damage caused by high pollution levels and nitrogen deposition.
10. I object to the lack of explanation regarding the change in the original time frame for the plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/2425  Respondent: 8796481 / Sally Erhardt  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the removal of Brownfield sites A4 from the plan – this site in Guildford is appropriate for housing and would be supported by the sustainable infrastructure of a large town. This site should be used for housing, not commercial retail.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/2424  Respondent: 8796481 / Sally Erhardt  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A42
**Comment ID:** pslp172/2423  **Respondent:** 8796481 / Sally Erhardt  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy A43

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**Answer (if comment is on questions 1-7 of the questionnaire):** ()

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I object to the increase in housing proposed in Tannery Lane, A42. The housing at this site has been increased by a third since the 2016 plan. There are no proposed to improve the local road network (only to add more junctions with the A3). This region is already VERY congested and the failure to consider how to improve and support the local road network in relation to this increase in housing is senseless. This increase in housing should not be allowed.

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**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** pslp172/2427  **Respondent:** 8796481 / Sally Erhardt  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy A50

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**Answer (if comment is on questions 1-7 of the questionnaire):** ()

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1. I object to the extensions to the development of the Green Belt. I object the the extension of Garlick’s’s Arch site (A43). Green Belt should NOT be built on and this extension is UNACCEPTABLE.
2. There is significant confusion within the plan as to the reason for including Garlick’s Arch A43 in the plan. Reasons of separation between Send Marsh/Burnt Common are being ignored as BOTH sites are in the plan. The proposed changes to this plan are poorly thought out.
3. I object to the increase in housing at Garlick’s Arch A43. The potential increase in housing at Garlicks Arch will be extremely harmful to the rural nature of Ripley, Send and Clandon. These villages, as I’m sure you know, have a great rural history and this will be destroyed.
4. I object to the allocation of 6 travelling show people sites in A34 Garlicks Arch. There should be no inclusion of Travelling show people plots as this development site is for 400 homes and so is not compliant with the minimum of 500 in as stated in section 4.2.24 of the Plan.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
Plan is self-inconsistent in respect of traveller sites. A50 Whittles Drive, Normandy, shows on the Site details: “Allocation: The site is allocated for approximately 14 Travelling Showpeople plots ...” Clearly A50 more than covers the total "need" of 8, (page 40, 4.2.22.) and so no “need” exists for this in site A43. This and other inconsistencies in the Plan mean no decision can be made on the basis of this document.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the proposal for a waste management facility in Green Belt at site A58. Transparency is greatly lacking in the plan regarding this waste management facility. It is very unclear in policy 4.423a and this does not allow for proper consultation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the change in policy on affordable homes – Policy 4.2.23 – whilst the first plan demads that “Developers will be expected to provide land for affordable homes at nil value,” the 2017 version says: Off-site provision or payment in lieu is expected to enable the same amount of additional affordable housing as would have been delivered on site.” This means that the developer no longer has to provide any ‘affordable’ homes but has to make a payment to the council. So whilst the housing that we need must be affordable, it is unlikely that this development will result in many affordable homes at all.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to the lack of planning for appropriate infrastructure for sites A43 and A42. Whilst there is clearly a need for better infrastructure for these developments, as acknowledged by the borough council, there is a complete lack of infrastructure improvements for both sites. Whilst the plan states that’s that the provision of infrastructure is ‘a key theme of our local plan’ this inconsistency completely undermines the plan and the development therefore should not go ahead.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/829  Respondent: 8796481 / Sally Erhardt  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

I object removing Send Business Park from the Green Belt – 4.3.15 – There can be no justification for removing (insetting) this site from the green belt and therefore no ‘exceptional circumstances’ as required by the NPPF can be claimed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/830  Respondent: 8796481 / Sally Erhardt  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy S2

I object to the unfair burden on the North East of the borough for this development. The new plan has become even more unbalanced toward the North East of the Borough – why is 40.6% of the homes proposed within 3 miles of Send Marsh? This area has already had its fair share of development and it is very unfair that this region should face most of the development and the extended development proposed by the new plan

I object to the concealment of development through ‘deferment’ at sites A24, A25, A26, A43. - This deferment is designed to hide the number of houses being built. I object to this.
POLICY A35, land at former Wisley Airfield, Ockham

This proposed development of over 2000 homes will have major adverse consequences on the local infrastructure, in particular:

- High volumes of traffic on local narrow lanes in all surrounding villages.
- Unmanageable traffic flows onto an already busy A3 and Junction 10 of the M25.
- Additional traffic forced through Ripley and Cobham as a result of proposed road closures and junction changes. Particularly in the rush hour and school arrival and departure times these two towns are virtually impassable.

In addition

- As a result of the A3 an M25 junctions, levels of Nitrous Oxide around this area are already high and will be added to by the approximately 4000 additional vehicles from the site. This will be dangerous for new residents.
- The site is important for wildlife, being a Site of Special Scientific Importance. This was set up to provide protection for rare and threatened birdlife in certain lowland heath locations.
- There is currently no infrastructure at all on this site, meaning that all water, gas, electricity and telephone will need to be installed.

For the above reasons I OBJECT to the above-named Policy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
POLICY A39, located in East Horsley

This site is for 100 dwellings and has been added since the 2014 local plan. This site is unsuitable for this number of houses as it will have very limited access onto Ockham Road South which is right up against the northern side of a railway bridge with a busy vet and a restaurant on the southern side.

The site is also prone to flooding in certain areas.

In addition, as a result of the additional dwellings, the local infrastructure will be unable to cope; in particular:

- The local schools, both primary and secondary, are already completely full and would not be able to take additional children. This matter is not addressed in the local plan.
- Public transport is currently inadequate with poor bus services and station car parks that are already full.
- Local roads are also unfit for purpose being very busy and in poor condition.
- The nearest medical centre, in East Horsley, is totally overstretched with appointments being difficult to obtain.
- There are only a couple of small shops in West Horsley with most residents doing their shopping in East Horsley village. Traffic and parking in East Horsley Village is already too great for the facilities.

For the above reasons I OBJECT to the above-named Policy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3690  Respondent: 8796609 / Rupert Pye  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

POLICIES A37, A38, A40 and A41, located in West Horsley

All these sites are located within Green Belt. These sites, plus two others, are proposing 405 homes in total. The village as a whole had 1124 dwellings in the 2011 Census and the proposed developments represent an increase of 36% over the plan period, an enormous expansion by any standards. This will completely adversely alter the nature of the village as a whole and will change it from a low density housing area.

As a result of the additional dwellings, the local infrastructure will be unable to cope; in particular:
The local schools, both primary and secondary, are already completely full and would not be able to take additional children. This matter is not addressed in the local plan.

Public transport is currently inadequate with poor bus services and station car parks that are already full.

Local roads are also unfit for purpose being very busy and in poor condition.

The nearest medical centre, in East Horsley, is totally overstretched with appointments being difficult to obtain.

There are only a couple of small shops in West Horsley with most residents doing their shopping in East Horsley village. Traffic and parking in East Horsley Village is already too great for the facilities.

For the above reasons I OBJECT to the above-named Policies.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

I am writing to OBJECT to the overall number of properties scheduled for development in the Guildford 2016 local plan which takes no account of the fact that a substantial part of the Guildford area is covered by the Surrey Hills Area of Outstanding Natural Beauty (AONB). Quite rightly this is not to be developed which means that the same number of proposed properties are to be built on a far smaller area of land than is covered by the total Guildford area. The total number of properties should be reduced to take account of the proportion of land taken by the AONB; as it is, the density of new developments is approximately twice what it should be.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I also OBJECT to the fact that 76% of the proposed developments are on high quality Green Belt with only 24% being on Brownfield or Urban areas (Ash, Tongham and Guildford). It is also Government policy that Metropolitan Green Belt should only be built on in exceptional circumstances and that in this context housing need alone is not an exceptional circumstance; I therefore OBJECT to the revised local plan as a whole.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp173/444  Respondent: 8796609 / Rupert Pye  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Appendix H: Maps - West Horsley North

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I wish to make the following comments and objections on the above-mentioned Local Plan:

1. The reduction in the proposed number of new homes in West Horsley, at 90, is an insult to all those who previously objected to the Guildford Local Plan. It does nothing to reduce the very large number of dwellings proposed on Green Belt.
2. The eastern side of the Borough is now scheduled to take an even greater proportion of new homes in the Green Belt.
3. It is totally unacceptable that Guildford is choosing not to constrain its overall housing growth, as many other Councils have done, to protect Green Belt. The objectively assessed housing target will mean that, at the end of the Plan Period, Guildford has grown by nearly 25%, nearly double the Office for National Statistics prediction for the growth of Guildford.
4. Nothing has been put forward since last year's Consultation to improve the sustainability of the West Horsley development sites and thus meet National policy requirements. The local infrastructure will not be capable of coping with the extra volume of traffic and demand for services arising from the proposed new dwellings.
5. Flawed evidence continues to be relied upon to justify overexpansion.
6. More homes are needed on brown field sites in Guildford town centre, which is where these are needed, rather than on Green Belt around our villages.
7. Finally, I OBJECT MOST STRONGLY TO NO CHANGES BEING PROPOSED SINCE THE 2016 CONSULTATION TO INSETTING WEST AND EAST HORSLEY FROM THE GREEN BELT.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/889  Respondent: 8796673 / Suzanne Burroughs  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT to the proposed Infrastructure Schedule (Appendix C)

The Infrastructure Schedule sets out the key infrastructure requirements on which the delivery of the plan depends. For each of the Key Allocated Sites in the borough it identifies infrastructure projects that are required, except for Garlick’s Arch (A43) which is not mentioned. It is clear that the Plan takes no account of the infrastructure required for this site and is therefore not fit for purpose.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/890   Respondent: 8796673 / Suzanne Burroughs    Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)

The Plan’s proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the borough, it is over double the previous figure of 322 used in previous plans. The SHMA report methodology is I believe inaccurate; it inflates the needs of the borough by distorted student numbers. However, it is based on commercially confidential modelling assumptions that cannot be checked or reviewed. There is no transparency to this evidence base and it is therefore impossible to assess its accuracy. This is not democratic and is not appropriate for consultation of the Plan.

The National Planning Policy Framework allows the overall housing target to be reduced to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/1402   Respondent: 8796673 / Suzanne Burroughs    Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A25
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT to Gosden Hill development being in the Local Plan. The land in Gosden Hill does exactly what the Greenbelt was designed to achieve. It provides a green buffer between the Guildford Urban Area and West Clandon, gives Burpham a defined green boundary and breathing space and it hides Guildford town from visitors until they pass the off-slip to Burpham.

No exceptional circumstances have been demonstrated for building on this site and therefore it does not comply with paragraphs 87-89 of the NPPF. It stops the sprawl of Guildford town, assists in safeguarding the countryside from encroachment and assists in urban regeneration by encouraging the recycling of derelict and other urban land. All requirements of the NPPF.

The scale of Gosden Hill is out of proportion to West Clandon. It would have four times the amount of housing plus shops, offices/factories, GP surgery, schools. Development on this scale would blight a historic village with a history going back to the doomsday book and beyond.

Gosden Hill is the most obvious location for the north end of an A3 tunnel. It has rising ground and is situated just before the urban area. If it is built on, it will be very difficult to construct a tunnel.

The development will generate in the region of 6,000 vehicles which will pour on to the A3 which is stationary every day during rush hours. The linking of the A3100, B2215 and A247 would channel thousands of cars through the narrow, winding road through West Clandon, a road where large lorries mount the pavement virtually every day and through Send and Ripley which are also severely constrained.

The volume of traffic will greatly increase air pollution which is particularly critical given the proposal to build two schools.

Currently, a two way junction at the site would require vehicles wanting to go north on the A3 to go through Burpham which is grid-locked every day.

Burpham’s sewers are at capacity. Sewage would have to be pumped to Slyfield for processing, a project of enormous cost.

There is inadequate fresh water in Guildford and current supplies could not meet the needs of a development of this size.

Electricity supply is also inadequate and would require a big infrastructure development.

The railway station was rejected by Guildford Borough Council in 1984 because it feared Gosden Hill would become a dormitory estate for London.

The wording of the Local Plan with regard to Gosden Hill is so loose that the developer could virtually do whatever it wants.

The remaining agricultural land between Gosden Hill and West Clandon is so small that it is highly likely to be uneconomic and therefore a prime candidate for further development which would roll the Guildford Urban Area over West Clandon towards East Clandon and Wisley.

If the Strategic Sites are developed, the north of Guildford will deliver 36%, 5,036 houses towards the total of around 14,000. The infrastructures of the existing villages and the A3 will be overwhelmed by the scale of development.

A new on-slip at Burpham would only be 1.8km from the on-slip at Burnt Common which is against Highway England’s requirement of 2km.
Development of the A3 at best will not start until after 2020 and the building of a tunnel, which is only an “aspiration” in the Local Plan is likely to be many years after. In the meantime given that developers build houses to provide cash-flow for infrastructure, Gosden Hill will have a crippling effect on villages like West Clandon and the A3.

Gosden Hill already has surface water problems. Merrow Stream crosses the site. No hydrological survey has been carried out to assess the implications. Electricity pylons run through the centre of Gosden Hill which have health and safety issues.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/1403  Respondent: 8796673 / Suzanne Burroughs  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT to the inclusion of the land at Garlick’s Arch, Send Marsh/Burnt Common and Ripley (A43)

Garlick’s Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8). There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).

The Plan states the preference is to making the best use of previously developed land. Yet at the 11th hour a perfectly acceptable brown field site at Burnt Common, capable of accommodating approximately 100 houses, was removed from the Plan and replaced with the Garlick’s Arch site. There was no proper consultation in relation to the inclusion of this site. Why was a brownfield site removed and replaced a Greenfield site? There is no evidence that Section 18 of the Planning and Compulsory Purchase Act 2004, which requires local planning authorities to produce a Statement of Community Involvement, has been complied with for this site. This only came to light for local residents following a Council meeting on 11th May 2016.

Moreover, Guildford Borough Council’s own Green Belt & Countryside Report does not address Garlick’s Arch at all, so there is no evidence base to support the inclusion of this site.

National Planning Policy promotes sustainable developments, with sustainable transport. With ever reducing bus services in the area and no train station within reasonable walking distance it is impossible for any development on this site to offer a sustainable transport solution. Development on this site is wholly inappropriate (Policy I3).

The stream, which runs through the site, is identified as having a high risk of flooding by the Environment Agency. There are other sites that do not flood that can be developed and therefore this site should be removed from the Plan (Policy P4).

This site is bordered by Ancient Woodland and within it a number of trees are protected by Tree Preservation Orders (Policy D3).

The site has an abundance of wildlife, some of which are protected. It is home to many types of owls and bats, with the woods having cuckoos and woodpeckers. In addition there are regular sightings of badgers, deer and red kites. The development of the site will result in the loss of habitat. No wildlife report has been conducted on the site. (Policy I4)
It is clear that with this site being added at the 11th hours no infrastructure planning has been undertaken. The Infrastructure Schedule makes no provision for any infrastructure improvements for this site. How will the local services such as schools and doctors cope, many of which are already at capacity? (Policy I1)

Furthermore, several electricity pylon runs through the site, which will have the potential to be a health hazard for any residents.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** PSLPS16/1404  **Respondent:** 8796673 / Suzanne Burroughs  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT to the inclusion of the land for new on/off ramps at Burnt Common (A43a)

The addition north facing ramps to the A3 at Burnt Common would be a disaster for local communities. There is no requirement for local traffic to access the A3 to the north, but the addition will draw in a huge amount of ‘through’ traffic.

The route from London/M25 to Woking or would now be through Burnt Common and Send. Equally traffic from the east of Guildford (Merrow etc) and the A25 will now go through West Clandon and Burnt Common. This will cause immense damage to those areas on small roads which cannot be improved.

This Plan does not address the needs of local communities or the Borough in this regard. There has again been no Section 18 consultation on this.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** PSLPP16/2980  **Respondent:** 8796673 / Suzanne Burroughs  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
1. I OBJECT to the damage to the historic environment as a result of the scale of the proposed development (Policy D3)

I OBJECT to the local plan based on the impact it will have on the special countryside of the borough.

The proposed development at Garlick’s Arch (A43) will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/2975  Respondent: 8796673 / Suzanne Burroughs  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT to the sustainable employment policy (Policy E1)

If developed, the new employment site at Garlick’s Arch, Send Marsh/Burnt Common (A43), would be treated as a Strategic Employment Site.

The proposed development of up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8) at Garlick’s Arch (A43) is in the scheme of industrial development relatively small. Just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m. The Garlick’s Arch site which is in the Green Belt should not be developed as a Strategic Employment Site when there is a suitable alternative brownfield site very close by, which is far more sustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/2976  Respondent: 8796673 / Suzanne Burroughs  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
1. I OBJECT to the location for new employment floorspace at Garlick’s Arch – Site A43 (Policy E2)

Proposals for new industrial, warehousing and storage (use Class B1c, B2 and B8) floorspace will be directed to the Industrial Strategic Employment Sites.

There is no need for the new employment floorspace to be located at Garlick’s Arch, when just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2977  Respondent: 8796673 / Suzanne Burroughs  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT to the loss of rural employment (Policy E5)

Policy E5 supports the retention and development of local services and community facilities in our inset and identified villages. Yet the development at Garlick’s Arch (A43) would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises. The Plan does not promote rural employment; rather it will result in the loss of existing local rural businesses.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2989  Respondent: 8796673 / Suzanne Burroughs  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E6

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
1. POLICY E6 - The leisure and visitor experience

I OBJECT. Tourism and visitors do not depend on new visitor “attractions” and could actually be damaged by them, as compellingly argued in the current debate over Newlands Corner. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment/“Disneyfication”. Heritage sites and the Green Belt are particularly vulnerable to harm.

Guildford has many “leisure and visitor attractions” already. The case for creating more is not made and no examples are given. Instead, the plan’s explicit priorities should be:

1. To protect the borough’s prime leisure and tourism asset, its countryside, from inappropriate development. This is all the more valuable because of its accessibility from London, the rest of Britain and the Continent, in that order. Rural residents are its custodians and require no Council interference. Economically, the most valuable forms of tourism, such as walking and cycling, require no new development. In the overcrowded South-East of England, lack of development is a leisure and tourism asset, not a liability.

2. To help make Guildford’s river landscape less off-putting and support town-break packages for high-value tourists. To achieve this, the policy needs to define what leverage, if any, Council planners have to influence normal tourism market mechanisms.

3. To help private providers market local tourism. This need not involve extra spending. The Council could, for instance, help co-ordinate ready-made, local tourism packages under a distinctive brand at an all-in price. An “English town break” (including B&B accommodation, a walking tour of Guildford, a pub lunch in the Surrey Hills, a visit to Wisley Gardens and a National Trust property and a SouthWest Trains travelcard for a day out in London) would be highly attractive to many European visitors who currently by-pass Guildford to go to Bath, Oxford or Cambridge instead.

4. To rule out the redevelopment of scarce rural hotel sites (e.g. Thatchers, East Horsley, earmarked for 40 new houses under Site A37 of the plan yet just a short walk from the new opera house).

I trust that the objections made above are fully taken into consideration and that the Plan is amended accordingly.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<tr>
<th>Comment ID: PSLPP16/2986</th>
<th>Respondent: 8796673 / Suzanne Burroughs</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT (POLICY H1 – Homes for all) Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan period. It fails to set rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions.

The housing mix is based on out-of-date, pre-Brexit projections and on assumptions set out in a flawed SHMA that has not been scrutinised or evaluated.

I support higher density development in the urban area, without resorting to dehumanising, high-rise buildings that developers commonly claim are necessary for financial viability. Much of Guildford town could usefully be regenerated with 4-5 storey blocks with landscaping and underground parking, as often seen on the Continent and, recently, in London.
Student accommodation should be provided for 100% of new students and more than 60% of existing students, which would free up ideal family accommodation in the urban area. Other university cities (e.g. Oxford) insist on higher percentages than those proposed in the plan. In my view, the Council’s timidity is a case of “regulatory capture” by Surrey University, which has failed to use its existing planning permissions (dating from 2004) to accommodate 3,000 students or to improve the efficient development of its campus (e.g. by building on its extensive and under-used surface car parks). If all students were accommodated in this way, 2,000 homes would be freed up in town and there would be no need to build on the Hog’s Back.

Guildford borough has already a higher proportion of traveller sites than most comparable boroughs. Over-provision is inappropriate given other constraints.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2988  Respondent: 8796673 / Suzanne Burroughs  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. POLICY H3 – Rural Exception Homes

I OBJECT This is a Trojan horse policy. It says that homes can be built anywhere near a settlement of any form (including agricultural land and the AONB). These homes are meant for people with a village connection, but they could be for anyone on the Guildford borough housing list. To make the housing viable, or to improve the “mix” this can include “market” housing (i.e. normal commercial development which in Guildford usually means large executive homes). This policy means building anywhere, and ignoring all historic planning restrictions.

The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove “exceptional circumstances.”

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2982  Respondent: 8796673 / Suzanne Burroughs  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Page 2827 of 3335
1. I OBJECT, due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1)

Our villages are already suffering from severe congestion for much of the day, for example the Newark Road & Rose Lane junction in the centre of Ripley. The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.

Furthermore, many of the country lanes around the villages of Ripley, Send and Clandon are narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition.

I OBJECT to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces.

Many of the affected villages, such as West Clandon, already suffer from traffic congestion. Further development around these villages will only result in more traffic and more parking problems.

With some 5000 houses being proposed close to the village of Ripley, the roads serving the village will become even more congested. Cycling has become an ever popular past time, particularly at weekends hundreds of cyclists past through the villages on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road accidents involving cyclists as a result of the development proposed under the local plan.

The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the road becoming ever more dangerous for pedestrians. There is a particular problem near the school which is being increased in size so perhaps more children will be walking and there will also be more cars at the south end of west clandon village.

Where the A247 is restricted in its width outside the house called “Summers” vehicles regularly go on to the pavement and often wing mirrors are also clipped by two vehicles passing.

The council has a statutory obligation to protect the public and the additional traffic flows will bring added pollution and risk to injury of the public. In the case of West Clandon the Street often only has a narrow footpath on one side of the road making it very dangerous, especially when vehicles mount the pavements.

1. I OBJECT to the lack of proper infrastructure planning for sites (Policy I1)

Policy I1 requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.

Despite the Garlick’s Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents’ in the locality will see their quality of life significantly deteriorate in many ways.

Many of the utilities in the Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers. No plans to improve these services should mean no development of the Garlick’s Arch site.

The summer of 2016 has been wet and so we have had no hosepipe bans. I worry that there is not sufficient water in the southeast area to supply more houses.

Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are already at capacity and suffering from funding cuts or freezes. Any further development without funding will place further stress upon existing health services.

Police services are seeing funding reduced. The development of the proposed 13,860 homes during the plan period will stretch the police services further and is unsustainable.
There is no provision of the increased capacity of Guildford hospital, where is this assessed and remedied?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2984  Respondent: 8796673 / Suzanne Burroughs  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2)

There is no certainty that either the A3 or M25 in the borough will be improved to increase capacity and reduce congestion during the Plan period. Highways England has no plans to even examine improving the A3 before 2020. I have considerable concerns that development of the large residential sites identified at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), will take place before any improvements are made to the trunk road network. The A3 & M25 are already at capacity during peak hours and any development prior to improvement of these roads will only make the situations worse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2985  Respondent: 8796673 / Suzanne Burroughs  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT to poor air quality concerns (Policy I3)

Paragraph 4.6.27 of the Plan states that “Development must also mitigate its traffic impacts, including its environmental impacts and impacts on amenity and health.” The significant level of development being proposed, particularly in the north east of the borough will lead to considerable further congestion, despite any attempts to mitigate this through travel plans. This will be particularly acute in built up residential areas and will only lead to greater levels of air pollution, which will have a detrimental effect on local residents and their health and can result in early death.

I am already aware that there is pollution from vehicles when I am working near the road behind my hedge in my garden.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

1. I OBJECT to not protecting the Green Belt (Policy P2). Why do we have a greenbelt policy if it is not respected. It seems to me that GBC are completely ignoring our green belt.

I OBJECT to the proposals to remove the villages of Ripley, Send and Clandon from the Green Belt, together with sites of Wisley Airfield (A35) and Garlick’s Arch (A43). National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these villages (as mere housing need does not constitute a ‘special circumstance’ and the land to be taken from the Green Belt. Once taken the green belt is lost forever. And are the housing numbers correct? As we have no access to the consultants work it is not possible to check.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached. GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site.

Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
1. I OBJECT to development in areas which are at risk of flooding (Policy P4)

National Planning Policy states that Local Plans should take account of climate change over the longer term, including factors such as flood risk. It goes on to say that new development should be planned to avoid increased vulnerability to the range of impacts arising from climate change.

The Plan states that in accordance with national planning practice guidance, the Level 1 SFRA has been used to guide development towards areas at the lowest risk of flooding and identify areas unsuitable for development. However, the document concludes that land outside of the area of flood risk is not capable of accommodating all of the borough’s identified development needs. A Level 2 SFRA has therefore also been produced and will help the Council apply the exceptions test (as described in the NPPG) as necessary to development proposals in areas at risk of flooding.

The site at Garlick’s Arch (A43) is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. Knowing the area well I am aware that this site often floods during the winter months and the flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

| Comment ID: | PSLPP16/2971 | Respondent: | 8796673 / Suzanne Burroughs Agent: |
| Document: | Proposed Submission Local Plan: strategy and sites 2016 / Policy S1 |
| Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( ) |
| Answer (if comment is on questions 1-7 of the questionnaire): () |

Objections to Guildford Borough Proposed Submission Local Plan (June 2016)

I am aware that this e-mail attachment has been prepared by villagers but I have added some extra comments and I do feel that GBC has not listened to us previously.

I OBJECT in the strongest possible terms to the Guildford Borough Proposed Submission Local Plan (June 2016). This Plan is unsustainable, unworkable and, in many provisions, unnecessary.

I set out below my objection to specific policies and matters within the Plan.

1. I OBJECT to the Local Plan as the development proposed will not be sustainable (Policy S1)

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.
The strategic sites of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are just unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result. It would make sense to me to use any brownfield sites in the town centre for residential use rather than more shopping or business use as the internet has reduced the number of pedestrian shoppers and a lot of “hot/sharing of desks” now takes place.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT to the Borough Wide Strategy (Policy S2)

   a. The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

   b. The Housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.

   c. The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any commonsense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guilford with Woking it appears that Guildford residents are being asked to build homes on open
countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Respondent: 8796673 / Suzanne Burroughs</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A25</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to the changed policy A25 Gosden Hill for the development of 1700 homes which is still far too much.
2. There is no need for housing on this site because the local plan housing target is incorrect and inflated and ignores constraints.
3. Gosden Hill is located entirely within the Green Belt. No exceptional circumstances have been demonstrated for building on this site and therefore development here does not meet paragraphs 87-89 of the NPPF. Furthermore, Gosden Hill performs all five functions of green belt,
4. The site has no provision for foul or surface water sewerage and adjoining sewerage is at capacity.
5. The Green Belt at this point serves the important function of separating West Clandon from the edge of urban Guildford. Development here will cause the two to coalesce defeating one of the objectives of the Green Belt. If this development proceeds I believe the narrow strip of Green Belt remaining between Guildford and Clandon at this point will be too narrow and will come under further pressure. It will represent an undesirable ribbon development along the A3. It will be highly visible from the A3 when approaching Guildford and will, in conjunction with A43a at Garlick’s Arch give the appearance of almost continuous development from Send through to Guildford.
6. The development of this site cannot be sustainable and will cause massive congestion onto surrounding roads. The development will generate in the region of 6,000 vehicles which will exit straight on to the A3 which is stationary every day during rush hours. The linking of the A3100, B2215 and A247 would channel thousands of cars through the narrow, winding road through West Clandon.
7. I object to the proposal for a link road to bring traffic from the Gosden Hill development to the proposed 4 way junction at Burnt Common. This has the potential to generate large volumes of traffic (including commercial vehicles) on the A247 through Send and West Clandon - a road which is already under traffic stress (see below).
8. The volume of traffic will greatly increase air pollution which is particularly critical given the proposal to build two schools.
9. A new on-slip at Burpham would only be 1.8km from the on-slip at Burnt Common which is against Highway England’s requirement of 2km.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/4387  Respondent: 8796673 / Suzanne Burroughs  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to the changed policy A43 Garlick’s Arch for 400 homes and 6 travelling show people pitches
2. It ignores all the thousands of previous objections made by local people
3. There is no proven demand for travelling show people plots in this location
4. There is no need for putting houses on this site because the local plan housing target is incorrect and inflated and ignores constraints.
5. The allocation of 28.9 ha is an excessive land grab into the Green Belt. If we take a normal density of 30 homes per ha and it is at the end of the day proven that there is a need for 400 homes in this location the land requirement is 13 ha not 28.9 ha which is more than double. This replicates a similar over land grab at Burnt Common where the factor is 7 times the land required.
6. This confirms the worrying impression that GBC have a pre-determined policy of building on the Green Belt at every opportunity. The arithmetic does not stack up. One would have thought that they would as custodians of the green Belt be intent on conserving it rather than exploiting it.
7. The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.
8. Garlick’s Arch (A43) is in an unsustainable location. It does not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. The site is unsuitable due to lack of access to sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be dependent on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.
9. The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.
10. I object to the proposal to remove Garlick’s Arch from the Green Belt. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for this land to be taken from the Green Belt. Once taken the green belt is lost forever. There is a real danger that the loss of this Green Belt will result in urban sprawl and the neighbouring villages merging into one another. The significant development in West Clandon, Send and Ripley will result in the character of these villages being lost and the countryside encroached.
11. I object to the development at Garlick’s Arch because of flood risk. The site at Garlick’s Arch is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river
20. Despite the Garlick’s Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents’ in the locality will see their quality of life significantly deteriorate in many ways.

21. Many of the utilities in the West Clandon, East Clandon, Burpham, Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers. No plans to improve these services should mean no development of the Garlick’s Arch site.

22. Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are already at capacity and suffering from funding cuts or freezes. Any further development without funding will place further stress upon existing health services.

23. I object due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2). There is no certainty that either the A3 or M25 in the borough will be improved to increase capacity and reduce congestion during the Plan period. Highways England has no plans to even examine improving the A3 before 2020. I have considerable concerns that development of the large residential sites identified at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), will take place before any improvements are made to the trunk road network. The A3 & M25 are already at capacity during peak hours and any development prior to improvement of these roads will only make the situations worse.

24. I object to poor air quality concerns (Policy I3). Paragraph 4.6.27 of the Plan states that “Development must also mitigate its traffic impacts, including its environmental impacts and impacts on amenity and health.” The significant level of development being proposed, particularly in the north east of the borough will lead to considerable further congestion, despite any attempts to mitigate this through travel plans. This will be particularly acute in built up residential areas and will only lead to greater levels of air pollution, which will have a detrimental effect on local residents and their health.
25. I object to the inclusion of the land at Garlick’s Arch, Send Marsh/Burnt Common and Ripley (A43). Garlick’s Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8). There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).

26. It is clear that with this site being added at the eleventh hour and no infrastructure planning has been undertaken. The Infrastructure Schedule makes no provision for any infrastructure improvements for this site. How will the local services such as schools and doctors cope, many of which are already at capacity? (Policy I1)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/4390  Respondent: 8796673 / Suzanne Burroughs  Agent: 8796673 / Suzanne Burroughs

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy A58

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to Policy A 58 at Burnt Common and to the proposed inclusion of Burnt Common as an Industrial Strategic Employment Site
2. This previous allocation for B1c, B2 and B8 development was removed from the 2014 draft due to all the objections made previously.
3. The word “minimum” is a change from the previous “maximum” in the 2016 plan and since that time there has been a decline in demand for industrial land. This change alone is unacceptable since even if there was a need to build 7,000 sq m at Burnt Common this development would only require 1.4 ha at a standard plot ratio density of 50% not 9.26 ha. There is no justification for zoning an additional 7.86 ha in the Green Belt.
4. There is in fact no justification for building any more industrial development in the borough particularly at Burnt Common. The current industrial pipeline of granted consents of 38,357sqm in B1c, B2 or B8 use class space is double the 19,000 sq m said to be needed by Aecom who justify the need for new space on top of the existing pipeline by a completely unsubstantiated suggestion that “there is the possibility that some pipeline developments may not come forward at all, or be developed in different quantities by use class than has been consented.”
5. There is no need to build industrial or warehouse development in the middle of the Green Belt when Slyfield and Guildford still have empty sites and industrial units.
6. The 2017 Employment Land Need Assessment shows a reduction in demand to 3.9 hectares for industrial land for the whole borough not a huge over allocation of 9.26 hectares at Send in the Green Belt.
7. The Employment Land Needs Assessment update 2017 (ELNA) states “that the pipeline for employment floorspace defined by planning permissions yet to be implemented and prior approvals suggests the potential for an additional 33,607sqm of B use class floorspace to come forward. This figure comprises a net loss of 4,750sqm of B1a use class floorspace and a net gain of 38,357sqm in B1c, B2 or B8 use class space.”
8. 38,357 sq m of B1c, B2 or B8 use class is quite sufficient supply for the plan period and is in fact more space than the 3.9 ha of industrial land that is said to be needed for the plan period by Aecom. Since if you were to develop 3.9 ha at a plot ratio of 50% it would provide new industrial development of 19,000 sq m approximately half of current planning permissions granted. This does not justify the need for new development of industrial space on the Green Belt in such areas as Burnt Common.
9. The reality of demand for industrial space is that it is both nationally and locally in decline and this is evidenced by old existing permissions that have not been taken up and developed. The ELNA alludes incorrectly to the poor quality of existing space being a “constraint” on supply and fails to acknowledge that this assertion cannot apply to potential newly developed space e.g. the undeveloped pipeline of 38,357sqm.
10. The impact on small surrounding roads will create traffic gridlock.
11. It will join up existing villages and defeat the purpose of the Green Belt.
12. The ongoing poor quality of the updated research undertaken by Aecom in the Employment Land Needs Assessment 2017 does not support industrial development on land in the Green Belt at Burnt Common.
13. The Aecom research is generally superficial and lacks sufficient detail and analysis between B1c, B2 and B8 use classes and no reliable individual analysis has been undertaken of the widely different supply and demand dynamics of light industrial, general industrial and warehousing and distribution floor space.
14. The potential inclusion of a waste management facility mentioned at paragraph 4.4.23a lacks enough detail for proper consultation and is completely inappropriate.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/2814  Respondent: 8796673 / Suzanne Burroughs  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The Plan now states: “the presumption in favour of sustainable development will not automatically apply to policies relating to sites protected under the Birds and Habitats Directives and/or designated as Sites of Special Scientific Interest (SSSIs), land designated as Green Belt, Local Green Space, the Surrey Hills Area of Outstanding Natural Beauty, designated heritage assets and locations identified as at risk of flooding.”

Gosden Hill and Blackwell Farm (both currently in the green belt) are called “urban extensions” surely a euphemism for urban sprawl? Garlick’s Arch and Burnt Common developments take land from the green belt to extend Ripley/Send. One of the important specific purposes of the green belt is to prevent urban sprawl.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp17q/529  Respondent: 8796673 / Suzanne Burroughs  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Question 4: Duty to cooperate

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
The NPPF states para 155: “Early and meaningful engagement and collaboration with neighbourhoods, local organisations and businesses is essential. A wide section of the community should be proactively engaged, so that Local Plans, as far as possible, reflect a collective vision and a set of agreed priorities for the sustainable development of the area, including those contained in any neighbourhood plans that have been made.”

The changes in this latest version of the Guildford Local Plan show little or no willingness of Guildford Borough Council to reflect a collective vision. Despite the many thousands of responses to previous versions of the Plan which overwhelmingly rejected building on Green Belt land this latest version has as much, if not more, building on the Green Belt and increased problems of infrastructure and traffic which will bring increased noise and air pollution and danger to residents.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policies A37, A38, A40 and A41, located in West Horsley

These proposed developments are all within Green Belt and between them there are around another 400 more proposed houses. This along with the proposed 100 new houses in Policy A39, and a few other new houses within West Horsley make a 36% increase in the number of houses within the village. This kind of expansion would be to the total detriment of the village and alter it's nature beyond recognition. Therefore the impact of the Policies A37, A38, A40 and A41 are unsuitable for the following reasons,

- again the areas are within the Green belt
- again the surrounding are has inadequate infrastructure to cope with such a large number of new houses
- again the local roads can hardly cope with the existing traffic let alone any extra traffic generated by new developments
- again the local Medical Centre in East Horsley is already overstretched
- again the local schools have no more capacity for additional pupils
- again the public transport in the local area is inadequate

For these reasons I OBJECT strongly to Policies A37, A38, A40 and A41.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Policy A35 - Land at former Wisley Airfield, Ockham

The proposed new settlement at the Wisley Airfield Site was unanimously refused by the Planning Committee in May yet it appears in the Local Plan again. The site forms part of the Metropolitan Green Belt and therefore development is only permitted under 'very special circumstances' under the NPPF. The impact of such a large development would have a huge detrimental affect upon the surrounding area for the following reasons,

- the area is within the Metropolitan Green Belt and no special circumstances have been shown to allow the building of 2000+ houses
- there is a Site of Special Scientific Importance (SSSI) which is to provide protection for the wildlife in lowland heath locations and it provides part of a buffer to the ever encroaching urban sprawl of London
- there is no infrastructure on the Wisley Airfield site so all of this would need to be put in place to support such a large number of new house
- the already congested junction of the A3/M25 would not be able to cope with a vast increase in the number of cars such a development would generate
- the increase of extra traffic would have an adverse affect on the air quality in the area surrounding the site which would be detrimental both to people and the countryside
- the local roads in the surrounding area are already congested and are not suitable to cope with the huge number of extra cars generated by a proposed development of 2000+ new houses
- the schools in the surrounding area are already over subscribed and therefore cannot support an increase in pupil numbers from the proposed development at Wisley Airfield
- the Medical Centre in East Horsley is operating to capacity and making an appointment is already difficult but this would become even more frustrating if numbers at the surgery increased
- the shopping centre in East Horsley thrives and very often it's difficult to park so this would be increasingly difficult with the extra cars using the shopping centre
- the number of people commuting to London or Guildford would increase and the station car park has insufficient capacity for many more cars

For these reasons I **OBJECT** strongly to Policy A35.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
This proposed development wasn't included in the Local Plan in 2014 but now the field which is in the Green Belt is being proposed as the site for the building of 100 houses with the entrance to the new development being by the railway bridge in East Horsley. The impact of Policy A39 on the surrounding area would be unsuitable because,

- the access to this site is next to a railway bridge and an area of road very prone to flooding
- the access is also next to a vet and a restaurant all of which have cars coming and going on to an already busy road
- the access to and from the site is close to the steps down from the station and is where many people cross when returning home
- the area is within the Green Belt
- the surrounding area's infrastructure is insufficient to cope with the additional 100 houses
- the roads are unfit for purpose being narrow and poorly maintained with many local roads having no paths
- the local Medical Centre in East Horsley is already overstretched with difficulties obtaining appointments at present
- the schools in the local area are already over subscribed so would not have the capacity to admit new pupils
- the public transport in the area is inadequate

For these reasons I OBJECT strongly to Policy A39.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/3806  Respondent: 8796705 / Mandy Pye  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The Local Plan has been drafted with the view that we need a certain number of new houses within the borough, but with half the borough designated as the Surrey Hills Area of Outstanding Natural Beauty (AONB) this large number of houses has to be accommodated within the other half of the borough. Much of this other half of the borough is Green Belt and the Local Plan then allocates 76% of the proposed new houses to be built on Green Belt land leaving the remaining 24% to be built on Brownfield and Urban land, namely in Ash and Tongham and Guildford. Our elected Council promised to protect our Green Belt in Surrey and have totally failed the people of Surrey with their revised Local Plan, as after the huge number of objections to the Local Plan of 2014 by the public the Council promised it would listen to the comments made. We were told they would be taken in to account in the revised Local Plan and I see very little evidence of them having done so, and indeed there has been an increase, including 100 new houses in Policy A39, in the number of proposed houses to be built with a higher housing density that will forever change the character of our villages.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I am very disappointed that our local Conservative Councillors voted in favour of so many of the various Policies within the Local Plan. We have a Conservative Council in Guildford because they were voted in on the basis that we were being offered policies that would help protect our unique countryside in Surrey. We see more of the beautiful countryside threatened with being concreted over and we will become just another part of the ever growing urban sprawl of London, the London Borough of Guildford maybe?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

I am writing to **OBJECT** most strongly to the new revised Guildford Local Plan, in particular to the Policies that affect West Horsley, but also to those in East Horsley and all the villages that the Local Plan has proposed to remove from the Green Belt. Most land in our borough no longer appears to be safe and designating various areas as Green Belt, SSSI's or for any other type of conservation seems to count for nothing. The proposed number of houses the Guildford Borough Council wishes to build in our villages will change the villages that their residents know and love. The proposal is for an overall increase of 36% in the number of houses in West Horsley alone and there's a distinct feeling that West and East Horsley have been 'allocated rather more than their fair share' compared to other areas of the borough. It has even been proposed that our local facilities such as the Horsley Tennis and Cricket Club and the East Horsley Kingston Meadows, which also has tennis courts, could possibly be considered for development. These are places that are a huge asset to the people who live in the Horsleys and are an integral part of village life which are enjoyed by many. The open spaces we have within our villages are a part of what makes our villages a special place to live.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I wish to strongly object to the proposals in the Local Plan for the Horsleys, particularly West Horsley. The very slight reduction in the number of proposed houses in West Horsley is welcome but it is insignificant compared to the number still proposed in the Local Plan for Green Belt land in West Horsley.

2. Guildford Borough Council's new Local Plan doesn't address the reduction in the objectively assessed housing target as many other councils have done in order to protect Green Belt. It has not listened to the opinions of Surrey residents who object most strongly to the number of proposed houses to be built on the Green Belt.

3. The belief that local residents will adopt cycling or walking rather than their cars to travel to the local facilities is a fallacy. Cycling on many of our local roads is a risk and for many walking is not always an easy option. The Local Plan 2017 still doesn't address the problems of lack of infrastructure such as a large number of proposed houses in West Horsley would necessitate.

4. I object to no changes having been proposed since the 2016 consultation to insetting West and East Horsley from the Green Belt.

Our elected Government has continued to inform the public that our Green Belt is safe in their hands. Our Guildford Borough Council has shown us this not the case as by insetting West and East Horsley it would allow more houses to be built without objection as they wouldn't be built on Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/263  Respondent: 8796769 / Susan Marshall  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I again send in another request for you to think even more closely about your horrific plans for developing the horsleys. You well know these villages cant take any more houses, from the point of narrow roads, very little parking for shops, over stressed doctors and over full schools. Please do not do this to our villages.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/36  Respondent: 8797537 / Shonagh Finnan  Agent:
<table>
<thead>
<tr>
<th>Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North</th>
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**With reference to the plan for the Horsleys**

I object to this new plan because the councillors promised to **protect the Green Belt**. Did the political candidates just say this to get votes and then ignore their promise once elected thinking there will be nothing the public can do? This is third world stuff and not worthy of Guildford Borough Council. Shame on you.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

<table>
<thead>
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<th>Comment ID: PSLPP16/94  Respondent: 8797537 / Shonagh Finnan  Agent:</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H3</td>
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</table>

I object to the **shear number of extra houses** proposed for Horsley, West Horsley in particular. I think a little in-filling might be acceptable **IF** the need for extra houses has been shown now, which it has not been in the near past. The character of the village will change. The additional **percentage increase** is totally unreasonable.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

<table>
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<th>Comment ID: PSLPP16/95  Respondent: 8797537 / Shonagh Finnan  Agent:</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ( )</td>
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</table>
I object to the lack of common sense being applied to this suggested plan insofar as our infrastructure cannot take many more houses. Schools are full, car parks are full already and the doctors’ surgery has a long appointment wait time. Also, what about the flooding in Horsley, at the moment not under control?

When I lived in Cobham I sometimes could not park at the shops and drove home again empty-handed. This is a sorry way to live.

I object to the suggestion of “traffic managing” in the Horsley area as with maybe 5000 more cars on the local roads we need full access to all the present roads to spread the traffic over the whole area not funnel everyone down the same route.

Think again if you wish to retain your council seat. You will not be voted for again.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: PSLPS16/7676  Respondent: 8797601 / David Newell  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A25

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

> I object to the Gosden Hill proposal.

> I do not believe very exceptional circumstances have been shown to justify taking this site out of the Green Belt.

> Even if the Gosden Hill development were to remain in the plan I believe the boundary should be explicitly drawn so as to prevent it from being visible from West Clandon. In addition development should be conditional on the A3 improvements and new railway station.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/7677  Respondent: 8797601 / David Newell  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

> I object to the Garlick’s Arch proposal.

> This site was removed from consideration before the previous draft of the plan was issued.

> I, along with many others, do not understand how this site has been brought back into the plan.

> I do not believe exceptional circumstances have been shown to justify taking this site out of the Green Belt. This site was not discussed in the Green Belt and Countryside study and there seems to have been no consideration of the justification for removing it from the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17000  Respondent: 8797601 / David Newell  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

> Stronger assurances should be included in the plan that development can only commence when required infrastructure improvements have been secured.

> The A247 through Clandon is overburdened already with excessive heavy traffic.

> It is unsuitable as an A road in the first place since it has, in the Village three pinch points so narrow as to prevent two lorries to pass each other. Lorries regularly mount the pavement at speed already. Any plan should include proposals to provide other traffic routes away from the A247.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16999  Respondent: 8797601 / David Newell  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

> I don’t believe the draft plan accords with the NPPF policies on protecting the Green Belt.

> Exceptional circumstances need to be clearly shown to justify removing areas from the Green Belt. This has not been done.

> The need for housing and “a number” is not itself a very special circumstance justifying indiscriminate removal of sites from the Green Belt. Having properly calculated a housing needs number, constraints should be applied to it to reflect the Green Belt and the AONB. Each Green Belt site needs to considered on its own merits. You have not done this. The benefits of the proposed development need to be identified together with the harm to the Green Belt. Only if there are exceptional circumstances and following a proper balancing exercise demonstrating that these exceptional circumstances outweigh the harm to the Green Belt can the proposal proceed. The draft plan does not demonstrate that this has been done.

> Even once a housing number has been calculated it cannot be used to justify taking out Green Belt land on a wholesale basis.

> No exceptional circumstances have been presented which would permit any of the sites in this 2016 Plan to be taken out of the Green Belt.
> The Council is not committed to any of this.

> I urge you to reject this plan and respect the wishes of the people of West Clandon and all right thinking residents of Surrey who are against any building on the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17001  Respondent: 8797601 / David Newell  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I am sure Effingham Station is NOT in East Horsley, it is major junction for trains in our area, parking is already full by 10am. Effingham village the shops and businesses must be protected for the local residents

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/11792  Respondent: 8797665 / Sylvia Lillywhite  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I am sure Effingham Station is NOT in East Horsley, it is major junction for trains in our area, parking is already full by 10am. Effingham village the shops and businesses must be protected for the local residents

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Answer (if comment is on questions 1-7 of the questionnaire): ()

Drains are blocked, giving rise to local flooding.

The villages of East/West Horsley need a new school site. Traffic and parking for residents must be terrible during the school year, even people in the village cannot get places at the present time, it needs a 3 form entry school with better sports facilities available for the local residents to enjoy, and enhance the children’s learning experience.

The Medical centre is totally inadequate for the village. Only today I tried for an appointment at the surgery.....2 weeks to wait.

We need more parking for the Village Hall, too many commuters use it to avoid high charges in the car park at the station.

Another few hundred houses will swamp the already very well used businesses, although we have 3 hairdressers, 3 Estate agents, please no more of these given permission to start up.

A36 I hope the mail Chown building at Thatchers Hotel will be preserved when you build on that site, it is part of village history.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

P2 In my opinion the Green belt is not protected by GBC, you are trying to change boundaries already, what hope do we have. I do not like the idea of infilling in the proposed new area!! of East Horsley south of the A246.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/2227  Respondent: 8797665 / Sylvia Lillywhite  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A41

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

A41 The removal of this site from the revised local plan is short sighted to say the least.

The site A41 was given to the school to build a school fit for purpose, at the moment there are approx 430 pupils in a school build for 200 max children with 18 in a class currently there are 32 in each class almost double.

A waiting list of 96 currently.

The outdoor area is totally insufficient for 430 children.

Sports facilities in the school are just not viable on safety grounds.

Quality of life in classrooms in hot/cold weather is unacceptable.

Windows are single glazed in upstairs rooms, already a bird flew into one and the glass smashed..not acceptable.

The parking is inadequate and causes problems between the school and residents.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/2027  Respondent: 8798465 / Linda Ross  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - East Horsley
I have recently looked at the new Local Plan put forward by Guildford Borough Council and wish to object to the proposals on the following grounds:

Whilst accepting that new houses will have to be built in both East and West Horsley, I feel that the total number proposed is simply too many as we do not have the infrastructure to deal with the increased population development on this scale would bring.

Many of the roads, for example the one in which live, are in dreadful condition and we understand the County has insufficient resources to carry out all the necessary repairs.

Flooding is common in many parts of the two Parishes making road travel difficult when heavy or prolonged rain occurs.

Our local schools and medical facilities are already under pressure and would not be able to cope with additional large numbers.

Car parking for shops, village halls, Doctors' Surgery and railway station is very limited indeed and there is no available space in which to extend these facilities.

In addition, I am totally opposed to these two Parishes being taken out of the Green Belt. The villages will cease to be individual entities and simply become part of the apparent plan to concrete over every available green space.

Proposed development that is strictly "in-fill" might be acceptable in smaller numbers but some of the proposals will totally alter the look and nature of the villages and cannot be acceptable to residents. I feel that proposals to alter the village boundaries in order to give more scope for "in-filling" are also unacceptable.

I realise that planning practice seems to put forward plans that do not include additional schools, shops, medical facilities, etc. as these would be included at a later date. Presumably these would require yet more green spaces numbers but some of the proposals will totally alter the look and nature of the villages and cannot be acceptable to residents. I feel that proposals to alter the village boundaries in order to give more scope for "in-filling" are also unacceptable.

I realise that planning practice seems to put forward plans that do not include additional schools, shops, medical facilities, etc. as these would be included at a later date. Presumably these would require yet more green spaces being built on, and to ask people to accept plans that do not show these additional works suggests the council is being less than open with residents.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I wish to express my objection to the Guildford plan proposals for West and East Horsley on the following grounds:

1. The developments would require the green belt boundaries to be changed which is totally contrary to Policy P2: Green Belt and the Countryside which states that the green belt will be protected against “inappropriate development” and I argue with my points below that the development proposals are inappropriate.
2. The density of the proposed developments is totally out of character with the rest of the villages – being much higher than the existing density and the number of proposed homes would swamp and forever alter the character of the existing villages.
3. The road network cannot cope with the volume of traffic at rush hour – adding this number of houses would cause complete gridlock. In addition the state of the roads would become far worse due to the inevitable increase in traffic once the houses are built. The heavy lorries which will come during the building phase will also cause considerable further damage.
4. There is insufficient school space at nursery, primary and secondary levels. The Raleigh School is already looking for a new site as it is too small for the existing children in the village and special provision has had to be made for Horsley children to attend the Howard secondary school. Any news homes will just make a bad situation worse.
5. Medical and dental facilities: - the current provision is too small for the existing communities. It is very hard to get a Doctor’s appointment and almost impossible to get on a list for a National Health Service Dentist. Additional homes would put extra stress on the existing facilities
6. The existing bus service is barely adequate – more homes will not alleviate the issue, just compound it
7. Shops and local services – West Horsley has but one shop and no provision is made in the plans for additional shops and services alongside the new homes. The parking for the shops and services in East Horsley could not cope with the influx of new homes/residents.
8. The waste water facilities would be unable to cope with any additional homes – it can’t cope with the number of homes that are already in the village, overflowing in Oakham Road North Green lane area.
9. Some of the proposed sites have inadequate surface water drainage – the land gets flooded. Building on land liable to flooding is frankly ridiculous.

In summary the development is inappropriate and the infrastructure would not be able to handle the additional homes / population and should therefore be rejected

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/2195  Respondent: 8798689 / Julian Allen  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A46

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
• The removal of site A46 from the Plan (with its proposed 1100 houses) has left the Plan even further unbalanced against the North East of the Borough with over 40% of the development proposed in this small area of Green Belt, all within just 3 miles of Send Marsh
• The potential for a substantial increase in industrial floorspace from 7000 sq m to an unspecified amount at the site A58 Burnt Common does not provide local residents with enough information for a full and proper consultation given the ambiguity and lack of detail within the document
• The potential for a Waste Management Facility at site A58 Burnt Common is briefly mentioned, obscurely in policy 4.423a and does not allow for full and proper consultation
• The increase in housing numbers from 45 to 60 at Site A42 in Tannery Lane, Send will have a significant impact on the already highly congested local rural road network around and within Ripley. This is in contradiction to section 2.14a of the Plan which states “Whilst most local roads are single carriageway, with a lane in each direction, it is at their junctions that the free flow of traffic is most often impeded during peak periods, in some cases resulting in significant delays.” And yet there is no proposals to improve the local roads, only to add more junctions with the A3, thereby increasing congestion on the Trunk and Local road network.
• Brownfield sites A4 and A34 have been removed from the Local Plan – meaning there is more pressure on Green Belt sites to meet the so-called housing “need”.
• On Affordable Homes, the previous version of the plan (Policy 4.2.23) stated that Developers will be expected to provide land for affordable homes at nil value. Now it just says “Off-site provision or payment in lieu is expected to enable the same amount of additional affordable housing as would have been delivered on site. Developers don’t even have to build any affordable homes which defeats the point.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/4124  Respondent: 8798753 / Jane Reeves Newell  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Stronger assurances should be included in the plan that development can only commence when required infrastructure improvements have been secured.

The A247 through Clandon is overburdened already with excessive heavy traffic.

It is unsuitable as an A road in the first place since it has, in the Village three pinch points so narrow as to prevent two lorries to pass each other. Lorries regularly mount the pavement at speed already. Any plan should include proposals to provide other traffic routes away from the A247.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/4126  Respondent: 8798753 / Jane Reeves Newell  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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The A247 through Clandon is overburdened already with excessive heavy traffic.

It is unsuitable as an A road in the first place since it has, in the Village three pinch points so narrow as to prevent two lorries to pass each other. Lorries regularly mount the pavement at speed already. Any plan should include proposals to provide other traffic routes away from the A247.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/4123  Respondent: 8798753 / Jane Reeves Newell  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I live in West Clandon and I hereby register my opposition to the 2016 Guildford Draft Local Plan.

Just generally, and in common with many others, I do not believe the suggested housing figures have been calculated properly.

It appears to overstate the housing need.

The Council has prevented Councillors and others from properly considering the SHMA by refusing to make public the basis upon which it was drawn up.

When properly recalculated, the housing figure should be subject to constraints to reflect Guildford’ circumstances, including in particular the Green Belt and road infrastructures.

National policy permits such restraints to be applied and I feel it is inappropriate of you not to consider the need to do this.

With regard to specific policies they appear to be so vague, general and carelessly formed that they commit the Council to very little at all. I object to all of the policies in this 2016 Guildford Plan.

All the data collected was done pre Brexit and is therefore invalid.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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With regard to specific policies they appear to be so vague, general and carelessly formed that they commit the Council to very little at all. I object to all of the policies in this 2016 Guildford Plan.

All the data collected was done pre Brexit and is therefore invalid.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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I object to the Gosden Hill proposal.

I do not believe very exceptional circumstances have been shown to justify taking this site out of the Green Belt.

Even if the Gosden Hill development were to remain in the plan I believe the boundary should be explicitly drawn so as to prevent it from being visible from West Clandon. In addition development should be conditional on the A3 improvements and new railway station.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**
Attended documents:

Comment ID: PSLPS16/7695  Respondent: 8798753 / Jane Reeves Newell  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire):()

I object to the Garlick’s Arch proposal.

This site was removed from consideration before the previous draft of the plan was issued.

I, along with many others, do not understand how this site has been brought back into the plan.

I do not believe exceptional circumstances have been shown to justify taking this site out of the Green Belt. This site was not discussed in the Green Belt and Countryside study and there seems to have been no consideration of the justification for removing it from the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17015  Respondent: 8798753 / Jane Reeves Newell  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire):()

I don’t believe the draft plan accords with the NPPF policies on protecting the Green Belt.

Exceptional circumstances need to be clearly shown to justify removing areas from the Green Belt. This has not been done.

The need for housing and “a number” is not itself a very special circumstance justifying indiscriminate removal of sites from the Green Belt. Having properly calculated a housing needs number, constraints should be applied to it to reflect the Green Belt and the AONB. Each Green Belt site needs to considered on its own merits. You have not done this. The benefits of the proposed development need to be identified together with the harm to the Green Belt. Only if there are exceptional circumstances and following a proper balancing exercise demonstrating that these exceptional circumstances outweigh the harm to the Green Belt can the proposal proceed. The draft plan does not demonstrate that this has been done.
Even once a housing number has been calculated it cannot be used to justify taking out Green Belt land on a wholesale basis.

No exceptional circumstances have been presented which would permit any of the sites in this 2016 Plan to be taken out of the Green Belt.

I object to the Plan itself and all the specific policies therein. All aspects of this Plan will lead to uncontrolled destruction of Green Belt land.

The Green Belt is a long term government policy protected by law.

The Green Belt is already a living example of sustainable development in practice and it is not acknowledged in these policies nor in this 2016 plan.

The Council is not committed to any of this.

I urge you to reject this plan and respect the wishes of the people of West Clandon and all right thinking residents of Surrey who are against any building on the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17016  Respondent: 8798753 / Jane Reeves Newell  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Talk of sustainable development as “golden thread running through both plan making and decision taking” appears all well and good but no clear definition of what that means appears anywhere in the Plan. Nor is the long term effect of development accounted for in any way.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/1751  Respondent: 8798849 / David Williams  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I OBJECT to the proposed Infrastructure Schedule (Appendix C)

The Infrastructure Schedule sets out the key infrastructure requirements on which the delivery of the plan depends. For each of the Key Allocated Sites in the borough it identifies infrastructure projects that are required, except for Garlick’s Arch (A43) which is not mentioned. It is clear that the Plan takes no account of the infrastructure required for this site and is therefore not fit for purpose.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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I OBJECT to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)

- The “objectively assessed need” figure of 693 homes a year is too high.
- A professional review by NMSS has concluded that, even basing the calculations on a period of stronger economic and student growth, the housing need figure should be revised down to 510 homes a year and the method changed to consider student housing need separately due to the distorting effects.
- The current SHMA inflates the proposed housing figure due to
  - failure to correct for errors in the historical data for international migration flows,
  - issues with the way it considers students and affordability and
  - flaws in the method for estimating the number of homes needed to support job growth.
- It is unacceptable that demographic and economic model assumptions have been withheld and cannot be checked making the process unaccountable.

The Plan’s proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the borough, it is over double the previous figure of 322 used in previous plans. The SHMA report methodology is I believe inaccurate; it inflates the needs of the borough by distorted student numbers. However, it is based on commercially confidential modelling assumptions that cannot be checked or reviewed. There is no transparency to this evidence base and it is therefore impossible to assess its accuracy. This is not democratic and is not appropriate for consultation of the Plan.

The National Planning Policy Framework allows the overall housing target to be reduced to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Please note my objection to the proposals laid out in the draft local plan.

The proposals for West Horsley where I live will have a huge impact on both the local and wider area, where there is already pressure on services and no plans for infrastructure to support the developments.

Please note my objection.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPS16/3456</th>
<th>Respondent: 8798849 / David Williams</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Introduction</td>
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</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to all strategic sites proposed in the draft Plan to be built in the Green Belt.

1. I object to the identification and allocation of sites in this plan without regard to Green Belt, infrastructure or other constraints. **The plan says that “allocating these sites does not grant planning permission for development.”** However, each of the sites will be removed from the Green Belt and will be available in principle for development and non-Green Belt uses. The inclusion of these sites without detailed site by site justification shows contempt for the thousands of detailed comments the Council have received about individual sites ever since the Issues and Options consultation in 2013. The plan has hardly changed since the Council received 20,000 objections to its first draft plan in 2014. The Inspector considering the plan may conclude that the consultation has not been properly conducted.

2. The housing needs assessment is flawed in various respects and overstates housing need. In addition since it was produced, the referendum Brexit decision has almost certainly reduced future housing need and rendered the previous assessment seriously out of date. As a result any assessment of Green Belt sites which took place to consider whether “exceptional circumstances” existed to outweigh the harm to the Green Belt was based on false premises and should be reconsidered.

3. Having determined housing need the Council was entitled to consider constraints before determining the housing number. I believe that as Ill as being entitled to do this the Council was required to give proper consideration to constraints. The scarcity of sites outside the Green Belt as Ill as infrastructure (most notable roads) considerations all represented constraints which should have been taken into account in determining the final housing number. Accordingly in this regard our objection to the allocation of Green Belt sites is twofold. First I believe constraints should have been applied. Secondly I believe the Council did not properly consider constraints and that their decision making process was flawed and thus subject to being set aside by the Inspector.

Even if having properly applied constraints there is a need to develop in the Green Belt then specific Green Belt sites should not be included in the plan unless “exceptional circumstances” for development are proven in relation to that
specific site, as stipulated repeatedly in the NPPF. The Green Belt should trump short-term considerations such as perceived housing need, as case law has established. There needs to be a specific balancing exercise conducted on each Green Belt site weighing the harm to the Green Belt against the very special circumstances which are argued in favour of development at that particular site. There is no evidence this has been done. Instead the council have appeared to say that having chosen a housing needs figure and decided it cannot be met without building on Green Belt then there is no need for any further consideration and any convenient Green Belt site can be allocated for building at will.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/3446  Respondent: 8798849 / David Williams  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A25

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy A25 with proposals for Gosden Hill Farm.

The Green Belt at this point serves the important function of separating West Clandon from the edge of urban Guildford. Development here will cause the two to coalesce defeating one of the objectives of the Green Belt. If this development proceeds I believe the narrow strip of Green Belt remaining between Guildford and Clandon at this point will be too narrow and will come under further pressure.

It will represent an undesirable ribbon development along the A3. It will be highly visible from the A3 when approaching Guildford and will, in conjunction with A43a at Garlick's Arch give the appearance of almost continuous development from Send through to Guildford.

The Plan does not put forward any evidence that exceptional circumstances exist to justify removing this site from the Green Belt.

The development will overburden the local road network and increase congestion on the A3 and A247 through the centre of West Clandon. This is already very heavily used whilst being unsuitable for designation as an A road. In places it is too narrow for two lorries to pass causing them to mount the pavement.

Note the following accident data:

2010 –2014 from Crashmap data

- Clandon Cross Roads Area to Bulls Head - 17 incidents
- Bulls Heads Head to Bennett Way - 8 incidents
- Bennett Way to Highcotts Lane - 15 incidents
- Tithebarn Lane to Portsmouth Road Birch Close - 8 incidents

2015

- 21 Oct 2015 – A247 near shell garage - Three vehicles collided causing delays

Surrey Fire and Rescue deployed.
2016

- 15 April 2016 12 year old boy injured in The Street – A247 closed in both directions
- 28 April 2016 A3 West Clandon London bound between A247 Tythebarns Lane (Burntcommon and M25J10 (Wisley Interchange) congestion on A3 to A3100 Clay Lane Burpham
- 30 June 2016 Motorcyclists with injuries airlifted to hospital Send Marsh Road

Attempts have been made over many years to reduce traffic, traffic speeds and accident risks through West Clandon, however little has been achieved as the road cannot be widened and SCC is reluctant to impose further speed limits as congestion is already very high.

I object most strongly to the proposal for a link road to bring traffic from the Gosden Hill development to the proposed 4 way junction at Burnt Common. This has the potential to generate large volumes of traffic (including commercial vehicles) on the A247 through West Clandon - a road which is already under traffic stress (see below).

The land in Gosden Hill does exactly what the Greenbelt was designed to achieve. It provides a green buffer between the Guildford Urban Area and West Clandon, gives Burpham a defined green boundary and breathing space and it hides Guildford town from visitors until they pass the off-slip to Burpham.

No exceptional circumstances have been demonstrated for building on this site and therefore it does not comply with paragraphs 87-89 of the NPPF. It stops the sprawl of Guildford town, assists in safeguarding the countryside from encroachment and assists in urban regeneration by encouraging the recycling of derelict and other urban land. All of these are requirements of the NPPF.

Gosden Hill is the most obvious location for the north end of an A3 tunnel. It has rising ground and is situated just before the urban area. If it is built on, it will be very difficult to construct a tunnel.

The development will generate in the region of 6,000 vehicles which will pour on to the A3 which is stationary every day during rush hours. The linking of the A3100, B2215 and A247 would channel thousands of cars through the narrow, winding road through West Clandon, a road where large lorries mount the pavement virtually every day and through Send and Ripley which are also severely constrained.

The volume of traffic will greatly increase air pollution which is particularly critical given the proposal to build two schools.

Currently, a two way junction at the site would require vehicles wanting to go north on the A3 to go through Burpham which is grid-locked every day.

Burpham’s sewers are at capacity. Sewage would have to be pumped to Slyfield for processing, a project of enormous cost.

There is inadequate fresh water in Guildford and current supplies could not meet the needs of a development of this size.

Electricity supply is also inadequate and would require a big infrastructure development.

The railway station was rejected by Guildford Borough Council in 1984 because it feared Gosden Hill would become a dormitory estate for London.

The wording of the Local Plan with regard to Gosden Hill is so loose that the developer could virtually do whatever it wants.

The remaining agricultural land between Gosden Hill and West Clandon is so small that it is highly likely to be uneconomic and therefore a prime candidate for further development which would roll the Guildford Urban Area over West Clandon towards East Clandon and Wisley.
If the Strategic Sites are developed, the north of Guildford will deliver 36%, 5,036 houses towards the total of around 14,000. The infrastructures of the existing villages and the A3 will be overwhelmed by the scale of development.

A new on-slip at Burpham would only be 1.8km from the on-slip at Burnt Common which is against Highway England’s requirement of 2km.

Development of the A3 at best will not start until after 2020 and the building of a tunnel, which is only an “aspiration” in the Local Plan, is likely to be many years after. In the meantime given that developers build houses to provide cash-flow for infrastructure, Gosden Hill will have a crippling effect on villages like West Clandon and the A3.

Gosden Hill already has surface water problems. Merrow Stream crosses the site. No hydrological survey has been carried out to assess the implications. Electricity pylons run through the centre of Gosden Hill which have health and safety issues.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/3449  Respondent: 8798849 / David Williams  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy A43 and A43a on Garlick’s Arch.

The site was only inserted in the draft plan at a late stage just before publication of the consultation draft which is a shabby way for the Council to proceed. The site is not a sustainable site being far from any infrastructure facilities and transport links. The bus service is infrequent and it is almost certain any future residents will rely almost entirely on cars for journeys. Similarly any employees at the employment areas will almost undoubtedly arrive and leave by car.

The site is susceptible to flooding and will not make a suitable site.

The Green Belt at this point serves the important function of separating West Clandon from Send. Building here will cause the two to coalesce defeating one of the objectives of the Green Belt.

I have seen no evidence that exceptional circumstances exist to justify removing this site from the Green Belt or that this important issue has been addressed. The Green Belt and Countryside study did not even consider this site.

It is understood the Council’s eyes may have been turned by the possibility of receiving for free the land which might be used for new A3 slip roads in return for allowing this development, thus justifying it as some form of enabling development. However the slip road land if needed could be safeguarded in the plan and acquired by compulsory purchase when required. Lack of current funding for the slip road is not a justification for allowing the development of this site. If the slip road is genuinely needed then government funding will be available for it. (One of the reasons for turning down the so called enabling development proposal intended to fund the rebuilding of the Howard of Effingham School was that the redevelopment of the school was not essential. As and when it became essential Government funding would become available. Accordingly enabling development was not necessary. The same principle applies here.)

The A247 running south past this site through the centre of West Clandon is already very heavily used whilst being unsuitable for designation as an A road. In places it is too narrow for two lorries to pass causing them to mount the pavement- often at speed. It has narrow bends with poor sight lines, an infants school and a hump-backed bridge concealing
the entrance road to the station for southward traffic. In addition, there are no continuous footpaths which forces pedestrians to cross and re-cross the road. Development at Garlick’s Arch will only exacerbate the problem and make the road even more congested and unsafe for pedestrians.

The development will cause harm to the ancient woodland on and by the site.

Taken together with the Gosden Hill site, there will be a ribbon of development along the A3 in contrast to the current “soft” edge approach to Guildford.

Garlick’s Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8). There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).

The Plan states the preference is to making the best use of previously developed land. Yet at the 11th hour a perfectly acceptable brown field site at Burnt Common, capable of accommodating approximately 100 houses, was removed from the Plan and replaced with the Garlick’s Arch site. There was no proper consultation in relation to the inclusion of this site. Why was a brownfield site removed and replaced with a Greenfield site? There is no evidence that Section 18 of the Planning and Compulsory Purchase Act 2004, which requires local planning authorities to produce a Statement of Community Involvement, has been complied with for this site. This only came to light for local residents following a Council meeting on 11th May 2016.

Moreover, Guildford Borough Council’s own Green Belt & Countryside Report does not address Garlick’s Arch at all, so there is no evidence base to support the inclusion of this site.

National Planning Policy promotes sustainable developments, with sustainable transport. With ever reducing bus services in the area and no train station within reasonable walking distance it is impossible for any development on this site to offer a sustainable transport solution. Development on this site is wholly inappropriate (Policy I3).

The stream, which runs through the site, is identified as having a high risk of flooding by the Environment Agency. There are other sites that do not flood that can be developed and therefore this site should be removed from the Plan (Policy P4).

This site is bordered by Ancient Woodland and within it a number of trees are protected by Tree Preservation Orders (Policy D3).

The site has an abundance of wildlife, some of which are protected. It is home to many types of owls and bats, with the woods having cuckoos and woodpeckers. In addition there are regular sightings of badgers, deer and red kites. The development of the site will result in the loss of habitat. No wildlife report has been conducted on the site. (Policy I4)

It is clear that with this site being added at the 11th hours no infrastructure planning has been undertaken. The Infrastructure Schedule makes no provision for any infrastructure improvements for this site. How will the local services such as schools and doctors cope, many of which are already at capacity? (Policy I1)

Furthermore, several electricity pylon runs through the site, which will have the potential to be a health hazard for any residents.

I OBJECT to the inclusion of the land for new on/off ramps at Burnt Common (A43a)

The addition north facing ramps to the A3 at Burnt Common would be a disaster for local communities. There is no requirement for local traffic to access the A3 to the north, but the addition will draw in a huge amount of ‘through’ traffic.

The route from London/M25 to Woking or would now be through Burnt Common and Send. Equally traffic from the east of Guildford (Merrow etc) and the A25 will now go through West Clandon and Burnt Common. This will cause immense damage to those areas on small roads which cannot be improved.

This Plan does not address the needs of local communities or the Borough in this regard. There has again been no Section 18 consultation on this.
I OBJECT to the damage to the historic environment as a result of the scale of the proposed development (Policy D3)

I OBJECT to the local plan based on the impact it will have on the special countryside of the borough.

The proposed development at Garlick’s Arch (A43) will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees.

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy D3 - Historic environment

I object to this policy as it is very weak and I do not think it is clear enough in its support for the conservation of the historic environment. It provides for development which will “enhance” heritage assets which I fear is a developer’s charter as it leaves plenty of room for abuse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I OBJECT to Policy D4 - Development in urban areas and inset villages

The policy should place much greater emphasis on residential development in the existing urban centres. In this way housing needs can be met without resorting to large developments in the Green Belt. There are urban areas in need of regeneration but these are ignored in favour of Green Belt development.

The policy should not be applied to the villages which should remain in the Green Belt. Unrestricted application of this policy to the villages intended to be inset will change their characters radically and for the worse. The development it encourages will increase traffic and congestion disproportionately.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

I OBJECT to the sustainable employment policy (Policy E1)

I object to the inclusion of a strategic employment site at Gosden Hill Farm. Employment sites should be concentrated on previously developed land in more sustainable locations with good transport links where the infrastructure can support development. Warehousing, distribution and industrial premises cause considerable commercial traffic, noise, pollution and general disruption. They are not good neighbours for schools and 2000 houses. Many of the jobs will be taken by people outside the area leading to additional congestion in Burpham and on the A3.

I object to the inclusion of a strategic employment site at Garlick’s Arch. It is in a non-sustainable location remote from any facilities of any kind and with poor public transport links. It is unlikely jobs there will be taken by local residents and it is likely all travel to and from work will be by car adding to local congestion. Employment sites should be concentrated on previously developed land in more sustainable location with good transport links where the infrastructure can support development.

The site is in any event subject to frequent flooding and unsuitable for development.

If developed, the new employment site at Garlick’s Arch, Send Marsh/Burnt Common (A43), would be treated as a Strategic Employment Site.

The proposed development of up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8) at Garlick’s Arch (A43) is in the scheme of industrial development relatively small. Just to the
south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m. The Garlick’s Arch site which is in the Green Belt should not be developed as a Strategic Employment Site when there is a suitable alternative brownfield site very close by, which is far more sustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7558  Respondent: 8798849 / David Williams  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the location for new employment floorspace (Policy E2)

I object to this policy. It would be more sensible to confine new office and research and development floor space to the urban Guildford area. I also oppose the policy of expanding the Research Park onto Blackwell Farm. No exceptional circumstances, as defined under the NPPF, have been advanced to justify incursion into this permanent and high-quality area of Green Belt.

Proposals for new industrial, warehousing and storage (use Class B1c, B2 and B8) floorspace will be directed to the Industrial Strategic Employment Sites.

There is no need for the new employment floorspace to be located at Garlick’s Arch or Gosden Hill Farm, when near to these sites at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7562  Respondent: 8798849 / David Williams  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I OBJECT to the loss of rural employment (Policy E5)

Policy E5 supports the retention and development of local services and community facilities in our inset and identified villages. Yet the development at Garlick’s Arch (A43) would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises. The Plan does not promote rural employment; rather it will result in the loss of existing local rural businesses.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/7598  Respondent: 8798849 / David Williams  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E6

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy E6 - The leisure and visitor experience.

The policy should acknowledge that whilst in some areas new and enhanced leisure facilities are valuable (for example the new Opera House at West Horsley Place Towers), much tourism depends on the undeveloped nature of Green Belt areas surrounding Guildford. Accordingly the policy should recognize that in many rural areas new and enhanced visitor facilities may be unnecessary and counterproductive, particularly away from existing buildings and development. For example the attraction of Newlands Corner is its undeveloped nature. Significant development of visitor facilities there is likely to diminish rather than increase its attractions. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment. Heritage sites and the Green Belt are particularly vulnerable to harm.

Tourism and visitors do not depend on new visitor “attractions” and could actually be damaged by them, as compellingly argued in the current debate over Newlands Corner. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment/“Disneyfication”. Heritage sites and the Green Belt are particularly vulnerable to harm.

Guildford has many “leisure and visitor attractions” already. The case for creating more is not made and no examples are given. Instead, the plan’s explicit priorities should be:

1. To protect the borough’s prime leisure and tourism asset, its countryside, from inappropriate development. This is all the more valuable because of its accessibility from London, the rest of Britain and the Continent, in that order. Rural residents are its custodians and require no Council interference. Economically, the most valuable forms of tourism, such as walking and cycling, require no new development. In the overcrowded South-East of England, lack of development is a leisure and tourism asset, not a liability.

2. To help make Guildford’s river landscape less off-putting and support town-break packages for high-value tourists. To achieve this, the policy needs to define what leverage, if any, Council planners have to influence normal tourism market mechanisms.

3. To help private providers market local tourism. This need not involve extra spending. The Council could, for instance, help co-ordinate ready-made, local tourism packages under a distinctive brand at an all-in price. An “English town break” (including B&B accommodation, a walking tour of Guildford, a pub lunch in the Surrey Hills, a visit to Wisley Gardens and a National Trust property and a Southwest Trains travelcard for a day out in...
London) would be highly attractive to many European visitors who currently by-pass Guildford to go to Bath, Oxford or Cambridge instead.

4. To rule out the redevelopment of scarce rural hotel sites (e.g. Thatchers, East Horsley, earmarked for 40 new houses under Site A37 of the plan yet just a short walk from the new opera house).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7586  Respondent: 8798849 / David Williams  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E7

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (

I OBJECT to Policy E7 Guildford Town Centre

The policy “vision” describes protecting the Guildford’s unique setting and historical character and sets out some of the ways this will be done. However none of this is included in the formal Policy wording in the blue box. I suspect the Vision wording is effectively of little or any force. These principles should be included in the formal policy.

There should be a much greater focus on residential use of the town centre where many people would like to live and where the necessary amenities and infrastructure exist. The policy misses the opportunity to propose forward looking sustainable residential development plans in, for example the Walnut Tree Close area, where very significant numbers of new homes could be provided. Such town centre sites could meet much of the housing need over the plan period without harming the countryside.

There is an urgent need for a strategy to focus on brownfield redevelopment before considering development outside the existing urban area.

The policy does not address any of the major issues raised by the Council’s own Town Centre Master Plan, the Guildford Vision Group’s proposal for new river and rail crossings or plans for the redevelopment of Guildford Station, all of which are already the subject of public discussion.

The policy also fails to provide guidance on design requirements, as required by the NPPF.

The policy and surrounding text concentrates too much on shopping without regard to its nature which risks a proliferation of dull high-street chain stores. The policy should seek to enhance Guildford’s character and encourage a wider variety of small shops including locally owned businesses and shops of use to consumers. (For example there is no butcher in Guildford.)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7579  Respondent: 8798849 / David Williams  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy H1 Guildford Town Centre

The policy “vision” describes protecting the Guildford’s unique setting and historical character and sets out some of the ways this will be done. However none of this is included in the formal Policy wording in the blue box. I suspect the Vision wording is effectively of little or any force. These principles should be included in the formal policy.

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy H1 – Homes for all. Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan period. It fails to set rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions.

The housing mix is based on out-of-date, pre-Brexit projections and on assumptions set out in a flawed SHMA that has not been scrutinised or evaluated.

I support higher density development in the urban area, without resorting to dehumanising, high-rise buildings that developers commonly claim are necessary for financial viability. Much of Guildford town could usefully be regenerated with 4-5 storey blocks with landscaping and underground parking, as often seen on the Continent and, recently, in London.

Student accommodation should provided for 100% of new students and more than 60% of existing students, which would free up ideal family accommodation in the urban area. Other university cities (e.g. Oxford) insist on higher percentages than those proposed in the plan. In my view, the Council’s timidity is a case of “regulatory capture” by Surrey University, which has failed to use its existing planning permissions (dating from 2004) to accommodate 3,000 students or to improve the efficient development of its campus (e.g. by building on its extensive and under-used surface car parks). If all students were accommodated in this way, 2,000 homes would be freed up in town and there would be no need to build on the Hog’s Back.

It is not appropriate to release Green Belt land to house students who could be accommodated on the Surrey campus or other university sites. The plan should take account of the university's ability to house its own students and reduce the housing number accordingly.

Guildford borough has already a higher proportion of traveller sites than most comparable boroughs. Over-provision is inappropriate given other constraints.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID:  PSLPP16/7583  Respondent:  8798849 / David Williams  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy H2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to this policy on affordable homes (Policy H2) on the grounds of feasibility and that it should be more firm and explicit on unviability in paragraph 4.2.40.

In particular a scheme is only unviable if the value of developing the land (including some allowance for development risk and a normal level of profit) falls below the sale vale of the land for alternative non-premium uses such as agriculture. The price paid for the land is not relevant. The possibility of avoiding the affordable housing obligation through use of
unviability arguments only serves to inflate land values. It will become clear that developments are unviable when developers start selling land for alternative non-development uses.

It should be noted in the plan that because of Guildford's relative popularity as a place to live combined with its location close to others towns and within the London Commuter belt no amount of building will meet demand. Similarly no amount of affordable housing will ever meet demand.

In addition the definition of an ‘affordable home’ is 80% of market value. With even a 2 bedroom flat in Guildford now having a market value of +£360,000 the discounted price is still not going to be affordable to anyone on a normal income.

And at what point will ‘affordable homes’ be able to go onto the market at full market price?

As we have seen with council houses it is not long before the discounted property is sold at full market value with the original owner simply pocketing the profit.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7595  Respondent: 8798849 / David Williams  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy H3 – Rural Exception Homes as this Trojan horse policy. It says that homes can be built anywhere near a settlement of any form (including agricultural land and the AONB). These homes are meant for people with a village connection, but they could be for anyone on the Guildford borough housing list. To make the housing viable, or to improve the “mix” this can include “market” housing (i.e. normal commercial development which in Guildford usually means large executive homes). This policy means building anywhere, and ignoring all historic planning restrictions.

The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove “exceptional circumstances.”

The wording of the policy is far too wide and drives a coach and horses though all other aspects of planning policy. As drafted the planning authority could be obliged to grant permission for inappropriate and unsuitable developments.

The wording provides no ability to balance the desirability of the development against other considerations including harm to the Green Belt or the AONB. (If the housing would meet identified need and adjoins a settlement under this policy wording permission would have to be granted even in the most sensitive AONB location, even if more suitable locations are available.) The policy should include the need for a balancing exercise including consideration whether more suitable locations exist.

The policy wording should not allow market housing. The ability to include market housing is likely to inflate land values, leading to a self-perpetuating need to include market housing. It may lead to spurious developer led proposals which will be difficult to resist.

The policy wording should define small, either in land size or number of units. I am concerned that if small is left undefined the policy could be used to justify significant developments. In the context of the plan a development of 150
homes might be argued as small. (If Wisley at 2,500 homes is a big development then 500 homes might be a medium development and 150 could be small.)

The policy wording should be restricted to adjoining sites or define the concept of being "closely related". In particular I believe adding the concept of safe and easy walking distance extends the potential radius within which sites will be argued to be “closely related” Many people would regard a mile or so as an easy walking distance. (School children are expected to walk further than that before being eligible for free school travel.)

The wording of the policy itself does not require the local connection requirement for tenants to be secured in perpetuity - only the affordability must be secured in perpetuity. (For example housing could be built for retired Cabinet Ministers under this policy so long as the first tenant was required to have a local connection.) The introduction to the policy mentions this point, but it is not part of the policy itself and may carry little weight at appeal.

The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove “exceptional circumstances.” The size and location of sites should be better defined and it should be clear market housing cannot be included.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7569  Respondent: 8798849 / David Williams  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT, due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1)

Our villages are already suffering from severe congestion for much of the day, for example the Newark Road & Rose Lane junction in the centre of Ripley and the A247 through West Clandon. The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.

Furthermore, many of the country lanes around the villages of Ripley, Send and Clandon are narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition.

I OBJECT to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces.

Many of the affected villages, such as West Clandon, already suffer from traffic congestion. Further development around these villages will only result in more traffic and more parking problems.

With some 5,000 houses being proposed close to the village of Ripley, the roads serving the village will become even more congested. Cycling has become an ever popular past time, particularly at weekends hundreds of cyclists past through the villages on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and
with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road accidents involving cyclists as a result of the development proposed under the local plan.

The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the road becoming ever more dangerous for pedestrians.

The council has a statutory obligation to protect the public and the additional traffic flows will bring added accidents, noise, pollution and injury of the public. In the case of West Clandon the Street often only has a narrow footpath on one side of the road making it very dangerous, especially when vehicles mount the pavements.

This policy as it is inappropriate and inadequate and fails to respond to the challenges raised by the proposed significant Green belt developments. The borough’s infrastructure is already heavily strained. However the plan’s determination to build large housing estates across the Guildford countryside significantly increases the need for infrastructure investment without securing the means for its provision. Placing housing in the established urban areas would reduce the need for enhanced infrastructure as would a more realistic housing number.

The policy wording says nothing about roads and traffic. The Council’s methodology for assessing traffic congestion - averaging it over periods of several hours and ignoring the effects of junctions - simply hides the problem, which will get worse as development proceeds. The schemes referred to in this policy will not solve existing congestion and the local road network has not been given sufficient consideration. Some proposed development locations would require highway schemes that are unlikely ever to happen.

Adequate infrastructure provision is a pre-condition of sustainable development. But in this plan it is an afterthought buried away in Policy I1. By prioritizing greenfield over urban, brownfield regeneration, the plan creates insurmountable (and unnecessary) obstacles for itself. Common sense suggests a local plan should first assess the borough’s infrastructure capacity for sustainable development, and then tailor development accordingly. This plan, however, assumes infrastructure will follow on the heels of housebuilding as if by magic. It makes implementation critically dependent on providers outside the Council’s control and on the vagaries of CIL income. Instead of recognizing this as a key constraint, the plan is based on hope. It is also highly likely that developers faced with the imposition of large infrastructure requirements will go to court to invoke the NPPF provision that prevents authorities from imposing conditions that make a development non-viable.

Policy I1 requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.

Despite the Garlick’s Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents’ in the locality will see their quality of life significantly deteriorate in many ways.

Many of the utilities in the Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers. No plans to improve these services should mean no development of the Garlick’s Arch site.

Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are already at capacity and suffering from funding cuts or freezes. Any further development without funding will place further stress upon existing health services.

Police services are seeing funding reduced. The development of the proposed 13,860 homes during the plan period will stretch the police services further and is unsustainable.

There is no provision of the increased capacity of Guildford hospital, where is this assessed and remedied?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I OBJECT due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2)

I object to this policy as it is too vague and optimistic. Significant improvements to the road infrastructure are like to be many years away even if they ever happen. The draft plan, however, commits to building massive housing estates in the countryside before any of these road improvements are in place. This is inappropriate and will lead to massive traffic disruption during the construction phase and will add permanently to an already congested network (about 3,000 private cars from the 2,100 new homes at Wisley Airfield alone).

Road infrastructure represents a major constraint that should have been applied to the housing target at a much earlier stage in the plan process and not left as an unresolved difficulty in the draft plan.

There is no certainty that either the A3 or M25 in the borough will be improved to increase capacity and reduce congestion during the Plan period. Highways England has no plans to even examine improving the A3 before 2020. I have considerable concerns that development of the large residential sites identified at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), will take place before any improvements are made to the trunk road network. The A3 & M25 are already at capacity during peak hours and any development prior to improvement of these roads will only make the situations worse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

I OBJECT to poor air quality concerns (Policy I3)

Paragraph 4.6.27 of the Plan states that “Development must also mitigate its traffic impacts, including its environmental impacts and impacts on amenity and health.” The significant level of development being proposed, particularly in the north east of the borough will lead to considerable further congestion, despite any attempts to mitigate this through travel plans. This will be particularly acute in built up residential areas and will only lead to greater levels of air pollution, which will have a detrimental effect on local residents and their health and can result in early death.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
I OBJECT to not protecting the Green Belt (Policy P2)

This policy does not sufficiently safeguard the Green Belt even though Green Belt constitutes 89% of the borough and should be the cornerstone of all local planning policy. The Green Belt is not the Council’s to give away and once it is gone it is gone forever. Sacrificing areas of the Green Belt to a developer influenced growth agenda is a betrayal of future generations and does not constitute sustainable development.

The Green Belt should be protected in perpetuity, but Policy P2 seeks to justify excessive development in supposedly protected areas. This is in breach of party manifesto commitments and contrary to previous responses to public consultation. It is disreputable to argue, as the Council does, that the Plan would involve the loss of “only” 1.6% of the borough’s Green Belt. Leaving aside the reliability of that statistic, the NPPF does not set an “acceptable” percentage. The fact remains that the plan proposes that 65% of the housing plus industrial development be built on land to be taken out of the Green Belt.

Paragraph 4.3.16 is seriously deficient in simply stating that the Council considers that exceptional circumstances exist to justify amendment of Green Belt boundaries. The exceptional circumstances are not identified. It is clear from national guidance that unmet housing need is not on its own an exceptional circumstance. Even to the extent that exceptional circumstances exist, these have to be balanced against the harm to the Green Belt in the specific sites proposed to be taken out of the Green Belt. This balancing exercise appears not to have been done.

The Countryside Study which the Council may argue fulfilled the need to demonstrate the exceptional circumstances required to justify removal of areas from the Green Belt was a simplistic tick box exercise. Within limits it may have answered certain questions about different attributes of different areas of Green Belt but it did not carry out the balancing exercise needed to determine whether specific exceptional circumstances justified removal of specific areas of land from the Green Belt. I believe that each of the identified Green Belt site proposed to be removed from the Green Belt should be carefully assessed against any exceptional circumstances in deciding whether it should be removed from the Green Belt in the final plan. This exercise should bear in mind that housing need in itself is not an exceptional circumstance and nor is the Council’s growth aspiration. An important consideration is that more housing need could be met on urban sites than is currently planned. The Plan has fallen into the developers’ hands and developers prefer building on undeveloped land rather than brown field sites.

I note that the Summer 2016 edition of "About Guildford" (published by the Council) on page 5 states that "... the Plan rejects any schemes that would have a detrimental impact on the Green Belt." This is demonstrably untrue and I consider this to be a deliberate untruth which compromises the consultation process. I would ask that this untruth be corrected and the consultation period restarted after the correction has been given the same distribution as the original statement. (I assume the document was delivered to most houses in the Borough.) I reserve the right to argue before the inspector that the consultation process was flawed and ineffective because of this.
I object to the “insetting” of 14 villages from the Green Belt. Contrary to assertions made in the Plan process many of these villages do contribute to the openness of the Green Belt and there is no need to inset them.

I also object to the wholesale extensions to the settlement boundaries in many villages to allow for infilling and that infilling is also proposed outside the settlement boundaries of 11 further villages. Many Guildford villages are linear. It is all too easy to square off boundaries by including countryside bounded on only one or two sides by existing development, claiming it contributes nothing to the “openness” of the Green Belt, a term which neither the plan nor the NPPF defines. The NPPF’s other 4 tests of Green Belt status, including the prevention of urban sprawl, are ignored. Effectively, this policy makes all villages within the Green Belt vulnerable to large blocks of new development and seems almost calculated to secure the rejection of the plan as a whole.

To “inset” two-thirds of the borough’s rural villages on the grounds that they no longer contribute to the purposes of the Green Belt is extreme and inherently implausible, given the borough’s location on the edge of Metropolitan London. I cannot see how such extensive areas fail to contribute to the purposes of the Green Belt under the NPPF, but this could quickly be the case if the proposed “insetting” and boundary extensions go ahead.

This policy is wildly disproportionate in terms of any foreseeable development need and has caused tidal waves of opposition from residents. It flies in the face of NPPF paragraph 17’s aim of “empowering local people to shape their surroundings” and other NPPF provisions.

Paragraph 4.3.17 states that “the general extent of the Green Belt has been retained.” I believe this should be deleted as an untruth.

In addition I OBJECT to the proposals to remove from the Green Belt the so called ‘strategic sites’ of Wisley Airfield (A35), Gosden Hill Farm (A25) and Garlick’s Arch (A43) and all other strategic sites. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these sites and villages (as mere housing need does not constitute a ‘special circumstance’) to be taken from the Green Belt. Once taken from the green belt they will be lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached.

GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site.

Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I OBJECT to development in areas which are at risk of flooding (Policy P4)

National Planning Policy states that Local Plans should take account of climate change over the longer term, including factors such as flood risk. It goes on to say that new development should be planned to avoid increased vulnerability to the range of impacts arising from climate change.

The Plan states that in accordance with national planning practice guidance, the Level 1 SFRA has been used to guide development towards areas at the lowest risk of flooding and identify areas unsuitable for development. However, the document concludes that land outside of the area of flood risk is not capable of accommodating all of the borough’s identified development needs. A Level 2 SFRA has therefore also been produced and will help the Council apply the exceptions test (as described in the NPPG) as necessary to development proposals in areas at risk of flooding.

The site at Garlick’s Arch (A43) is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. Knowing the area well I am aware that this site often floods during the winter months and the flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7540  Respondent: 8798849 / David Williams  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to this Policy as the development proposed will not be sustainable (Policy S1)

The NPPF states that the presumption in favour of sustainable development “should be seen as a golden thread running through both plan-making and decision-taking.” As the first policy in the Plan, Policy S1 ought to set a clear framework. Instead, no definition of “sustainable development” is given. The policy also fails to set out any principles for applying sustainable development in practice to local planning decisions, which often have serious long-term impacts.

The policy states that it aims “to secure development that secures the economic, social and environmental conditions in the area”. This fails to recognize that economic growth, social justice and environmental protection often conflict. The policy does not say how each element is to be weighted or conflicts resolved. As a practical guide to the planning decision to be taken in the Plan period it is seriously deficient. The policy is likely to be used by developers to justify inappropriate developments on economic grounds. Under this policy, virtually any development will qualify as “sustainable”, in breach of the NPPF’s most important guideline.

Policy S1 is also seriously deficient in making no mention of the Green Belt. The Green Belt is a long term Government policy enshrined in primary legislation to protect green areas in perpetuity. The Green Belt is a living example of sustainable development in practice and is one of the most important factors affecting sustainable development in the area covered by the Plan and should be acknowledged in this policy. Policy S1 should include a commitment to protect the Green Belt from inappropriate development and to uphold Green Belt boundaries and protections. This would set at least
one clear boundary to planning decisions. The Plan and the Council have treated the Green Belt as a developable land bank rather than as a constraint to development.

The commitment to approve planning applications “wherever possible” and “without delay” reveals the pro-development bias of the plan. Countervailing references to sustainability are so vague that the NPPF presumption in favour of sustainable development becomes a presumption in favour of any development at all.

This policy also ignores, as if they are inconvenient constraints, most of the 12 Core Planning Principles set out in NPPF paragraph 17.

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact on existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill Farm (A25) are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are also unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick’s Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: PSLPP16/7543</th>
<th>Respondent: 8798849 / David Williams</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the Borough Wide Strategy (Policy S2)

The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

The housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.
The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guildford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

The assumptions and calculations in the SHMA are widely regarded as flawed and even before Brexit, produced an inflated housing needs number. The figure of 13,860 new homes is completely unsubstantiated. It has not been scrutinised by Councillors despite repeated requests for debate. The assumptions and calculations underlying the model are hidden, protected by a claim to intellectual property by a commercial sub-contractor used in preparing the SHMA. I have serious doubts about the objectivity of the SHMA because it has been produced by consultants whose website openly proclaims their pro-development agenda leading to reasonable suspicion that the figures are inflated. Guildford’s OAN is not transparent but has been taken on trust by the authors of the plan. Given that almost every element of the plan is predicated on this OAN, the plan as a whole cannot be considered “sound”.

The status of the 13,860 figure is ambiguous. The Council has said that the housing number and the OAN are identical because the OAN is “deliverable” and is by definition objective and cannot be contradicted. The OAN is only deliverable because of the Council’s cavalier approach to the Green Belt in contravention of the NPPF, ministerial statements and local and national Conservative Party manifesto commitments. The plan also states that infrastructure or other constraints may in due course affect deliverability. It is also unlikely that the number of houses can be built at the rate proposed. In recent years, housing starts have on average been less than half the proposed rate. This is not because developers do not have the land or cannot get planning permission. Constraints in the supply chain and maintaining profit levels have been more important.

The plan cannot be considered “deliverable”. In addition, the number of homes proposed, plus existing planning permissions, plus expected “windfall” sites, exceeds the total of 13,860. So how many homes (taking account of these adjustments) do the Council want built? The plan does not say. Without this figure it is hard to see how anything else can be planned. This undermines the validity of the whole consultation. It is unreasonable to ask the public to approve a “plan” that fails to propose a target number that takes all the standard constraints and adjustments realistically into account, leaving the Council to set one without further consultation. Even if the OAN is not flawed, it is at best only a baseline figure and should not be passed off as a policy proposal.

It is unreasonable to embark on a radical transformation of the borough on the basis of an unclear housing target. Most of Guildford Borough is highly protected from development (89% Green Belt, 44% AONB and about 75% protected by SPA). Whether or not increasing the number of dwellings by up to a quarter is desirable, it would be a major and irreversible change, arguably turning a largely rural borough into a mainly urban or suburban one like Woking. The scale of the housing number increases the onus for it to be seen to be sound. A substantially lower number, on the other hand, would remove the need to build on Green Belt or open countryside, and instantly meet the single biggest public objection to the plan as a whole.

The Plan in general and this policy in particular does not address the point that Guildford exists as part of London's commuter belt. Any increase in supply of housing in Guildford, particularly if the increase is proportionately greater than elsewhere in the commuter belt, will simply result in a shift of population into the area. It will not reduce prices or increase availability except imperceptibly. The Plan also ignores the point that many of those working in the area live elsewhere.
Accordingly in considering the housing number the Plan should take into account that in this part of London’s commuter belt, demand for housing is, in practical terms, unlimited.

This policy does not take proper accounts of the constraints to development which exist, principally posed by the Green Belt and by infrastructure limitations. I believe the Council is under a duty to properly consider applying these constraints. It is clear the Council has failed to do this. This approach differs from all the other boroughs in Surrey. The Plan appears to have deliberately been manipulated towards a growth agenda without disclosing why this is being done. The housing that is needed should be concentrated on urban brown field sites and through increasing the housing density of existing built up urban areas.

The development of 13,860 homes in the Plan period with 65% in the Green Belt does not constitute sustainable development. It will have a permanently detrimental impact on the Borough in general and on West Clandon and surrounding area in particular. The developments at Garlick’s Arch and Gosden Hill Farm do not meet the needs of the local communities. The road infrastructure in and around West Clandon will be unable to cope with additional demand. The edge of urban Guildford will creep that much closer to West Clandon, thus negating the purposes of the Green Belt in the area which include safeguarding the countryside from encroachment, checking the unrestricted sprawl of large built up areas and preventing neighboring towns merging into one another.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill Farm (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
1. An excessive ambition to expand the local economy which is neither warranted nor wanted by the local population. Guildford is already one of the highest ‘value creation’ areas in the country and has one of the lowest unemployment rates. There is no evidence that massive and accelerated expansion is required.

1. SHMA figures which are neither transparent nor justifiable, especially in view of previous figures set. Independent assessments of the SHMA (eg from Guildford Residents’ Association and David Reeve) show it is set far too high and so cannot be said to be adequate, up to date or relevant.

In addition the recent vote to leave the EU and the impact this will have on the economy and migration have not been taken into account.

The Plan should be re-assessed and the methodology for arriving at housing need figures should be fully transparent.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** SQLP16/1139  **Respondent:** 8798849 / David Williams  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 2: Legal compliance

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

I do not consider the Proposed Submission Local Plan: strategy and sites as a whole to be legally compliant because it mainly ignores the consultation process for the 2014 draft Plan it is claimed to be based on.

That consultation process was absolutely clear by some +20,000 responses that that Plan was flawed and no development should be carried out on Green Belt land.

Instead this 2016 draft Plan actually increases the number of dwellings being built on the Green Belt, in direct contradiction to the consultation process, yet is stated to be a Regulation 19 proposal.

As a result I do not see how the 2016 draft Plan can be Legally Compliant.

The 2016 draft Plan should be re-assessed and should take into account the views of the majority of responses from the consultation process for the 2014 draft Plan.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** SQLP16/1142  **Respondent:** 8798849 / David Williams  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I do not consider the Proposed Submission Local Plan: strategy and sites as a whole to be sound, because, but not limited to, the following reasons:

1. "Only sites that propose sustainable solutions have been included in the Plan and the Plan rejects any schemes that would have a detrimental effect on the green belt." Summer 2016 edition of "About Guildford" (published by the Council) on page 5. This is demonstrably untrue and appears designed to bias the consultation process.
2. The housing OAN figure has been calculated by a process which is not transparent. It has not been properly examined by Councillors before being adopted.
3. The OAN has been adopted as the housing number without the application of any constraints to take account of Guildford's circumstances, including in particular the Green Belt, AONB and road infrastructure. National policy permits such constraints to be applied and it is inappropriate not to consider the need to do this.
4. The draft Plan does not accord with the NPPF policies on protecting the Green Belt. Exceptional circumstances need to be shown to justify removing areas from the Green Belt and this has not been done. The housing need number is not justification in itself according to published ministerial statements Having properly calculated an OAN, constraints should be applied to it to reflect the Green Belt, AONB and infrastructure. Each proposed Green Belt site then needs to be justified on its own merits. The benefits of the proposed development need to be identified together with the harm to the Green Belt. Only if there are exceptional circumstances and following a proper balancing exercise demonstrating that these exceptional circumstances outweigh the harm to the Green Belt can the proposal proceed. The draft Plan does not demonstrate that this has been done. The housing number has been used as a blanket justification for all Green Belt sites-which amount to 65% of the proposed housing number.

1. Whatever the justification for the assumptions made in calculating the OAN, those assumptions are now almost certainly incorrect following the referendum.
2. The housing number is at least twice the achieved rate of building in the Borough over the last few years. There is no evidence in the Plan to show that this rate is achievable and sustainable.
3. Much of the infrastructure required to support the level of development proposed is outside the Council’s control. The Infrastructure Plan is long on possibilities and aspirations and very short on commitments. The infrastructure requirements placed on developers are supposed to be in place before development commences. This is utterly unrealistic and indicates a lack of knowledge of developer’s business models which depend on positive cash flow. It seems very clear that at best, infrastructure provision will seriously lag development and leave higher levels of congestion than now. This will reduce the quality of life for residents through congestion and disruption.
4. The 40-45% requirement for affordable homes together with infrastructure such as railway stations, park and ride facilities, schools and roads is highly likely to be challenged on a site by site basis by developers using the NPPF provision that Councils cannot impose conditions which make development non-viable.

1. GBC has not included details of its Town Centre Master Plan and urban development proposals in time for and as a part of the Guildford Local Plan consultation
2. GBC has failed to provide an Infrastructure Report in time for and as a part of the Guildford Local Plan consultation
3. GBC has proposed an OAN of 693 houses per annum in the GL Hearn West Surrey Strategic Housing Market Assessment (SHMA) which many, including independent assessors, consider unsound
4. Highways England will not start to consider what it intends to do as regards the A3 in the vicinity of Guildford until 2018
5. Network Rail have not made available for the public consultation any plans for a new railway station at Merrow with an adjacent Park & Ride for 1,000 cars
6. The GBC proposals for Gosden Hill Farm do not appear to be in coordination with the Neighbourhood Plan for Burpham
7. The draft Local Plan will cause further linear development along the A3 between Burpham and West Clandon PC and encroachment onto open Green Belt countryside in clear conflict with the National Planning Policy Framework.

8. The proposal for Garlick’s Arch was added to the draft Local Plan without any prior consultation under Regulation 18.

9. The Land Availability Assessment (LAA) indicates a range of planning difficulties for Gosden Hill Farm and Burpham which have to be met by the developer involved. These include Electricity Grid supply problems and foul sewage and surface water issues that suggest the development proposed cannot easily be implemented both technically and financially.

10. No adequate explanation is given as to how the aspirational proposal for a tunnel will be used to overcome traffic issues relating to the quality of life and amenity of Burpham, West Clandon, Send and Ripley citizens.

11. In common with many others I do not believe the housing figure has been properly calculated and I believe it overstates housing need. The Council has prevented councilors or others from properly considering the SHMA by refusing to make public the basis on which it was drawn up.

12. The housing figure, when properly recalculated, should be subject to constraints to reflect Guildford's circumstances, including in particular the Green Belt and road infrastructure. National policy permits such constraints to be applied and it is inappropriate not to consider the need to do this.

13. Even once a housing number has been calculated it cannot be used to justify taking land out of the Green Belt on a wholesale basis.

14. Cast iron commitment should be included in the plan that development can only commence when required infrastructure improvements have been secured.

15. The status of the text which accompanies each policy box is not clear. If the accompanying text does not have the force of policy a number of the policies (i.e. the text in blue) are so vague and general that they commit the Council to very little.

The draft Plan should be re-assessed with housing on brownfield sites made a priority over commercial development and Greenfield sites and each of the above points addressed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: SQLP16/1145  Respondent: 8798849 / David Williams  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 4: Duty to cooperate

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I do not consider the Proposed Submission Local Plan: strategy and sites as a whole has complied with the Duty to cooperate.

This 2016 draft of the Local Plan clearly demonstrates Guildford Borough Council’s refusal to co-operate with the wishes and requirements of the vast majority of the residents in its Borough.

The Council has failed to co-operate with the results of the consultation process for the 2014 draft Plan which was meant to inform and guide this 2016 draft Plan.
Despite campaigning on a clear statement ‘Conservatives Say Green Belt To Stay’, the ruling party on GBC is now intent on pushing through a Plan which will devastate Green Belt land and extend the Guildford Urban Area to further merge into surrounding rural villages.

This is not cooperation by any definition.

In addition the Council has failed to cooperate in providing any transparency to the housing need figures commissioned by the Council from GL Hearn.

The 2016 draft Local Plan should be reassessed with a reviewed and transparent SHMA and revised to reflect the views of the residents of the Borough, who pay for Guildford Borough Council to act in their interests, and not those of developers and central government.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp173/210  Respondent: 8798849 / David Williams  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Appendix H: Maps - West Horsley North

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policies A37, 38, 40, 42, 44 & 45 – My Objections

- Some 295 houses in various smaller developments in West Horsley, 100 in Send and 15 in Ripley. These will generate traffic on the A 247 to access the A3.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp172/1958  Respondent: 8798849 / David Williams  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A25

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
• Gosden Hill development of 1700 houses. Reference to a potential link road from the development to the A247. The clear implication is for an access from the development to the A247 with enormous traffic implications for the A247.

• South bound off- and on- slip roads to service the development and replace the existing off-slip road to Burpham. The only North bound access to the A3 will be via the existing slip road off Clay Lane. (See later, Burnt Common).

• A 4-entry form secondary school, a primary school, a retail centre and a park and ride for up to 700 cars.

• When developed, the new employment site at the north side of Gosden Hill Farm (site allocation A25) will be treated as an Office and Research & Development Strategic Employment Site (7000sq.m). This could mean several hundred employees.

• I object to the changed policy A25 Gosden Hill for the development of 1700 homes which is still far too much.

• There is no need for housing on this site because the local plan housing target is incorrect and inflated and ignores constraints.

• Gosden Hill is located entirely within the Green Belt. No exceptional circumstances have been demonstrated for building on this site and therefore development here does not meet paragraphs 87-89 of the NPPF. Furthermore, Gosden Hill performs all five functions of green belt,

• The site has no provision for foul or surface water sewerage and adjoining sewerage is at capacity.

• The Green Belt at this point serves the important function of separating West Clandon from the edge of urban Guildford. Development here will cause the two to coalesce defeating one of the objectives of the Green Belt. If this development proceeds I believe the narrow strip of Green Belt remaining between Guildford and Clandon at this point will be too narrow and will come under further pressure. It will represent an undesirable ribbon development along the A3. It will be highly visible from the A3 when approaching Guildford and will, in conjunction with A43a at Garlick’s Arch give the appearance of almost continuous development from Send through to Guildford.

• The development of this site cannot be sustainable and will cause massive congestion onto surrounding roads. The development will generate in the region of 6,000 vehicles which will exit straight on to the A3 which is stationary every day during rush hours. The linking of the A3100, B2215 and A247 would channel thousands of cars through the narrow, winding road through West Clandon.

• I object to the proposal for a link road to bring traffic from the Gosden Hill development to the proposed 4 way junction at Burnt Common. This has the potential to generate large volumes of traffic (including commercial vehicles) on the A247 through Send and West Clandon - a road which is already under traffic stress (see below).

• The volume of traffic will greatly increase air pollution which is particularly critical given the proposal to build two schools.

A new on-slip at Burpham would only be 1.8km from the on-slip at Burnt Common which is against Highway England’s requirement of 2km.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/1959  Respondent: 8798849 / David Williams  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
• Garlick’s Arch development of 400+ houses and facilities for travelling showmen (implies storage yards and long vehicles). This will generate traffic on the A247.
• I object to the changed policy A43 Garlick’s Arch for 400 homes and 6 travelling show people pitches
• It ignores all the thousands of previous objections made by local people
• There is no proven demand for travelling show people plots in this location
• There is no need for putting houses on this site because the local plan housing target is incorrect and inflated and ignores constraints.
• The allocation of 28.9 ha is an excessive land grab into the Green Belt. If we take a normal density of 30 homes per ha and it is at the end of the day proven that there is a need for 400 homes in this location the land requirement is 13 ha not 28.9 ha which is more than double. This replicates a similar over land grab at Burnt Common where the factor is 7 times the land required.
• This confirms the worrying impression that GBC have a pre-determined policy of building on the Green Belt at every opportunity. The arithmetic does not stack up. One would have thought that they would as custodians of the green Belt be intent on conserving it rather than exploiting it.
• The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.
• Garlick’s Arch (A43) is in an unsustainable location. It does not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. The site is unsuitable due to lack of access to sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be dependent on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.
• The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.
• I object to the proposal to remove Garlick’s Arch from the Green Belt. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for this land to be taken from the Green Belt. Once taken the green belt is lost forever. There is a real danger that the loss of this Green Belt will result in urban sprawl and the neighbouring villages merging into one another. The significant development in West Clandon, Send and Ripley will result in the character of these villages being lost and the countryside encroached.
• I object to the development at Garlick’s Arch because of flood risk. The site at Garlick’s Arch is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. Knowing the area well I am aware that this site often floods during the winter months and the flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.
• I object to the loss of rural employment on the site. The development at Garlick’s Arch would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises.
• I object to the potential loss of Ancient Woodland on the site. The proposed development at Garlick’s Arch will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees that existed in the year 1600.
• I object due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1). Our villages are already suffering from severe congestion for much of the day, for example the Newark Road and Rose Lane junction in the centre of Ripley and the A247 through West Clandon. The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.
• Furthermore, many of the country lanes around the villages of West Clandon, East Clandon, Ripley, and Send are narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition. I object to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces.
• Many of the affected villages, such as West Clandon, East Clandon, Send and Ripley, already suffer from parking problems. Further development around these villages will only result in more traffic and more parking problems.

• With some 5000 houses being proposed close to the villages of West Clandon, East Clandon, Send and Ripley, the roads serving the village will become even more congested. Cycling has become a popular past time, particularly at weekends hundreds of cyclists past through the village on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road accidents involving cyclists as a result of the development proposed under the local plan.

• The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the roads becoming ever more dangerous for pedestrians.

• I object to the lack of proper infrastructure planning for sites (Policy I1). Policy I1 requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.

• Despite the Garlick’s Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents’ in the locality will see their quality of life significantly deteriorate in many ways.

• Many of the utilities in the West Clandon, East Clandon, Burpham, Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers. No plans to improve these services should mean no development of the Garlick’s Arch site.

• Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are already at capacity and suffering from funding cuts or freezes. Any further development without funding will place further stress upon existing health services.

• I object due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2). There is no certainty that either the A3 or M25 in the borough will be improved to increase capacity and reduce congestion during the Plan period. Highways England has no plans to even examine improving the A3 before 2020. I have considerable concerns that development of the large residential sites identified at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), will take place before any improvements are made to the trunk road network. The A3 & M25 are already at capacity during peak hours and any development prior to improvement of these roads will only make the situations worse.

• I object to poor air quality concerns (Policy I3). Paragraph 4.6.27 of the Plan states that “Development must also mitigate its traffic impacts, including its environmental impacts and impacts on amenity and health.” The significant level of development being proposed, particularly in the north east of the borough will lead to considerable further congestion, despite any attempts to mitigate this through travel plans. This will be particularly acute in built up residential areas and will only lead to greater levels of air pollution, which will have a detrimental effect on local residents and their health.

• I object to the inclusion of the land at Garlick’s Arch, Send Marsh/Burnt Common and Ripley (A43). Garlick’s Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8). There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).

• It is clear that with this site being added at the eleventh hour and no infrastructure planning has been undertaken. The Infrastructure Schedule makes no provision for any infrastructure improvements for this site. How will the local services such as schools and doctors cope, many of which are already at capacity? (Policy I1)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Burnt Common strategic industrial employment site for light industry, storage and distribution activities. It is to be designated an Industrial Strategic Employment Site which means that it is a preferred site for industrial development including waste management facilities. The site is 9ha which it is stated allows for considerable future expansion. This will generate large amounts of traffic including heavy vehicles on the A247.

• I object to Policy A 58 at Burnt Common and to the proposed inclusion of Burnt Common as an Industrial Strategic Employment Site
• This previous allocation for B1c, B2 and B8 development was removed from the 2014 draft due to all the objections made previously.
• The word “minimum” is a change from the previous “maximum” in the 2016 plan and since that time there has been a decline in demand for industrial land. This change alone is unacceptable since even if there was a need to build 7,000 sq m at Burnt Common this development would only require 1.4 ha at a standard plot ratio density of 50% not 9.26 ha. There is no justification for zoning an additional 7.86 ha in the Green Belt.
• There is in fact no justification for building any more industrial development in the borough particularly at Burnt Common. The current industrial pipeline of granted consents of 38,357sqm in B1c, B2 or B8 use class space is double the 19,000 sq m said to be needed by Aecom who justify the need for new space on top of the existing pipeline by a completely unsubstantiated suggestion that “there is the possibility that some pipeline developments may not come forward at all, or be developed in different quantities by use class than has been consented.”
• There is no need to build industrial or warehouse development in the middle of the Green Belt when Slyfield and Guildford still have empty sites and industrial units.
• The 2017 Employment Land Need Assessment shows a reduction in demand to 3.9 hectares for industrial land for the whole borough not a huge over allocation of 9.26 hectares at Send in the Green Belt.
• The Employment Land Needs Assessment update 2017 (ELNA) states “that the pipeline for employment floorspace defined by planning permissions yet to be implemented and prior approvals suggests the potential for an additional 33,607sqm of B use class floorspace to come forward. This figure comprises a net loss of 4,750sqm of B1a use class floorspace and a net gain of 38,357sqm in B1c, B2 or B8 use class space.”
• 38,357 sq m of B1c, B2 or B8 use class is quite sufficient supply for the plan period and is in fact more space than the 3.9 ha of industrial land that is said to be needed for the plan period by Aecom. Since if you were to develop 3.9 ha at a plot ratio of 50% it would provide new industrial development of 19,000 sq m approximately half of current planning permissions granted. This does not justify the need for new development of industrial space on the Green Belt in such areas as Burnt Common.
• The reality of demand for industrial space is that it is both nationally and locally in decline and this is evidenced by old existing permissions that have not been taken up and developed. The ELNA alludes incorrectly to the poor quality of existing space being a “constraint” on supply and fails to acknowledge that this assertion cannot apply to potential newly developed space e.g. the undeveloped pipeline of 38,357sqm.
• The impact on small surrounding roads will create traffic gridlock.
• It will join up existing villages and defeat the purpose of the Green Belt.
• The ongoing poor quality of the updated research undertaken by Aecom in the Employment Land Needs Assessment 2017 does not support industrial development on land in the Green Belt at Burnt Common.
• The Aecom research is generally superficial and lacks sufficient detail and analysis between B1c, B2 and B8 use classes and no reliable individual analysis has been undertaken of the widely different supply and demand dynamics of light industrial, general industrial and warehousing and distribution floor space.
• The potential inclusion of a waste management facility mentioned at paragraph 4.4.23a lacks enough detail for proper consultation and is completely inappropriate.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
**Policies ID1 & ID2 Infrastructure – My Objections**

Although much is made of the need for new infrastructure to support these developments and for this to be in place as needed, the Plan admits “…*we forecast that there will also be an absolute increase in overall traffic volumes*** and this is assuming all the infrastructure (listed in **App. C** to the Plan) is in place in a timely fashion. GBC has little or no control over the plans of Surrey County Council as the local highways authority and Highways England for trunk roads. Worryingly, the Plan now has less substantive information about improvements to the A3 South of the M25 from Highways England and it appears that their plans are not yet formed (**Policy ID2**). In the absence of such information, the infrastructure proposed is specific to each proposed development and does not address cumulative effects. What would be the case with regard to planning approval if SCC and/or HE do not provide timely infrastructure?

The Plan now calls for nearly all infrastructure to be funded by developers (see **APP. C**). We question how realistic it is to expect developers not only to pay for all the infrastructure but also to have it in place in a timely fashion. The Plan says that planning permission will be refused if timely provision of infrastructure cannot be secured. Such refusals will almost certainly be settled in the courts. Developers’ business models are based on building and selling houses to create the cash to provide infrastructure. People will be living on the sites well before infrastructure is complete. Will GBC prevent development of Gosden Hill until slip roads etc. are provided off and onto the A3? Again, the infrastructure is site specific and does not address cumulative effects.

If development were to be refused the land would still have been removed from the green belt and its future rendered uncertain.

Residents are being asked to accept very large amounts of development with little or no detail being provided on measures which would relieve existing congestion and limit future problems. The cumulative effects of the developments listed below are certain to have a devastating effect on the A247 through our village (and of course on Send) and it is hard to see how any of the infrastructure proposed in the Plan (**App. C**) will do anything to mitigate the effects of these developments on the A247 and hence our village.

**Summary of the Impacts on the A247 – My Objections**

All of these developments will draw additional traffic to the A247 through the village. It would be naïve to think that the employment sites and schools will serve only the developments themselves. Apart from the normal movements of residents to and from the new sites there will be considerable additional traffic on the A247 generated by:

- children from elsewhere being delivered to schools and collected
- the employees of the offices and industrial sites getting to work and returning home
- the vehicle movements generated by distribution and storage activities
- traffic from Wisley wishing to travel South and returning
- traffic from Gosden Hill wishing to travel South and returning
- traffic from Slyfield wishing to travel South and returning
- private and commercial traffic originating in the South and accessing Gosden Hill, Burnt Common or the A3 and returning (including traffic from Dunsfold)

The A247 although an A road:
- is less than 2 vehicle wide in places
- does not have continuous footpaths
- has several sharp bends
- has a hump-backed bridge with poor site lines
- has a very difficult junction to access the station
- is largely unlit
- has a primary school
- is already very congested at times

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>pslp17q/59</th>
<th>Respondent:</th>
<th>8798849 / David Williams</th>
<th>Agent:</th>
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<td>Proposed Submission Local Plan: strategy and sites 2017 / Question 4: Duty to cooperate</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Non-plan Items– My Objections

- Surrey County Council’s business plan for Newlands Corner (not referenced in the Local Plan) to attract 100,000 more visitors a year. A significant proportion of these can be expected to use the A247.

- Waverly B. C. has approved the development of 1,800 homes at Dunsfold which has the potential to feed traffic trying to avoid Guildford, onto the A247 to access the A3 (not referenced in the Local Plan)

Cumulative impact of changes – My Objections

Changes to the Plan have done nothing to alleviate the problems (particularly of traffic and congestion) raised in residents’ previous responses. Indeed it is now clear that the problems will be made much worse. There do not appear to be any changes which would be of benefit to the Clandons and indeed the cumulative effect of what is in the Plan and some external factors not in the Plan will have a much worse impact on the A247 through West Clandon and Send than the 2016 draft. Note that the A247 is the only road over the Guildford to Waterloo railway, North of Guildford that doesn’t involve travelling through the town centre.

Duty to Cooperate – My Objections
The NPPF states para 155: “Early and meaningful engagement and collaboration with neighbourhoods, local organisations and businesses is essential. A wide section of the community should be proactively engaged, so that Local Plans, as far as possible, reflect a collective vision and a set of agreed priorities for the sustainable development of the area, including those contained in any neighbourhood plans that have been made.”

The changes in this latest version of the Guildford Local Plan show little or no willingness of Guildford Borough Council to reflect a collective vision. Despite the many thousands of responses to previous versions of the Plan which overwhelmingly rejected building on Green Belt land this latest version has as much, if not more, building on the Green Belt and increased problems of infrastructure and traffic which will bring increased noise and air pollution and danger to residents.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/808  Respondent: 8798881 / H L Cousins  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT to the proposed Infrastructure Schedule (Appendix C)

The Infrastructure Schedule sets out the key infrastructure requirements on which the delivery of the plan depends. For each of the Key Allocated Sites in the borough it identifies infrastructure projects that are required, except for Garlick’s Arch (A43) which is not mentioned. It is clear that the Plan takes no account of the infrastructure required for this site and is therefore not fit for purpose.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/809  Respondent: 8798881 / H L Cousins  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
1. I OBJECT to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)

° The “objectively assessed need” figure of 693 homes a year is too high.

° A professional review by NMSS has concluded that, even basing the calculations on a period of stronger economic and student growth, the housing need figure should be revised down to 510 homes a year and the method changed to consider student housing need separately due to the distorting effects.

° The current SHMA inflates the proposed housing figure due to

° failure to correct for errors in the historical data for international migration flows,

° issues with the way it considers students and affordability and

° flaws in the method for estimating the number of homes needed to support job growth.

° It is unacceptable that demographic and economic model assumptions have been withheld and cannot be checked making the process unaccountable.

The Plan’s proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the borough, it is over double the previous figure of 322 used in previous plans. The SHMA report methodology is I believe inaccurate; it inflates the needs of the borough by distorted student numbers. However, it is based on commercially confidential modelling assumptions that cannot be checked or reviewed. There is no transparency to this evidence base and it is therefore impossible to assess its accuracy. This is not democratic and is not appropriate for consultation of the Plan.

The National Planning Policy Framework allows the overall housing target to be reduced to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/1333  Respondent: 8798881 / H L Cousins  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A25

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT to Gosden Hill development being in the Local Plan The land in Gosden Hill does exactly what the Greenbelt was designed to achieve. It provides a green buffer between the Guildford Urban Area and West Clandon, gives Burpham a defined green boundary and breathing space and it hides Guildford town from visitors until they pass the off-slip to Burpham.

No exceptional circumstances have been demonstrated for building on this site and therefore it does not comply with paragraphs 87-89 of the NPPF. It stops the sprawl of Guildford town, assists in safeguarding the countryside from encroachment and assists in urban regeneration by encouraging the recycling of derelict and other urban land. All requirements of the NPPF.
The scale of Gosden Hill is out of proportion to West Clandon. It would have four times the amount of housing plus shops, offices/factories, GP surgery, schools. Development on this scale would blight a historic village with a history going back to the doomsday book and beyond.

Gosden Hill is the most obvious location for the north end of an A3 tunnel. It has rising ground and is situated just before the urban area. If it is built on, it will be very difficult to construct a tunnel.

The development will generate in the region of 6,000 vehicles which will pour on to the A3 which is stationary every day during rush hours. The linking of the A3100, B2215 and A247 would channel thousands of cars through the narrow, winding road through West Clandon, a road where large lorries mount the pavement virtually every day and through Send and Ripley which are also severely constrained.

The volume of traffic will greatly increase air pollution which is particularly critical given the proposal to build two schools.

Currently, a two way junction at the site would require vehicles wanting to go north on the A3 to go through Burpham which is grid-locked every day.

Burpham’s sewers are at capacity. Sewage would have to be pumped to Slyfield for processing, a project of enormous cost.

There is inadequate fresh water in Guildford and current supplies could not meet the needs of a development of this size.

Electricity supply is also inadequate and would require a big infrastructure development.

The railway station was rejected by Guildford Borough Council in 1984 because it feared Gosden Hill would become a dormitory estate for London.

The wording of the Local Plan with regard to Gosden Hill is so loose that the developer could virtually do whatever it wants.

The remaining agricultural land between Gosden Hill and West Clandon is so small that it is highly likely to be uneconomic and therefore a prime candidate for further development which would roll the Guildford Urban Area over West Clandon towards East Clandon and Wisley.

If the Strategic Sites are developed, the north of Guildford will deliver 36%, 5,036 houses towards the total of around 14,000. The infrastructures of the existing villages and the A3 will be overwhelmed by the scale of development.

A new on-slip at Burpham would only be 1.8km from the on-slip at Burnt Common which is against Highway England’s requirement of 2km.

Development of the A3 at best will not start until after 2020 and the building of a tunnel, which is only an “aspiration” in the Local Plan is likely to be many years after. In the meantime given that developers build houses to provide cash-flow for infrastructure, Gosden Hill will have a crippling effect on villages like West Clandon and the A3.

Gosden Hill already has surface water problems. Merrow Stream crosses the site. No hydrological survey has been carried out to assess the implications. Electricity pylons run through the centre of Gosden Hill which have health and safety issues.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/1334  Respondent: 8798881 / H L Cousins  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT to the inclusion of the land at Garlick’s Arch, Send Marsh/Burnt Common and Ripley (A43)

Garlick’s Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8). There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).

The Plan states the preference is to making the best use of previously developed land. Yet at the 11th hour a perfectly acceptable brown field site at Burnt Common, capable of accommodating approximately 100 houses, was removed from the Plan and replaced with the Garlick’s Arch site. There was no proper consultation in relation to the inclusion of this site. Why was a brownfield site removed and replaced a Greenfield site? There is no evidence that Section 18 of the Planning and Compulsory Purchase Act 2004, which requires local planning authorities to produce a Statement of Community Involvement, has been complied with for this site. This only came to light for local residents following a Council meeting on 11th May 2016.

Moreover, Guildford Borough Council’s own Green Belt & Countryside Report does not address Garlick’s Arch at all, so there is no evidence base to support the inclusion of this site.

National Planning Policy promotes sustainable developments, with sustainable transport. With ever reducing bus services in the area and no train station within reasonable walking distance it is impossible for any development on this site to offer a sustainable transport solution. Development on this site is wholly inappropriate (Policy I3).

The stream, which runs through the site, is identified as having a high risk of flooding by the Environment Agency. There are other sites that do not flood that can be developed and therefore this site should be removed from the Plan (Policy P4).

This site is bordered by Ancient Woodland and within it a number of trees are protected by Tree Preservation Orders (Policy D3).

The site has an abundance of wildlife, some of which are protected. It is home to many types of owls and bats, with the woods having cuckoos and woodpeckers. In addition there are regular sightings of badgers, deer and red kites. The development of the site will result in the loss of habitat. No wildlife report has been conducted on the site. (Policy I4)

It is clear that with this site being added at the 11th hours no infrastructure planning has been undertaken. The Infrastructure Schedule makes no provision for any infrastructure improvements for this site. How will the local services such as schools and doctors cope, many of which are already at capacity? (Policy I1)

Furthermore, several electricity pylon runs through the site, which will have the potential to be a health hazard for any residents.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT to the inclusion of the land for new on/off ramps at Burnt Common (A43a)

The addition north facing ramps to the A3 at Burnt Common would be a disaster for local communities. There is no requirement for local traffic to access the A3 to the north, but the addition will draw in a huge amount of ‘through’ traffic.

The route from London/M25 to Woking would now be through Burnt Common and Send. Equally traffic from the east of Guildford (Merrow etc) and the A25 will now go through West Clandon and Burnt Common. This will cause immense damage to those areas on small roads which cannot be improved.

This Plan does not address the needs of local communities or the Borough in this regard. There has again been no Section 18 consultation on this.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2735  Respondent: 8798881 / H L Cousins  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT to the damage to the historic environment as a result of the scale of the proposed development (Policy D3)

I OBJECT to the local plan based on the impact it will have on the special countryside of the borough.

The proposed development at Garlick’s Arch (A43) will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2732  Respondent: 8798881 / H L Cousins  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT to the sustainable employment policy (Policy E1)

If developed, the new employment site at Garlick’s Arch, Send Marsh/Burnt Common (A43), would be treated as a Strategic Employment Site.

The proposed development of up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8) at Garlick’s Arch (A43) is in the scheme of industrial development relatively small. Just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m. The Garlick’s Arch site which is in the Green Belt should not be developed as a Strategic Employment Site when there is a suitable alternative brownfield site very close by, which is far more sustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2733  Respondent: 8798881 / H L Cousins  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT to the location for new employment floorspace at Garlick’s Arch – Site A43 (Policy E2)

Proposals for new industrial, warehousing and storage (use Class B1c, B2 and B8) floorspace will be directed to the Industrial Strategic Employment Sites.

There is no need for the new employment floorspace to be located at Garlick’s Arch, when just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2734  Respondent: 8798881 / H L Cousins  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E5
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT to the loss of rural employment (Policy E5)

Policy E5 supports the retention and development of local services and community facilities in our inset and identified villages. Yet the development at Garlick’s Arch (A43) would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises. The Plan does not promote rural employment; rather it will result in the loss of existing local rural businesses.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2742 Respondent: 8798881 / H L Cousins Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E6

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. POLICY E6 - The leisure and visitor experience

I OBJECT. Tourism and visitors do not depend on new visitor “attractions” and could actually be damaged by them, as compellingly argued in the current debate over Newlands Corner. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment/“Disneyfication”. Heritage sites and the Green Belt are particularly vulnerable to harm.

Guildford has many “leisure and visitor attractions” already. The case for creating more is not made and no examples are given. Instead, the plan’s explicit priorities should be:

1. To protect the borough’s prime leisure and tourism asset, its countryside, from inappropriate development. This is all the more valuable because of its accessibility from London, the rest of Britain and the Continent, in that order. Rural residents are its custodians and require no Council interference. Economically, the most valuable forms of tourism, such as walking and cycling, require no new development. In the overcrowded South-East of England, lack of development is a leisure and tourism asset, not a liability.

2. To help make Guildford’s river landscape less off-putting and support town-break packages for high-value tourists. To achieve this, the policy needs to define what leverage, if any, Council planners have to influence normal tourism market mechanisms.

3. To help private providers market local tourism. This need not involve extra spending. The Council could, for instance, help co-ordinate ready-made, local tourism packages under a distinctive brand at an all-in price. An “English town break” (including B&B accommodation, a walking tour of Guildford, a pub lunch in the Surrey Hills, a visit to Wisley Gardens and a National Trust property and a SouthWest Trains travelcard for a day out in London) would be highly attractive to many European visitors who currently by-pass Guildford to go to Bath, Oxford or Cambridge instead.
4. To rule out the redevelopment of scarce rural hotel sites (e.g. Thatchers, East Horsley, earmarked for 40 new houses under Site A37 of the plan yet just a short walk from the new opera house).

I trust that the objections made above are fully taken into consideration and that the Plan is amended accordingly.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/2740  **Respondent:** 8798881 / H L Cousins  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ()**

1. **I OBJECT (POLICY H1 – Homes for all)** Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan period. It fails to set rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions.

The housing mix is based on out-of-date, pre-Brexit projections and on assumptions set out in a flawed SHMA that has not been scrutinised or evaluated.

I support higher density development in the urban area, without resorting to dehumanising, high-rise buildings that developers commonly claim are necessary for financial viability. Much of Guildford town could usefully be regenerated with 4-5 storey blocks with landscaping and underground parking, as often seen on the Continent and, recently, in London.

Student accommodation should provided for 100% of new students and more than 60% of existing students, which would free up ideal family accommodation in the urban area. Other university cities (e.g. Oxford) insist on higher percentages than those proposed in the plan. In my view, the Council’s timidity is a case of “regulatory capture” by Surrey University, which has failed to use its existing planning permissions (dating from 2004) to accommodate 3,000 students or to improve the efficient development of its campus (e.g. by building on its extensive and under-used surface car parks). If all students were accommodated in this way, 2,000 homes would be freed up in town and there would be no need to build on the Hog’s Back.

Guildford borough has already a higher proportion of traveller sites than most comparable boroughs. Over-provision is inappropriate given other constraints.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/2741  **Respondent:** 8798881 / H L Cousins  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy H3
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. POLICY H3 – Rural Exception Homes

I OBJECT This is a Trojan horse policy. It says that homes can be built anywhere near a settlement of any form (including agricultural land and the AONB). These homes are meant for people with a village connection, but they could be for anyone on the Guildford borough housing list. To make the housing viable, or to improve the “mix” this can include “market” housing (i.e. normal commercial development which in Guildford usually means large executive homes). This policy means building anywhere, and ignoring all historic planning restrictions.

The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove “exceptional circumstances.”

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2726  Respondent: 8798881 / H L Cousins  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT in the strongest possible terms to the Guildford Borough Proposed Submission Local Plan (June 2016). This Plan is unsustainable, unworkable and, in many provisions, unnecessary.

I set out below my objections to specific policies and matters within the Plan.

1. I OBJECT, due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1)

Our villages are already suffering from severe congestion for much of the day, for example The Street in West Clandon and Newark Road & Rose Lane junction in the centre of Ripley. The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.

Furthermore, many of the country lanes around the villages of Ripley, Send and West Clandon are narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT to the lack of proper infrastructure planning for sites (Policy I1)

Policy I1 requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.

Despite the Garlick’s Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents’ in the locality will see their quality of life significantly deteriorate in many ways.

Many of the utilities in the Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers. No plans to improve these services should mean no development of the Garlick’s Arch site.

Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are already at capacity and suffering from funding cuts or freezes. Any further development without funding will place further stress upon existing health services.

Police services are seeing funding reduced. The development of the proposed 13,860 homes during the plan period will stretch the police services further and is unsustainable.

There is no provision of the increased capacity of Guildford hospital, where is this assessed and remedied?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/2736</th>
<th>Respondent: 8798881 / H L Cousins</th>
<th>Agent:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID2</td>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
</tr>
<tr>
<td>1. I OBJECT due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2)</td>
<td>There is no certainty that either the A3 or M25 in the borough will be improved to increase capacity and reduce congestion during the Plan period. Highways England has no plans to even examine improving the A3 before 2020. I have considerable concerns that development of the large residential sites identified at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), will take place before any improvements are made to the trunk road network. The A3 &amp;</td>
<td></td>
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</table>
M25 are already at capacity during peak hours and any development prior to improvement of these roads will only make the situations worse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

I OBJECT to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces.

Many of the affected villages, such as West Clandon, already suffer from severe traffic congestion. Much of West Clandon is deemed by Guildford Borough Council to be a Conservation Area and we residents are required to abide by those rules. Is not GBC also duty bound to protect and conserve the area? Further development around these villages will only result in more traffic and more parking problems.

With some 5,000 houses being proposed close to the village of Ripley, the roads serving the village will become even more congested. Cycling has become an ever popular past time, particularly at weekends hundreds of cyclists past through the villages on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road accidents involving cyclists as a result of the development proposed under the local plan.

The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the road becoming ever more dangerous for pedestrians.

The council has a statutory obligation to protect the public and the additional traffic flows will bring added pollution and risk to injury of the public. In the case of West Clandon, The Street often only has a narrow footpath on one side of the road making it very dangerous, especially when vehicles have, of necessity, to mount the pavement. With a primary school, two pubs and a children’s playground, quite clearly the village should be protected from, and not be forced to take yet more, traffic.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I OBJECT to poor air quality concerns (Policy I3)

Paragraph 4.6.27 of the Plan states that “Development must also mitigate its traffic impacts, including its environmental impacts and impacts on amenity and health.” The significant level of development being proposed, particularly in the north east of the borough will lead to considerable further congestion, despite any attempts to mitigate this through travel plans. This will be particularly acute in built up residential areas and will only lead to greater levels of air pollution, which will have a detrimental effect on local residents and their health and can result in early death.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2730  Respondent: 8798881 / H L Cousins  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

4. I OBJECT to not protecting the Green Belt (Policy P2)

I OBJECT to the proposals to remove the villages of Ripley, Send and Clandon from the Green Belt, together with sites of Wisley Airfield (A35) and Garlick’s Arch (A43). National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these villages (as mere housing need does not constitute a ‘special circumstance’) and the land to be taken from the Green Belt. Once taken Green Belt is lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached. GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site.

Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2731  Respondent: 8798881 / H L Cousins  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

<table>
<thead>
<tr>
<th>1. I OBJECT to development in areas which are at risk of flooding (Policy P4)</th>
</tr>
</thead>
<tbody>
<tr>
<td>National Planning Policy states that Local Plans should take account of climate change over the longer term, including factors such as flood risk. It goes on to say that new development should be planned to avoid increased vulnerability to the range of impacts arising from climate change.</td>
</tr>
<tr>
<td>The Plan states that in accordance with national planning practice guidance, the Level 1 SFRA has been used to guide development towards areas at the lowest risk of flooding and identify areas unsuitable for development. However, the document concludes that land outside of the area of flood risk is not capable of accommodating all of the borough’s identified development needs. A Level 2 SFRA has therefore also been produced and will help the Council apply the exceptions test (as described in the NPPG) as necessary to development proposals in areas at risk of flooding.</td>
</tr>
<tr>
<td>The site at Garlick’s Arch (A43) is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. Knowing the area well I am aware that this site often floods during the winter months and the flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.</td>
</tr>
<tr>
<td><strong>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</strong></td>
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<tr>
<td><strong>Attached documents:</strong></td>
</tr>
</tbody>
</table>

**Comment ID:** PSLPP16/2728  **Respondent:** 8798881 / H L Cousins  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

<table>
<thead>
<tr>
<th>1. I OBJECT to the Local Plan as the development proposed will not be sustainable (Policy S1)</th>
</tr>
</thead>
<tbody>
<tr>
<td>The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.</td>
</tr>
<tr>
<td>The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.</td>
</tr>
<tr>
<td>The strategic sites of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are just unsuitable due to</td>
</tr>
</tbody>
</table>
being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2729  Respondent: 8798881 / H L Cousins  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the Borough Wide Strategy (Policy S2)

1. The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

2. The Housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.

3. The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guildford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only
about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated
between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of
the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the
borough.

The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a
disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of
these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp171/3155  Respondent: 8798881 / H L Cousins  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally
Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

E. Policy S1 Presumption in favour of Sustainable Development– Our Objections

The Plan now states: “the presumption in favour of sustainable development will not automatically apply to policies
relating to sites protected under the Birds and Habitats Directives and/or designated as Sites of Special Scientific Interest
(SSSIs), land designated as Green Belt, Local Green Space, the Surrey Hills Area of Outstanding Natural Beauty,
designated heritage assets and locations identified as at risk of flooding.”

Gosden Hill and Blackwell Farm (both currently in the green belt) are called “urban extensions” surely a euphemism for
urban sprawl? Garlick’s Arch and Burnt Common developments take land from the green belt to extend Ripley/Send. One
of the important specific purposes of the green belt is to prevent urban sprawl.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp17q/634  Respondent: 8798881 / H L Cousins  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Question 4: Duty to cooperate

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally
Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
G. Duty to Cooperate – Our Objections

The changes in this latest version of the Guildford Local Plan show little or no willingness of Guildford Borough Council to cooperate with the wishes of its own electorate.

Despite the thousands of responses to previous versions of the Plan which overwhelmingly rejected building on Green Belt land this latest version has as much, if not more, building on the Green Belt and increased problems of infrastructure and traffic which will bring increased noise and air pollution and danger to residents.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/6348  Respondent: 8799393 / Sue Kitcatt  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I am writing to object to the latest Local Plan.

The reasons for this are as follows:

1) I strongly object to the local area being taken out of the Greenbelt and the turning of our villages into an A3 urbanised corridor. The greenbelt should be protected at all costs. It is an easy option to give over hundreds of acres for building before exploring other avenues. Three Farm Meadows is in all but name, not a brownfield site, it should be designated greenbelt as it has been part of our rural environment for years. It is totally inappropriate to build over this land which has become a natural habitat of so much flora and fauna. Our villages wish to remain villages. Our children need green space to grow and flourish. It would be tantamount to an act of vandalism to carve through our beautiful countryside for developments which would be better located elsewhere on land already occupied by empty office blocks and disused buildings.

2) The road network is not supportive of so many building projects - especially Three Farm Meadows. How are all the people who live in these houses going to travel to work, school and local amenities. Already the A3 is solid every weekday morning. Junction 10-12 of the M25 are the busiest junctions on the M25 with traffic queuing back for miles every rushhour. Already the Horsleys face an overwhelming amount of traffic diverting from Junction 9 at Leatherhead and travelling through the village to get to further up the M25. Juggernauts and large busses travel through our village at astonishing levels. These roads are narrow and ill equipped to deal with such traffic. The huge increase in traffic which would be created by developments cannot possibly be supported by our local roads and lanes.

The local train stations carparks (Effingham and Horsley) are full every morning. Where are more travellers going to park? Where is the local public transport network? Last week I witnessed a bus grounding itself twice coming out of station approach. There just isn’t the space and capacity to deal with yet more commuting traffic.

Schools and Surgery - The local schools and doctors surgery cannot support a bigger intake. Already our villages have children who are unable to access their local school despite living in the catchment area. Carparks at the surgery are full to capacity. The Doctors are overworked and the national problem of recruiting GPs does not bode well for being able to cope with a large increase in local residents.
3) The water table in this area is higher than average. The roads are continually flooding and driving is hazardous with some roads, such as East Lane/The Street, frequently closing during heavy downpours. We have cheap road surfacing (such as that which was completed in Forest Road recently) which doesn’t last and the number of potholes frequently opening up is horrendous.

4) The current use of our roads by hundreds of cyclists needs to be taken into account. Cyclists flock to our area throughout the year training for Ride London and wanting to experience the Olympic route. Although not a problem in themselves, this should be taken into account when assessing the impact of any new developments on road usage. We continually have cycle teams and clubs riding through our roads - sometimes strings of 30/40 and the impact of these on local residents cannot be understated. Most residents are perfectly tolerant but more traffic would certainly involve more danger.

5) Air pollution is a real concern for anyone living in close proximity to the M25 and A3. This will also be a concern for residents of any new development at 3 Farm Meadows and may affect the rationale of building a school on that site. With child asthma and breathing related illnesses on the increase and parents choosing to move to the countryside to avoid the risk of their children developing these, it seems to be totally contrary to health guidelines to build a new village so close to one of the busiest junctions on the M25 and take away so much of the green space that is such a health benefit to so many.

6) Affordable housing - I have yet to see any affordable housing in the Horsleys and surrounding area. I wonder what is meant by affordable. My son is a primary school teacher. On a salary of £21,000/annum could you guarantee he will be able to afford a house in the area. There have been opportunities to build such houses but instead I see mansion after mansion being erected and small bungalows being turned into huge detached houses. This is not joined up thinking. There is a lot of talk, but not much action in this area. I feel developers are not really interested in supporting the local communities but more concerned with financial investment.

7) The development at Three Farm Meadows has already been rejected by GBC. I wonder why the developers are still permitted to put plans forward. I believe it should be completely taken out of the plan. The amount of time, effort and work for councillors to continually assess the viability of this plan, when it has already been rejected on environmental grounds, which have not and cannot be changed, seems ridiculous. It is a waste of our money to have this project continually submitted and debated.

In summary I totally object to Horsley and the surrounding area being targeted for an unsustainable number of housing projects. To build on Greenbelt land would be a travesty and an unjust act undertaken by the council. Once our precious countryside is built on, it can never be returned to what it was. There is no need for it and housing needs can and should be met through other projects in areas which already have the infrastructure to support them.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
The New Guildford Local Plan Proposals population growth predictions were always questionable and following the referendum to leave the European Union, we believe it will be impossible to predict population numbers until the ‘exit’ negotiations are complete.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Wisley Airfield

We don’t think this is a suitable site for a large new development since it suffers from considerable noise and air pollution from the traffic around the A3/M25 junction. In our opinion this site is not convenient for commuting to London from ‘local’ train stations and would put many more car journeys on our hard-pressed roads. We note that the developers are hoping that bus services will provide some help; we don’t believe the local bus companies are viable enough to support their current rural routes let alone add to them. Basically any development in this area cannot rely on public transport and will generate an enormous number of extra car journeys which the local roads and infrastructure cannot support.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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A further cause for concern is the level of street lighting. A rural area like this doesn’t need much street lighting at all.

We all accept the inevitability of change, however, the rate of change is a critical element. Changes must be assimilated whilst retaining the essential character of the area. We contend that the rate of change during the last twenty years has been too fast and we are now confronted with a step change. If the plan proceeds in its current form the essential character of the area will be lost for ever.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Comment ID: PSLPP16/8551  
Respondent: 8799521 / David Donaldson  
Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

There has also been a relentless amount of infilling and house extension work. In particular, many bungalows and small houses have been torn down to make way for large houses. This should never have been permitted because older people end up living in large under-occupied houses or are being forced out of the area completely and this affects the character of the village.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/8550  
Respondent: 8799521 / David Donaldson  
Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We are writing to register our objection to a number of elements of the Guildford Local Plan Proposals concerning the Horsleys.

General concerns

My wife and I have lived in East Horsley for over twenty years and during this time we have witnessed a change from a rural environment to one more like an urban environment.

There has been a been a significant increase in traffic. This has put an immense strain on the roads and drains which now need constant attention and are always in a poor state of repair and are sometimes dangerous.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: PSLPP16/8554  Respondent: 8799521 / David Donaldson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Green Belt

We object strongly to the removal of the Horsleys from the Green Belt status because this protects the area from excessive development and loss of character. We don’t believe that the protection provided by Conservation Area status is good enough to prevent expansion of the villages in the same way that the Green Belt status has done. We do not believe we are faced with “exceptional circumstances” which would permit the re-designation of Green Belt land. We also object to the extension of the Settlement areas of Horsley which appear to have the sole aim of converting Green Belt land to potential building sites.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/3077  Respondent: 8800545 / Bill Taylor  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the proposed Infrastructure Schedule (Appendix C)

The Infrastructure Schedule sets out the key infrastructure requirements on which the delivery of the plan depends. For each of the Key Allocated Sites in the borough it identifies infrastructure projects that are required, except for Garlick's Arch (A43) which is not mentioned. It is clear that the Plan takes no account of the infrastructure required for this site and is therefore not fit for purpose.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/3078  Respondent: 8800545 / Bill Taylor  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base
I object to the Strategic Housing Market Assessment (SHMA) figure of 693 houses per annum in the borough being too high (Appendix D).

I consider the "objectively assessed need" figure of 693 homes a year is too high.

- A professional review by NMSS has concluded that, even basing the calculations on a period of stronger economic and student growth, the housing need figure should be revised down to 510 homes.
- The current SHMA inflates the proposed housing figure due to a failure to correct for errors in the historical data for international migration flows, issues with the way it considers students and affordability and flaws in the method for estimating the number of homes needed to support job growth.
- It is unacceptable that demographic and economic model assumptions have been withheld by the council and treated in secrecy by the council and cannot be checked making the process unaccountable.

The Plan's proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the borough, it is over double the previous figure of 322 used in previous plans. The SHMA report methodology is I believe inaccurate; it inflates the needs of the borough by distorted student numbers.

However, it is based on "commercially confidential" modelling assumptions that cannot be checked or reviewed. There is no transparency to this evidence base and it is therefore impossible to assess its accuracy. This is not democratic and is not appropriate for consultation of the Plan.

The National Planning Policy Framework allows the overall housing target to be reduced to take account of protected wildlife areas (e.g., Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to Policy A25 with proposals for Gosden Hill Farm.

The Green Belt at this point serves the important function of separating West Clandon from the edge of urban Guildford. Development here will cause the two to coalesce defeating one of the objectives of the Green Belt. If this development proceeds I believe the narrow strip of Green Belt remaining between Guildford and Clandon at this point will be too narrow and will come under further pressure. It will represent an undesirable ribbon development along the A3. It will be highly visible from the A3 when approaching Guildford and will, in conjunction with A43a at Garlick's Arch give the appearance of almost continuous development from Send through to Guildford. The Plan does not put forward any evidence that exceptional circumstances exist to justify removing this site from the Green Belt. The development will overburden the local road network and increase congestion on the A3 and A247 through the centre of West Clandon. This is already very heavily used whilst being unsuitable for designation as an A road. In places it is too narrow for two lorries to pass causing them to mount the pavement putting pedestrians at risk. Note that young families use the pavement to access Clandon school and everyday during rush hour traffic they put their lives in danger as no workable traffic calming measures have been implemented that prevent vehicles from mounting the pavement to pass each other at pinch points in the road or to manage the excessive speed of vehicles passing through the village.

I object to the proposal for a link road to bring traffic from the Gosden Hill development to the proposed way junction at Burnt Common. This has the potential to generate large volumes of traffic including commercial vehicles on the A247 through West Clandon - a road which is already under traffic stress (see below).

The land in Gosden Hill does exactly what the Greenbelt was designed to achieve. It provides a green buffer between the Guildford Urban Area and West Clandon, gives Burpham a defined green boundary and breathing space and it hides Guildford town from visitors until they pass the off-slip to Burpham. No exceptional circumstances have been demonstrated for building on this site and therefore it does not comply with paragraphs 87-89 of the NPPF. It stops the sprawl of Guildford town, assists in safeguarding the countryside from encroachment and assists in urban regeneration by encouraging the recycling of derelict and other urban land. All of these are requirements of the NPPF.

The scale of Gosden Hill is out of proportion to West Clandon. It would have four times the amount of housing plus shops, offices/factories, GP surgery, schools. Development on this scale would blight a historic village with a history going back to the doomsday book and beyond.

The development will generate in the region of 6,000 vehicles which will pour on to the A3 which is stationary every day during rush hours. The linking of the A3100, B2215 and A247 would channel thousands of cars through the narrow, winding road through West Clandon, a road where large lorries mount the pavement virtually every day and through Send and Ripley which are also severely constrained. The volume of traffic will greatly increase air pollution which is particularly critical given the proposal to build two schools.

A new on-slip at Burpham would only be 1.8km from the on-slip at Burnt Common which is against Highway England's requirement of 2km. Gosden Hill already has surface water problems. Merrow Stream crosses the site. No hydrological survey has been carried out to assess the implications. Electricity pylons run through the centre of Gosden Hill which have health and safety issues.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to Policy A43 and A43a on Garlick's Arch.

The site was inserted in the draft plan at a late stage just before publication of the consultation draft. The site is not a sustainable site being far from any infrastructure facilities and transport links. The bus service is infrequent and it is almost certain any future residents will rely almost entirely on cars for journeys.

Similarly any employees at the employment areas will almost undoubtedly arrive and leave by car.

The site is susceptible to flooding and will not make a suitable site.

The Green Belt at this point serves the important function of separating West Clandon from Send. Building here will cause the two to coalesce defeating one of the objectives of the Green Belt. I have seen no evidence in the proposed local plan that exceptional circumstances exist to justify removing this site from the Green Belt or that this important issue has been addressed. The Green Belt and Countryside study did not even consider this site.

It is understood the Council may have been offered the possibility of receiving for free the land which might be used for new A3 slip roads in return for allowing this development, thus justifying it as some form of enabling development. However the slip road land, if needed, could be safeguarded in the plan and acquired by compulsory purchase when required. Lack of current funding for the slip road is not a justification for allowing the development of this site. If the slip road is genuinely needed then government funding will be available for it. (One of the reasons for turning down the so called enabling development proposal intended to fund the rebuilding of the Howard of Effingham School was that the redevelopment of the school was not essential. As and when it became essential Government funding would become available. Accordingly enabling development was not necessary. The same principle applies here.)

The A247 running south past this site through the centre of West Clandon is already very heavily used whilst being unsuitable for designation as an A road. In places it is too narrow for two lorries to pass causing them to mount the pavement often at speed. It has narrow bends with poor sight lines, an infants school and a hump-backed bridge concealing the entrance road to the station for southward traffic. In addition, there are no continuous footpaths which forces pedestrians to cross and re-cross the road. Development at Garlick's Arch will only exacerbate the problem and make the road even more congested and unsafe for pedestrians.

The development will cause harm to the ancient woodland on and by the site. Taken together with the Gosden Hill site, there will be a ribbon of development along the A3 in contrast to the current "soft" edge approach to Guildford.

Garlick's Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8). There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).

The Plan states the preference is to making the best use of previously developed land. Yet perfectly acceptable brown field site at Burnt Common, capable of accommodating approximately 100 houses, was removed from the Plan and replaced with the Garlick's Arch site. There was no proper consultation in relation to the inclusion of this site. Why was a brownfield site removed and replaced with a Greenfield site?
There is no evidence that Section 18 of the Planning and Compulsory Purchase Act 2004, which requires local planning authorities to produce a Statement of Community Involvement, has been complied with for this site. This only came to light for local residents following a Council meeting on 11th May 2016.

Guildford Borough Council's own Green Belt & Countryside Report does not address Garlick's Arch at all, so there is no evidence base to support the inclusion of this site.

National Planning Policy promotes sustainable developments, with sustainable transport. With ever reducing bus services in the area and no train station within reasonable walking distance it is impossible for any development on this site to offer a sustainable transport solution. Development on this site is wholly inappropriate (Policy 13).

The stream, which runs through the site, is identified as having a high risk of flooding by the Environment Agency. There are other sites that do not flood that can be developed and therefore this site should be removed from the Plan (Policy P4). This site is bordered by Ancient Woodland and within it a number of trees are protected by Tree Preservation Orders (Policy D3).

The site has an abundance of wildlife, some of which are protected. It is home to many types of owls and bats, with the woods having cuckoos and woodpeckers. In addition there are regular sightings of badgers, deer and red kites. The development of the site will result in the loss of habitat. No wildlife report has been conducted on the site. (Policy 14)

It is clear that with this site being added at the 11th hours no infrastructure planning has been undertaken. The Infrastructure Schedule makes no provision for any infrastructure improvements for this site. How will the local services such as schools and doctors cope, many of which are already at capacity? (Policy 11) Furthermore, several electricity pylons run through the site, which will have the potential to be a health hazard for any residents.

I object to the inclusion of the land for new on/off ramps at Burnt Common (A43a) The addition of north facing ramps to the A3 at Burnt Common would be a significant negative impact for local communities. There is no requirement for local traffic to access the A3 to the north, but the addition will draw in a huge amount of 'through' traffic.

Page 19 of 25
William Taylor- Objection to Local Plan
The route from London/M25 to Woking would now be through Burnt Common and Send. Equally traffic from the east of Guildford (Merrow etc) and the A25 will now go through West Clandon and Burnt Common. This will cause immense damage to these areas on small roads which cannot be improved and which were never designed for the current traffic levels let alone increases in traffic levels that would result if the proposal to build new on/off access to the A3 at Burnt common (A43a) were to proceed. The proposed Plan does not address the needs of local communities or the Borough in this regard. There has again been no Section 18 consultation on this.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to the damage to the historic environment as a result of the scale of the proposed development (Policy D3); I object to the local plan based on the impact it will have on the special countryside of the borough. The proposed development at Garlick's Arch (A43) will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12755  Respondent: 8800545 / Bill Taylor  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to Policy D4 - Development in urban areas and inset villages

The policy should place much greater emphasis on residential development in the existing urban centres. In this way housing needs can be met without resorting to large developments in the Green Belt. There are urban areas in need of regeneration but these are ignored in favour of Green Belt development.

The policy should not be applied to the villages which should remain in the Green Belt. Unrestricted application of this policy to the villages intended to be inset will change their characters radically and for the worse. The development it encourages will increase traffic and congestion disproportionately.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12745  Respondent: 8800545 / Bill Taylor  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the inclusion of a strategic employment site at Gosden Hill Farm (Policy A25). Employment sites should be concentrated on previously developed land in more sustainable locations with good transport links where the infrastructure can support development. Warehousing, distribution and industrial premises cause considerable commercial traffic, noise, pollution and general disruption. They are not good neighbours for schools and 2000 houses. Many of the jobs will be taken by people outside the area leading to additional congestion in Burpham and on the A3.
I object to the inclusion of a strategic employment site at Garlick's Arch (Policy A43). It is in a non sustainable location remote from any facilities of any kind and with poor public transport links. It is unlikely jobs there will be taken by local residents and it is likely all travel to and from work will be by car adding to local congestion. Employment sites should be concentrated on previously developed land in more sustainable location with good transport links where the infrastructure can support development. The site is in any event subject to frequent flooding and unsuitable for development. If developed, the new employment site at Garlick's Arch, Send Marsh/Burnt Common (A43), would be treated as a Strategic Employment Site.

The proposed development of up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8) at Garlick's Arch (A43) is in the scheme of industrial development relatively small. Just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m. The Garlick's Arch site which is in the Green Belt should not be developed as a Strategic Employment Site when there is a suitable alternative brownfield site very close by, which is far more sustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/12746  Respondent: 8800545 / Bill Taylor  Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the location for new employment floorspace (Policy E2)

I object to this policy, It would be more sensible to confine new office and research and development floor space to the urban Guildford area, I also oppose the policy of expanding the Research Park onto Blackwell Farm, No exceptional circumstances, as defined under the NPPF, have been advanced to justify incursion into this permanent and high-quality area of Green Belt.

Proposals for new industrial, warehousing and storage (use Class B1c, B2 and B8) floorspace will be directed to the Industrial Strategic Employment Sites.

There is no need for the new employment floorspace to be located at Garlick's Arch or Gosden Hill Farm, when near to these sites at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/12747  Respondent: 8800545 / Bill Taylor  Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E5
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the loss of rural employment (Policy E5)

Policy E5 supports the retention and development of local services and community facilities in our inset and identified villages. Yet the development at Garlick's Arch (A43) would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises,

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12757  Respondent: 8800545 / Bill Taylor  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E6

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to Policy E6 - The leisure and visitor experience.

The policy should acknowledge that whilst in some areas new and enhanced leisure facilities are valuable (for example the new Opera House at West Horsley Place Towers), much tourism depends on the undeveloped nature of Green Belt areas surrounding Guildford. Accordingly the policy should recognize that in many rural areas new and enhanced visitor facilities may be unnecessary and counterproductive, particularly away from existing buildings and development. For example the attraction of Newlands Corner is its undeveloped nature. Significant development of visitor facilities there is likely to diminish rather than increase its attractions. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment. Heritage sites and the Green Belt are particularly vulnerable to harm.

Guildford has many "leisure and visitor attractions" already. The case for creating more is not made and no examples are given. Instead, the plan's explicit priorities should be:

1. To protect the borough's prime leisure and tourism asset, its countryside, from inappropriate development. This is all the more valuable because of its accessibility from London, the rest of Britain and the Continent, in that order. Rural residents are its custodians and require no Council interference. Economically, the most valuable forms of tourism, such as walking and cycling, require no new development. In the overcrowded South-East of England, lack of development is a leisure and tourism asset, not a liability.
2. To help private providers market local tourism. This need not involve extra spending. The Council could, for instance, help co-ordinate ready-made, local tourism packages under a distinctive brand at an all-in price. An "English town break" (including B&B accommodation, a walking tour of Guildford, a pub lunch in the Surrey Hills, a visit to Wisley Gardens and a National Trust property and a Southwest Trains travelcard for a day out in...
London) would be highly attractive to many European visitors who currently by-pass Guildford to go to Bath, Oxford or Cambridge instead.

3. To rule out the redevelopment of scarce rural hotel sites (e.g. Thatchers, East Horsley, earmarked for 40 new houses under Site A37 of the plan yet just a short walk from the new opera house).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Respondent: 8800545 / Bill Taylor</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E7</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to Policy E7 Guildford Town Centre

The policy "vision" describes protecting the Guildford's unique setting and historical character and sets out some of the ways this will be done.

However none of this is included in the formal Policy wording in the blue box. I suspect the Vision wording is effectively of little or any force. These principles should be included in the formal policy.

There should be a much greater focus on residential use of the town centre where many people would like to live and where the necessary amenities and infrastructure exist. The policy misses the opportunity to propose forward looking sustainable residential development plans in, for example the Walnut Tree Close area, where very significant numbers of new homes could be provided. Such town centre sites could meet much of the housing need over the plan period without harming the countryside.

There is an urgent need for a strategy to focus on brownfield redevelopment before considering development outside the existing urban area. The policy does not address any of the major issues raised by the Council's own Town Centre Master Plan, the Guildford Vision Group's proposal for new river and rail crossings or plans for the redevelopment of Guildford Station, all of which are already the subject of public discussion.

The policy also fails to provide guidance on design requirements, as required by the NPPF. The policy and surrounding text concentrates too much on shopping without regard to its nature which risks a proliferation of dull high-street chain stores. The policy should seek to enhance Guildford's character and encourage a wider variety of small shops including locally owned businesses and shops of use to consumers. (For example there is no butcher in Guildford town centre.)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to Policy HI - Homes for all. Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan period. It fails to set niles on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions.

The housing mix is based on out-of-date, pre-Brexit projections and on assumptions set out in a flawed SHMA that has not been scrutinised or evaluated. I support higher density development in the urban area, without resorting to dehumanising, high-rise buildings that developers commonly claim are necessary for financial viability. Much of Guildford town could usefully be regenerated with 4-5 storey blocks with landscaping and underground parking, as often seen on the Continent and, recently, in London.

Student accommodation should be provided for 100% of new students and more than 60% of existing students, which would free up ideal family accommodation in the urban area. Other university cities (e.g. Oxford) insist on higher percentages than those proposed in the plan. In my view, the Council's timidity is a case of "regulatory capture" by Surrey University, which has failed to use its existing planning permissions (dating from 2004) to accommodate 3,000 students or to improve the efficient development of its campus (e.g. by building on its extensive and under-used surface car parks). If all students were accommodated in this way, 2,000 homes would be freed up in town and there would be no need to build new housing on the Hog's Back.

Page 8 of 17
NJ Taylor - Objection to local Plan
It is not appropriate to release Green Belt land to house students who could be accommodated on the Surrey campus or other university sites. The plan should take account of the university's ability to house its own students and reduce the housing number accordingly.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12753  Respondent: 8800545 / Bill Taylor  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to this policy on affordable homes (Policy H2) on the grounds of feasibility and that it should be more firm and explicit on unviability in paragraph 4.2.40.

In particular a scheme is only unviable if the value of developing the land (including some allowance for development risk and a normal level of profit) falls below the sale value of the land for alternative non-premium uses such as agriculture. The price paid for the land is not relevant.
The possibility of avoiding the affordable housing obligation through use of unviability arguments only serves to inflate land values. It will become clear that developments are unviable when developers start selling land for alternative non-development uses.

It should be noted in the plan that because of Guildford's relative popularity as a place to live combined with its location close to others towns and within the London Commuter belt no amount of building will meet demand. Similarly no amount of affordable housing will ever meet demand. In addition the definition of an 'affordable home' is 80% of market value. With even a 2 bedroom flat in Guildford now having a market value of +£360,000 the discounted price is still not going to be affordable to anyone on a normal income.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12756  Respondent: 8800545 / Bill Taylor  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to Policy H3 - Rural Exception Home.

It says that homes can be built anywhere near a settlement of any form (including agricultural land and the AONB). These homes are meant for people with a village connection, but they could be for anyone on the Guildford borough housing list. To make the housing viable, or to improve the "mix" this can include "market" housing (i.e. normal commercial development which in Guildford usually means large executive homes). This policy means building anywhere, and ignoring all historic planning restrictions.

The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove "exceptional circumstances."

The wording of the policy is far too wide and as currently drafted the planning authority could be obliged to grant permission for inappropriate and unsuitable developments. The wording provides no ability to balance the desirability of the development against other considerations including harm to the Green Belt or the AONB. (If the housing would meet identified need and adjoins a settlement under this policy wording permission would have to be granted even in the most sensitive AONB location, even if more suitable locations are available.) The policy should include the need for a balancing exercise including consideration whether more suitable locations exist.

The policy wording should not allow market housing. The ability to include market housing is likely to inflate land values, leading to a self-perpetuating need to include market housing. It may lead to spurious developer led proposals which will be difficult to resist.

The policy wording should define small, either in land size or number of units. I am concerned that if small is left undefined the policy could be used to justify significant developments. In the context of the plan a development of 150 homes might be argued as small. (If Wisley at 2,500 homes is a big development then 500 homes might be a medium development and 150 could be small.)

The policy wording should be restricted to adjoining sites or define the concept of being "closely related". In particular I believe adding the concept of safe and easy walking distance extends the potential radius within
which sites will be argued to be "closely related" Many people would regard a mile or so as an easy walking distance. (School children are expected to walk further than that before being eligible for free school travel.)

The wording of the policy itself does not require the local connection requirement for tenants to be secured in perpetuity - only the affordability must be secured in perpetuity. The introduction to the policy mentions this point, but it is not part of the policy itself and may carry little weight at appeal.

The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove "exceptional circumstances." The size and location of sites should be better defined and it should be clear market housing cannot be included.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Our villages are already suffering from severe congestion for much of the day) for example the Newark Road & Rose Lane junction in the centre of Ripley and the A247 through West Clandon. The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.

Furthermore, many of the country lanes around the villages of Ripley, Send and Clandon are narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition.

I object to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces. Many of the affected villages, such as West Clandon, already suffer from traffic congestion. Further development around these villages will only result in more traffic and more parking problems.

With some 5,000 houses being proposed close to the village of Ripley, the roads serving the village will become even more congested. Cycling has become an ever popular past time, particularly at weekends hundreds of cyclists past through the villages on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road accidents involving cyclists as a result of the development proposed under the local plan.

The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the road becoming ever more dangerous for pedestrians. The council has a statutory obligation to protect the public and the additional traffic flows will bring added accidents, noise, pollution and injury of the public. In the case of West Clandon the Street often only has a narrow footpath on one side of the road making it very dangerous, especially when vehicles mount the pavements.

This policy as it is inappropriate and inadequate and fails to respond to the challenges raised by the proposed significant Green belt developments. The borough's infrastructure is already heavily strained.
However the plan's determination to build large housing estates across the Guildford countryside significantly increases the need for infrastructure investment without securing the means for its provision. Placing housing in the established urban areas would reduce the need for enhanced infrastructure as would a more realistic housing number. The policy wording says nothing about roads and traffic. The Council's methodology for assessing traffic congestion - averaging it over periods of several hours and ignoring the effects of junctions - simply hides the problem, which will get worse as development proceeds. The schemes referred to in this policy will not solve existing congestion and the local road network has not been given sufficient consideration. Some proposed development locations would require highway schemes that are unlikely ever to happen.

William Taylor - Objection to local Plan

Adequate infrastructure provision is a pre-condition of sustainable development. But in this plan it is an afterthought buried away in Policy 11. By prioritizing greenfield over urban, brownfield regeneration, the plan creates insurmountable (and unnecessary) obstacles for itself. Common sense suggests a local plan should first assess the borough's infrastructure capacity for sustainable development, and then tailor development accordingly. This plan, however, assumes infrastructure will follow on the heels of house building as if by magic. It makes implementation critically dependent on providers outside the Council's control and on the vagaries of CIL income.

It is also highly likely that developers faced with the imposition of large infrastructure requirements will go to court to invoke the NPPF provision that prevents authorities from imposing conditions that make a development non-viable.

Policy 11 requires the delivery of improvements to infrastructure in conjunction with development. I have concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all. Despite the Garlick's Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents in the locality will see their quality of life significantly deteriorate in many ways. Many of the utilities in the Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers. No plans to improve these services should mean no development of the Garlick's Arch site.

Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed.

Many of these services are already at capacity and suffering from funding cuts or freezes. Any further development without funding will place further stress upon existing health services.

Police services are seeing funding reduced. The development of the proposed 13,860 homes during the plan period will stretch the police services further and is unsustainable.

There is no provision of the increased capacity of Guildford hospital, where is this assessed and remedied?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to this policy as it is too vague and optimistic. Significant improvements to the road infrastructure are like to be many years after any housing or industrial space is built and the required infrastructure may never be put in place. The draft plan, however, commits to building massive housing estates in the countryside before any of these road improvements are in place. This is inappropriate and will lead to massive traffic disruption during the construction phase and will add permanently to an already congested network (about 3,000 private cars from the 2,100 new homes at Wisley Airfield alone).

Road infrastructure represents a major constraint that should have been applied to the housing target at a much earlier stage in the plan process and not left as an unresolved difficulty in the draft plan.

There is no certainty that either the A3 or M25 in the borough will be improved to increase capacity and reduce congestion during the Plan period. Highways England has no plans to even examine improving the A3 before 2020. I have concerns that development of the large residential sites identified at Wisley Airfield (A35), Garlick's Arch (A43) and Gosden Hill (A25), will take place before any improvements are made to the trunk road network.

The A3 & M25 are already at capacity during peak hours and any development prior to improvement of these roads will only make the situations worse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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I object to poor air quality concerns (Policy 13)

Paragraph 4.6.27 of the Plan states that "Development must also mitigate its traffic impacts, including its environmental Impacts and impacts on amenity and health." The significant level of development being proposed, particularly in the north east of the borough will lead to considerable further congestion, despite any attempts to mitigate this through travel plans. This will be particularly acute in built up residential areas and will only lead to greater levels of air pollution, which will have a detrimental effect on local residents and their health and can result in early death.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to not protecting the Green Belt (Policy P2).

This policy does not sufficiently safeguard the Green Belt even though Green Belt constitutes 89% of the borough and should be the cornerstone of all local planning policy. The Green Belt is not the Council's to give away and once it is gone it is gone forever. Sacrificing areas of the Green Belt to a developer influenced growth agenda is a betrayal of future generations and does not constitute sustainable development.

The Green Belt should be protected in perpetuity, but Policy P2 seeks to justify excessive development in protected areas. This is in breach of party manifesto commitments and contrary to previous responses to public consultation.

Paragraph 4.3.16 only states that the Council considers that exceptional circumstances exist to justify amendment of Green Belt boundaries. The exceptional circumstances are not identified within the local plan. It is clear from national guidance that unmet housing need is not on its own an exceptional circumstance. Even to the extent that exceptional circumstances exist, these have to be balanced against the harm to the Green Belt in the specific sites proposed to be taken out of the Green Belt. This balancing exercise appears not to have been done.

The Countryside Study which the Council may argue fulfilled the need to demonstrate the exceptional circumstances required to justify removal of areas from the Green Belt was a simplistic tick box exercise.

Within limits it may have answered certain questions about different attributes of different areas of Green Belt but it did not carry out the balancing exercise needed to determine whether specific exceptional circumstances justified removal of specific areas of land from the Green Belt. I believe that each of the identified Green Belt site proposed to be removed from the Green Belt should be carefully assessed against any exceptional circumstances in deciding whether it should be removed from the Green Belt in the final plan. This exercise should bear in mind that housing need in itself is not an exceptional circumstance and nor is the Council's growth aspiration. An important consideration is that more housing need could be met on urban sites than is currently planned.

I object to the "insetting" of 14 villages from the Green Belt. Contrary to assertions made in the Plan process many of these villages do contribute to the openness of the Green Belt and there is no need to inset them.

I object to the wholesale extensions to the settlement boundaries in many villages to allow for infilling and that infilling is also proposed outside the settlement boundaries of 11 further villages. Many Guildford villages are linear. It is all too easy to square off boundaries by including countryside bounded on only one or two sides by existing development, claiming it contributes nothing to the "openness" of the Green Belt, a term which neither the plan nor the NPPF defines.

To "inset" two-thirds of the borough's rural villages on the grounds that they no longer contribute to the purposes of the Green Belt is extreme and inherently implausible, given the borough's location on the edge of Metropolitan London. I cannot see how such extensive areas fail to contribute to the purposes of the Green Belt under the NPPF, but this could quickly be the case if the proposed "insetting" and boundary extensions go ahead.

I object to the proposals to remove from the Green Belt the so called 'strategic sites' of Wisley Airfield (A35), Gosden Hill Farm (A25) and Garlick's Arch (A43). National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. The local plan fails to demonstrate any exceptional circumstances for these sites and villages (as mere housing need does not constitute a 'special circumstance') to be taken from the Green Belt. Once taken from the green belt they will be lost forever. There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another.
The significant development in these villages will result in the character of these villages being lost and the countryside encroached. GBC's Green Belt & Countryside Report does not address Garlick's Arch (Policy A43 and A43a), so there is no evidence base to support including this site. Rather than developing Garlick's Arch, there is an existing brownfield site just to the south off the site at Burnt Common, with surplus land that could accommodate a further development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12758  Respondent: 8800545 / Bill Taylor  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to all strategic sites proposed in the draft Plan to be built in the Green Belt.

1. I object to the identification and allocation of sites in this plan without regard to Green Belt, infrastructure or other constraints. The plan says that "allocating these sites does not grant planning permission for development." However, each of the sites will be removed from the Green Belt and will be available in principle for development and non-Green Belt uses. The inclusion of these sites without detailed site by site justification shows contempt for the thousands of detailed comments the Council have received about individual sites ever since the Issues and Options consultation in 2013. The plan has hardly changed since the Council received 20,000 objections to its first draft plan in 2014. The Inspector considering the plan may conclude that the consultation has not been properly conducted.

2. The housing needs assessment is flawed in various respects and overstates housing need. In addition since it was produced, the referendum Brexit decision has almost certainly reduced future housing need and rendered the previous assessment seriously out of date. As a result any assessment of Green Belt sites which took place to consider whether "exceptional circumstances" existed to outweigh the harm to the Green Belt was based on false premises and should be reconsidered.

3. Having determined housing need the Council was entitled to consider constraints before determining the housing number. I believe that as well as being entitled to do this the Council was required to give proper consideration to constraints. The scarcity of sites outside the Green Belt as III as infrastructure (most notable roads) considerations all represented constraints which should have been taken into account in determining the final housing number. Accordingly in this regard our objection to the allocation of Green Belt sites is twofold. First I believe constraints should have been applied. Secondly I believe the Council did not properly consider constraints and that their decision making process was flawed and thus subject to being set aside by the Inspector.

4. Even if having properly applied constraints there is a need to develop in the Green Belt then specific Green Belt sites should not be included in the plan unless "exceptional circumstances" for development are proven in relation to that specific site, as stipulated repeatedly in the NPPF. The Green Belt should trump short-tenn considerations such as perceived housing need, as case law has established. There needs to be a specific balancing exercise conducted on each Green Belt site weighing the harm to the Green Belt against the very special circumstances which are argued in favour of development at that particular site. There is no evidence this has been done. Instead the council have appeared to say that having chosen a housing needs figure and decided it cannot be met without building on Green Belt then there is no need for any further consideration and any convenient Green Belt site can be allocated for building at will.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
I object to development in areas which are at risk of flooding (policy P4)

National Planning Policy states that Local Plans should take account of climate change over the longer term, including factors such as flood risk. It goes on to say that new development should be planned to avoid increased vulnerability to the range of impacts arising from climate change.

The Plan states that in accordance with national planning practice guidance, the Level 1 SFRA has been used to guide development towards areas at the lowest risk of flooding and identify areas unsuitable for development. However, the document concludes that land outside of the area of flood risk is not capable of accommodating all of the borough's identified development needs. A Level 2 SFRA has therefore also been produced and will help the Council apply the exceptions test (as described in the NPPG) as necessary to development proposals in areas at risk of flooding.

The site at Garlick's Arch (Policy A43) is identified on the Environment Agency's flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council's SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. Knowing the area well I am aware that this site often floods during the winter months and the flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
I object to this Policy as the development proposed will not be sustainable (policy S1)

The NPPF states that the presumption in favour of sustainable development "should be seen as a golden thread running through both plan-making and decision-taking." As the first policy in the Plan, Policy 81 ought to set a clear framework. Instead, no definition of "sustainable development" is given. The policy also fails to set out any principles for applying sustainable development in practice to local planning decisions, which often have serious long-term impacts.

Policy S1 is deficient in making no mention of the Green Belt. The Green Belt is a long term Government policy enshrined in primary legislation to protect green areas in perpetuity. The Green Belt is a living example of sustainable development in practice and is one of the most important factors affecting sustainable development in the area covered by the Plan and should be acknowledged in this policy. Policy S1 should include a commitment to protect the Green Belt from inappropriate development and to uphold Green Belt boundaries and protections. This would set at least one clear boundary to planning decisions.

The Plan and the Council have treated the Green Belt as a developable land bank rather than as a constraint to development.

The commitment to approve planning applications "wherever possible" and "without delay" reveals the pro-development bias of the plan.

Countervailing references to sustainability are so vague that the NPPF presumption in favour of sustainable development becomes a presumption in favour of any development at all.

This policy largely disregards the 12 Core Planning Principles set out in NPPF paragraph 17. The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy. The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact existing local communities by over development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick's Arch (A43) and Gosden Hill Farm (A25) are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are also unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the Borough Wide Strategy (policy S2)

The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

The housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards in light of the Brexit decision. The housing number is based on an arbitrary Housing Market Area (HMA): the "West Surrey" tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, "West Surrey" is much too small. Half of Guildford borough's residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside "West Surrey".

Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the triborough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has to date failed to revisit the data to validate that it is correct despite overwhelming concerns raised by borough residents. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make "West Surrey" reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guildford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour's "need", Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey's 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

The status of the 13,860 figure is ambiguous. The Council has said that the housing number and the OAN are identical because the OAN is "deliverable" and is by definition objective and cannot be contradicted. The OAN is only deliverable because of the Council's cavalier approach to the Green Belt in contravention of the NPPF, ministerial statements and local and national Conservative Party manifesto commitments. The plan also states that infrastructure or other constraints may in due course affect deliverability. It is also unlikely that the number of houses can be built at the rate proposed. In recent years, housing starts have on average been less than half the proposed rate. This is not because developers do not have the land or cannot get planning permission. Constraints in the supply chain and maintaining profit levels have been more important.

It is unreasonable to embark on a radical transformation of the borough on the basis of an unclear housing target. Most of Guildford Borough is highly protected from development (89% Green Belt,44%AONB and about 75% protected by SPA). Whether or not increasing the number of dwellings by up to a quarter is desirable, it would be a major and irreversible change, arguably turning a largely rural borough into a mainly urban or suburban one like Woking. The scale of the housing number increases the onus for it to be seen to be sound. A substantially lower number, on the other hand, would remove the
need to build on Green Belt
or open countryside, and instantly meet the single biggest public objection to the plan as a whole.

This policy does not take proper accounts of the constraints to development which exist, principally posed by the Green Belt and by infrastructure limitations. I believe the Council is under a duty to properly consider applying these constraints. This approach differs from all the other boroughs in Surrey. The Plan appears to have deliberately been manipulated towards a growth agenda without disclosing why this is being done? The housing that is needed should be concentrated on urban brown field sites and through increasing the housing density of existing built up urban areas. The development of 13,860 homes in the Plan period with 65% in the Green Belt does not constitute sustainable development. It will have a permanently detrimental impact on the Borough in general and on West Clandon and surrounding area in particular. The developments at Garlick's Arch and Gosden Hill Farm do not meet the needs of the local communities. The road infrastructure in and around West Clandon will be unable to cope with additional demand. The edge of urban Guildford will creep that much closer to West Clandon, thus negating the purposes of the Green Belt in the area which include safeguarding the countryside from encroachment, checking the unrestricted sprawl of large built up areas and preventing neighboring towns merging into one another.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send Page 3of 17
NJ Taylor- Objection to Local Plan border) (A43) and Gosden Hill Farm (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards.

Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result in coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID:  SLP16/1511  Respondent:  8800545 / Bill Taylor  Agent: 

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (No)

I do not agree that the evidence used for the Proposed Submission Local Plan Strategy and Sites is adequate, up-to-date and relevant.

The fundamental driving forces for much of the development proposed in the Plan (particularly that on Green Belt land) are based on:
1. An excessive ambition to expand the local economy which is neither warranted nor wanted by the local population. Guildford is already one of the highest 'value creation' areas in the country and has one of the lowest unemployment rates. There is no evidence that massive and accelerated expansion is required.

2. SHMA figures which are neither transparent nor justifiable, especially in view of previous figures set. Independent assessments of the SHMA (e.g. from Guildford Residents' Association and Councillor David Reeve) show it is set far too high and so cannot be said to be adequate, up to date or relevant. In addition the recent vote to leave the EU and the impact this will have on the economy and migration have not been taken into account. The Plan should be re-assessed and the methodology for arriving at housing need figures should be fully transparent.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: SQLP16/1512  
Respondent: 8800545 / Bill Taylor  
Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 2: Legal compliance

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (No)

I do not consider the Proposed Submission Local Plan: strategy and sites as a whole to be legally compliant because it mainly ignores the consultation process for the 2014 draft Plan it is claimed to be based on.

That consultation process was absolutely clear by some +20,000 responses that that Plan was flawed and no development should be carried out on Green Belt land.

Instead this 2016 draft Plan actually increases the number of

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: SQLP16/1513  
Respondent: 8800545 / Bill Taylor  
Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (No)
I do not consider the Proposed Submission Local Plan: strategy and sites as a whole to be sound, because, but not limited to, the following reasons:

1. The housing OAN figure has been calculated by a process which is not transparent. It has not been properly examined by Councilors before being adopted.
2. The OAN has been adopted as the housing number without the application of any constraints to take account of Guildford's circumstances, including in particular the Green Bell, AONB and road infrastructure. National policy permits such constraints to be applied and it is inappropriate not to consider the need to do this.
3. The draft Plan does not accord with the NPPF policies on protecting the Green Belt. Exceptional circumstances need to be shown to justify removing areas from the Green Belt and this has not been done. The housing need number is not justification in itself according to published ministerial statements. Having properly calculated an OAN, constraints should be applied to it to reflect the Green Belt, AONB and infrastructure. Each proposed Green Belt site then needs to be justified on its own merits. The benefits of the proposed development need to be identified together with the harm to the Green Belt. Only if there are exceptional circumstances and following a proper balancing exercise demonstrating that these exceptional circumstances outweigh the harm to the Green Belt can the proposal proceed. The draft Plan does not demonstrate that this has been done. The housing number has been used as a blanket justification for all Green Belt sites-which amount to 65% of the proposed housing number.
4. Whatever the justification for the assumptions made in calculating the OAN, those assumptions are now almost certainly incorrect following the referendum.
5. The housing number is at least twice the achieved rate of building in the Borough over the last few years. There is no evidence in the Plan to show that this rate is achievable and sustainable.
6. Much of the infrastructure required to support the level of development proposed is outside the Council's control. The Infrastructure Plan is long on possibilities and aspirations and very short on commitments. The infrastructure requirements placed on developers are supposed to be in place before development commences.

This is utterly unrealistic and indicates a lack of knowledge of developer's business models which depend on positive cash flow. It seems very clear that at best, infrastructure provision will seriously lag development and leave higher levels of congestion than now. This will reduce the quality of life for residents through congestion and disruption.
7. The 40-45% requirement for affordable homes together with infrastructure such as railway stations, park and ride facilities, schools and roads is highly likely to be challenged on a site by site basis by developers using the NPPF provision that Councils cannot impose conditions which make development non-viable.
8. GBC has not included details of its Town Centre Master Plan and urban development proposals in time for and as a part of the Guildford Local Plan consultation.
9. GBC has failed to provide an Infrastructure Report in time for and as a part of the Guildford Local Plan consultation.
10. GBC has proposed an OAN of 693 houses per annum in the GL Hearn West Surrey Strategic Housing Market Assessment (SHMA) which many, including independent assessors, consider unsound. Highways England will not start to consider what it intends to do as regards the A3 in the vicinity of Guildford until 2018.
11. Network Rail have not made available for the public consultation any plans for a new railway station at Merrow with an adjacent Park & Ride for 1,000 cars.
12. The GBC proposals for Gosden Hill Farm do not appear to be in coordination with the Neighbourhood Plan for Burpham.
13. The draft Local Plan will cause further linear development along the A3 between Burpham and West Clandon PC and encroachment onto open Green Belt countryside in clear conflict with the National Planning Policy Framework.
14. The proposal for Garlick's Arch was added to the draft Local Plan without any prior consultation under Regulation.
15. The Land Availability Assessment (LAA) indicates a range of planning difficulties for Gosden Hill Farm and Burpham which have to be met by the developer involved. These include Electricity Grid supply problems and foul sewage and surface water issues that suggest the development proposed cannot easily be implemented both technically and financially.

16. No adequate explanation is given as to how the asp rational proposal for a tunnel will be used to overcome traffic issues relating to the quality of life and amenity of Burpham, West Clandon, Send and Ripley citizens.

17. In common with many others I do not believe the housing figure has been properly calculated and I believe it overstates housing need. The Council has prevented councillors or others from properly considering the SHMA by refusing to make public the basis on which it was drawn up.

18. The housing figure, when properly recalculated, should be subject to constraints to reflect Guildford's circumstances, including in particular the Green Belt and road infrastructure. National policy permits such constraints to be applied and it is inappropriate not to consider the need to do this.

19. Even once a housing number has been calculated it cannot be used to justify taking land out of the Green Belt on a wholesale basis.

20. Cast iron commitment should be included in the plan that development can only commence when required infrastructure improvements have been secured.

21. The status of the text which accompanies each policy box is not clear. If the accompanying text does not have the force of policy a number of the policies (i.e. the text in blue) are so vague and general that they commit the Council to very little.

The draft Plan should be re-assessed with housing on brownfield sites made a priority over commercial development and Greenfield sites and each of the above points addressed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/1515  Respondent: 8800545 / Bill Taylor  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 4: Duty to cooperate

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (No)

I do not consider the Proposed Submission Local Plan: strategy and sites as a whole has complied with the Duty to cooperate.

This 2016 draft of the Local Plan clearly demonstrates Guildford Borough Council's refusal to co-operate with the wishes and requirements of the vast majority of the residents in its Borough.

The Council has failed to co-operate with the results of the consultation process for the 2014 draft Plan which was meant to inform and guide this 2016 draft Plan.

Despite campaigning on a clear statement 'Conservatives Say Green Belt To Stay', the ruling party on GBC is now intent on pushing through a Plan which will devastate Green Belt land and extend the Guildford Urban Area to further merge into surrounding rural villages.

This is not cooperation by any definition. In addition the Council has failed to cooperate in providing any transparency to the housing need figures commissioned by the Council from GL Hearn.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
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More generally I object to the stated housing need figure of 13,860, which is an unnecessarily high purely to the methodology used in arriving at it. It is flawed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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I object to the late inclusion of the new site known as Garlick’s Arch and the proposal to build hundreds of houses and thousands of square feet of industrial units on that land. No exceptional circumstances exist, there is ancient woodland and industrial development should be located and restricted to the current industrial development at Slyfield, where there is room for further development

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the inclusion of the new site known as Land West of Winds Ridge and Send Hill for both housing and travellers sites. This countryside is inappropriate for housing, it has an area of unsafe, vented land fill and the siting of travellers where there is a narrow width single track country road is impractical at best.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to development in places where there is insufficient transport infrastructure when there are urban brownfield sites with access to this infrastructure of sufficient size to accommodate all the development needed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy P2</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I fundamentally object to the removal of Send and Ripley from the Green Belt as this will lead to the destruction of these villages and their countryside features forever. The result of this will also be the complete urbanisation of the land between Guildford and Woking, which is bad planning, bad for the environment and bad for those who have chosen to live outside the urban sprawl.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: PSLPP16/1758  Respondent: 8800705 / Michael Cumper  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Lastly I object to the significant amount of development that has been suggested for one area of the Borough. I wonder whether this is the result of a Conservative majority deciding to make the residents of Send and Ripley suffer as a result of their rejection of the Conservative candidates at the last Borough election, and I say that as a member of the Conservative Party.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/373  Respondent: 8800705 / Michael Cumper  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Overall I object to the way that this plan has been put together in as much as there has been a failure to identify brownfield sites for development, the Town Centre Masterplan 2015 has not been included, there has been no proper consideration of the infrastructure requirements, such as new schools, GP services as examples, and what has been proposed is inadequate. I also object that there were sites added to the plan at the last minute.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp173/36  Respondent: 8800705 / Michael Cumper  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Appendix H: Maps - Send

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Green Belt, Policy 2 Send Business Park removal from the Green Belt

Further development being made possible by this action is not appropriate, given that this is a non-conforming development in an area of outstanding beauty and next to the Wey Navigation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/366  Respondent: 8800705 / Michael Cumper  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A42

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

A42 Clockbarn Nursery

There were thousands of objections to the original submission and these have been completed ignored. Rather than reconsidering the proposal in light of the objections the number of houses has been increased even more. The fact that this area is unable to sustain the increased traffic, erode the Green Belt further, add further problems to an area that already and seriously impact on the River Wey surrounding countryside.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/367  Respondent: 8800705 / Michael Cumper  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

A43 Garlicks Arch

There were thousands of objections to the original submission and these have been completed ignored. This is overdevelopment, riding roughshod over the Green Belt and in effect turing two villages, Send and Ripley into one town. There is no evidence for the need for the Travelling Showpeople sites. The infrastructure is not capable of managing the current traffic let along what this will create.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
**Comment ID:** pslp172/368  **Respondent:** 8800705 / Michael Cumper  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy A58

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

A58 Burnt Common, London Road

It was removed from the 2014 draft due to these objections. There is no need to build more industrial and warehouse units when Slyfield and Guildford still have empty sites and industrial units. Doing this on Green Belt when it is unnecessary must not happen. The evidence shows that that the demand for this is just not there.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPA16/2934  **Respondent:** 8800865 / Nigel Maycock  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

I would like to object to the local plan and specifically the plan proposed by Dandara and their proposal to place a number of homes on the field adjacent to the A246. I feel that this is wrong for the following reasons

- impact on the local schools ie Cranmore, Raleigh and the Howard. Currently the A246 is used as a route to all of these and in the morning is heavily congested with school traffic, by allowing these houses then the traffic will be delayed making the lives of both the school children and commuters suffer.

- the area is already deemed as both a green belt and outstanding natural beauty. By allowing it then is this going to allow other people who live up Shere road to place disproportionate increases on their houses.

- this will result in the loss of the green belt and outstanding natural beauty for all of Shere road including Sheapleas.

- access onto the A246 will cause chaos as the influx of around 120 cars , assuming that each house has 3, to the already congested road will delay all commuters.

- water supply is currently provided from a tank at the top of the hill and the extra would cause an unnecessary burden on the infrastructure

- there are also slow worms on the site. As you should know these are protected and the land they are resident on is therefore protected.

**General to a number of these proposals**
- unsupportable burden on the current drainage which is currently creaking
- the school places, there does not seem to be any plan to increase the number of school places in either primary or secondary. As the council has already turned down the planning by the Howard what is the plan?
- the support services such as the medical facilities are inadequate and the extra houses will result in these to cease to function, currently it is difficult to get an appointment to see a doctor, about 1 week, and almost impossible to get an appointment with your registered doctor. This means that you need to explain the symptoms multiple times for those who suffering with a long term illness.
- there does not seem any reason why boundaries of the Horsleys are due to increased barring to allow further development.
- the shops in the centre of east horsley have been falsely classified as a District Centre and would be inappropriate for the development proposed, the result of this is that the inhabitants would need to go the Cobham or Burpham for shopping therefore creating extra traffic.
- there appears to be a Strategic Housing Market Assessment (SHMA) with some mathematical model which we are unable to see and do not believe that the local borough knows how it produced the numbers.
- the density suggested will result in the Horsleys being of a greater than other proposals.
- there does not seem to be any mention of using brown field sites which should be the first consideration.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Keens Lane is too narrow to have two-way traffic.

Additional traffic accessing Keens Lane will cause further congestion on the Worplesdon Rd.

The roundabout currently at the top of Keens Lane is dangerous as users treat it as a chicane.

The congestion on the Worplesdon Road especially at peak times is currently unacceptable, adding more housing in the area will significantly increase the traffic.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/765  Respondent: 8801473 / Jerry Keane  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I wish to register my objection to aspects of the above submission, as follows.

I believe the SHAMA is out of date and needs to be reviewed, and reflect Brexit, which I assume would show a significant reduction in the requirement.

and therefore reduce the need to build on Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/4499  Respondent: 8801505 / Paul Edwards  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A25

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
1. I object to the changed policy A43 Garlick’s Arch for 400 homes and 6 travelling show people pitches
2. It ignores all the thousands of previous objections made by local people
3. There is no proven demand for travelling show people plots in this location
4. There is no need for putting houses on this site because the local plan housing target is incorrect and inflated and ignores constraints.
5. The allocation of 28.9 ha is an excessive land grab into the Green Belt. If we take a normal density of 30 homes per ha and it is at the end of the day proven that there is a need for 400 homes in this location the land requirement is 13 ha not 28.9 ha which is more than double. This replicates a similar over land grab at Burnt Common where the factor is 7 times the land required.
6. This confirms the worrying impression that GBC have a pre-determined policy of building on the Green Belt at every opportunity. The arithmetic does not stack up. One would have thought that they would as custodians of the green Belt be intent on conserving it rather than exploiting it.

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
7. The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

8. Garlick’s Arch (A43) is in an unsustainable location. It does not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. The site is unsuitable due to lack of access to sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be dependent on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

9. The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

10. I object to the proposal to remove Garlick’s Arch from the Green Belt. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for this land to be taken from the Green Belt. Once taken the green belt is lost forever. There is a real danger that the loss of this Green Belt will result in urban sprawl and the neighbouring villages merging into one another. The significant development in West Clandon, Send and Ripley will result in the character of these villages being lost and the countryside encroached.

11. I object to the development at Garlick’s Arch because of flood risk. The site at Garlick’s Arch is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. Knowing the area well I am aware that this site often floods during the winter months and the flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.

12. I object to the development at Garlick’s Arch because of flood risk. The site at Garlick’s Arch is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. Knowing the area well I am aware that this site often floods during the winter months and the flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.

13. I object to the potential loss of Ancient Woodland on the site. The proposed development at Garlick’s Arch will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees that existed in the year 1600.

14. I object due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1). Our villages are already suffering from severe congestion for much of the day, for example the Newark Road and Rose Lane junction in the centre of Ripley and the A247 through West Clandon. The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.

15. Furthermore, many of the country lanes around the villages of West Clandon, East Clandon, Ripley, and Send are narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition. I object to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces.

16. Many of the affected villages, such as West Clandon, East Clandon, Send and Ripley, already suffer from parking problems. Further development around these villages will only result in more traffic and more parking problems.

17. With some 5000 houses being proposed close to the villages of West Clandon, East Clandon, Send and Ripley, the roads serving the village will become even more congested. Cycling has become a popular past time, particularly at weekends hundreds of cyclists past through the village on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road accidents involving cyclists as a result of the development proposed under the local plan.

18. The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the roads becoming ever more dangerous for pedestrians.

19. I object to the lack of proper infrastructure planning for sites (Policy I1). Policy I1 requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.
20. Despite the Garlick’s Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents’ in the locality will see their quality of life significantly deteriorate in many ways.

21. Many of the utilities in the West Clandon, East Clandon, Burpham, Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers. No plans to improve these services should mean no development of the Garlick’s Arch site.

22. Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are already at capacity and suffering from funding cuts or freezes. Any further development without funding will place further stress upon existing health services.

23. I object due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2). There is no certainty that either the A3 or M25 in the borough will be improved to increase capacity and reduce congestion during the Plan period. Highways England has no plans to even examine improving the A3 before 2020. I have considerable concerns that development of the large residential sites identified at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), will take place before any improvements are made to the trunk road network. The A3 & M25 are already at capacity during peak hours and any development prior to improvement of these roads will only make the situations worse.

24. I object to poor air quality concerns (Policy I3). Paragraph 4.6.27 of the Plan states that “Development must also mitigate its traffic impacts, including its environmental impacts and impacts on amenity and health.” The significant level of development being proposed, particularly in the north east of the borough will lead to considerable further congestion, despite any attempts to mitigate this through travel plans. This will be particularly acute in built up residential areas and will only lead to greater levels of air pollution, which will have a detrimental effect on local residents and their health.

25. I object to the inclusion of the land at Garlick’s Arch, Send Marsh/Burnt Common and Ripley (A43). Garlick’s Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8). There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).

26. It is clear that with this site being added at the eleventh hour and no infrastructure planning has been undertaken. The Infrastructure Schedule makes no provision for any infrastructure improvements for this site. How will the local services such as schools and doctors cope, many of which are already at capacity? (Policy I1)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/4501  Respondent: 8801505 / Paul Edwards  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A58

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to Policy A 58 at Burnt Common and to the proposed inclusion of Burnt Common as an Industrial Strategic Employment Site
2. This previous allocation for B1c, B2 and B8 development was removed from the 2014 draft due to all the objections made previously.
3. The word “minimum” is a change from the previous “maximum” in the 2016 plan and since that time there has been a decline in demand for industrial land. This change alone is unacceptable since even if there was a need to
build 7,000 sq m at Burnt Common this development would only require 1.4 ha at a standard plot ratio density of 50% not 9.26 ha. There is no justification for zoning an additional 7.86 ha in the Green Belt.

4. There is in fact no justification for building any more industrial development in the borough particularly at Burnt Common. The current industrial pipeline of granted consents of 38,357sqm in B1c, B2 or B8 use class space is double the 19,000 sq m said to be needed by Aecom who justify the need for new space on top of the existing pipeline by a completely unsubstantiated suggestion that “there is the possibility that some pipeline developments may not come forward at all, or be developed in different quantities by use class than has been consented.”

5. There is no need to build industrial or warehouse development in the middle of the Green Belt when Slyfield and Guildford still have empty sites and industrial units.

6. The 2017 Employment Land Need Assessment shows a reduction in demand to 3.9 hectares for industrial land for the whole borough not a huge over allocation of 9.26 hectares at Send in the Green Belt.

7. The Employment Land Needs Assessment update 2017 (ELNA) states “that the pipeline for employment floorspace defined by planning permissions yet to be implemented and prior approvals suggests the potential for an additional 33,607sqm of B use class floorspace to come forward. This figure comprises a net loss of 4,750sqm of B1a use class floorspace and a net gain of 38,357sqm in B1c, B2 or B8 use class space.”

8. 38,357 sq m of B1c, B2 or B8 use class is quite sufficient supply for the plan period and is in fact more space than the 3.9 ha of industrial land that is said to be needed for the plan period by Aecom. Since if you were to develop 3.9 ha at a plot ratio of 50% it would provide new industrial development of 19,000 sq m approximately half of current planning permissions granted. This does not justify the need for new development of industrial space on the Green Belt in such areas as Burnt Common.

9. The reality of demand for industrial space is that it is both nationally and locally in decline and this is evidenced by old existing permissions that have not been taken up and developed. The ELNA alludes incorrectly to the poor quality of existing space being a “constraint” on supply and fails to acknowledge that this assertion cannot apply to potential newly developed space e.g. the undeveloped pipeline of 38,357sqm.

10. The impact on small surrounding roads will create traffic gridlock.

11. It will join up existing villages and defeat the purpose of the Green Belt.

12. The ongoing poor quality of the updated research undertaken by Aecom in the Employment Land Needs Assessment 2017 does not support industrial development on land in the Green Belt at Burnt Common.

13. The Aecom research is generally superficial and lacks sufficient detail and analysis between B1c, B2 and B8 use classes and no reliable individual analysis has been undertaken of the widely different supply and demand dynamics of light industrial, general industrial and warehousing and distribution floor space.

14. The potential inclusion of a waste management facility mentioned at paragraph 4.4.23a lacks enough detail for proper consultation and is completely inappropriate.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/2931  Respondent: 8801505 / Paul Edwards  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
The Plan now states: “the presumption in favour of sustainable development will not automatically apply to policies relating to sites protected under the Birds and Habitats Directives and/or designated as Sites of Special Scientific Interest (SSSIs), land designated as Green Belt, Local Green Space, the Surrey Hills Area of Outstanding Natural Beauty, designated heritage assets and locations identified as at risk of flooding.”

Gosden Hill and Blackwell Farm (both currently in the green belt) are called “urban extensions” surely a euphemism for urban sprawl? Garlick’s Arch and Burnt Common developments take land from the green belt to extend Ripley/Send. One of the important specific purposes of the green belt is to prevent urban sprawl.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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The NPPF states para 155: “Early and meaningful engagement and collaboration with neighbourhoods, local organisations and businesses is essential. A wide section of the community should be proactively engaged, so that Local Plans, as far as possible, reflect a collective vision and a set of agreed priorities for the sustainable development of the area, including those contained in any neighbourhood plans that have been made.”

The changes in this latest version of the Guildford Local Plan show little or no willingness of Guildford Borough Council to reflect a collective vision. Despite the many thousands of responses to previous versions of the Plan which overwhelmingly rejected building on Green Belt land this latest version has as much, if not more, building on the Green Belt and increased problems of infrastructure and traffic which will bring increased noise and air pollution and danger to residents.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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I OBJECT in the strongest possible terms to the Guildford Borough Proposed Submission Local Plan (June 2016). This Plan is unsustainable, unworkable and, in many provisions, unnecessary.

I am extremely concerned about the amount of new housing proposed and the infringements onto the current Green Belt, which will result in a significant increase in traffic and pollution in the area and the road through West Clandon becoming even busier and resulting in traffic accidents, more injuries and deaths. I attach two photographs taken in the last year which demonstrate very clearly how narrow the A247 is in parts – one is taken outside Summers and the other outside the Clandon Village school. In both cases lorries have mounted the pavement to pass each other - no further explanation needed. Increased housing will increase the amount of lorries passing through the village and on completion an increase in traffic in general.

Once the green spaces are taken, they can never be brought back and our country will forever be poorer and a less pleasant place to live.

I do not understand why the government cannot encourage more development and extra housing outside of the South East of England to ‘spread the load’ and discourage more and more people wanting to come to London and the South East. This should also ease the price and affordability of housing in the South East.

The 2016 draft Local Plan should be reassessed with a reviewed and transparent SHMA and revised to reflect the views of the residents of the Borough, who pay for Guildford Borough Council to act in their interests, and not those of developers and central government.

I trust that the objections made above are fully taken into consideration and that the 2016 draft Local Plan is amended accordingly.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ()**

1. I object to the changed policy A25 Gosden Hill for the development of 1700 homes which is still far too much.
2. There is no need for housing on this site because the local plan housing target is incorrect and inflated and ignores constraints.
3. Gosden Hill is located entirely within the Green Belt. No exceptional circumstances have been demonstrated for building on this site and therefore development here does not meet paragraphs 87-89 of the NPPF. Furthermore, Gosden Hill performs all five functions of green belt,.
4. The site has no provision for foul or surface water sewerage and adjoining sewerage is at capacity
5. The Green Belt at this point serves the important function of separating West Clandon from the edge of urban Guildford. Development here will cause the two to coalesce defeating one of the objectives of the Green Belt. If this development proceeds I believe the narrow strip of Green Belt remaining between Guildford and Clandon at this point will be too narrow and will come under further pressure. It will represent an undesirable ribbon development along the A3. It will be highly visible from the A3 when approaching Guildford and will, in conjunction with A43a at Garlick's Arch give the appearance of almost continuous development from Send through to Guildford.
6. The development of this site cannot be sustainable and will cause massive congestion onto surrounding roads. The development will generate in the region of 6,000 vehicles which will exit straight on to the A3 which is stationary every day during rush hours. The linking of the A3100, B2215 and A247 would channel thousands of cars through the narrow, winding road through West Clandon.

7. I object to the proposal for a link road to bring traffic from the Gosden Hill development to the proposed 4 way junction at Burnt Common. This has the potential to generate large volumes of traffic (including commercial vehicles) on the A247 through Send and West Clandon - a road which is already under traffic stress (see below).

8. The volume of traffic will greatly increase air pollution which is particularly critical given the proposal to build two schools.

9. A new on-slip at Burpham would only be 1.8km from the on-slip at Burnt Common which is against Highway England’s requirement of 2km.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/4543  Respondent: 8801665 / Charlotte Edwards  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to the changed policy A43 Garlick’s Arch for 400 homes and 6 travelling show people pitches
2. It ignores all the thousands of previous objections made by local people
3. There is no proven demand for travelling show people plots in this location
4. There is no need for putting houses on this site because the local plan housing target is incorrect and inflated and ignores constraints.
5. The allocation of 28.9 ha is an excessive land grab into the Green Belt. If we take a normal density of 30 homes per ha and it is at the end of the day proven that there is a need for 400 homes in this location the land requirement is 13 ha not 28.9 ha which is more than double. This replicates a similar over land grab at Burnt Common where the factor is 7 times the land required.
6. This confirms the worrying impression that GBC have a pre-determined policy of building on the Green Belt at every opportunity. The arithmetic does not stack up. One would have thought that they would as custodians of the green Belt be intent on conserving it rather than exploiting it.
7. The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.
8. Garlick’s Arch (A43) is in an unsustainable location. It does not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. The site is unsuitable due to lack of access to sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick’s Arch in the Infrastructure Plan. Residents will be dependent on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.
9. The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.
10. I object to the proposal to remove Garlick’s Arch from the Green Belt. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for this land to be taken from the Green Belt. Once taken the green belt
I object to the development at Garlick’s Arch because of flood risk. The site at Garlick’s Arch is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. Knowing the area well I am aware that this site often floods during the winter months and the flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.

I object to the loss of rural employment on the site. The development at Garlick’s Arch would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises.

I object to the potential loss of Ancient Woodland on the site. The proposed development at Garlick’s Arch will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees that existed in the year 1600.

I object due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1). Our villages are already suffering from severe congestion for much of the day, for example the Newark Road and Rose Lane junction in the centre of Ripley and the A247 through West Clandon. The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.

Furthermore, many of the country lanes around the villages of West Clandon, East Clandon, Ripley, and Send are narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition. I object to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces.

Many of the affected villages, such as West Clandon, East Clandon, Send and Ripley, already suffer from parking problems. Further development around these villages will only result in more traffic and more parking problems.

With some 5000 houses being proposed close to the villages of West Clandon, East Clandon, Send and Ripley, the roads serving the village will become even more congested. Cycling has become a popular past time, particularly at weekends hundreds of cyclists past through the village on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road accidents involving cyclists as a result of the development proposed under the local plan.

The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the roads becoming ever more dangerous for pedestrians.

I object to the lack of proper infrastructure planning for sites (Policy I1). Policy I1 requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.

Despite the Garlick’s Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents’ in the locality will see their quality of life significantly deteriorate in many ways.

Many of the utilities in the West Clandon, East Clandon, Burpham, Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers. No plans to improve these services should mean no development of the Garlick’s Arch site.

Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are already at capacity and suffering from funding cuts or freezes. Any further development without funding will place further stress upon existing health services.

I object due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2). There is no certainty that either the A3 or M25 in the borough will be improved to increase capacity and reduce congestion during the Plan period. Highways England has no plans to even examine improving the A3 before 2020. I have considerable concerns that development of the large residential sites identified at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), will take place before any improvements are made to the trunk road network. The A3 & M25 are already at capacity during peak hours and any development prior to improvement of these roads will only make the situations worse.
24. I object to poor air quality concerns (Policy I3). Paragraph 4.6.27 of the Plan states that “Development must also mitigate its traffic impacts, including its environmental impacts and impacts on amenity and health.” The significant level of development being proposed, particularly in the north east of the borough will lead to considerable further congestion, despite any attempts to mitigate this through travel plans. This will be particularly acute in built up residential areas and will only lead to greater levels of air pollution, which will have a detrimental effect on local residents and their health.

25. I object to the inclusion of the land at Garlick’s Arch, Send Marsh/Burnt Common and Ripley (A43). Garlick’s Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8). There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).

26. It is clear that with this site being added at the eleventh hour and no infrastructure planning has been undertaken. The Infrastructure Schedule makes no provision for any infrastructure improvements for this site. How will the local services such as schools and doctors cope, many of which are already at capacity? (Policy I1)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/4544  Respondent: 8801665 / Charlotte Edwards  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A58

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
half of current planning permissions granted. This does not justify the need for new development of industrial space on the Green Belt in such areas as Burnt Common.

9. The reality of demand for industrial space is that it is both nationally and locally in decline and this is evidenced by old existing permissions that have not been taken up and developed. The ELNA alludes incorrectly to the poor quality of existing space being a “constraint” on supply and fails to acknowledge that this assertion cannot apply to potential newly developed space e.g. the undeveloped pipeline of 38,357sqm.

10. The impact on small surrounding roads will create traffic gridlock.

11. It will join up existing villages and defeat the purpose of the Green Belt.

12. The ongoing poor quality of the updated research undertaken by Aecom in the Employment Land Needs Assessment 2017 does not support industrial development on land in the Green Belt at Burnt Common.

13. The Aecom research is generally superficial and lacks sufficient detail and analysis between B1c, B2 and B8 use classes and no reliable individual analysis has been undertaken of the widely different supply and demand dynamics of light industrial, general industrial and warehousing and distribution floor space.

14. The potential inclusion of a waste management facility mentioned at paragraph 4.4.23a lacks enough detail for proper consultation and is completely inappropriate.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/2976  Respondent: 8801665 / Charlotte Edwards  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The Plan now states: “the presumption in favour of sustainable development will not automatically apply to policies relating to sites protected under the Birds and Habitats Directives and/or designated as Sites of Special Scientific Interest (SSSIs), land designated as Green Belt, Local Green Space, the Surrey Hills Area of Outstanding Natural Beauty, designated heritage assets and locations identified as at risk of flooding.”

Gosden Hill and Blackwell Farm (both currently in the green belt) are called “urban extensions” surely a euphemism for urban sprawl? Garlick’s Arch and Burnt Common developments take land from the green belt to extend Ripley/Send. One of the important specific purposes of the green belt is to prevent urban sprawl.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp17q/582  Respondent: 8801665 / Charlotte Edwards  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Question 4: Duty to cooperate

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
The NPPF states para 155: “Early and meaningful engagement and collaboration with neighbourhoods, local organisations and businesses is essential. A wide section of the community should be proactively engaged, so that Local Plans, as far as possible, reflect a collective vision and a set of agreed priorities for the sustainable development of the area, including those contained in any neighbourhood plans that have been made.”

The changes in this latest version of the Guildford Local Plan show little or no willingness of Guildford Borough Council to reflect a collective vision. Despite the many thousands of responses to previous versions of the Plan which overwhelmingly rejected building on Green Belt land this latest version has as much, if not more, building on the Green Belt and increased problems of infrastructure and traffic which will bring increased noise and air pollution and danger to residents.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/987  Respondent: 8801729 / Paul Lloyd  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I am writing to object to the Local Plan which proposes to move the green belt boundary to exclude the fields behind Shalford Village Hall, and include them in the Village Settlement Boundary.

There is no compelling reason for you to make this change - and if it is to allow development here, then I believe this will change the character of the village (given the position and height of the field) so would object

I would be grateful if you would note my objection please

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp172/1353  Respondent: 8801761 / A Wright  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Protection for the AONB should be strengthened, not weakened. Guildford’s position on the North Downs, with its view of green fields from the High St., and rich biodiversity, is what makes it so valuable to residents and visitors and must be preserved. I object to any weakening of the protection. We cannot tell what changes may come in leaving the EC, and may find that there is less need for housing in the future. If we let the chalk grassland go, or weaken its links, we can never get it back again.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Policy P2, P3 & E5. I object that 58% of new housing development will be in the Green Belt, this is far too high. I particularly object to proposed development at Blackwell Farm, as this is an invaluable refuge for wildlife, eg. birds and butterflies, along the ridge of the North Downs. We must not destroy our heritage, please.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

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<th>Comment ID: PSLPA16/3478</th>
<th>Respondent: 8801953 / Sarah Relf</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Finally, I object in particular to development of sites A36 to A41 (East and West Horsley). Building 533 new houses on these sites, plus at least another 90 on small sites is excessive and disproportionate relative to plans for the rest of the borough. The total number of homes in West Horsley will increase by 35%. The rural character of both villages will be destroyed. The Horsleys feel victimised by this plan, which has been engineered by Council leaders representing Ash and Tongham, at the other end of the borough, where, in an astonishing case of political double standards, the Green Belt is actually being extended under Policy P3! Under the plan, rural West Horsley will take 35% of new homes, urban Ash and Tongham 16%, and Guildford urban area only 11%. Such an increase will put unsustainable strain on local facilities and infrastructure, including public transport, parking, schools, medical facilities, sewage, surface drainage and shops.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

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<th>Comment ID: PSLPP16/14439</th>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY D2

I object because sustainability should run through the whole local plan, as claimed in the NPPF, “like a golden thread”. It should be set out clearly in Policy S1, not as minor detail in Policy D2. This policy amounts to “greenwashing”: expounding aspirational environmental targets while ignoring the fact that building so many new homes across the Green Belt will be environmentally and socially unsustainable (bringing unacceptable traffic congestion, overstretched schools and medical facilities, and more pollution)
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

**POLICY E6**

I object because the Plan’s priority should be to protect Guildford’s prime leisure and tourism asset, namely, its countryside, from inappropriate development. Visitors do not depend on new attractions and the most valuable forms of tourism, such as walking and cycling, require no new development

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

**I object to infrastructure policies set out in I1, I2 and I3**

Infrastructure improvement proposals are inadequate even to meet current needs, let alone the new developments proposed in the Plan

In West Horsley, roads are in poor condition with frequent potholes. Many are unable to sustain even the current levels of traffic, particularly increasing levels of HGVs and online delivery vehicles. The principal roads through the village are narrow, winding lanes, with pinch points, sections without pavements, and are generally unlit. Many of the drains are blocked causing frequent surface water flooding when it rains. Pavements are in poor condition, often narrow, uneven and overgrown by adjacent vegetation. Local schools and the Medical Centre in neighbouring East Horsley are already operating at capacity

I sincerely request that GBC that radically reassess its own policy objectives rather than force through a Plan which clearly does not have the wider support of the residents of Guildford Borough.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/906  Respondent: 8801953 / Sarah Relf  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the removal of villages including West Horsley from the Green Belt by insetting and to extending the Settlement Area boundaries set out in Policy P2

GBC states in the first line of Policy P2, “We will continue to protect the Metropolitan Green Belt against inappropriate development”. This is blatantly untrue when around 65% of the proposed developments will be made on land that is currently in the Green Belt, and no “exceptional circumstances” or other reasons are provided to support the proposals for new Green Belt boundaries

The Key Evidence document “Guildford Borough Economic Strategy 2013-2031” makes no case for locating large numbers of new homes in West Horsley or its neighbouring villages, and proposed new economic development sites are on the opposite side of the Borough to West Horsley

West Horsley is a rural village in a rural location. Its Green Belt status should be preserved: it has been a key factor maintaining the character of the village, with its open green spaces, woodlands and large residential gardens, which make a vital contribution towards bio-diversity and providing wildlife corridors. Yet that same Green Belt status has not been a serious constraint on development within the village

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14435  Respondent: 8801953 / Sarah Relf  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
POLICY P2

I object because:

- The statement that “the general extent of the Green Belt has been retained” is a bare-faced lie
- The policy is based on a flawed Green Belt and Countryside Study that, according to one Conservative Councillor was irregularly commissioned by Council officers without the authority of Councillors
- It is a matter of law, morality and national and local policy, that the Green Belt should be protected in perpetuity

I particularly object to insetting of villages from the Green Belt and extending settlement boundaries in many villages

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/14432  Respondent: 8801953 / Sarah Relf  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY S1

I object because:

- The policy does not give any definition of “sustainable development”
- It ignores most of the 12 Core Planning Principles set out in NPPF paragraph 17
- It promises “development that secures the economic, social and environmental conditions in the area” without any recognition that these factors often conflict
- It fails to commit to uphold Green Belt boundaries and protections

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/905  Respondent: 8801953 / Sarah Relf  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
As a resident of West Horsley, I am writing to object to the Guildford Borough Proposed Submission Local Plan.

I reject and object to many parts of the Plan. Much is based on flawed evidence and inadequate consultation with local people. More than 20,000 responses to the previous draft Local Plan in 2014 were opposed to many of its proposals, yet GBC has made relatively few changes, and certainly none of any consequence. Its aggressive and unjustified target of increasing housing stock by 25% would create an intolerable strain on both land and infrastructure in this already congested part of the country, and its assertion in Policy P2 that “We will continue to protect the Metropolitan Green Belt” is frankly laughable in light of its proposals for insetting and settlement boundary changes proposed for so many of its rural villages. The reality seems to be that it is adopting an implicit forced growth policy for the Borough – one that is not supported by the majority of its electorate.

**I object to the borough housing targets set out in Policy S2**

The predicted population increase is unsubstantiated: it is in excess of Government ONS forecasts. Policy S2 states that provision will be made for 13,800 new homes between 2013 and 2033. The number of homes is too high and unsustainable in Guildford’s villages. The target outlined represents a 25% increase in the housing stock of the borough, while ONS projects a population increase of some 15% for Guildford Borough over this same period. And in light of the Brexit vote, GBC’s predictions are possibly even more questionable. I agree with East Horsley Parish Council’s very reasoned analysis of how and why GBC has come to such an over-inflated target for housing growth in its response to the Plan.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

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**I object to the development of 385 homes on the 4 proposed sites in West Horsley set out in Policies S1 Presumption in favour of Sustainable Development, S2 Borough Wide Strategy, H1 Homes for all, H2 Affordable Homes**

The need for so many houses to be built in West Horsley and at much higher densities than currently exist in the village over the first 5 years of the Plan period is totally unproven.

The expansion of West Horsley with the proposed high volumes of new housing development is unsustainable in terms of provision of school places and medical services, drainage, road capacity, public transport, shops, and parking for essential services (especially in East Horsley for shops, the library and the station).

The West Horsley Parish Council and Surrey Community Action Housing Survey: May 2014, identified only a limited need for some 20 affordable homes for local people who want to remain in the village (for young people and for elderly people who wish downsize to a smaller home).

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
Comment ID: PSLPP16/14434  Respondent: 8801953 / Sarah Relf  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY S2

I object because:

- Concerns about the Plan’s predicted increase in population and housing needs have been raised since 2014, but the Council has chosen not to seek better data
- The population and housing needs numbers are based on pre-Brexit projections, so probably need to be revised downwards, possibly quite dramatically

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/1729  Respondent: 8802241 / Diane Bailey  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I am writing to object most strongly to the changes that have been made in the policy for building and developments in AONB.

There was previous protection and key tests to be considered for proposals of development, which included conservation of wildlife, conservation of beauty and views in AONB, to ensure there was support for the rural economy, to provide public access to AONB. These protections must be kept in place.

Villages in the Surrey Hills have had a great increase in housing numbers in recent years, Gomshall probably more than most, yet there has been no change in the infrastructure. Public transport has DECREASED, this putting more cars on the road, the Medical facility is under increasing pressure to cope with many more new residents, there is a shortage of school places especially from 11 upwards and roads are in appaling condition, and not maintained. There has to be an infrastructure policy before any new building is approved.

Finally, as before, why not use the many brownfield sites first?

The changes being made from the policy previously put forward are not acceptable and therefore I register my objection.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Infrastructure Policies I1, I2 and I3: I object to these policies because they do not actually provide adequate planning for the improvement of infrastructure in and around East and West Horsley. I have particular concerns about the inadequacy of the narrow, winding lanes, the poor drainage and frequent flooding of these lanes, the pavements in poor condition and the low arched bridge on Ockham Road North which is regularly struck by large lorries. Local schools are already at capacity and there are no proposals to deal with this. The Medical Centre is also full and the proposal to expand it will not happen early enough. The station car parks are full every day. I do not believe that the infrastructure policies are adequate for the enormous scale of the proposed housing development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Policy P2: I object to the Draft Local Plan's infringement of the Green Belt. Despite saying 'We will continue to protect the Metropolitan Green Belt' GBC plans to build 65% of its new homes on land currently within the Green Belt while using brownfield sites in Guildford for commercial purposes. I do not understand the logic behind the decision to use available brownfield sites in Guildford for commercial buildings instead of for the high density housing (particularly flats) that could provide homes for the many people who already work in Guildford but can't live there. Under NPPF rules, GBC could use the protection of the Green Belt as a constraint to the delivery of new housing, but they have voluntarily chosen not to, in direct breach of the Conservatives' promise to the electorate ('You can trust us with the Green Belt') before the elections.

- Para 3.13 proposes that East Horsley should be inset from the Green Belt, implying that it does not make an important contribution to the Green Belt. I object and contest this: East Horsley is composed of woodland,
narrow, winding, tree-lined lanes and houses with large gardens and hedges. It is a rural village and its being in the Green Belt has preserved its character while still allowing housing stock (149 new homes in the village between 2000 and 2015).

- Para 4.16 proposes changes to the settlement boundaries of East and West Horsley. I object to Policy A39 which proposes moving the settlement boundary along the deep ditch ('classified by the Environment Agency as a 'main river line') behind the houses on the west side of Ockham Road North to the eastern boundary of Lollesworth Wood, removing five hectares of land from the Green Belt Under NPPF rules Green Belt boundaries may only be changed in exceptional circumstances, and housing does not constitute such a circumstance. Another serious objection to this land being used for housing is its liability to flooding and part of it has been designated Level Three flood risk which is the highest risk of anywhere in East Horsley.

- I object to the settlement boundary being moved and Kingston Meadows being removed from the Green Belt. This is the main recreational space in East Horsley (the village green, in effect) and is used by families, fitness enthusiasts, children at play, footballers, dog walkers daily, and sometimes for community events such as the recent Queen's Birthday Party. I resent GBC's PR machine telling us how they and the Local Plan promote healthy living and exercise while they are actually threatening a valuable resource in East Horsley.

- Para 3.17: I object to the proposal to remove Wisley Airfield from the Green Belt. This tract of farmland is an important part of the Green Belt and is totally unsuitable for high density housing for many reasons, including traffic density, local infrastructure and poor air quality. Councillors voted unanimously against the recent development proposal so I do not understand why it is still included in the new draft Local Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5078  Respondent: 8802369 / Penny Panman  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy S2: I object to the enormous scale of the proposed building plan. The Office for National Statistics and the Department of Communities and Local Government predict that, based on their population and household forecasts, 517 homes per annum will be required. But the Strategic Housing Market Assessment has for some reason added another 120 homes per annum in order to 'support economic growth', 31 to 'improve affordability' and 25 due to 'student growth' which brings the total up to 693 homes per annum. Guildford Borough Council tries to blame central government policy for the housing targets, but I believe they are actually due to GBC's own aggressive policy of civic and economic expansion. This is a political choice made by GBC without being honestly or transparently explained and I do not believe it is supported by the majority of the electorate. Doubt has consistently been thrown on GL Hearn's methodology in reaching the 693 homes per annum, and this has been reinforced by Councillor David Reeve's and another independent source's recent exhaustive research and mathematical modelling. The whole draft local plan is being built on shaky foundations. We deserve better.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5081  Respondent: 8802369 / Penny Panman  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

To summarise: despite Guildford Borough Council's promise that they have listened to local concerns about the previous draft local plan, I believe they have continued to tread exactly the same path as before, except that they have proposed an even greater number of homes while refusing to share the methodology behind reaching this number and they have taken even more land out of the Green Belt. Yet again the electorate is being treated with contempt. I object to this draft local plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/309  Respondent: 8802433 / Caroline Russo  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I am writing to object to the planned proposal for the development of West Horsley as set out in the Guildford Plan.

I have been resident in West Horsley since February 2013 and have a 9 year old daughter at The Raleigh School. West Horsley is a delightful village where residents made us feel welcome when moving here.

I grew up in Essex in an area that was within the Green Belt - it was like West Horsley a delightful village surrounded by farmland. The area was removed from the Green Belt and has over the past 15 years been developed and built on removing character, history and atmosphere. The original residents have gradually relocated as my old village is now a commercialised sprawl and extension of local Urban towns. I do not want to see this happen to West Horsley!

Looking at the planed number of homes in the proposal I cannot understand how local infrastructure of Roads, Public Transport, Doctors, Schools, Drain and Sewerage systems can support this number of houses. The roads in West Horsley are narrow and subject to frequent flooding. In several locations there are no pavements or only one side of the road is paved making walking or using a buggie dangerous. This is acceptable based on the current number of residents but should you increase the population of West Horsely as per the plans how do you intend to cater for local residents 'traffic' to the local shops, schools and station etc.

I accept there is the need for some affordable housing within the area for local residents but feel that the proposed addition of 385 houses to be build within a few square miles will make West Horsley into a 'New Town' taking away the attributes that make it special. I cannot comprehend why it would not be more suitable to build this number of houses on a site nearer to an urban town i.e. Guildford where some of the infrastructure is already in place i.e. roads, public transport etc.

I really hope that you take my objections along with the objections of all Horsely residents into consideration before taking the decision to build in our village - a decision that once made and carried out cannot be retracted.
As a resident of East Horsley for the past 20 years, I am writing to express deep concern about the general thrust of the New GBC Local Plan, and in particular about the proposed assault on the existing Green Belt. A very large target number of new houses are being proposed – an actual increase from the previous plan, in spite of objections – and the knock-on effects of such development on a village that is already under severe pressure as regards traffic and parking, and access to local amenities, will materially damage the quality of life for its residents – and leisure visitors. There are, however, two aspects of the new plan which I particularly wish to highlight.

First, the increased traffic implicit in a significant number of additional new houses. Over the period I have lived in East Horsley, the experience of walking down Ockham Road North and Ockham Road South to the station or the shops has become increasingly fraught, as more and more traffic, including heavy vehicles as well as domestic vehicles, charge by unrelentingly. These roads are narrow and the speed and heavyweight of traffic currently using them act as a severe deterrent to many people who would otherwise go out on foot rather than by car. The significant numbers of new houses currently being proposed under the new plan would only intensify this situation, and would seem designed further to discourage pedestrians, and make the roads – and of course, the parking at both ends of East Horsley – even more congested and unviable.
Second, the issue of the Green Belt. I am deeply disturbed to see that both East and West Horsley villages are to be taken out of the Green Belt. And I understand that 65 per cent of the new houses being proposed would be built on land that is currently in the Green Belt. These proposals are completely unacceptable as, once destroyed, these previously protected and increasingly valuable green belt amenities can never be recovered. Their importance, not just to the residents of the Horsleys, but more widely as essential national resources in an increasingly built-up environment, cannot be overstated.

I therefore urge the Council to take a step back and radically reassess their current plans, which threaten enormous damage to this vulnerable area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

As a resident of Sime Close, I would comment on the summer 2016 local plan as follows:

A22 Land north of Keens Lane, Guildford – homes (C3) and care home (C2)

1. Planning issues

   1. The autumn 2013 issues and options document designated several areas (including plot A22) as poor for housing, yet the summer 2014 and 2016 local plans indicate plot A22 still for development. I do not understand this significant change in opinion and would seek proof from professionals that the areas are suitable for housing.
1. The GBC leader has tweeted that the Strategic House Marketing Assessment (SHMA) should be revisited following Brexit. The number of housing units will then be reduced significantly from the current 690 and would negate the need to use Green Belt as housing.

1. The site is currently categorised as Green Belt land, yet the local plan moves the boundary to exclude it from the Green Belt. I have a fundamental issue with GBC taking such improper action and not making this clear in the local plan. As such, no development should be carried out. It’s critical that Green Belt land is protected for both the survival of wildlife and human social and leisure use. The countryside is part of Britain’s heritage and it needs to be conserved. This version of the local plan appears to have been made without due consideration of these factors.

1. Brownfield sites should always be considered for development ahead of Greenfield. This site is designated as Greenfield.

1. Environmental and safety issues

1. The need to maintain the wildlife corridor between Whitmor and Broadstreet Commons as per the government guidance in the National Planning Policy Framework (NPPF paras 113 & 117).

1. Horses are ridden or led along the surrounding roads including Tangle Lane, Gravetts Lane and Keens Lane. The significant increase of travel in the area, introduced by the proposed development, will undoubtedly lead to fatalities.

1. The site provides nesting habitat for deer and birds of all kinds from sparrows, robins, cuckoos to parrots, kestrels, heron, great-creased newts (protected species) and sparrow hawks.

1. The loss of an area, including local flora and fauna, existing as a green lung separating Guildford and Worplesdon.

1. There is a brook running parallel with the footpath that connects Keens Lane with Liddington Hall Drive and this attracts bats from the local area as a feeding area during the twilight hours of the spring, summer and autumn. All bats and their roosts are protected by law, therefore the Statutory Nature Conservation Organisation (SNCO) must be consulted if there is any threat to this protected species. This brook is in addition to a watercourse that runs on the east side of Gravetts Lane. Water voles are also present.

1. There is a water feature on this plot which provides habitat for herons and other water birds.

2. Deer and foxes have been seen crossing the site from east to west and vice versa, and should be considered in the possible use of the site.

1. Have the increased pollution levels been considered in light of the proposed building of c. 140 houses and care home i.e. approximately 350 additional cars?

1. Infrastructure issues

1. Parts of Tangle Lane, Keens Lane and Gravetts Lane are single track, and not suitable for the significant increase in traffic that would be created by circa 350 additional cars.

1. The main roads linking the above lanes i.e. the A320, A322 and A323 are already heavily congested in both the morning and evening rush hours. There will also be consequential adverse effects on the Guildford city traffic. Salt Box Road is also heavily congested linking the A320 and A322. This road is currently dangerous for cyclists and motorists due to poor visibility as a result of the poor width and numerous bends. This road is also very prone to ice during winter, making driving conditions hazardous. In addition, deer are present on both sides of this road. No doubt, there will be increased accidents and fatalities as a result of housing and care home development.
1. The current drainage systems over both sites cannot cope. e.g. Gravetts Lane with raw sewage evident on 23rd June 2016; Sime Close with frequent incidences of flooding at entrance, adversely impacting properties and access to the Close. These systems will cease to operate with the building of c. 140 houses and care home once fields are replaced with concrete.

1. The flood risk, although stated at zone 1 (low risk), will greatly increase with the proposed development of c.140 houses and a care home. What flood risk zone will this increase to, and is it appropriate for the existing residents of the local area?

1. There does not appear to be any provision of local amenities: shops, schools, parks, public transport and there will be an increasing burden on County Council, police and hospital services: has this been considered and additional resources to be available? The current resources are already restricted e.g. infrequent bus service and no stops near residences in Keens Lane/Sime Close etc. The street lighting is almost non-existent in Keens Lane, Gravett’s Lane and Tangle Lane. It currently takes at least 3 weeks to get a doctors’ appointment at Fairlands Surgery which is already an untenable situation without adding +300 patients to the area.

1. Why is another care home needed very close to the recently built care home on the A322? There is no provision for residents to walk to local shops and public transport is limited.

1. There is insufficient power in the area therefore gas and electricity systems would require upgrading.

1. The Broadband service in the area is very poor and not suitable for the number of residents in situ from the proposed development.

1. **Summary**

Plot A22 is Green Belt and should be preserved as such and therefore I would urge Guildford Borough Councillors to uphold its Green Belt status and not proceed with its planned development.

The draft local plan will also have a catastrophic effect on both residents and wildlife, nor are there adequate infrastructure needs to support the planned development of Plot A22. I conclude that the local plan is without merit and I strongly oppose its future progress.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

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As a resident of Sime Close, I would comment on the summer 2017 local plan as follows:

**A22 Land north of Keens Lane, Guildford – homes and care home**

- The Broadband service in the area is very poor and not suitable for the number of residents in situ from the proposed development.
• Why is another care home needed very close to the recently built care home on the A322? There is no provision for residents to walk to local shops and public transport is limited.
• The flood risk, although stated at zone 1 (low risk), will greatly increase with the proposed development of c.150 houses and a care home. What flood risk zone will this increase to, and is it appropriate for the existing residents of the local area?
• The current drainage systems over both sites cannot cope. e.g. Gravetts Lane with raw sewage evident on 23rd June 2016; Sime Close with frequent incidences of flooding at entrance, adversely impacting properties and access to the Close. These systems will cease to operate with the building of c. 150 houses and care home once fields are replaced with concrete.
• Parts of Tangley Lane, Keens Lane and Gravetts Lane are single track, and not suitable for the significant increase in traffic that would be created by circa 350 additional cars.

Infrastructure issues

• Deer and foxes have been seen crossing the site from east to west and vice versa, and should be considered in the possible use of the site.
• There is a water feature on this plot which provides habitat for herons and other water birds.
• The loss of an area, including local flora and fauna, existing as a green lung separating Guildford and Worplesdon.
• The site provides nesting habitat for deer and birds of all kinds from sparrows, robins, cuckoos to parrots, kestrels, heron, great-creased newts (protected species) and sparrow hawks.
• The need to maintain the wildlife corridor between Whitmor and Broadstreet Commons as per the government guidance in the National Planning Policy Framework (NPPF paras 113 & 117).

Environmental and safety issues

• The GBC leader has tweeted that the Strategic House Marketing Assessment (SHMA) should be revisited following Brexit. The number of housing units will then be reduced significantly from the current 690 and would negate the need to use Green Belt as housing.

Planning issues

• The autumn 2013 issues and options document designated several areas (including plot A22) as poor for housing, yet the summer 2014, 2016 and 2017 local plans indicate plot A22 still for development. I do not understand this significant change in opinion and would seek proof from professionals that the areas are suitable for housing.
• The site is currently categorised as Green Belt land, yet the local plan moves the boundary to exclude it from the Green Belt. I have a fundamental issue with GBC taking such improper action and not making this clear in the local plan. As such, no development should be carried out. It’s critical that Green Belt land is protected for both the survival of wildlife and human social and leisure use. The countryside is part of Britain’s heritage and it needs to be conserved. This version of the local plan appears to have been made without due consideration of these factors.
• Brownfield sites should always be considered for development ahead of Greenfield. This site is designated as Greenfield.
• Horses are ridden or led along the surrounding roads including Tangley Lane, Gravetts Lane and Keens Lane. The significant increase of travel in the area, introduced by the proposed development, will undoubtedly lead to fatalities.
• There is a brook running parallel with the footpath that connects Keens Lane with Liddington Hall Drive and this attracts bats from the local area as a feeding area during the twilight hours of the spring, summer and autumn. All bats and their roosts are protected by law, therefore the Statutory Nature Conservation Organisation (SNCO) must be consulted if there is any threat to this protected species. This brook is in addition to a watercourse that runs on the east side of Gravetts Lane. Water voles are also present.
• Have the increased pollution levels been considered in light of the proposed building of c. 150 houses and care home i.e. approximately 350 additional cars?
• The main roads linking the above lanes i.e. the A320, A322 and A323 are already heavily congested in both the morning and evening rush hours. There will also be consequential adverse effects on the Guildford city traffic. Salt Box Road is also heavily congested linking the A320 and A322. This road is currently dangerous for cyclists
and motorists due to poor visibility as a result of the poor width and numerous bends. This road is also very prone to ice during winter, making driving conditions hazardous. In addition, deer are present on both sides of this road. No doubt, there will be increased accidents and fatalities as a result of housing and care home development.

- There does not appear to be any provision of local amenities: shops, schools, parks, public transport and there will be an increasing burden on County Council, police and hospital services: has this been considered and additional resources to be available? The current resources are already restricted e.g. infrequent bus service and no stops near residences in Keens Lane/Sime Close etc. The street lighting is almost non-existent in Keens Lane, Gravett’s Lane and Tangle Lane. It currently takes at least 3 weeks to get a doctors’ appointment at Fairlands Surgery which is already an untenable situation without adding +300 patients to the area.
- There is insufficient power in the area therefore gas and electricity systems would require upgrading.

**Summary**

- Plot A22 is Green Belt and should be preserved as such and therefore I would urge Guildford Borough Councillors to uphold its Green Belt status and not proceed with its planned development.
- The draft local plan will also have a catastrophic effect on both residents and wildlife, nor are there adequate infrastructure needs to support the planned development of Plot A22. I conclude that the local plan is without merit and I strongly oppose its future progress.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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Comment ID: PSLPA16/389  Respondent: 8802913 / Louise Thompson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

Answer (if comment is on questions 1-7 of the questionnaire): ()

I am writing to object strongly to Guildford Borough Council's latest proposed Local Plan.

As a resident of West Horsley I am very concerned about the irreversible impact that so many new houses will have on the character of the village and the strain it will place on the existing infrastructure.

I believe that the original Green Belt legislation was designed to prevent such urban sprawl as the Local Plan is seeking to create, and it should be vehemently protected. Under no circumstances should villages be removed from the Green Belt by 'insetting'.

In order to support the proposed scale of housing development, massive changes would have to be made to the local infrastructure, which would have a further detrimental effect on the environment.

The solution to the country's housing shortage needs to be tackled at a national level. There is huge dissatisfaction in the North, as has become evident during the recent Brexit fiasco. The government needs to channel more resources into regenerating northern counties, making these areas more affluent and attractive to business, drawing development away from the South and alleviating the pressure around London.

There is no need for so much housing to be built in and around cities such as Guildford. The development needs to happen across the country to redress the balance between north and south and heal the seismic rift in the population which currently exists.
The proposals outlined in Guildford Borough's latest Local Plan for development on Green Belt land cannot and must not be permitted to proceed. The damage caused to villages and natural environments would be irreparable. Development should be restricted to existing brownfield sites and, as I have already stated, spread out across the country.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/2439  
Respondent: 8803073 / Elisabeth Stanford  
Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

As a resident of West Horsley I would like to object to the planned removal of the Horsleys from the Green belt. The "exceptional circumstances" required before taking this action have not been demonstrated.

The proposed number of houses for West Horsley is completely out of proportion with the current size of the village, with 385 new homes being built in West Horsley- a 35% increase on the current housing number of 1,111.

The whole character of the village will be completely change forever, plus the infrastructure is not present to support this number of new people and cars. Local and roads are already overloaded, schools are already full, drainage is inadequate.

Whilst agreeing that some new housing is required in West Horsley, this massive development is not the answer and I hope that you will consider the feelings of local residents.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/1139  
Respondent: 8803169 / Paul Baxter  
Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Introduction

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Dear Sir or Madam

As a long term resident of West Clandon, I must register my very grave concerns with regard to the unacceptable and highly detrimental impact which this plan will have on our small village. I have registered concerns before, and I am upset that, once again, the Council seems determined to press ahead with changes which will damage our local environment for ever.

West Clandon is a village and I, like all residents, want to see that status preserved physically as well as through bodies like the parish council. As such, whilst I do not object to small scale residential building on infill sites etc, I object very strongly to what is proposed at Gosden Hill Farm which will erode the tract of countryside between West Clandon and Guildford. I do not find this acceptable at all - in no time at all West Clandon will have gone the same way as Burpham and Merrow.

Quite apart from the impact on the village atmosphere we currently enjoy, I am also deeply worried about the impact of the proposals on our local infrastructure. Traffic through West Clandon on the A247 is already significant; this road, despite its 'A' status, is only small, and yet we have high volumes speeding through at all times of day. It cannot be acceptable to be proposing plans which will add to this problem.

For this reason, as well as objecting to Gosden Hill, I must express dismay at plans to build a major junction north of the village centre at the A3 / A247 interchange. This, along with extra housing, will place an intolerable burden on West Clandon and the already overstretched local infrastructure.

I ask the Council to reflect on these points; if sustainability really does matter then please let's see a plan that respects the concerns of local residents and council tax payers and not ride roughshod over them. The current proposals diminish West Clandon in many different ways and, as such, are wholly unacceptable to me and many others.

Yours faithfully

Paul Baxter

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Respondent: 8803297 / Francesca Milone</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I'm a resident of Horsley Village and I would like to strongly object to your plans to build extensively on the area. The proposed plans will directly affect me and my family. I have two children who go to a nearby school and from drop off I commute to my work place via the A3. The traffic is appalling, the roads are dreadful and the sheer volume of work you're proposing just doesn't stack up given the infrastructure of our peaceful and beautiful village. My family and I moved here for it's connection with the "country life" whilst being accessible. But I would never have imagined that you would even entertain a proposition that would destroy everything Horsley and the nearby villages stand for. As an example of lack of infrastructure to support the plans...We called the doctors before 9am to get a same day appointment (appointments are released on the day) but none were available. This happened first hand TODAY! I took the train to work last week and the carpark was full as was the early train. People were standing as there were no seats available a few stops on. How do you expect to support an influx on people demanding these services. You will ruin this area and our lives as we know it if this goes ahead, even if chopped in half. I strongly urge you to reconsider.

Francesca Milone

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
2.2 A43 Land at Garlick’s Arch

I object to this site. It was not identified until June 2016 as a potential site for development. It had previously been rejected in the 2014 draft and no evidence has been produced to support the development of this site. The provision of 400 house totally distorts the Burn Common community and is massive addition to the population but with no addition amenities planned. There is one convenience store within walking distance. The schools and surgeries in Send and Ripley are too far to walk and in any case they are full in Send. The site contains ancient woodland of which there is very little in the parish of Send and the development has potential negative impact on this. The land is subject to flooding and the flood risk will be heightened by housing and industrial development. No case has been made for the industrial and commercial use of this site in preference to the alternative site at Burn Common which was the preferred option from the draft plan in 2014 and up to and including the May2016. Development of this site will have negative visual impact on the AE and for views from the south of the A3 including the North Downs. The combination of Garlick’s Arch and Gosden Farm development will significantly alter the character of Guildford from a compact to county town to a sprawling urban conurbation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a</td>
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2.3 A43A Land for North Facing Slip Roads on A3 at Burnt Common

I object to this development. No necessity for this new North facing junction was identified in previous versions of the local plan. The main justification is to improve access to the proposed Wisley Airfield redevelopment. It is difficult to justify this as that site is 6 kilometres away and can only be accessed through the already stressed local roads. In addition, GBC has recently rejected the latest planning application for the Wisley Site. New infrastructure should only be approved when the final nature of the Wisley development is known. Providing a northbound A3 access at Send will have a very negative effect on the A247 which has the problems already described above. The new junction will certainly attract commercial traffic from South Woking which currently accesses the A3 via the inadequate A245 or via the narrow Newark Lane. A new Woking to A3 access road was proposed when we moved to Send in 1981 and we are still waiting.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: PSLPS16/2184</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A44</td>
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2.4 A44 Lands at Winds Ridge.

I object to this development. This land is unsuitable for development being land fill with active waste management still in place. The site will have a negative visual impact being clearly visible from the Wey Navigation Corridor and Potter’s Lane. Access to the site is very poor being single lane from Potters lane and very narrow from May’s Corner traffic lights with cars frequently parked restricting access.

[IMAGE 1]

Figure 1 Lorry attempting to enter Tannery Lane from Send Road

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents: IMAGE 1.jpg (35 KB)

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2. Proposed developments on Sites A42, A43, A43A, A44.

I wish to object to the proposed developments on these sites. The combination of these new housing proposals gives rise to population increase of over 25%. This is a clear overdevelopment of the three settlements. The lack of infrastructure has already been noted. In particular, the A247, the main artery through Send is extremely congested. Send is a classic linear village and most of the house along the A247 were constructed before the car era and lack off-road parking facilities and in consequence many cars are permanently parked on road. This is a source of traffic congestion with long tailbacks in the morning and evening rush hours and delays at other times when large vehicles traverse the village. The situation will be exacerbated later this year when the new St Bede’s school opens (Planning application 16/P/00033 Approved GBC 31st March 2016) as access to both infants and junior school will now be from the A247 effected doubling the number of pupils arriving in that way. While the planning application included a School Green Travel Plan to minimise car journeys to the school the mitigation measures of increased cycling and walking are difficult to implement as footpaths and cycle paths are inadequate. Public transport is not an option as no buses pass the school. Inevitably increased car use will result giving more congestion with increased risks to children.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I submit the following objections to proposals in the Local plan affecting the settlements of Send/ Send Marsh/ Burnt Common.

1. Insetting Of the Send village within the green be

I wish to object to this proposal as it makes available for development a significant number sites in addition to those specifically identified in the Local Plan. Sites such as the land behind Heath Drive and soon to be redundant ST Bede’s school buildings could be used for housing. This will significantly change the nature of the village from a rural setting to an urban environment. Furthermore, this will place additional strain on the already limited infrastructure where the village schools are full with no additional capacity. The Village Medical Centre is also full and the roads are already over capacity. Public transport is already very limited with no late evening or Sunday service. Further development in the village will visually impact the Wey Navigation Corridor, a major local and national asset.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** pslp172/2145  **Respondent:** 8803617 / Timothy Bruton  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy A42

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I wish to object to the following policies affecting Send.

Site A42 -an increase of 15 new houses on the site

The demand for housing overall has decreased in the Local plan yet the number of houses in Send has increased. This site is down a single track lane with no pedestrian or cycle provision and is already busy with heavy vehicles attending the Send Business Centre.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** pslp172/2146  **Respondent:** 8803617 / Timothy Bruton  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy A58

Answer (if comment is on questions 1-7 of the questionnaire): ()
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Site A58- Land around Burnt Common warehouse.

This site had previously been found unsuitable for development in earlier versions of the plan. Development will be continuous with the Gosden Farm site on the other side of the A3 giving a ribbon development of Guildford along the A3. This together with Garlick’s Arch development therefore gives a continuous urban development from Ockham Road North to Onslow Village and this is approximately 7.5 miles of urbanisation. This is a significant degradation of the Guildford environment in contradiction to the stated development criteria in the Local Plan.

Insetting the Send Business Centre within the green belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** pslp171/652  **Respondent:** 8803617 / Timothy Bruton  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Insetting the Send Business Centre within the green belt.

Send has suffered significant erosion of its greenbelt through the approval of the marina in Tannery Lane and the Vision Engineering factory in Send. Additional development at the Send business centre would significantly alter the character of the village. The poor quality of Tannery Lane has been noted above. Access for large vehicles from Send Road continues to be a major hazard. The A247 through Send is narrow and already overloaded. It cannot sustain additional traffic movements of Tannery Lane and to the new sites at Garlick’s Arch and the Burnt Common proposed industrial development. Improvement to the road is very difficult given the narrowness of the road from Sandy Lane to Mays Corners and the mini roundabout in Old Woking is also a bottleneck.

The proposed developments taken in total destroy Send and Send Marsh Burnt Common as a pleasant semi-rural village and create a congested urban sprawl.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** PSLPP16/13834  **Respondent:** 8803713 / Ian Berry  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the plan to add any significant number of home to the area, let alone 385. There is no infrastructure to cope with developments of this nature in either West, East Horsley, Ockham or Ripley, as follows:

- No room for extra kids at the local schools at infant, junior or senior level.
- The drainage is bad enough already without more homes to cope with. Thames Water has already advised GBC that it would not be able to cope.
- The roads could not cope with more traffic in rush hours – the Ockham Road is very busy with traffic using it to get to the A3 and M25. The A3 northbound is often totally jammed in the mornings with traffic coming onto it from this road. This then clogs up the M25 in both directions. I get stuck in it every morning so I should know! The Local Plan (including the proposed Wisley Development) seems to completely ignore this issue.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13832  Respondent: 8803713 / Ian Berry  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the plan to remove East and West Horsley from the Green Belt. The Green Belt was instigated for a reason, and that reason hasn’t changed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13836  Respondent: 8803713 / Ian Berry  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to the fact that East and West Horsley seem to be ‘targeted’ for development. There are much more logical sites in the borough where development could be sustained by existing infrastructure.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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I am so tempted to have a rant about GBC’s incompetence to come up with a proper holistic plan to cope with the increased requirement for homes. But it wouldn’t be fair on the poor souls who has to read these letters and collate the info.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<tr>
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<th>PSLPS16/3116</th>
<th>Respondent: 8803841 / Wellesley Theodore Wallace</th>
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I object to the alteration of the boundary of the Green Belt so as to exclude this site of 89 hectares, the existing use of which is farmland and to the allocation for 1300 houses and 700 flats.

The exceptional circumstances required under NPPF para 83 for alteration of the Green Belt boundary are not identified in the Policy A25. Under the Introduction to Policy P2: Green Belt it is stated,

"4.3.16 ... We consider that exceptional circumstances exist to justify the amendment of Green Belt boundaries in order to facilitate the development that is needed and promote sustainable patterns of development. 4.3.17 Whilst the general extent of the Green Belt has been retained, land has been removed from the Green Belt in order to enable development around Guildford urban area ..."

Apart from these assertions no details are given of the circumstances said to exist in relation to the site or to those covered by Policies A43 and A43a unless these are hidden in the evidence base.
The revisions on 6 October 2014 to the National Planning Policy Guide ("NPPG") state that the NPPF should be read as a whole and that "need alone is not the only factor to be considered when drawing up a Local Plan". The NPPF is clear that planning authorities should meet objectively assessed needs, unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits when assessed against the policies in the NPPF taken as a whole or unless specific policies in the NPPF indicate that development should be restricted. Such policies include land designated as Green Belt. The Strategic Housing Land Availability Assessment should under the NPPG take account of constraints such as the Green Belt. If this has been done, it is not apparent. This is notwithstanding that at page 154 of the Regulation 18 Consultation Statement it is stated, "We therefore do need to consider each site on its own merits within this overall balancing act."

The failure to specify the circumstances for excluding sites from the Green Belt prevents the "meaningful and proactive engagement" of the community required under NPPF para 155.

The exclusion of Gosden Hill Farm from the Green Belt has the effect of extending the sprawl of Guildford, a large built-up area, and extends the ribbon development along the old Portsmouth Road (B2215) from the old gates to Ockham Park on the north side of Ripley, through Ripley, Send Marsh, Burnt Common and the area around Ewbank's, to Burgham and Guildford, which ribbon development has very small open spaces apart from Gosden Hill itself and the land around Garlick's Arch copse. It does the very reverse of safeguarding the countryside from encroachment.

In spite of the station envisaged as Guildford East (Merrow) and the Park and Ride site the development allocated under Policy A25 including the strategic employment site will inevitably add to the already excessive traffic through West Clandon.

Policy A25 is not legally compliant for the reasons set out in my comments on question 2. Policy A25 is not sound for the reasons set out in my comments on question 3.

My answers to Question 4 apply to Policy A25.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/3121  Respondent: 8803841 / Wellesley Theodore Wallace  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the removal of this land from the Green Belt and to its allocation for approximately 400 homes (260 houses and 140 flats) and up to 7,000 square metres for industrial or storage and distribution uses and slips roads to and from the A3.

The comments in relation to Policy A25 as to the Green Belt also apply to these sites.

These Policies make no mention of the traffic impact on the A247 through West Clandon all of which is in the Green Belt. That impact will be severe. Appendix B of the comments by Surrey County Council on the 2014 Draft Plan included the following:

"...the A247 [which] is a very heavily trafficked A class road and carries a heavy proportion of HGVs".

Sec also observed that there was "a very limited bus route".
Buses on route 463 run between Guildford and Woking via West Clandon. There are five buses a day to Woking running at intervals of two hours or more, the last passing Clandon station at 1740 hours; only one of these services runs through Ripley. There are seven buses a day to Guildford at intervals varying from 1½ to over 2 hours, the last passing Clandon Station at 1902 hours. There has been a recent consultation on a reduction of bus services but no decision has yet been announced.

The Land Availability Assessment 2016 in relation to the site stated correctly that the closest railway station is Clandon, that the pedestrian footway along the A247 is narrow in places, that it switches to different sides of the road and that there are bus stops close to the station. It made no mention of the infrequency of buses.

It is inevitable that a substantial proportion of residents at Garlick's Arch would need to use Clandon Station to get to and from work and would travel by car since the station is about 1½ miles away. The station car park has spaces for 150 cars and is already used to full capacity. A number of people use Clandon station because of the difficulty of parking at other stations on the line, including Effingham. Rail users travelling when the car park is likely to be full are often dropped and picked up on return thus generating additional trips. In addition to those living at Garlick's Arch, there would be persons travelling to work at Garlick's Arch as well as commercial traffic generated, some of which would use the A247 through West Clandon.

The Strategic Highway Assessment Report ("SHAR") prepared by SCC this year based on data provided by Guildford BC calculates the number and distribution of vehicle trips to and from each development site based on various scenarios. Table 3.3 gives the weekday average AM trips on Scenario 2 which adds development to 2031 of the most likely strategic sites under the Local Plan (but without mitigation schemes) to trips on Scenario 1 which consists of background growth plus developments for which there is already permitted development.

The total Scenario 1 figure in Table 3.3 for Garlick's Arch is zero, there being no permitted development. Under Scenario 2, 116 weekday average AM peak hour departures are forecast, consisting of 100 cars, 13 LGVs and 3 HGVs and 44 vehicle arrivals are forecast, 38 being cars. The peak hours are wrongly shown on page 20 as 1600 - 1900 whereas they should be 0700 - 1000 (see page 7). The average peak hour must be the total for the three hours divided by three and clearly understates the actual peak hour which will be much more concentrated. For reasons which are not explained, although Scenario 2 adds to the Do-minimum Scenario 1, seven AM departure trips are shown for Clandon in Table 3.2 covering Scenario 1 but zero departures are shown in Table 3.3

At para 4.2.2 of SHAR it is stated that Scenario 2 traffic demand for all development proposed in the Local Plan "shows a marked deterioration in the performance of the network when compared with Scenario 1".

Table 4.1 forecasts that under Scenario 3, which includes mitigation measures among which are the slip roads under Policy 43a at Burnt common, there would be an increase in southbound traffic along the A247 Clandon Road at an average AM peak hour from 936 vehicles per hour under Scenario 1 to 1269 vph which is 36%. That Table shows the ratio of traffic flow to theoretical capacity ("RFC") under Scenario 3 as 1.1, as a result of which "flow breakdown and extensive queues can be expected"; the level of service ("LOS") is shown as "F" which indicates "every vehicle moves in lockstep with the vehicle in front of it with frequent slowing required ".

At para 5.1.7 it is stated that the results of the assessment indicate that if the schemes in the Department of Transport's Road Investment Strategy ("RIS") are not forthcoming the residual cumulative impact of the Local Plan on the highway network could be considered severe. This is of course viewing the highway network in the borough as a whole. It must follow that the effect of particular developments on specific roads such as the A247 would be more severe.

The SHAR is a statistical exercise based on differing scenarios and does not consider any features of particular roads such as the A247. I have already referred above to the comments of Surrey County Council on the A247 in respect of the 2014 Draft Plan and to the Land Availability Assessment 2016 which mentioned the narrowness of the footpath in places and the switches to different sides of the road.

Table 4.4 which I have referred to above estimates the southbound traffic on the A247 at an average AM peak hour as 936 vehicles on Scenario 3. The flow of northbound traffic along the A247 going towards the A3, London via Ripley and Woking may if anything be greater. Although the weight of traffic slows speeds at peak hours, at other times the 30mph limit is regularly ignored by lorries and cars also. The width of the A247 varies, being quite narrow in places, and the sight
lines are poor particularly at the hump backed bridge over the railway (a photograph of which I provided with my comments in 2014), outside the church, outside the school, beside Summers and at Lime Grove. There is a particular problem when lorries or buses pass each other. It is not possible to see any scope for mitigation of the traffic problems on the A247. The traffic lights at the junction between the A247 and the A246 have caused problems of their own. The existing traffic problems on the A247 in Clandon are serious, Policies A43, and much more so A43a, would make them severe.

Policies A43 and A43a are not legally compliant in particular for the for the reasons set out in answer to question 2. The evidence base and submission documents are so extensive and difficult to access that it has not been possible to consider most of their content in any detail within the short time limit allowed. The passage cited from the judgement of Webster J applies here but has not been observed.

Policies A43 and A43a are not sound for the reasons given in my answer to question 3 coupled with the matters set out in my comments above on those policies.

My comments on question 4 apply to Policies A43 and A43a.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Part 6 of the Local Planning Regulations 2012 requires consultation and public participation. In R (Association of Municipal Authorities) v Secretary of State for Social Services [1986] 1 All E R 164 Mr Justice Webster said this at page 167, "in any context the essence of consultation is the communication of a genuine invitation to give advice and a genuine consideration of that advice. In my view it must go without saying that to achieve consultation sufficient information must be supplied by the consulting party to the consulted party."

Although that was not a planning case, this was clearly a statement of a general principle which must apply here: Webster J cited the decision of the Court of Appeal Rollo v Minister of Town and Country Planning [1948] I All E R 13. In the present case in Local Plan is not legally compliant.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Respondent: 8803841 / Wellesley Theodore Wallace</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Question 3: Soundness.

The Local Plan is not sound. It does not meet objectively assessed development and infrastructure requirements, specifically in respect of housing need and transport infrastructure. It is not based on proportionate evidence. It is very doubtful that it is effective. It is not consistent with NPPF policies in particular with section 9 thereof.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 4: Duty to cooperate</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I have no direct knowledge of the extent of cooperation with Surrey County Council and other local authorities. It is clear that the cooperation with the Surrey County Council over Site 77 in the 2014 plan was wholly inadequate.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/1042  Respondent: 8803841 / Wellesley Theodore Wallace  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I propose that Policies A25, A43 and A43a should be deleted and that the sites covered therein should remain in the Green Belt. I wish to participate at the Examination to adduce evidence as to the impact of Policies A25, A43 and A43a on the transport infrastructure, to question witnesses for the Council and to make submission both on the facts and the law.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp173/695  Respondent: 8803841 / Wellesley Theodore Wallace  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Apart from exceptional circumstances which should be considered on a site by site bases being assessed against the purposes of the Green Belts view NPPF ss 80, no consideration has been given as to why the existing Green Belt boundaries are not capable of enduring beyond the plan period.

The inclusion of Gosden Hill Farm in the Guildford Urban Area undoubtedly extends the sprawl of Guildford. A58 is only separated from A25 by Nutbourne Fruit Farm, the dual carriage A3 and [unclear text], and from A43 by A247 Clandon Road and the horses along it. Virtually the whole of the land from A43 through Ripley to the gates of Ockham Park are developed apart from a small amount od land between Kiln Lane and Blore Heath off the B2215.
The development on A48 effectively extends the sprawl of the large built up area of Guildford to Ripley, Clandon and Send.

In Redhill Aerodrome [2015] 1 P&CR 3, Sullivan LJ said that ‘far from there being any indication that placing the presumption in favour of sustainable development at the heart of the framework is intended to effect a change in Green Belt policy, there is a clear statement [in footnote 9] to the contrary.’

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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The map on p391 of Guildford Urban Area is wholly inadequate to cover Policy A25 in particular the infrastructure requirements and opportunities (3) and (4).

No details are given even now of the exceptional circumstances view NPPF for altering the Green Belt boundary to exclude A25. No consideration appears to have been given to the traffic impact on the A247 in Clandon which remains part of the Green Belt; the additional traffic would be an encroachment on the Green Belt and its openness, see Legoland Windsor Park Ltd v Windsor and Maidenhead RBC [2016] PAD 6 and R (Newsmith stainless Ltd) v Secretary of State [2001] ENHC Admin 74

The changes to the 2016 plan are so exclusive and inadequately explained that the limitation on comments permitted makes the consultation almost valueless.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

A proper map should be provided for A25 if only to show clearly the surrounding roads; the map at p391 is wholly inadequate.

Attached documents:

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<th>Respondent:</th>
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Although the Planning Policy for Traveller Sites (2015) states at para 17 that land removed from the Green Belt to meet an identified need for a traveller site should be specifically allocated in the plan as a traveller site only, no specific allocation has been made. Requirement (7) refers to 'village' in the singular without specifying which village. It is quite likely that several large vehicles with trailers will liaise in convoy to the same destination, creating an additional problem is using the A247.

Leave the existing Green Belt boundary unchanged.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp172/4017  Respondent: 8803841 / Wellesley Theodore Wallace  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A58

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

This replaces A48 at Effingham and is probably mistakenly numbered; alternatively it should come after A57.

Policy A58 is entirely new having been added to the map of Send Marsh/Burnt Common on 19th May 2017.

The only access and exit is the existing access to the Ewbank's premises from the B2215 London Road from the Burnt Common roundabout with A247 road. Although allocated for a minimum of 7000 M2 of light or general industrial use and storage distribution, no details are given of likely employment numbers; these are likely to involve considerate traffic. Burnt Common roundabout is already congested bunching traffic on the A247 in both directions and adding to delays at the roundabout with the southbound A3 and Tithebarnes Lane. No details are given of the potential all movements junction at Policy A25, infrastructure (2), the connector road at infrastructure (3) and the slip roads at A43a. If proper consideration has been given to the transport access and the effect on the A247 and the Green Belt it has not been given.

The document should be amended either to remove the allocation or to provide adequate details of the transport connections to enable meaning consultation to take place.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp17q/384  Respondent: 8803841 / Wellesley Theodore Wallace  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Question 1: The evidence base and submission documents

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (No)
The SHAR is not up to date, the model base years being 2009. Development under the plan would generate significant extra traffic on the A247 through West Clandon, the only road between London Road, Guildford, and the M25 with a bridge over the railway via Cobham. Congestion at the A3/M25 intersection at Wisley causes many vehicles to use the A247 to avoid the M25. There should be a traffic census on the A247.

The Green Belt study (2013-15) states that Send Marsh and Burnt Common has a good bus service; the bus service from there through West Clandon including Clandon Station was reduced in Sept 2016; there are now only six buses a day mostly at two hour intervals. There is no longer a no. 40 bus. Only 100 vehicles leaving 400 houses at Garlicks Arch at AM peak is not audible. (SHAR Take 3.3)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp17q/385  Respondent: 8803841 / Wellesley Theodore Wallace  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Question 2: Legal Compliance

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (No)

The questionnaire invites representations on the 'proposed changes' in the 2017 proposed plan, asking questions about the proposed changes 'as a whole'. It states 'comments must relate to proposed changes only'. The forward to the 2017 plan states that the consultation period 'offers another opportunity to have your views heard'. Cllr Spooner does not confine this to the latest changes. Many of the changes impact on policies and site allocations which are unchanged. The limitation in this consultation conflicts with NPPF para 155. Farther, it is difficult to see how it could comply with the as yet unpublished statement of community involvement. It does not help that no consultation statement has yet been published on the responses to the 2016 draft plan. The restriction to changes is not legally compliant.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp17q/390  Respondent: 8803841 / Wellesley Theodore Wallace  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Question 4: Duty to cooperate

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I have no means of knowing whether Guildford BC, other local planning authorities, Surrey County Council and other public authorities have complied with the duty to co-operate.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPS16/2599  **Respondent:** 8803969 / David Scotland  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ()**

Dear Sirs

Objections to Guildford Borough Council Proposed Local Plan (June 2016) and to the continued inclusion in the plan of the Former Wisley Airfield (FWA), now known as Three Farms Meadows (TFM) - Allocation A35 - for the phased development of a new settlement of up to 2100 dwellings

I object to the draft Local Plan for the following key reasons:

- I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored. Further, it is an inter generational covenant (enshrined in primary legislation) to protect green areas in perpetuity. It is the envy of the world and the proposals to raid these precious areas is nothing short of outrageous.
- I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.
- I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans.
- I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan's new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).
- I object to the threat the Local Plan poses to the historic rural village of Ockham and the blight on properties. The plan calls for a village of 159 residences (with narrow lanes, no streetlights, very few pavements and many listed houses) to be subsumed into a 2,000+ dwelling development, with urban-style buildings up to five storeys high and a population density higher than most London boroughs.
- I object to the detrimental impact on transport, local roads and road safety. I specifically object to:
  1. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars
  2. The increased volume of car A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads
  3. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements

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4. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them).

5. The increase in the already severe congestion on the Strategic Road Network of the A3 and A further planning application at RH5 Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest.

6. The lack of suitable public transport stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity.

- I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).
- I object to the fact that air quality concerns have not been taken seriously - air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.
- I object to the fact that the proposed plan does not meet the needs and desires of local communities, as evidenced through the Ockham Parish Plan. The top two responses as to why local residents enjoy life in Ockham are (1) access to the countryside and clean air and (2) the peace and quiet afforded by wide open spaces. Over 90% wish to see both the historic features of the village maintained and the village's green spaces, including the FWA/TFM, protected.
- I object to the continued inclusion of a site (the former Wisley Airfield, - now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC's Planning. After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd's (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter. Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.
- I would point out that the number of new homes has been based on pre-Brexit projections for economic and population growth, including migration which now needs to be revised downwards, possibly quite seriously.
- Most of the borough's infrastructure is antiquated, congested and straining to accommodate even current needs and organic growth. The plan's commitment to build housing across the Guildford countryside will mean either major infrastructure investment, which no one will believe will happen and for which there are no funds, or else a catastrophic collapse in transport, educational, medical, energy, water and communication services.
- Finally I object to the proposal to build 533 houses on 6 sites in the Horsleys as it is plainly both excessive in absolute terms and disproportionate relative to the rest of the It will destroy the rural character of these communities.

I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object most strongly to the proposal to remove West Horsley and East Horsley from the Green Belt. The Green Belt was created to form a lung for our increasingly crowded cities and to create space between villages to allow them to maintain their character; to build on it would be an entirely retrograde and irrevocable step.

West Horsley, where I live, seems to be a target for development to a far greater extent than other areas in the Guildford Plan and I can see no legitimate reason for an increase of housing in this area of at least 35%. Most of this proposed development would lie outside the current settlement areas and would have an immense and detrimental impact on what is, currently, a rural and peaceful village on the edge of an Area of Outstanding Natural Beauty. The village contains a substantial number of historic buildings, particularly in the Conservation Area, many of which are listed and have no foundations and the inevitable increase in traffic caused by building on this scale would without doubt cause major problems for many of these ancient buildings. Additionally, if the Wisley Airfield development goes ahead (despite being unanimously refused I understand that this is, extraordinarily, still a serious possibility), the suggested road scheme would inundate the Horsleys with traffic turning the area into a racetrack.

The proposed number of houses suggested for West Horsley is entirely unsustainable and will entirely change the character of this village. Nor does there appear to be any provision for our already overstretched infrastructure: we have a junior school which is bursting at the seams, a doctor's surgery which is totally overstretched, drains which cause regular problems due to over capacity and flooding issues on the roads (The Street and Ripley Lane in particular are frequently impassable in the winter), we have a derisory bus service and a station car park which is full by 9am each day. Add to this the fact that West Horsley's Post Office has closed and the shop is shortly to follow it and you have a picture of a village which is not suitable for non drivers and which would not in any way be able to accommodate the numbers of new inhabitants suggested by the plan.

I have objected twice before in writing to the local plan consultations, as I know have thousands of others. There seems to be no attempt by the planners to listen to these opinions as they just rehash with the same ideas. As I said in my previous letter, I believe GBC planners should look more closely at the idea of 'urban regeneration' which is suggested in the National Planning Policy Framework. Small scale development could be acceptable in the village of West Horsley - more affordable housing is needed and some homes for the growing population of older people. What we do not need is a high density housing which is developer driven in order to turn a large profit. Concreting over the countryside cannot be sustainable or sensible and must not be allowed to happen.

I am absolutely opposed to the local plan with which we have been presented.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
1. Wisley/Ockham development

The proposal for over 2000 dwellings with traveller, retail and commercial sites, under 2 miles away from the Horsleys, would be an environmental and social disaster for the Horsleys, putting an impossible and unacceptable pressure on the village facilities, including the transportation links (rail and road).

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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Comment ID: PSLPS16/2011  Respondent: 8804417 / Vivian and Philip Markley  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A36

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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1. Thatchers Hotel - proposed replacement by 48 dwellings

This is unacceptable. GBC themselves have already rejected the planning proposal previously submitted by the owners of Thatchers. I live directly behind Thatchers, and proposed development would adversely affect my wellbeing, and my right to peaceful enjoyment of my life (under the provisions of the Human Rights Act) by virtue of increased noise and light pollution. In addition public safety would be compromised and adversely affected - the entrance/exit to Thatchers is already a safety hazard, opening as it does on to the busy A246 on a bend; the additional and more frequent traffic from 48 houses would make it positively dangerous.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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Comment ID: PSLPP16/4274  Respondent: 8804417 / Vivian and Philip Markley  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E8

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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1. Station parade designation as a "District Centre"

The proposed classification is based on a false and misleading interpretation of the facilities in the village centre.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:
Comment ID: PSLPP16/4275  Respondent: 8804417 / Vivian and Philip Markley  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. Infrastructure overload

Infrastructure in the Horsleys is already under pressure - schools are full, roads and parking are overloaded, drainage is inadequate, the medical centre is already at capacity.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4272  Respondent: 8804417 / Vivian and Philip Markley  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I refer to the proposed submission for the Guildford Local Plan.

I object to the plan for the following reasons:

1. Green belt changes

The Horsleys should not be removed from the Green belt. There are no valid "exceptional circumstances" which could or should permit this.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4273  Respondent: 8804417 / Vivian and Philip Markley  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
1. Extension of the boundaries of the settlement areas of the Horsleys

No cogent reasons have been given for the proposed changes and they should be dismissed. There should be no "open door" for additional future development of the Horsleys.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/778  Respondent: 8804417 / Vivian and Philip Markley  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. Housing Numbers

The plan for new houses is based on a flawed assessment based around a Strategic Housing Market Assessment (SHMA) which itself is incorrect. If it were to be enacted it would mean a population increase more than 70% higher than the official national estimates for population growth in the borough. This must be rejected.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/276  Respondent: 8804513 / Ian Buchanan  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Normandy and Flexford

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

NO NEED FOR A SECONDARY SCHOOL

I work at Guildford Grove Primary School which is next to Kings College. I have grave concerns for the future of the pupils in my school as the falling numbers at Kings College puts their local school at risk. The GBC plans would make it far worse. There can be no justification in planning a secondary school in Normandy when all the secondary schools in the surrounding areas are under subscribed and have many places. Money should be invested in the current schools and not try and remove children from those schools in order to fill a school in Normandy. There are very few primary and secondary age children currently living in the village.
TRANSPORT AND ROADS

Many commuters use Normandy to cut through when the A3 and A31 have traffic congestion, which happens most mornings. This then affects Glaziers lane with a restricted weight bridge and Westwood Lane with a restricted lane under a restricted height bridge. The GBC plan will increase the traffic on both lanes significantly.

ENVIRONMENTAL DAMAGE

The proposed development will negatively impact on or destroy habitats of numerous species. Surrey Hills is an area of outstanding beauty not to be scarred buy a huge housing development adding to light and air pollution (with all the extra cars). The area is also next to the Thames basin which protects birds. The green belt includes the land between Flexford and Normandy. In March 2013 Surrey County Council boasted about creating and keeping green belt area and had promised to preserve the green belt. Building on green belt areas defeats the object and reasons for having green belt areas.

Flooding is a concern with streams. Building on this land will contribute to more flooding as the land can’t absorb the rain as it flows over built areas into roads and drains that can’t cope with the flow. The road by the train station is an example, regular flooding making it impossible to even walk through without wellington boots.

It would be so much fairer if the plan was to build 50 to 100 houses in each village NOT over a 1000 in one village! This is a politically led plan in the hope that there will be less political come back however we care too much for our village and environment for this plan to be forced on us.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/3787  Respondent: 8804513 / Ian Buchanan  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A46

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I’d like to register my complaint that the above development is being considered. There are so many reason why this is not a good idea but allow me to outline a few:

1. This is greenbelt area and there are no exceptional circumstances that have not been approved by the inspectorate
2. the flood risk will become a major issue as this development concretes over vast amounts of wetlands
3. Habitats for wildlife are supposed to be protected but this development will damage what little habitat they still have
4. We need to safeguard the countryside from the sprall of urbanisation. This only increases the sprall
5. there is no need for a secondary school in the area given that 3 major secondary schools in the area are way below capacity
6. We seem to value space for park and rides but not for nature and peace and quiet. This development will only exacerbate the problem.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/18627  Respondent: 8804833 / Brian Yeomans  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy P3: Green Belt

I OBJECT to this policy.

This policy is much weaker than previous protection. It is dependent on the Surrey Hills Management Plan which welcomes housing development. The Surrey Hills needs much more substantial protection. Even major (undefined) development in the AONB would be permitted if exceptional (undefined) circumstances could be demonstrated. P3

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/1056  Respondent: 8804897 / Alan Goodfellow  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - East Horsley

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the land to the north of Fangate Manor being taken out of the Green Belt and taking it into the settlement boundary. There are no exceptional circumstances for doing this and there would be a loss of agricultural land currently supporting deer, badgers, foxes, pheasants and a multitude of other birds and animals. In the LAA relating to this site, the plan shows access to Manor Close. I would point out that Manor Close is a private road and access would not be allowed from any development of this site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: PSLPS16/1613  Respondent: 8804897 / Alan Goodfellow  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the proposed development at Wisley This land is in the Green Belt currently and there are no exceptional circumstances to allow this development. Guildford B.C. have already refused permission for this site as it failed to meet a lot of criteria. I believe that for this and reasons stated in my last paragraph this site should be taken out of the Draft Local Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3562  Respondent: 8804897 / Alan Goodfellow  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I am writing to OBJECT to the draft local Plan.

I OBJECT to the taking of East Horsley, West Horsley and all other villages in the borough out of the Green Belt. In your response to the e-petition “Keep the Green Belt” dated 13 December 2013 it was stated that “The council also notes the essential characteristics of the Green Belt as being its OPENNESS and PERMANENCE, and that the Green Belt boundaries should only be altered in exceptional circumstances.” I do not believe that such circumstances exist and therefore the existing boundaries should be maintained thus protecting the villages from undesirable development, which would change the entire character of the villages which currently have great community feeling and this I feel would be destroyed. We have a duty to leave a legacy to future generations and this community feeling would be lost through over development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3563  Respondent: 8804897 / Alan Goodfellow  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the volume of housing proposed in the Local Plan for the Horsleys, currently standing at 533 on the main sites proposed plus a further 90 on other small sites. This scale of development cannot be sustained without major infrastructure changes and improvements. Currently our roads (which are mainly country lanes) are choked with traffic, parking at the shops is impossible, parking at the station is only just sufficient, it is very difficult to obtain an appointment at the surgery and the schools are already full to overflowing. “With a further 500 plus families life would be impossible and that is without the development at Wisley. Should all this volume of development be done then the area would become an urbanised area. Do we want to leave this as a legacy for future generations or do we want to leave the pleasant green land that we have known and enjoyed ourselves?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/126  Respondent: 8804929 / Helen Beckett  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I refer to the proposed planning in West Horsley, the extent of which is entirely unacceptable.

The latest plan indicates over 530 new homes for The Horsleys. This level of new housing would COMPLETELY change the character of the village, not to mention the impact it will have on its infrastructure.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/129  Respondent: 8804929 / Helen Beckett  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
**Schools**

There is only ONE state primary school in West Horsley and NO state secondary schools. The Raleigh School is already oversubscribed and many children living in West Horsley were NOT offered places at their local school in the last few years. There is already a problem here with a lack of places and this already needs resolving WITHOUT adding another 533 homes. How do you propose to deal with this??

**Medical services**

It is already difficult to get an appointment at Kingston Avenue Medical Centre, the ONLY surgery in East and West Horsley. You cannot dilute this service any more.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Traffic**

The increase in traffic on East Lane, in particular, will be intolerable with the proposal of over 345 new households impacting on this road (potentially up to 750 more cars?). It is already congested during school times from Nightingale Avenue and Northcote Road. This will have a massive impact on our day-to-day lives.

2000 houses are being planned for Wisley Airfield. Many of these potential residents will be driving in and out of Horsley to use the station and shops. We simply DO NOT have the capacity for additional parking at Horsley Station and local shops. The Station car park is currently full every weekday as it is. It will become impossible to use the train as there is no alternative parking.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Green Belt

You seem determined not to respect the green belt. How can you possibly consider removing these villages from the green belt??

We moved to West Horsley nearly three years ago and chose this area specifically because we wanted a village environment to bring up our daughter.

We wanted to get away from traffic and congestion and enjoy the green belt around us.

The proposed development of homes on green belt sites at much higher densities than currently exist would be totally out of character with existing housing. It is also unsustainable in terms of drainage, road capacity, schools, shops, medical facilities, parking and public transport.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/130  Respondent: 8804929 / Helen Beckett  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Drainage and Flooding

There are known sewage overflow problems in Ockham Road North and Green Lane. There will be serious capacity issues with the sewer network in the village going right through to the treatment works if the large numbers of dwellings proposed are constructed.

The amount of flooding experienced a couple of years ago meant many main roads were closed for weeks on end. We were forced to use small lanes to exit the village. By doubling the number of cars in the village, this issue will be exacerbated.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/115  Respondent: 8804929 / Helen Beckett  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 7: Any other comments?

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I am disappointed that, despite the many objections to your plans, you STILL continue to ignore the overwhelming feedback from local residents. It is us, the current residents, who will have to live alongside these new developments and put up with the vast increase in local traffic and demand for public transport, schools, medical facilities and parking, etc.

Your plans will have a HUGELY negative impact on our day-to-day lives.

I trust that you will finally listen and review your plans substantially.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp173/239  Respondent: 8804929 / Helen Beckett  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Appendix H: Maps - West Horsley North

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I refer to the proposed planning in West Horsley, the extent of which is entirely unacceptable.

The latest plan indicates 295 new homes for The Horsleys. This level of new housing would COMPLETELY change the character of the village, not to mention the impact it will have on its infrastructure.

Green Belt

You seem determined not to respect the green belt. How can you possibly consider removing these villages from the green belt??

We moved to West Horsley nearly four years ago and chose this area specifically because we wanted a village environment to bring up our daughter.

We wanted to get away from traffic and congestion and enjoy the green belt around us.

I object to no changes being proposed since the consultation in 2016 with regards to insetting West and East Horsley from the green belt. You appear to be ignoring the overwhelming objections that were made last year!

The proposed development of homes on green belt sites at much higher densities than currently exist would be totally out of character with existing housing. It is also unsustainable in terms of drainage, road capacity, schools, shops, medical facilities, parking and public transport.

Traffic

The increase in traffic in West Horsley will be intolerable with the proposal of these new households. It is already congested during school times and this will have a massive impact on our day-to-day lives.
Many of these potential residents will be driving in and out of Horsley to use the station and shops. We simply DO NOT have the capacity for additional parking at Horsley Station and local shops. The Station car park is currently full every weekday as it is. It will become impossible to use the train as there is no alternative parking.

Schools

There is only ONE state primary school in West Horsley and NO state secondary schools. The Raleigh School is already oversubscribed and many children living in West Horsley were NOT offered places at their local school in the last few years. There is already a problem here with a lack of places and this already needs resolving WITHOUT increasing the number of homes. How do you propose to deal with this??

Medical services

It is already difficult to get an appointment at Kingston Avenue Medical Centre, the ONLY surgery in East and West Horsley. You cannot dilute this service any more.

Drainage and Flooding

There are known sewage overflow problems in Ockham Road North and Green Lane. There will be serious capacity issues with the sewer network in the village going right through to the treatment works if the large numbers of dwellings proposed are constructed.

The amount of flooding experienced a few years ago meant many main roads were closed for weeks on end. We were forced to use small lanes to exit the village. By doubling the number of cars in the village, this issue will be exacerbated.

I am disappointed that, despite the many objections to your plans, you STILL continue to ignore the overwhelming feedback from local residents. It is us, the current residents, who will have to live alongside these new developments and put up with the vast increase in local traffic and demand for public transport, schools, medical facilities and parking, etc.

Why don't you plan more apartment homes in Guildford Town Centre rather than additional retail units?

Your plans will have a HUGELY negative impact on our day-to-day lives.

I trust that you will finally listen and review your plans substantially.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
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<th>Comment ID:</th>
<th>pslp173/536</th>
<th>Respondent:</th>
<th>8805089 / Roger Mitchell</th>
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<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2017 / Appendix H: Maps - Normandy and Flexford</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
It is with relief that my wife and I, residents of Normandy for nearly 50 years, see that some of the threats to West Surrey and North East Hampshire proposed in the earlier discredited plan, have been withdrawn, especially policies A46 and A47. There remain however in the revised proposals other threats to the Green Belt which by its existence in its current form helps to prevent the degeneration of the region into a continuous urban sprawl to everybody's, not only local residents,' detriment.

I object to the 'insetting' of settlements at Normandy and Flexford and Walden Cottages as well as the Travellers' sites at Palm House Nurseries and Whittles Drive. Such 'insetting' would represent a serious erosion of the Green Belt and could and most probably would be used further to erode the Green Belt, one of our country's most valuable assets, especially in this part of the South East.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
10) I object to the continued inclusion of a site (the former Wisley Airfield, now known as Three Farm Meadows) where the planning application has already been unanimously rejected by GBC’s Planning Committee.

After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd’s (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter.

Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4102  Respondent: 8805249 / Peter Warburton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

5) I object to the threat the Local Plan poses to the historic rural village of Ockham and the blight on properties there. The plan calls for a village of 159 residences (with narrow lanes, no streetlights, very few pavements and many listed houses) to be subsumed into a 2,000+ dwelling development, with urban-style buildings up to five storeys high and a population density higher than most London boroughs.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4103  Respondent: 8805249 / Peter Warburton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

6) I object to the detrimental impact on transport, local roads and road safety. I specifically object to:
   1. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars
   2. The increased volume of car traffic. A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads
3. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements
4. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them)
5. The increase in the already severe congestion on the Strategic Road Network of the A3 and M25. A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest
6. The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to the Guildford Borough Council Proposed Local Plan (June 2016) and, in particular to the continued inclusion in the plan of the Former Wisley Airfield (FWA), now known as Three Farms Meadows (TFM) – Allocation A35 - for the phased development of a new settlement of up to 2100 dwellings, and the erosion of greenbelt land in East and West Horsley.

I object to the draft Local Plan for the following key reasons in respect of Three Farms Meadows:

1) I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4107  Respondent: 8805249 / Peter Warburton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the draft Local Plan for the following key reasons in respect of East and West Horsley:

1. I object a plan that removes East and West Horsley from the Green Belt.
2. I object to a plan that includes 533 new houses in East and West Horsley.
3. I object to the erosion of farmland
4. I object to a plan that will destroy the beauty of the village in which I live.

I trust that these objections will be fully considered.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4105  Respondent: 8805249 / Peter Warburton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
7) I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/4101  Respondent: 8805249 / Peter Warburton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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4) I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp172/1619  Respondent: 8805249 / Peter Warburton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

There are some small changes made in the revised Local Plan to Site Policy A35, Land at Wisley airfield in Ockham. However, these changes do not provide any justification for continuing to include this site within the revised Local Plan.

Having made a downward revision to its housing targets in the revised 2017 Local Plan draft, GBC is proposing to remove a number of development sites that were included in the 2016 version of the plan. The largest site removed is addressed by Site Policy No. 46 located in Normandy (‘Land to the south of Normandy and north of Flexford’) where a mixed used development of 1,100 homes had previously been proposed.

In rejecting a 2015 planning application for development at the Wisley site (proposed in advance of the Local Plan) GBC identified no less than 14 reasons to justify their rejection of the planning application, only one of which was the issue of it being in the Green Belt. The reminder highlighted a long list of deficiencies associated with this proposed development including its major impact on traffic flows, its severe environmental impacts, its total lack of existing transport and other infrastructure, as well as many other factors. According to GBC’s consultation website, a total of 1,429 comments were
registered in the 2016 Local Plan consultation about the Wisley airfield site – 97% of them were against its development. And yet GBC chooses to maintain Wisley airfield as a policy site in the 2017 revised Local Plan.

With a planning appeal due to be heard in September 2017, I trust that if the planning inspector decides to reject the appeal of Wisley Property Investments, then GBC will finally listen to the views of so many of its residents, accept the AECOM sustainability conclusions on the deficiencies of this site and remove Wisley airfield entirely from the Local Plan.

I OBJECT to Site Policy A35, the creation of a new settlement at the former Wisley airfield.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/1620  Respondent: 8805249 / Peter Warburton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A39

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Although small changes have been made to Site Policy A39, these are not material and GBC is still proposing to include this Green Belt site within the revised Local Plan.

In particular the change in the inset boundary proposed in the Pegasus Green Belt & Countryside Study for this site has no merit whatsoever. This study proposes the movement of the settlement boundary westwards from behind the houses on the western side of Ockham Road North up to the eastern boundary of Lollesworth Wood, thereby removing over 5 hectares of agricultural fields from the Green Belt. The present Green Belt boundary line is defined by a deep and well-maintained drainage ditch classified by the Environment Agency as a ‘river line’. As such, this river line represents a highly defensible Green Belt boundary. Therefore, I believe the justification for moving this boundary under current Green Belt rules is unsound.

The site also has other serious deficiencies for development with nearly a third of the land being classified as Flood Zone 3. The site is also directly adjacent to an important SNCI, as GBC’s revised policy has now belatedly recognised.

I OBJECTS to Site Policy A39, land near Horsley railway station

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/422  Respondent: 8805249 / Peter Warburton  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Policy D1 provides the general policy framework for infrastructure development in the borough proposed in the local plan, including the accompanying Infrastructure Schedule set out in Appendix C. Other than a few specific changes consequential on the removal of certain projects in the light of the reduced housing target, there are only minor changes made to the infrastructure proposals in the 2017 version of the GBC Local Plan. These changes totally fail to address the inadequacies of the existing infrastructure, nor meet the stated objective of providing infrastructure to support the proposed developments. Accordingly:

I OBJECT to the inadequate provision of infrastructure investment across the borough provided for in the local plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The revised Green Belt Policy P2 continues to make the hollow promise that “The Metropolitan Green Belt will continue to be protected”. However, despite minor changes it has failed to revise Paragraph 4.3.13 which proposes to inset the village of East Horsley from the Green Belt.

There is no justification for this approach. East Horsley is a rural village of very low housing density. Within the current settlement area the average density of housing is just 8 dwellings per hectare. Most houses lying within the current settlement area have large gardens that are filled with trees, shrubs and open lawns. As a result East Horsley makes an important contribution to the Green Belt of this area, providing openness, picturesque green spaces and wildlife corridors which support a rich biodiversity – for example, there are currently an estimated 43 different protected species of wildlife to be found in East Horsley.

If East Horsley is inset from the Green Belt, as proposed in the revised Local Plan under Policy P2, then important Green Belt planning protection will be lost over land currently within the settlement area. This will inevitably lead to increased development within this area and the loss of openness, destruction of trees and hedgerows, diminished biodiversity and the impairment of picturesque views of this rural village.

It is also important to recognise that the locality of East and West Horsley represents one of the first lines of defence against Metropolitan urban encroachment outside of the M25 circle. To inset East and West Horsley from the Green Belt would therefore represent a further weakening of this important Green Belt barrier. Accordingly:

I OBJECT to the insetting of East Horsley proposed as part of Policy P2.

I also note one new change made to the proposed settlement boundaries of East Horsley under the revised 2017 local plan, as detailed in the accompanying Appendix H maps for East Horsley (South). The Amendment 4 on this map addresses land in the southern part of the village designated as being within ‘the identified boundary of the village’ and which is currently Green Belt land outside of the settlement area. However, under Amendment 4 the settlement boundary is to be extended further south to encompass all of this area.
This is land which is close to and in some parts directly adjacent to the Surrey Hills AONB. It is a very low density part of the village located in a highly distinctive rural setting including in Chalk Lane a sunken single track road lined with chalk slopes and which dates back many hundreds of years. To bring such land within the settlement area of the village is not in any way justifiable and is very likely to lead to development that is inappropriate to the Green Belt. This area of the village has benefitted from Green Belt protection for many years but this proposed change would have a significant adverse impact and lead to the destruction on its character. Accordingly:

I OBJECT to the movement of the settlement boundary proposed under Amendment 4 in Appendix H map of East Horsley (South), proposed as part of Policy P2.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp171/420    Respondent: 8805249 / Peter Warburton  
Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The revised policy proposes a target for new housing in Guildford borough of 12,426 homes.

However I believe this revised target for borough housing is still excessively high and should be reduced much further. This is due to the following:

a) The conclusions of the revised SHMA are seriously flawed

The West Surrey Strategic Housing Market Assessment: Guildford Addendum Report, 2017 (‘SHMA Addendum’) issued by consultants GL Hearn in March 2017 provides an update on the previous SHMA issued in 2016. Much has happened in those 12 months, particularly the imminent prospect of Brexit, which is likely to result in major changes in population trends, migration patterns and the economic development of the UK.

b) GBC fails to make any allowance for planning constraints, particularly the Green Belt

The housing need projections of GL Hearn are taken by GBC directly as the housing targets proposed in the Local Plan. They therefore fail to take into account any of the significant constraints which limit the supply of housing across the borough, in particular the large proportion of land which currently falls within the Metropolitan Green Belt. They also fail to allow for the already overstretched infrastructure.

Other local plans across the country have adjusted their housing targets to reflect such constraints. However, GBC chooses to ignore them. This is despite having a revised Green Belt policy P2 in the Local Plan which states that “The Metropolitan Green Belt will continue to be protected”.

In order to meet its high housing targets, GBC proposes to remove large swathes of land from the Green Belt for use as housing. This is contrary to ministerial guidance and planning inspectorate decisions which continue to support the position that unfulfilled housing need does not constitute the ‘very special circumstances’ needed to justify building on Green Belt land. This is achieved because the Green Belt & Countryside Study produced for GBC by the consultants Pegasus proposes numerous changes in Green Belt boundaries without due justification in order to deliver land for housing use in the Local Plan. The many apparent justifications given by Pegasus in their Green Belt & Countryside Study are extraordinarily weak
and in many cases fail to meet the planning criteria required for moving long established defensible Green Belt boundaries. In East Horsley this applies to the Green Belt movement proposed at Kingston Meadow (a movement away from a river line) and at Lollesworth Fields, as discussed further in Section 2 below.

The majority of the land being proposed by GBC for development under the revised Local Plan is currently part of the Metropolitan Green Belt. Indeed the Guildford Green Belt group have estimated that some 57% of all the new housing proposed in the 2017 GBC Local Plan is to be built on land which is currently Green Belt.

A further concern is the fact that the Green Belt land selected by GBC in the local plan is predominantly located in the north eastern part of the borough. Therefore it is land closest to London, which represents that most vital part of the Green Belt needed to prevent the encroachment of the Metropolitan conurbation.

Throughout the Local Plan consultations many thousands of residents across the borough have written to object to GBC’s approach towards this fundamental issue – there were over 25,000 comments in the 2016 consultation, mostly opposing the plan. Judging by the revised 2017 Local Plan now proposed by GBC it seems that these voices have once again been ignored.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPS16/5931  **Respondent:** 8805569 / Carolyn Piggott  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A46

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ()**

**I STRONGLY OBJECT to the proposed development of site A46 in Normandy.**

I object on the following grounds:

1) the plan does not demonstrate exceptional circumstances to justify that the proposed development area (A46) is removed from the green belt, and what effect removing this area from the green belt will have on the local area.

2) the need for a new secondary school is not proven and research into the number of vacant places in other nearby secondary schools shows that they are undersubscribed. You cannot justify the need for a school based on development of houses in this area.

3) the increase in traffic could not be supported by the road system and it is unfeasible that people moving to the area would all use the train, most people living in this type of location do have cars. The roads are already saturated with traffic with a large number of cars using the A323 to commute from Aldershot/Camberley/Farnborough to and from Guildford. When there are problems on the A31 (frequent) or A3 (also frequent) then the A323 takes a large amount of the traffic away from these roads.

4) the impact on the environment and local sustainability have not been addressed. Normandy is an important natural area and if removed then Guildford is in danger of merging with Aldershot/Camberley/Farnborough and creating urban sprawl.

5) the local population have not been kept fully informed of this proposal from the earliest time possible.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** pslp172/3173  **Respondent:** 8805633 / Alena Thomas  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy A42

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. Policy A42. Clockbarn Nursery, Tannery Lane, Send. Allocated for 60 houses in place of the previous 45 houses. Apart from being lined both sides with green fields for much of its length, Tannery Lane is a narrow route turning off from the middle of Send and where it turns off there is existing development either side adding to the traffic turning into it will cause further delays through the middle of the village and require a significant amount of infrastructure work.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** pslp172/3176  **Respondent:** 8805633 / Alena Thomas  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy A58

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy A 58. 9.26 hectares at Burnt Common, for an initial minimum of 7,000m2 of industrial space. This is by far the biggest potential problem with the latest round of changes. GBC have changed two little letters here - ‘maximum’ becomes ‘minimum’ and the possibility is thus opened up of a huge new development on Green Belt land, in a location where there is actually, according to recent research, reduced demand for industrial space. Such industrial development will cause very heavy additional traffic on the surrounding roads, where there are already long queues in the rush hour. I’m genuinely baffled by what passes through the heads of GBC on this issue: they must have cars, they must sometimes sit for long periods as we do in jams going up the hill past the university on the A3 or indeed on the A3 northbound past the Potter’s Lane and Ripley turn-offs; or find their routes to school or work are solid due to the smallest roadworks; and yet they’re quite happy to say they’re addressing the problem of accommodation for people working in schools and hospitals in Guildford not by providing houses in the immediate vicinity of the town but by building a mini-commuter belt in Wisley, Horsley, Send etc., from which people will need to climb into their cars by the thousand and head off into the complete gridlock the Plan will have created. Except of course that most of the new housing won’t be affordable, as above, so most of the cars may be heading the other way, into London.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp17q/280  Respondent: 8805633 / Alena Thomas  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Question 6: Any other comments?

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )

I am writing to object in the strongest possible terms to the latest draft of the Guildford Borough Council Local Plan - as I have written to object to previous drafts, apparently with no effect other than to redouble the Council’s determination to dump punitive and badly thought-through levels of proposed development on our village.

The Council’s approach to the process of consultation is deeply cynical. Rather than responding to the legitimate opposition of local residents to the disproportionate share of development allocated to Send in the first Draft Plan, subsequent drafts have added insult to injury, apparently taking the view that far from having a democratically enshrined right to have their voice heard on decisions with a potentially devastating effect on the future of their community, residents are being a damned nuisance by not letting GBC and their developer friends build whatever, whenever and wherever they like.

The plan as it relates to Send is flawed on three levels:

- the calculation of housing requirement for the Borough as a whole is extremely spurious, based on wrong assumptions about industrial demand, classification of university students and the indiscriminate imposition of national-level requirements on individual regions

- the share of the burden of development to be placed on Send and its environs has been from the first draft suggestive of a very poor attitude to complying with the demands of government. Rather than 'how can we spread this requirement fairly across the Borough', the Council appear to be asking 'which few parishes can we sacrifice in the interests of keeping the others relatively happy'. More important in my view, the Council's disregard for the Green Belt has been shocking: the Act requires 'exceptional circumstances' for areas to be removed from the Belt, while the current justifications for development are the most unexceptional imaginable - ongoing pressure of population and increasing demand for housing. This is exactly what previous governments committed not to doing.

In spite of this, we see the Plan focusing on new build in areas such as Send, Ripley and Wisley where it's easy and cheap to carve up the countryside, rather than making a serious attempt to use the Borough’s extensive brownfield capacity to cover a high proportion of the development. The official line seems to be to talk about affordable housing and insinuate that those objecting are NIMBYs: but given the choice of sites (highly unpopular but the most profitable for development) and the decision to make a minimum of only 40 percent of houses built on land freed up for development 'affordable' (equivalent to perhaps 25 percent of the land thus freed up) - leaving developers rubbing their hands over the other 75 percent, it’s hard to keep faith in the Council's having any other motive than greed.

- most specifically, the effect on Send of the proposed developments will be to cripple the already creaking road system, massively overload schools and medical facilities, undermine the environment and - in short - ruin the village. It’s far from perfect at the moment but I can say hand on heart that it’s quite a nice place to live. It seems likely to be a truly grim place to live if the current Plan goes through.
It’s the third of these I want to focus on for the remainder of this email, and as instructed I shall focus on changes made since the previous draft - but please note none of the objections raised previously have been addressed and you should still give these full consideration.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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In view of new evidence which shows that Guildford’s projections for population growth is flawed and is predicting much higher growth than is likely, PLEASE can you reconsider your plan to build so many homes and especially on Green Belt land. There is evidence that Guildford's proposal for more than 12,426 homes (plus a buffer of 1,155 homes) is excessive and will result in needless loss of Green Belt and increased traffic congestion. It cannot be justified in what is already a highly congested borough.

There is evidence that Guildford’s population growth predictions are overestimated by about 40% because of under-recording of students leaving at the end of their studies.

Please LISTEN to the evidence and re-calculate your projections based on up-to-date evidence.

Once Green Belt land is gone - it is gone for ever. What will you say to your Grandchildren when they ask why Guildford is so busy and congested and horrid to live in?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Insetting of Villages – Chilworth

I note from the proposed Local Plan that it is intended to remove Chilworth’s Green Belt protection status (known as ‘insetting’).

I object to the proposal most strongly because:-

1. The village is close to and overlooked by the Surrey Hills AONB and any development will have a detrimental effect on the enjoyment of this beautiful area.
2. The road network around Chilworth is overused already and queues, frequently through most of the New Road section of the village, develop at peak times, especially at school closing time at Tillingbourne School when parents collecting children park outside the school.
3. Most houses on New Road do not have off street parking so traffic is often clogged up by parked cars, exacerbating the problem at Item 1 above.
4. Although there are a shop and post office in the village they can’t supply everything for living so people will have to travel to Guildford, Godalming or elsewhere for shopping.
5. Assuming most people will work in surrounding towns or in London public transport won’t be able to cope, hence increasing traffic problems.
6. Is the infrastructure adequate for increased housing including water supply, sewerage, gas and electricity?
7. There are two schools in the village but it is doubtful if they would be adequate for an increase in population.

These are just a few points of some importance and I urge you to take them into account.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/4474  Respondent: 8806145 / Jane Wray  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A22

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I would like to register an objection to the inclusion of the Keens Lane development on the the local plan for the following reasons:

1. This is green belt land.
2. Keens Lane is too narrow to cope with the increased predicted traffic and the road cannot be widened due to the proximity of a house called Timbers.
3. The land is next to a listed building and within proximity of a site of SSI. (Whitmoor Common)

I hope you will consider these points when making your decisions.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp172/551  Respondent: 8806145 / Jane Wray  Agent:
We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/2168  Respondent: 8806209 / Jane Halliwell  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Objections to Guildford Borough Council Proposed Local Plan (June 2016) and to the continued inclusion in the plan of the Former Wisley Airfield (FWA), now known as Three Farms Meadows (TFM) – Allocation A35 - for the phased development of a new settlement of up to 2100 dwellings

I live within a few hundred metres of the proposed development at Three Farm Meadows.

I object to the continued inclusion of a site (the former Wisley Airfield, now known as Three Farm Meadows) in the Local Plan. A planning application for this site has already been unanimously rejected by GBC’s Planning Committee. After 14 months of consideration the planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter.

I object to the fact that air quality concerns have not been taken seriously. Air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, and cause further problems on roads locally and through Ripley Village.

I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).
I object to the lack of consideration for the need for good public transport to service this and the other developments in the immediate area. The railway stations at Effingham Junction and Horsley will not be able to cope with the increased need for transport to London and Guildford and the car parks are already at capacity. Cycling would not be a safe option since the roads in the area are narrow, have no pavements and no space to provide cycle lanes.

I object to the fact that a large proportion the proposed new housing appears to be in the immediate localities of Ockham, Ripley, Send and the Horsleys.

I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.

I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/3369  Respondent: 8806273 / Peter Leonard  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Having read the council’s Local Plan Strategy document and seen the proposals for building up to 593 houses in The Horsley in the next 5 years, I would like to raise my strong objections and concerns.

Extension of the Horsleys Settlement Boundaries - No sound reasons are apparent in the broader document as to why the settlement boundaries should change apart from the desire to build additional housing.

Housing – My objections are based on the points below;

• The very large number of new build houses identified for West Horsley would negatively transform the village beyond recognition as it would increase the village size by over 35%. This is significantly higher than any other area in the borough.
• The housing density envisaged per site appears significantly higher than is presently the case in the village. This is totally out of keeping with the existing character and layout of the village that comprises low density housing with a considerable mix of ages and housing styles
• The need for so many houses in Guildford Borough, never mind West Horsley, has not been proved in the Consultation documents
• Why are Brownfield sites not being used ahead of taking land out of the Greenbelt for housing development? Surely this should be the more sustainable priority?

Housing number calculation - The mathematical model used by the consultants used to derive the high number of house requirements in the SHMA has not been revealed. It surely cannot be acceptable that affected areas such as the Horsleys should just accept data without being able to test that data for accuracy or applicability?

Infrastructure – My objections relating to the Horsleys’ broader infrastructure are further
magnified by the proposal to build over 2000 houses on the former Wisley Airfield.
• Roads – Traffic generation from the proposed new housing would be considerable particularly as most households would have two to three cars. The present narrow lanes in and around the Horsleys would not be able to cope without major redevelopment. Additionally the private schools in the area are well supported by families living in Guildford and other villages. These private schools produces significant traffic problems on Ockham Road North and the A246
• Drainage and sewage – Road drainage is a continued concern that will be exacerbated by the runoff from the additional housing. Winter road flooding is an ongoing problem. Additionally, there may be a serious under capacity of existing sewers and the treatment works to cope with the large numbers of dwellings proposed

Village facilities
• West Horsley has very limited facilities with only a single small shop at the southern end of the village with very limited parking
• I object to the shopping parade in East Horsley being defined as a “Rural District Centre”. It presently suffers from severe parking constraints and the facilities are too limited in scope to deal with a sizable increase in the local population

Schools – My objections relate to the following;
• A lack of state primary school places in the village. The Raleigh school which serves both East and West Horsley is full every year
• Secondary school places are limited in number at the Howard of Effingham School and other secondary schools are a greater travelling distance from the village. Any rise in population will severely impact issues like road traffic
• Glenesk and Crammore are both private schools. However the fees would be well beyond the means of many of the new homeowners putting additional pressure on schools like the Raleigh

Medical
• I object strongly that the only Doctors Medical Practice that serves all of East and West Horsley plus areas beyond the villages will be placed under even more pressure. It is always extremely busy and appointments difficulty to get

Transport – My objections in this regard surround the limited transport infrastructure
• Horsley station - parking at this station is limited and often full on a weekday. An increase in village population will increase pressure on station parking and traffic movement to / from Horsley station. There is no land available for more parking
• West Horsley’s bus service through the village is extremely limited.
• The bus service operating from Guildford to Leatherhead travels along the A246 at the southern end of the village and really is only of use to residents living within a maximum of 8 to 10 minutes walk from the bus stops at the Bell & Colvill roundabout

Of significant concern to me is how much further land would the village have to sacrifice in terms of new road layouts, additional parking spaces and enlarged facilities such as schools, shops, medical facilities to cater for this population growth?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/2886  Respondent: 8806273 / Peter Leonard  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley South

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I wish to express my objections to the Local Plan Strategy document specifically in relation to the removal of the Horsleys from the Green Belt and the proposal to build up to 593 houses in the two villages over a five-year period.

Exclusion from the Green Belt – In objecting to this proposal in relation to West Horsley (and the other villages similarly threatened in Surrey), I do not believe that the Council in its strategy document has demonstrated that there are exceptional circumstances as defined by the National Planning Policy Framework (NPPF) to justify these changes to the Green Belt boundaries.

I believe that the removing of West Horsley from the Green Belt is challengeable for each of the 5 legal purposes of the Green Belt. These are;

• To check the unrestricted sprawl of large built up areas
• To prevent neighboring towns merging into one another
• To assist in safeguarding the countryside from encroachment
• To preserve the setting and special character of historic towns
• To assist in urban regeneration by encouraging the recycling of derelict and other urban land.

Increasing the size of the village by over 35% in 5 years can only be seen as a significant encroachment on the countryside as well as increasing urban sprawl. Most of all, such a large number of new-build houses will destroy the setting and special character of this village.

Note: Meeting unmet housing needs cannot legally be considered to be an exceptional circumstance. Furthermore, the justification that forms the basis for this change appears to be at odds with the Guildford Borough Economic Strategy 2013-2031 where no case was made for large-scale development in either West or East Horsley.

Housing number calculation and methodology - I object to the fact that I am unable to review the mathematical model used by the council’s consultants to arrive at the high number of houses proposed for the Horsleys. It cannot be acceptable for this to remain confidential.

Infrastructure – My objections relate to the fact that the council has failed to demonstrate in its Plan how it plans to deal with infrastructure issues especially as it plans to have 593 houses erected in the Horsleys in a five-year period. Of concern is that;

1. There is no Strategic Environmental Assessment included
2. There is no sustainability assessment presented for any of the sites
3. There is no infrastructure document present.

Therefore there is no account as how the council plans to deal with issues such as;
• Road and Transportation – Traffic generation from the proposed new housing would be considerable and the present narrow lanes and roads would need major redevelopment. This would be compounded by the limited public transportation in West Horsley with a bus service through the village. Horsley station and surrounding roads would also see a significant increase in traffic movement. It has a difficult access and parking is limited and often full on a weekday. There is no scope to increase parking.
• Drainage and sewage – Road drainage and winter flooding are continued concerns for the village. Increased runoff from the additional housing will add to the problem especially as some of the sites are prone to flooding in any event. Sewage systems will need major rebuilding and there is no supporting documentation explaining how such infrastructure will cope in the future.
• Schools – There is a lack of capacity at local state schooling at both primary (The
Raleigh) and secondary (The Howard of Effingham School) level. With no increased capacity in the Local Plan, there will be a need for families to travel greater distances from the village. This will further impact road traffic and road infrastructure. Additionally the Glenesk and Cranmore schools are already well supported by families living in Guildford and other villages and result in significant traffic problems at each at the end of the school day on Ockham Road North and the A246 respectively.

• Medical – Currently there is severe pressure on the only Medical Practice serving East and West Horsley plus areas beyond the villages. It would not be able to cope with such a large population especially within the timeframe envisaged.
• Village facilities – Using the description that the shopping parade in East Horsley is a “Rural District Centre” to support the Council’s justification for locating large numbers of housing is totally inaccurate. The range and size of the shops is limited and the parade experiences severe parking constraints. The single small shop at the southern end of West Horsley would not be able to support the additional housing at the Bell& Colvill site. Parking can only cope with 5 cars at a time.

Note - The impact of 2000 houses proposed for the old Wisley airfield at Ockham on the broader Horsley infrastructure will be equally as dramatic as it is only 2 miles away.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Exclusion from the Green Belt – My objection to this proposal is that the case for the removal of the Horsleys from the Green Belt is not substantiated in the strategy document. Specifically, the National Planning Policy Framework (NPPF) requires any change of Green Belt boundaries to demonstrate exceptional circumstances. Unmet housing need is NOT an exceptional circumstance in law. Furthermore, the justification that forms the basis for this change appears to be at odds with the Guildford Borough Economic Strategy 2013-2031 where no case was made for large-scale development in either West or East Horsley.

The scale of proposed development growth plan will do significant damage to the character of the village by extending urban sprawl. This is doing exactly what the Green Belt sets out to protect the countryside from. The environmental impact to the surrounding Green Belt will be significantly increased by this proposal.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<tr>
<th>Comment ID: PSLPA16/730</th>
<th>Respondent: 8806305 / Laurence Cook</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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</table>
2. Sites in East and West Horsley

I OBJECT in particular to including Sites A36-41 (East and West Horsley). This is a back-door way to create a mega-village – essentially, a soulless new dormitory town.

Whatever their merits as development sites, the 6 Horsley sites should not be considered individually but for their cumulative impact on the contiguous villages of East and West Horsley.

Building 533 new houses on these 6 sites, plus at least another 90 on small sites is (a) excessive in absolute terms and (b) disproportionate relative to the rest of the borough. It will destroy the rural character of these communities.

Under the plan, rural West Horsley will take 35% of new homes, urban Ash and Tongham 16% and Guildford urban area only 11%. The total number of homes in West Horsley will increase by 35%, which is disproportionate when measured against the overall increase in housing across the borough and particularly in Guildford town. If the Council have justifiable reasons to transform a particular community so radically, the plan should present a case rather than putting forward site proposals as a fait accompli.

These sites will put unsustainable strain on local facilities and infrastructure, including public transport, parking, schooling, medical facilities, sewage, surface drainage and shops. For instance:

- Thames Water have advised the Council that the current wastewater network will not cope and that the foul drainage system all the way to the treatment works North of Ripley will need to be upgraded.
- Guildford Council’s Education Review says “expansion options may need to be considered for primary” education in the Horsley area within the first 5 years of the plan, but Surrey County Council have no plans to do so. The Raleigh School is already full. The private Glenesk and Cranmore schools are also at or near to full capacity. The suggestion that schools in Ripley can be used contradicts the plan’s stated intention to reduce traffic on the A3 and strategic aim that primary schools should be within walking distance.
- The plan’s Infrastructure Schedule (Appendix C) imagines an “East Horsley and West Horsley traffic management and environmental improvement scheme between 2019 and 2023 by Surrey CC” but gives no details. This scheme is just wishful thinking. The proposed housing can only harm the local environment, not “improve” it.

The density of new housing on the 6 Horsley sites is inappropriate, being greater than anywhere in the locality at present.

Sites situated on the periphery of existing development in the Horsleys encroach on surrounding open fields and require the extension of settlement boundaries for which the plan presents no arguments. Contrary to NPPF paragraph 79, this will contribute to creeping urbanisation by attenuating the Green Belt corridors separating the Horsleys from neighbouring settlements.

Collectively, these 6 sites militate against NPPF paragraph 81’s encouragement of access to the Green Belt and its amenity and recreation value. This has been a success story in the Horsleys, with the creation of an amenity wood and community garden, the purchase of adjacent fields (on the eastern side of Ockham Road North) by local residents in order to preserve their open aspect, well-maintained pitches for local football and cricket clubs, public tennis courts, open space for a high-quality campsite (at Waterloo Farm) used by many foreign tourists and the approval of plans for a “Theatre in the Woods” – making West Horsley the only village in Surrey with an opera house. The open nature of West Horsley determined that a long portion of the 2012 Olympic cycle races passed through the village. This route has since been adopted by cyclists as a permanent asset, including the annual Prudential cycle race. These and future examples of “positive planning” depend on protecting the Green Belt to maintain the openness and attractiveness of the local landscape and avoiding the urbanisation and traffic congestion that Sites A36-41 will bring.
By surrounding Waterloo Farm campsite with 120 new houses, Policy A40 on land to the North of West Horsley will make this rural tourism amenity unviable. This may accord with developers’ plans, since the site would then be vulnerable to infilling with yet more housing.

Site A40 is subject to an unacceptable flood risk from a combination of a high groundwater table and the lack of surface water run-off. This is flat, clay land on the downhill side of the Horsleys where floodwater from new development will accumulate and back up onto existing properties nearby. I can provide photographs proving how badly these fields already flood at present. These problems will only get worse with the increase in extreme weather events associated with climate change. The “appropriate mitigation” suggested in Policy A40 exists only as an abstract notion. It should not overrule the need for Green Belt “exceptional circumstances”.

Policy A40 underestimates the problems of safe access and egress. Firstly, Ockham Road North was closed for several weeks in 2014 because of flooding, and still floods regularly. Secondly, access problems are not confined to flooding and are not addressed by the proposal to extend the existing 30mph zone past the site entrance. Repeated attempts made by Ockham Road North residents to extend this zone have been turned down by the local authorities, Highways England and Surrey Police, even though data collected in 2015 show that traffic has doubled over the last 15 years and that the average speed in the 40mph section of this road is 52mph, with maximum recorded speeds of over 80mph. No traffic calming measures have so far been achieved. Additional housing will add to several hazards along this stretch of road, including:

- Its use by pedestrians, especially children (using the Raleigh and Glensk schools and catching school buses to Guildford and Howard of Effingham), pensioners living in the string of bungalows at the northern end of the road, and visitors from the Waterloo campsite who are unfamiliar with the area.
- The existence of a narrow footpath on only one side of the road in any one spot. The layout means that walking half a mile between Green Land and East Lane requires crossing the road twice.
- The road’s increasing use by recreational cyclists (see above).
- Its winding nature, poor sight lines (especially when interrupted by summer vegetation) and dangerous, concealed driveways. Most of these were built in the 1930s. Some have been widened but many are too narrow for modern traffic. Since a deep ditch runs along most of the road, vehicles have to swing out dangerously when entering or leaving.
- The prospect of additional traffic, including 19,000 HGV movements (90 a day over a long period) if Surrey County Council approves the Drift Golf Course’s planning application to re-landscape its site using bulk waste transported from London.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID:</th>
<th>PSLPS16/1186</th>
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<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy A35</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

3. Three Farms Meadow site

I OBJECT to the re-inclusion in the plan of Policy A35 (land at Three Farms Meadow, alias the former Wisley airfield, Ockham). Following a huge public outcry, Guildford Planning Committee have unanimously rejected a recent planning application for precisely this development on 14 separate grounds. This deceived many residents into thinking that it has...
been defeated. Scandalously, the site had been reinserted into the new draft local plan published just 24 hours before the planning decision – a clear signal to the developers to try again.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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POLICY D4 - Development in urban areas and inset villages

I OBJECT. This does not address any of the obvious practical issues already touched on above:

- The plan envisages that 40% of homes built will be “affordable”, but this does not provide any accommodation for low-paid workers, for example, those on the minimum wage, who cannot afford to buy so-called “affordable” homes or pay an “affordable” rent. There is a need for some expansion in social housing, especially in urban areas, where there is a greater concentration of low-paid workers such as those employed in the retail, warehousing and distribution sectors (all of which this plan aspires to expand).
- The number of homes planned in the urban area is too low. There is a glaring need for regeneration in many urban areas, but this is ignored in favour building homes on green-field sites instead. This will not address urban housing needs. It is also unsustainable, since building outside the town does disproportionate harm to road traffic, air quality and overstretched infrastructure.
- The plan envisages a large expansion of the traditional “bricks and mortar” retail sector, but this is a sector in rapid and continuous decline.
- All the stated policy aims for “inset” villages will be negated by the excessive weight of new housing development proposed which would radically change their character forever. Against this disruptive background, it is barely relevant to talk about preserving views!

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
POLICY E1 - Meeting employment needs

I OBJECT because:

- The evidence base is unreliable;
- There is unclear differentiation between B class uses;
- Only high value-added business uses, contributing to a modern “knowledge economy”, are desirable, not low-grade, low-employment warehousing which is also land hungry;
- Industrial and commercial businesses must be concentrated in the urban area or existing business parks (e.g. Slyfield) not in the rural environment which the infrastructure is unable to support;
- The rural environment must support micro- or high-tech businesses, agricultural industries, and tourism, and these sectors must not be damaged by general industrial development which is inappropriate.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: PSLPP16/2360</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E2</td>
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POLICY E2 - Location for new employment floor space

I OBJECT. It would be more sensible to confine all new office and research and development (use Class B1a and B1b) floor space to Guildford town centre. I oppose the policy of expanding the Research Park onto Blackwell Farm. No exceptional circumstances, as defined under the NPPF, have been advanced to justify incursion into this permanent and high-quality area of Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: PSLPP16/2361</th>
<th>Respondent: 8806305 / Laurence Cook</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E3</td>
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POLICY E3 - Maintaining employment capacity and improving employment floor space

I OBJECT. The policy of resisting change of use from B1a to residential flies in the face of positive property market solutions for the regeneration of brownfield land and is contrary to national Government policy, recently reconfirmed, which permits changes of use from B1a (offices) to C3 (residential).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: PSLPP16/2362  Respondent: 8806305 / Laurence Cook  Agent:</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E4</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY E4 - Surrey Research Park

I OBJECT. The Council are required by the NPPF to facilitate commercial science and technology clusters. But, as with Policies H1 and E2 above, this policy seems to be dictated more by the ambitions of Surrey University than the public interest. In an extremely tangled sentence, it says that the Research Park will be “protected for business use… in any science… that is complementary to the activities of the University of Surrey.”

This fails to distinguish adequately between the University’s public role as a state-funded, academic institution and its private, financial interest in profit-making business spin-offs. It ignores enterprises that might be commercial rivals of the University. And it fails to consider the public harm done by turning the Research Park into a larger Business Park, such as the loss of Green Belt social and environmental capital.

B1b should be the primary use class for the Research Park and applications for B1a should be resisted given the danger of diluting the core purpose and reputation of the park. The inclusion of B1c uses is inappropriate and unnecessary.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E5</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
POLICY E5 - Rural economy

I OBJECT. Use of rural areas for town centre uses without applying the sequential approach is against the principles of localism that require local people to be consulted and heeded, not ignored. Villages need protecting in terms of both design and scale.

Most of the economic activities listed in 4.4.44 depend on maintaining the rural character of our villages which would be endangered by the wholesale “insetting”, boundary expansion and house building proposed in other parts of the plan. This applies also to new and projected enterprises in the Green Belt (e.g. Grange Park Opera’s Theatre in the Woods in West Horsley, which requires a protected, rustic setting to be a success, not housing estates and congested roads). Policy E5 is incompatible with the high housing numbers proposed.

Previous commitments to improved high-speed broadband and mobile phone coverage have now been diluted, despite general support. This disregards the responses from the 2014 public consultation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2364  Respondent: 8806305 / Laurence Cook  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E8

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY E8 - District centres

I OBJECT to the proposal that sites “on the edge” of District Centres should be considered for retail developments. This is another Trojan horse policy, allowing retail hubs to be vastly expanded in order to smooth the way for vast new housing estates outside in the countryside (e.g. to meet the “everyday shopping and service needs” of the roughly 1,500 people living in the 600 new homes planned for the Horsleys).

This is a case of back-to-front priorities. Expanded local retail hubs are being proposed in order to justify more housebuilding in the villages, and in a forlorn attempt to mitigate the serious traffic and infrastructure problems this will bring. The Council have no business preparing the way for new supermarkets in the Green Belt. Rural retail capacity should be left to local demand.

The policy proposes not a single measure to support existing rural shops and services that are the lifeblood of village communities, e.g. using business rates and other levers at the Council’s disposal.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2365  Respondent: 8806305 / Laurence Cook  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E9
Do you consider this section of the document complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY E9 - Local centres

I OBJECT (for the reasons given under Policy E8 above) to the proposal for retail development adjacent to the 6 rural centres, and sites on the edge of designated centres. This is creeping urbanisation, damaging to the Green Belt and to Guildford town revival as a thriving urban hub. It will contribute to local urban decay and depopulation, just as expansion of the suburbs did to mid-20th century London.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2352  Respondent: 8806305 / Laurence Cook  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY H1 – Homes for all

I OBJECT. Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan period. It fails to set any rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions.

The housing mix is based on out-of-date, pre-Brexit projections and on assumptions set out in a flawed SHMA that has not been scrutinised or evaluated.

I support higher density development in the urban area, without resorting to de-humanising, high-rise buildings that developers commonly claim are necessary for financial viability. Much of Guildford town could usefully be regenerated with 4-5 storey blocks with landscaping and underground parking, as often seen on the Continent and, recently, in London.

Student accommodation should be provided for 100% of new students and more than 60% of existing students, which would free up ideal family accommodation in the urban area. Other university cities (e.g. Oxford) insist on higher percentages than those proposed in the plan. In my view, the Council’s timidity is a case of “regulatory capture” by Surrey University, which has failed to use its existing planning permissions (dating from 2004) to accommodate 3,000 students or to improve the efficient development of its campus (e.g. by building on its extensive and underused surface car parks). If all students were accommodated in this way, 2,000 homes would be freed up in town and there would be no need to build on the Hog’s Back.

Guildford borough already has a higher proportion of traveller sites than most comparable boroughs. Overprovision is inappropriate given other constraints.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
POLICY H2 – Affordable homes

I OBJECT. “Affordable” homes, under national definitions, means homes that are sold or rented at 80% of market value. Even if 70% of these are rented as proposed, the level of market prices in the South-East means (even post-Brexit) that these homes will remain well beyond most people’s means and that starter homes will not become available for local people.

In addition, the viability clause (4.2.40) means that in practice the policy could be unenforceable. Private financial viability has no place in a public policy and should be removed. It is a get-out-of-jail-free card for developers that will sacrifice countryside for no local benefit.

I question the assumptions that seem to underlie this policy: that people have a right (rather than a legitimate aspiration) to own a home; that they should be encouraged to live locally (contradicting the Government’s policy of encouraging labour mobility and development in poorer regions, where homes are cheaper anyway); that increasing local house-building will reduce overcrowding and congestion (rather than simply suck more people into the borough); and that it will stem the rise in house prices (even though 13,860 new homes will be a drop in the ocean, given that prices are determined by an infinite demand-pull from London, whose population is increasing by 100,000 a year, and by the currently low cost of capital for overseas and other buyers). The weak mechanisms proposed in the plan might influence the market in a more remote part of the UK, but not here.

This policy’s version of “affordability” is just a smokescreen for pushing through more development generally.

Building more homes in Guildford cannot increase real affordability given the overhang of the London market.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
POLICY H3 – Rural Exception Homes

I OBJECT. This is a Trojan horse policy. It says that homes can be built anywhere near a settlement of any form (including agricultural land and the AONB). These homes are meant for people with a village connection, but they could be for anyone on the Guildford borough housing list. To make the housing viable, or to improve the “mix”, this can include “market” housing – i.e. normal commercial development which in Guildford usually means large executive homes. This policy means building anywhere, and ignoring all historic planning restrictions.

The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove “exceptional circumstances.”

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY I1 - Infrastructure and delivery

I OBJECT. Most of the borough’s infrastructure is antiquated, congested and straining to accommodate even current needs and organic growth. Yet this plan’s commitment to building housing estates across the Guildford countryside will mean either major infrastructure investment that no-one is prepared to pay for or else a catastrophic and simultaneous collapse in transport, educational, medical, energy, water and communications services.

The plan targets greenfield sites – requiring heavy infrastructure investment – in order to generate CIL income necessary to meet an infrastructure shortfall that is already serious. This is not sensible. The current draft CIL scale also encourages development on greenfield sites rather than brownfield.

The policy wording says nothing about roads and traffic. The Council’s methodology for assessing infrastructure needs in this area is inadequate, identifying only the tip of an iceberg of existing congestion. The schemes referred to in this policy will not solve existing congestion and the local road network has not been given sufficient consideration. Some proposed development locations would require highway schemes that involve demolishing property and road-widening in residential areas to solve the resultant congestion. The A3 improvements are not guaranteed to take place but they are being used to justify removing large areas from the Green Belt before detailed traffic assessments have taken place. These detailed investigations are being deferred until the planning application stage and will be left to developers to prepare. If a site then proves to be unsustainable its Green Belt protection will have been lost for no reason and unsuitable development will take place by a more insidious process.
Adequate infrastructure provision is a pre-condition of sustainable development. But in this plan it is an afterthought buried away in Policy I1. By prioritising greenfield over urban, brownfield regeneration, the plan creates insurmountable (and unnecessary) obstacles for itself. Common sense suggests a local plan should first assess the borough’s infrastructure capacity for sustainable development, and then tailor development accordingly. This plan, however, assumes infrastructure will follow on the heels of housebuilding as if by magic. It makes implementation critically dependent on providers outside the Council’s control and on the vagaries of CIL income. Instead of recognising this as a key issue, the plan is based on a wing and a prayer.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2368   Respondent: 8806305 / Laurence Cook   Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY I2 - Supporting the Department of Transport’s “Road Investment Strategy”

I OBJECT. This policy is too vague and optimistic. Decisions by Highways England on improving the strategic road network (the M25 and A3) are still years off. The Council have suggested a very expensive tunnel under Guildford, but this is no more than a dream. Even if Highways England accepted this (which is highly unlikely in the post-Brexit public spending climate) it would not be built until the end of the plan period at the earliest. Other, less expensive A3 improvements, and changes to the Junction 10/Heathrow stretch of the M25, will also take years to agree and complete.

The draft plan, however, commits to building massive housing estates in the countryside before any of these road improvements are in place. This is foolhardy. Surrey is the most congested county in England, with 683 people per square kilometre, compared with an English average of 413. This policy will lead to massive traffic disruption during the construction phase and will add permanently to an already congested network (about 3,000 private cars from the 2,100 new homes at Wisley Airfield alone). This is a major development constraint that should have been applied to the OAN before this consultation, and not left up in the air.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2369   Respondent: 8806305 / Laurence Cook   Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
POLICY 13 - Sustainable transport for new developments

I OBJECT. This is another vaguely aspirational policy, based on wishful thinking and not grounded in the practical realities of daily life. It consists of a standard, box-ticking list of local government measures unrelated to the specifics of the plan. Like infrastructure, transport appears to be an afterthought; the policy fails in its essential job of guiding planning decisions, since it assumes development of any kind can be supported by sustainable transport.

The sustainability of the dormitory settlements which the Council want built across the countryside depends on a general “modal shift” from private car use to walking, cycling and public transport. This is unrealistic. The proposed sites are often miles away from the nearest railway station. Bus services even in the largest villages are almost non-existent – just one bus to and from Guildford each day in the Horsleys and none at weekends. Since bus services depend on profitability, they cannot be expanded and the Council are not proposing to subsidise new ones. Rural buses are too slow anyway for busy people. Most rural roads in the borough are narrow, winding, hilly, potholed, muddy and unlit. Many flood badly and have no footpaths.

The desired modal shift would require a comprehensive co-ordination of bus and train timetables with services every few minutes, seven days a week, to stops within walking distance of every home in the borough. This kind of integrated public transport system has been achieved in Switzerland, for instance, but only at huge public cost and thanks to a political consensus supporting state ownership of trains, buses and the post office, which delivers rural passengers as well as mail. There is absolutely no chance of this in the UK.

The vast majority of the borough’s residents are not, in practice, able to cycle. This includes children, the elderly, commuters who have to look smart, the infirm, the unfit and people carrying goods or shopping of any kind. Dependence on walking and cycling discriminates against these groups, which include some of the most vulnerable members of the community. It is socially unjust.

One in two working people in Guildford commute for up to 3 hours a day. They will not leave their cars for even part of their journey if it means longer travel times.

Park-and-rides are a welcome part of the transport mix but are too slow for commuters and others on a tight schedule. Well-off pensioners seem to be the main beneficiaries. For an adult couple going shopping it is still cheaper to park in town.

Forget about water buses. The Wey is too narrow and, with a river speed limit of 4mph, boats are too slow for anything but recreation. Except on the tideway, not even the Thames has such services.

The addition of two new stations appears attractive but will slow down train journeys, which are already slower than at any time since the 1930s. Knock-on effects on localities where the new stations are built have not been worked out or presented.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
POLICY P1 – Surrey Hills Area of Outstanding Natural Beauty

I OBJECT. This policy weakens existing protection when it should strengthen it. It is dependent on the Surrey Hills Management Plan. The latter welcomes housing development. Even major (undefined) development in the AONB would be permitted if exceptional (undefined) circumstances could be demonstrated.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2356  Respondent: 8806305 / Laurence Cook  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY P2 – Green Belt

I OBJECT. This policy states, “the general extent of the Green Belt has been retained.” This is a lie.

The policy wording is tepid in support of the Metropolitan Green Belt even though the latter forms 89% of the borough and should be the cornerstone of all local planning policy. It is precious beyond the short-term demands of the present Government’s policy or a 15-year local plan. As noted under Policy S1 above, it is a solemn legacy to future generations – an asset and amenity that belongs as much to Londoners and the whole nation as to the people who live in it. It is an inalienable public good. Once gone it is gone forever. It is not the Council’s to give away.

Policy P2 omits any assessment of the Green Belt’s value. The Green Belt is not just empty space but is an inhabited, working environment that safeguards a certain stock of natural capital. Building on it involves high opportunity costs, including an irreversible loss of:

• Agricultural production
• Rural leisure and tourism amenities
• Water catchment
• Flood control
• Biodiversity
• Natural heritage
• A carbon sink for air pollution
• Room for public facilities such as parks and burial grounds
• Profitable film locations (e.g. Shere)
• Future economic potential such as mineral extraction (even fracking)
• Natural beauty, landmarks, open space, rural views and sight lines
• Benefits to public health and wellbeing, physical and psychological (as well expressed in the NPPF)

As a matter of law, morality and national and local policy, these assets should be protected in perpetuity, but Policy P2 seeks to justify excessive development in supposedly protected areas. This is in breach of party manifesto commitments and contrary to previous responses to public consultations.

It is disreputable to argue, as the Council do, that the plan would involve the loss of “only” 1.6% of the borough’s Green Belt. In reality the figure is nearer 7% when insetting, infilling and settlement boundary extensions are included. More
importantly, there is no “acceptable” percentage (in the NPPF or anywhere else) of Green Belt that may be sold. No-one argues that we should sell 1.6% of the Crown jewels in order to build houses.

I am not opposed to appropriate development in the Green Belt and recently supported a major planning application in my own village. But I fail to see why a system of fair burden-sharing of new development cannot be applied to the borough’s existing settlements in proportion to their size. This alternative would minimise the strain on infrastructure and maximise the chances of retaining the character of each settlement through gradual growth. It is reasonable to ask urban Guildford, with $x$ times the population of semi-rural East Horsley for instance, to accommodate $x$ times the number of new homes over the plan period. Parish councils could be asked, and will no doubt be willing, to propose where their quota of houses should go. Most rural residents are reasonable people who, if not alienated by top-down planners, will support realistic numbers of new houses in their neighbourhoods. Unfortunately, this democratic, bottom-up approach has not been attempted.

Instead, while developers flip and land-bank urban sites as a financial speculation, this plan will dump most new development on greenfield sites where building costs are lower, covering the Green Belt with dozens of housing estates that few residents want. 8,086 new houses are planned for the Green Belt but only 1,135 for Guildford urban area. This is disruptive, socially inequitable and unnecessary. It will not only destroy countryside but will also delay and disincentivise much-needed urban regeneration. The remarkable revival and repopulation of central London shows that building dormitory satellite settlements is an out-of-date approach to planning.

I particularly protest at the “insetting” of 14 villages from the Green Belt, and at “infilling” 12 of the borough’s Green Belt villages. I am deeply disturbed that settlement boundaries are to be hugely extended in many villages and that infilling is also proposed outside the settlement boundaries of 11 further villages. Many Guildford villages are “leggy” in outline, reflecting the effect of ribbon development (often along just one side of existing roads) permitted between the Wars. It is all too easy to square off boundaries by including countryside bounded on only one or two sides by existing development, claiming it contributes nothing to the “openness” of the Green Belt, a term which neither the plan nor the NPPF defines. The NPPF’s other 4 tests of Green Belt status, including the prevention of urban sprawl, are ignored. Effectively, this policy makes all villages within the Green Belt vulnerable to large blocks of new development.

I believe this policy is based on a flawed Green Belt and Countryside Study that, according to one Conservative Councillor, was irregularly commissioned by Council officers without the authority of Councillors. To “inset” two thirds of the borough’s rural villages on the grounds that they no longer contribute to the purposes of the Green Belt is extreme and inherently implausible, given the borough’s location on the edge of Metropolitan London. I cannot see how such extensive areas fail to contribute to the purposes of the Green Belt under the NPPF, although they would quickly destroy them if the proposed “insetting” and boundary extensions go ahead. This policy is wildly disproportionate in terms of any foreseeable development need (especially post-Brexit) and has caused tidal waves of opposition from residents. It flies in the face of NPPF paragraph 17’s aim of “empowering local people to shape their surroundings” and other NPPF provisions.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

<table>
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<th>Comment ID: PSLPP16/2370</th>
<th>Respondent: 8806305 / Laurence Cook</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
SITES1. Green Belt sites

I OBJECT to the identification and allocation of sites in this plan without regard to Green Belt, infrastructure or other constraints. The plan says that “allocating these sites does not grant planning permission for development, however, it does identify the principle of development and uses.” This ignores the tens of thousands of detailed comments the Council have received about individual sites ever since the Issues and Options consultation in 2013. This amounts to a war of attrition by the Council in conjunction with developers, since many busy residents are sick and tired of repeating the same comments to deaf ears. The plan has hardly changed since the Council received 20,000 objections to its first draft plan in 2014. Some residents have concluded that commenting is a waste of time.

All Green Belt sites should be removed from the plan until “exceptional circumstances” for development are proven, as stipulated repeatedly in the NPPF. The Green Belt should trump short-term considerations such as perceived housing need, as case law has established.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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<th>Comment ID: PSLPP16/2357</th>
<th>Respondent: 8806305 / Laurence Cook</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

**POLICY P4 – Flood risk and water source protection zones**

I OBJECT. Urban development on existing hardstanding would not create additional flood risk, especially where there is scope for improved flood resistance measures to be included in the design. Sites such as the Arriva bus depot, on the River Wey bank, are potential high-value brownfield sites that would not be available for housing if this policy is implemented. It is not the footprint of existing buildings that should limit future development, but the extent of existing hardstanding. Tarmac and concrete do not act as functional floodplain, and some land with hard standing close to the river, within the town centre and within easy walking distance of the railway station, provides an excellent opportunity for real urban regeneration that could protect the surrounding countryside.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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<th>Comment ID: PSLPP16/2358</th>
<th>Respondent: 8806305 / Laurence Cook</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P5</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
POLICY P5 - Thames Basin Heath Special Protection Areas

I OBJECT. This policy is weak. The mitigation (cash compensation) offered for development in the special protection area is so small as to be meaningless.

SANG (Suitable Alternative Natural Greenspace) is not beneficial since the sites identified or targeted are already green space. This is just using agricultural or wooded land as recreation land in order to justify building on other green spaces nearby. There is no actual increase in open space or environmental protection; instead, it is a ploy designed to permit building on otherwise protected areas. SANG – in part used to prevent dogs and cats attacking nesting birds – must also ensure that it is not using land which is adjacent to the Special Protection Areas.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2350  Respondent: 8806305 / Laurence Cook  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY S1 – Presumption in favour of sustainable development

I OBJECT. The NPPF states that the presumption in favour of sustainable development “should be seen as a golden thread running through both plan-making and decision-taking.” Standing at the head of the draft plan, Policy S1 ought to set a clear framework. Instead, no definition of “sustainable development” is given. The policy also fails to set out any principles for applying sustainable development in practice to local planning decisions, which often have serious long-term impacts.

The promise “to secure development that secures the economic, social and environmental conditions in the area” omits to recognise that economic growth, social justice and environmental protection often conflict. It does not say how each element is to be weighted or conflicts resolved. As a practical guide to the tough choices Councillors will face, it is useless. Under this policy, any development will qualify as “sustainable”, thereby failing to apply the NPPF’s most important guideline.

The most gaping hole in Policy S1 is the Green Belt. As an inter-generational covenant (enshrined in primary legislation) to protect green areas in perpetuity, the Green Belt is a living example of sustainable development in practice. It is the envy of the world. Policy S1 should commit to uphold Green Belt boundaries and protections, setting at least one clear boundary to planning decisions. The plan’s contempt for Green Belt constraints is amply demonstrated in later policies.

The commitment to approve planning applications “wherever possible” and “without delay” reveals this draft plan’s pro-development bias. Countervailing references to sustainability are so vague that the NPPF presumption in favour of sustainable development becomes a presumption in favour of any development at all.

This policy also ignores, as if they are inconvenient constraints, most of the 12 Core Planning Principles set out in NPPF paragraph 17. In my view Policy S1 is a non-policy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I OBJECT. I have 5 objections to the proposal to build 13,860 new homes:

1. The number is based on pre-Brexit projections for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.

2. The number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half the people who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent districts of Rushmoor and Mole Valley, minutes from Guildford town, are outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere. Unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and is part of a far wider and more complex housing market.

3. These concerns have been raised since 2014 but the Council have failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so the housing numbers derived from it are unreliable. For instance, by juxtaposing Guilford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county (none in Mole Valley, for instance). This highly lopsided distribution is unexplained.

4. The figure of 13,860 new homes is unsubstantiated. It has not been scrutinised by Councillors despite repeated requests for debate. The assumptions and calculations underlying the model are hidden, protected by a claim to intellectual property by commercial sub-contractor used in preparing the SHMA. The Council say we should trust the contractors’ model because it is used by a large number of other local authorities. Wide usage, however, does not confer objectivity. Guildford’s OAN would fail the basic transparency test even if the methodology used were a universally admired ‘gold standard’. But it is not: it belongs to consultants whose website openly proclaim their pro-development agenda, provoking reasonable suspicion that the figures are inflated. External experts and members of the public have provided detailed critiques of the model. Its most fatal flaw, however, is that it has not been disclosed – not even to the authors of the plan, who have taken it on trust. This is irrational and unsound.

5. The status of the 13,860 figure is ambiguous. The plan fails to set a Housing Target of new homes to be built, or explain how this relates to the “Objectively Assessed Number” (OAN) for housing need. Elsewhere, the Council have said that the two are identical because the OAN is “deliverable” and is by definition objective and cannot be contradicted, but in the same breath say that infrastructure or other constraints may in due course affect deliverability. Despite the NPPF, the plan fails to address these constraints. In any case, the number of homes proposed, plus existing planning permission, plus expected “windfall” sites, exceeds the total of 13,860. So how many homes (taking account of these adjustments) do the Council want built? The plan does not say. Without this figure it is hard to see how can anything else be planned. This undermines the validity of the whole consultation. It is unreasonable to ask the public to approve a “plan” that fails to propose a Housing Target that takes normal constraints and adjustments credibly into account, and which leaves the Council to set one at any level without further consultation. Even if the OAN were not flawed, it is at best only a baseline figure and should not be passed off as a policy proposal.
It is irrational to embark on a radical transformation of the borough without a clear Housing Target. Most of Guildford borough is theoretically protected from development (89% Green Belt, 44% AONB and about 75% protected by SPA). Whether or not increasing the existing number of dwellings by up to a quarter is desirable, it would be a major and irreversible change, arguably turning a largely rural borough into a mainly urban or suburban one like Woking. The scale of the housing number increases the onus for it to be seen to be sound. A substantially lower number, on the other hand, would remove the need to build on Green Belt or open countryside, and instantly meet the single biggest public objection to the plan as a whole.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPA16/308  **Respondent:** 8806369 / Alasdair Macmillan  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

**Proposed Submission Local Plan: Strategies and Sites 2016 – West Horsley**

- I am writing to express my very strong objections to the proposals set out for West Horsley.

First; I object to the proposal to remove any part of the village from the Green Belt.

Second; I object because the sum of all the proposals is seriously out of proportion (adding nearly 40% to the village) and will put all local amenities and infrastructure under severe pressure.

Proposals A37 to A 41 taken together would increase the number of houses in the village by nearly 50% and would alter its rural nature. The average proposed density is about 7 houses per acre which is a suburban, rather than a rural, density.

There is very limited employment in the village and the road and rail routes to employment elsewhere are already reaching capacity.

The same is true of the schools provision and the plan does not appear to include land for any new school.

Parking facilities are already inadequate. Extra demand will swamp them and lead to unwelcome, unruly and obstructive parking on the local roads and streets which will further amplify our traffic problems and sour community relations.

Is there an ‘objectively assessed’ need for so much development? Does it define the types and quantities of housing needed?

Other proposed local developments – there are major schemes proposed in Wisley, Effingham and Bookham and these are all likely to add significant extra through traffic to our already crowded roads and parking facilities.

The traffic implications of these proposals are clear - and they are clearly unacceptable.
Site A40 is remote from most village amenities and most residents will use a car to reach them – so this development would probably add another 500 – 1000 daily vehicle movements on and off busy Ockham Road North at the inadequate Green Lane junction.

Sites A38 and A41. These two sites, in particular, will seriously impact the rural nature of the village. They are also remote from most village amenities and most residents will use a car to reach them – so this development would probably add another 1000 – 2000 daily vehicle movements on and off East Lane. Much of this will use the junction with Ockham Road North. Currently traffic at this difficult junction can approach 1000 vehicle movements per hour in rush hour – and at this level it is already fully loaded and queuing occurs.

Site A39 has the advantage of proximity to shops, station and surgery but 100 new houses are still likely to generate several hundred daily vehicle movements to and from Ockham Road North – access presumably being close to the railway bridge. This is a hazardous location, particularly at rush hour, when there is a high volume of fast moving two way traffic on this relatively narrow road.

Walking from here is also hazardous because;

1. the footway is narrow and fast moving north bound traffic is often running within a few inches of the kerb line. Pedestrians have been struck by passing vehicles!
2. On wet days the road acts as an extra storm water drain and pedestrians are liable to drenching spray from vehicles passing very close to them.

A public footway running north from this development and away from Ockham Road North and through Weston Lea to East Lane and the Raleigh and Glenesk primary schools would be welcomed by many.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp173/247  Respondent: 8806369 / Alasdair Macmillan  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Appendix H: Maps - West Horsley North

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I have strong objections as follows;

• ONS predictions suggest that the proposed degree of expansion is not necessary

• The proposed number of houses to be constructed to the east of Guildford has gone up significantly since the 2016 proposal. There are also possible developments in Effingham, the Bookham area of Mole Valley DC, and at Wisley and taken together these will overload all local roads and other infrastructure.

• There is no proposed change since the 2016 Consultation to insetting East and West Horsley from the green belt. This is very unpopular and likely to change the character of the area.

• The concentration of new houses proposed for West Horsley will create significant extra traffic on East Lane and Ockham Road North. These roads are already overloaded at some times of day and walking or cycling along them is often hazardous.

• The concentration of new houses proposed for West Horsley will overload other local infrastructure – particularly schooling and the Medical Practice.
I feel that these proposals could change the character of West Horsley from rural to suburban and I object strongly to that.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/758  Respondent: 8806433 / Fiona Tyler  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Shalford (south)

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The fields behind Shalford Village Hall should be retained within the existing Green Belt Boundary and be kept outside the village settlement boundary. There is no valid reason for change. The land helps to contribute to the open nature of the village, providing an attractive setting for the community buildings. Importantly Chinthurst Lane is already congested and this rural lane would provide access to this land.

I strongly object to this proposed development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/297  Respondent: 8806497 / Sandra Macmillan  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

This letter states my strong objections to the proposals set out for West Horsley.

First; I object to the proposal to remove any part of the village from the Green Belt.

Second; I object because the proposals together add nearly 40% to the number of dwellings in the village. This will overload all local amenities and infrastructure.

Proposal A39 on the fringe of West Horsley impacts further on these resources. Taken overall these proposals show a housing density of 7 per acre which is suburban and would alter the rural nature of the village.
Road and rail routes are already reaching capacity during busy times! These proposals could add several thousand further daily vehicle movements within the village.

Parking facilities are already inadequate. Extra demand will overload them and lead to unwellcome, unruly and obstructive parking on the local roads and streets which will further amplify our traffic problems and sour community relations.

Local schools are fully subscribed and the plan does not appear to include land for any new school.

There are many other proposed local developments in East Horsley, Wisley, Effingham, Bookham and Ripley which are all likely to add significant load to our already crowded schools, roads, parking facilities and other amenities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

I have strong objections as follows;

- ONS predictions suggest that the proposed degree of expansion is not necessary

- The proposed number of houses to be constructed to the east of Guildford has gone up significantly since the 2016 proposal. There are also possible developments in Effingham, the Bookham area of Mole Valley DC, and at Wisley and taken together these will overload all local roads and other infrastructure.

- There is no proposed change since the 2016 Consultation to insetting East and West Horsley from the green belt. This is very unpopular and likely to change the character of the area.

- The concentration of new houses proposed for West Horsley will create significant extra traffic on East Lane and Ockham Road North. These roads are already overloaded at some times of day and walking or cycling along them is often hazardous.

- The concentration of new houses proposed for West Horsley will overload other local infrastructure – particularly schooling and the Medical Practice.

I feel that these proposals could change the character of West Horsley from rural to suburban and I object strongly to that.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( No )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the inclusion of many of the documents in this "Evidence Base".

In particular, I object to the inclusion of

The Green Belt and Countryside Study, which is subjective and exhibits examples of predetermination in its conclusions. It is a very shoddy piece of work

The SHMA which did not objectively research the housing market and reached a housing needs number which is grossly exaggerated because the authors demonstrated they did not have the skill required to properly assess the underlying factors behind the population growth numbers produced by the ONS

The Employment Land Needs Assessment 2015, especially for the unambitious targets for efficiency of land use and its selective use of statistics.

These poor quality of these reports (and probably others) no doubt has been influenced by the lack of continuity in producing the plan, with an extraordinarily rapid turnover of council officers and consultants associated with the production of the plan, coupled with the turnover of Councilors responsible for the plan - 3 in 3 years is a poor record. No doubt too that the consultants were responding to the council objective, which was declared to be "to roll back the Green Belt". There can be no doubt that this objective was made clear to consultants when they sat in meetings to plan the production of their reports.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/1258  Respondent: 8806849 / Roland McKinney  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A25

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( No )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Firstly, I want to pint out that this site is not in the Guildford urban area, it is a Green Belt site, as is Blackwell farm, which is also listed as being in Guildford's urban area. this is untrue.

Development on this site will cause great harm to the Green Belt, and as has been made clear, housing need alone does not permit Green Belt boundary changes.

There will also be an increase in road traffic associated with this development and an increase in air pollution. My attachment provides more details.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
I object to the choice of this site.

It is a green belt site, close to areas of AONB and GLV, and new roads would cut through these areas. This area should have been incorporated in its entirety into the AONB or at least into the AGLV. The views across this land down into Guildford Town and from Guildford centre to the AONB are among the most iconic in the borough. To destroy them would be municipal vandalism on an enormous scale. This site includes high quality agricultural land that should not be developed.

Building on this area would cause great harm to the green belt and this is considered in more detail in the attachment, as is sustainability.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents: Site objection.pdf (617 KB)
air pollution. As there is no AQMA on or near this site, as there should be, the legality of choosing this site is questionable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:  Site objection.pdf (617 KB)

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( No )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I wish to comment on this site, but please note my comments also apply to Sites A37, A39, A40 and A41.

These sites are all Green Belt sites and their development will cause great harm to the Green Belt. There are no special circumstances that outweigh the harm that will be done to the green belt. Thus this policy is not lawful.

This is covered in more detail in the attachment.

the development of this site (and A39, A40 and A41) will cause the merger of the villages of East Horsley and West Horsley. This is clearly the councils intention, as it seeks to inset these villages from the Green Belt, with a total of 363 ha (3.6 square kilometres) to be removed from the Green belt, with little regard given to the quality of the new proposed Green belt boundaries. These large housing developments will submerge the pattern of development in these villages as the housing density is much higher than housing already present, and the style will be little boxes, so loved by developers. The NPPF specifically states that one of the purposes of the Green Belt is to stop the merger of towns - but in fact this is a deliberate policy of GBC. There is a recognition of the need to prevent towns from merging, as this draft local plan includes a proposal to create new Green Belt around Ash Green village, to prevent it merging with Ash and Tongham. It is a remarkable contradiction that on the hand GBC seek to promote the merger of neighbouring villages, but on the other hand seek to prevent. In one case the policy to ensure the merger happens is to remove the villages from the green belt, with the addition of large numbers of new dwellings, but on the other hand, to create new green belt to halt housing development to prevent Ash Green village from merging with its neighbours. These different proposals are in the same plan - and the contradiction in them seems lost on the architects of the local plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:  Site objection.pdf (617 KB)

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( No )

Answer (if comment is on questions 1-7 of the questionnaire): ()
This site is in the Green Belt - developing it will cause great harm to the Green Belt. No special circumstances have been given for this development, other than the need for houses, which is not an adequate reason. This is covered in more detail in the attachment.

The sequential test has not been employed at this site and so its flood risk should prevent its development.

Nor is there any need for extra employment land. This is solely because AECOM, who produced the Employment Land Needs Assessment adopted an unambitious target for land use efficiency. This target was just to be the same as the national average. But because land in the borough is expensive and 89% of the borough is Green belt, there is a need for a much more ambitious land use efficiency, so land use efficiency is better than the best. This would eliminate the need for employment land on this site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:  
Site objection.pdf (617 KB)

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Comment ID: PSLPS16/1235  
Respondent: 8806849 / Roland McKinney  
Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A46

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( No )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to this site

Building on this site will result in the merger of the villages of Flexford and Normandy, which is contrary to the policies in paragraph 80 of the NPPF. Although the NPPF uses the words neighbouring towns, the aim is clear - and this is recognised by GBC in that they want to prevent the village of Ash Green merging with Ash and Tongham. How they then find it lawful to propose to deliberately merge Normandy and Flexford is confusing.

This inappropriate development will cause great harm to the green belt, and create more traffic and air pollution. these are covered in more detail in the attachment.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:  
Site objection.pdf (617 KB)

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Comment ID: PSLPP16/13476  
Respondent: 8806849 / Roland McKinney  
Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Submission Summary
There are effectively two separate parts to this policy, both are flawed, and in the case of insetting, fatally flawed. In the case of urban development there are numerous flaws, including:

- The plan envisages a large expansion of the traditional “bricks and mortar” retail sector, but this is a sector in long term decline, and so is not sustainable even in the medium term.
- The plan envisages that 40% of homes built will be affordable, but these will not provide appropriate accommodation for low paid workers, for example, those on the minimum wage, who cannot afford to buy “affordable” homes, nor can they pay so-called “affordable” rent. There is a great need for an expansion in social housing, especially in urban areas, where there is a greater concentration of low paid workers such as those employed in the retail, warehousing and distribution sectors.
- The number of homes planned in the urban area is too low – there is a need for regeneration in some areas of Guildford, but this is ignored and instead the plan concentrates on building homes on greenfield sites, which does not meet the needs for housing within the town, especially within the centre. This is not a sustainable policy as building outside the town has a disproportionate effect on road traffic. The analysis in Annexe 1 shows this to be the case when alternative methods of travel to work are analysed for two separate areas, one in the town centre and the second in a rural village.

In the case of insetting, the policy is fatally flawed, for three separate reasons.

- Firstly, it is based on an erroneous assumption. GBC justify the policy (in para 4.5.47) by suggesting, without any supporting data, that development in villages washed over by the green belt has been at a lower rate than within Guildford town. This was not the case, and statistics from the ONS censuses of 2001 and 2011 show that this assumption is incorrect. These statistics show that the growth rate in housing was higher in Effingham, a village washed over by the green belt, than in Merrow, which is not washed over by the green belt. In fact, the rate of increase in housing stock in Effingham was faster than the average for the borough.
- Secondly, insetting has been based on the Green Belt and Countryside Study, but the analysis in this document was flawed to the extent that it is valueless. It has serious flaws in its methodology, includes subjective judgements, and thus its conclusions are flawed - see Annexe 2 for detailed analysis These flaws are so serious that this study should be removed from the evidence base that supports the Local Plan.
- Finally, although a flawed justification was provided for the insetting of villages, this does not apply to all the areas selected for insetting, many of which are not “villages”, such as Pirbright Barracks. These sites are listed in the text below. No attempt has been made to justify the insetting of these sites, and in the absence of any justification they should remain in the Green Belt.

Urban development
There is a fundamental flaw in the draft Local Plan, in that there are not enough dwellings planned in urban areas, in particular, Guildford town centre. This is where the demand for affordable homes is most acute, a fact which is recognised in much of the draft Local Plan. Yet the plan then envisages that most dwellings will be built outside the urban area, so there is no continuity in the plan – if the demand for affordable homes is most acute within the town, then is where these dwellings should be built. There are sites available, for example, various sites in Woodbridge Meadows, Walnut Tree Close (including the area around the station) and North Street. Yet the focus in these areas is to provide a very limited number of dwellings, with the emphasis on additional retail space and more commercial premises. Given the profound changes in traditional retail, this is not a sustainable policy. There have been many examples of bankruptcies amongst traditional retailers, the most recent examples being BHS and Austin Reed, and previously Woolworths, Comet, etc. The British Retail Consortium forecast that by 2025 up to one third of those now employed in traditional retail could lose their jobs, due to a combination of factors. These included the continuation of the move to shopping via the internet and higher costs, from business rates and the introduction of the “living” wage. Recent figures show that online sales are still growing quickly, with more than 13% of total retail sales now made over the internet. Nor does an expansion in traditional retail chime with the objective of attracting highly paid jobs to the area – the majority of jobs in retail are low paid, and zero hours contracts are common. So any expansion in traditional bricks and mortar retail would create a greater demand for affordable and social housing – exactly the reverse of what is needed.

Even the major grocery retail chains have been affected by changes in retail habits – Tesco, Sainsbury’s, Morrisons, etc are closing some stores, with no major large stores planned. Banks and other financial institutions are still closing some branches, so changes in town centres still have some way to go – but none of these changes are recognised in the draft Local Plan, which envisages no limit to traditional retail.
There is another reason why the retail sector is unlikely to exhibit strong long term growth, and this is consumer debt, which has reached a level that the Bank of England has said could contribute to economic stability. This is likely to have a greater destabilising effect in the event of an economic downturn – and there will certainly be at least two of these during the life of the Local Plan. Consumer spending simply cannot be maintained indefinitely at its current rate, and to plan for a large increase is irresponsible.

Building the majority of homes outside urban areas is contrary to the advice of planners such as Lord Rogers, who has detailed the many advantages of increasing housing density in urban areas. The housing policy in this plan will result in a greater number of commuter journeys, creating more congestion, with an increase in air pollution across the borough. This is examined in detail in Annexe 1.

So there has to be a reappraisal of urban development plans, with more homes provided in urban areas, in particular in the centre of Guildford. As the council own many sites in the centre, these could be made available for development within the first 5 years of the plan, with mixed housing on these sites, including new social housing, which is sorely needed. Affordable housing is simply not affordable to anyone on the minimum wage, there is a need for a considerable expansion of social housing, a need that is not adequately recognised in the draft Local Plan.

In the detail of Policy D4, it is suggested that in urban areas and inset villages, planning permission will be granted provided that a proposed development:

- “Ensures that the layout, scale, form, massing, height of buildings and structures, and materials relate to the site context and its surroundings;” ..... There are several other criteria listed and the Policy then goes on to elaborate criteria specific to inset villages, as follows:
  - In addition to the above, proposals for new development within inset village areas will have particular regard to:
    - The distinctive settlement pattern of the village and the important relationship between the built development and the surrounding landscape;
    - Important views of the village from the surrounding landscape;
    - Views within the village of local landmarks.”

There are numerous development sites proposed that mean that the first criterion cannot be met, as the developments proposed do not relate to the scale, form or massing of the site surroundings. For example, the Horsleys. Here it is proposed that a total of 3.6 km² should be removed from the green belt, with a total of 533 houses proposed on sites in East and West Horsley on a total of 29.1 ha, an average density of 18 dwellings/ha. These proposed developments are not in scale or proportion to the existing villages, and the housing density is considerably higher than existing housing density. Effectively, if these developments were to proceed, East and West Horsley would merge and become a large urban area in the green belt, totally different in character to the existing villages, and the housing density pattern completely lost. Similar considerations apply to other proposed development sites, such as Flexford and Normandy. In this case, 1.3 km² would be removed from the green belt with a total of 1,100 dwellings proposed on 67 ha, an average density of 16.4 dwellings/ha. Again, the scale and form of new development would overwhelm existing hamlets and villages, merging these to form another urban area in the heart of the green belt, with no consideration of the views of the settlements from the surrounding countryside, much of which has been given AONB status.

Thus the words of the policy statement D4 do not match the proposals contained in the draft local plan. The “Reasoned Justification” for the policy consists of five paragraphs, 4.5.45 to 4.5.49. Of these, 4.5.45 and 4.5.46, 4.5.48 and 4.5.49 are not justifications for the policy, they are simply statements or further information. Paragraph 4.5.47 is the only attempted justification for this policy, but in fact this applies only to insetting. Paragraph 4.5.47 is factually wrong and so the justification for this policy does not bear close examination. Parts of this paragraph are taken in turn below, to show the inaccuracies this paragraph contains.

“Historically, development has been focused in the urban areas of Guildford, and Ash and Tongham only. Development in the villages has been very limited due to the Green Belt designation which previously washed over all but one of the villages.”

This depends on how development is measured. In terms of raw numbers, this may be true, but this would ignore the fact that urban area of Guildford town contains much of the housing in the borough. Taking the increase in housing stock between the censuses of 2001 and 2011 in specific wards reveals a much more complex picture. Effingham, for example, had a higher rate of adding dwellings than the average for the borough and some of Guildford’s urban wards. Using census data collected by the ONS, between 2001 and 2011, the number of dwellings in Effingham increased by 6.6%, whereas for
the borough as a whole it increased by 5.0%. Over the same period in Merrow, a ward within the urban area of Guildford, the number of dwellings increased by only 1.2%, whilst in Normandy ward the increase was 2.6%. This analysis has not been exhaustive, but it is sufficient to show that the opening statement in paragraph 4.5.47 is incorrect, and that in some cases, proportionally, considerable development has occurred in green belt villages. It should be incumbent on GBC to assess the facts before making inaccurate statements such as this. ONS statistics are open to all.

In the first three months of 2016, planning applications for 12 additional dwellings in Effingham have been made, in a village of approximately 525 dwellings. Although one of these applications has been reduced from 6 to 4 dwellings, another 5 have been approved which shows clearly that development within villages washed over by the green belt can occur, and that organic growth is possible. There is no necessity for insetting.

“Fifteen villages are now inset from the Green Belt meaning that development is no longer, by definition, considered inappropriate”.

Guildford’s Green Belt boundaries were established in the Guildford Borough Local Plan 1987, so are well established. There has not been any justification for the extensive green belt review that accompanies the insetting of villages, or for the removal of these villages from the green belt. According to the NPPF, paragraph 83, green belt boundary changes should be made only in exceptional circumstances, as follows:

“No exceptional circumstances have been demonstrated, with none given as justification in Policy D4 for the policy of insetting. Proposed green belt boundary changes are on a very large scale, as it is proposed to remove 14.4 km2 from the Green Belt, more than 6% of the existing area designated as green belt, and to create new green belt boundaries extending to more than 105 km. This is not a simple revision to the Green Belt, and a demonstration of exceptional circumstances is required for each and every change. This has not been done, not for a single proposed change.

Although Guildford Borough Council are in the process of producing a new Local Plan, this in itself is not enough to change Green Belt boundaries; the requirement to demonstrate exceptional circumstances still applies. According to a High Court judgement, Gallagher vs Solihull, issued March 30th, 2014, Case No. CO/17668/2013, there is still a requirement to prove exceptional circumstances – quotations below are from paragraph 125 of this judgement:

“However, it is not arguable that the mere process of preparing a new local plan could itself be regarded as an exceptional circumstance justifying an alteration to a Green Belt boundary. National guidance has always dealt with revisions of the Green Belt in the context of reviews of local plans…… and has always required “exceptional circumstances” to justify a revision. The NPPF makes no change to this.”

“Exceptional circumstances are required for any revision of the boundary, whether the proposal is to extend or diminish the Green Belt.”

Whilst each case is fact-sensitive and the question of whether circumstances are exceptional for these purposes requires an exercise of planning judgment, what is capable of amounting to exceptional circumstances is a matter of law, and a planner may err in law if he fails to adopt a lawful approach to exceptional circumstances. Once a Green Belt has been established and approved, it requires more than general planning concepts to justify an alteration.”

Each and every proposed change to the green belt boundary requires that exceptional circumstances be demonstrated, otherwise the changes are not lawful. This has not been done by GBC, not for any proposed change.

From paragraph 130 of this judgement:

“In other words, something must have occurred subsequent to the definition of the Green Belt boundary that justifies a change. The fact that, after the definition of the Green Belt boundary, the local authority or an inspector may form a different view on where the boundary should lie, however cogent that view on planning grounds, that cannot of itself constitute an exceptional circumstance which necessitates and therefore justifies a change.”

“…..That, in his judgment, may now be so: but that falls very far short of the stringent test for exceptional circumstances that any revision of the Green Belt boundary must satisfy. There is nothing in this case that suggests that any of the assumptions upon which the Green Belt boundary was set has proved unfounded, nor has anything occurred since the Green Belt boundary was set that might justify the redefinition of the boundary.”

No changes that would warrant an alteration to green belt boundaries have been demonstrated by GBC, their so called “sensitivity analysis” was shallow and subjective, and no changes that may have occurred since the boundary was established were discussed. The changes proposed do not meet the standards set in this judgement. Instead, GBC maintain that it is housing need that creates blanket exceptional circumstances for changes proposed to the green belt. However, this is not the case. Following a meeting with local councillors and MPs in early 2014, Nick Boles wrote to Anne Milton MP to
clarify the issue of exceptional circumstances and in this letter said:

“The written Ministerial Statement of 1 July 2013 set out the Government’s concern that some recent planning decisions have not accorded the Green Belt the level of protection that was the explicit policy intent of Ministers. It made clear that the single issue of unmet need – whether for conventional housing or for travellers sites – is unlikely to outweigh the harm to the Green Belt and other harm to constitute the “very special circumstances” justifying inappropriate development in the Green Belt.”

This was reaffirmed more recently in a letter from Brandon Lewis to all English MPs, dated 07/06/2016. In this letter, Brandon Lewis said

“The Government has put in place the strongest protection for the Green Belt. The Framework makes it clear than inappropriate development may be allowed only where very special circumstances exist, and that Green belt boundaries should be adjusted only where very special circumstances exist, through the Local Plan process and with the support of local people. We have been repeatedly clear that demand for housing alone will not change Green Belt boundaries.”

These quotations show that the insetting process has considerable hurdles to overcome, including as it does the revision to Green Belt boundaries that accompanies insetting. Thus the most important questions are – did the flawed Pegasus “Guildford Borough Green belt and Countryside Study” show unequivocally that villages to be inset are not open villages, making no or a minimal contribution to the openness of the Green Belt; and that there were exceptional circumstances (other than unmet housing need) that justify a change to the Green Belt, creating a new boundary around all these villages – more than 105 km of new boundary? The Pegasus study did not do this, and this was just one of its many flaws. Some of these flaws are discussed in detail in Annexe 2.

As shown above, development has occurred within villages, and the NPPF made it easier for additional development to take place within the green belt, via the provisions of paragraph 89, which specifically makes it easier for limited infill to occur and on a larger scale, for affordable housing to be built within villages washed over by the Green Belt. These provisions came into effect in 2012 when the NPPF was adopted and so the rate of increase in housing within villages is very likely to increase beyond that observed in the period between the 2001 and 2011 censuses.

It is clear from the most recent figures for planning applications to GBC in 2016 in Effingham that the pace of development within villages is changing, even with continued green belt protection. There is no requirement for insetting villages within the green belt, and a desire to increase development within the villages is not an adequate basis for changing green belt boundaries to permit insetting.

The final part of paragraph 4.5.47 is

“In accordance with national policy, the important character of these inset villages should instead be protected using other development management policies”.

This is not national policy, national planning policy is provided by the NPPF, and paragraph 86 of the NPPF is the relevant paragraph, which reads

“If it is necessary to prevent development in a village primarily because of the important contribution which the open character of the village makes to the openness of the Green Belt, the village should be included in the Green Belt. If, however, the character of the village needs to be protected for other reasons, other means should be used, such as conservation area or normal development management policies, and the village should be excluded from the Green Belt.”

There is thus no national policy that requires insetting. Instead, a judgement should be made for each village based on whether the village is open, and if it makes a contribution to the openness of the Green Belt. In fact, many of the villages proposed for insetting exhibit an open pattern of development, and make an important contribution to the openness of the green belt, for example, Effingham. This has not been considered, other than in the flawed Pegasus report, and the examination of their approach included in Annexe 2 reveals how this analysis was flawed. No further consideration has been given by GBC to insetting, and so GBC’s policy of wholesale insetting does not accord with a national policy, real or imagined, as claimed.

In itself, there are many issues with insetting, and these include:

- According to the draft Local Plan, insetting is based largely on the findings of the Pegasus study, “Guildford Borough Green Belt and Countryside Study. This report was very poor and various parts of the study criticised by many, including some borough councillors. It is perverse to continue with any recommendations of this study. In particular, a detailed review of this report for Effingham village showed that it was inaccurate and subjective. This review is attached as Annex 2.

- The settlement hierarchy was also subject to a detailed review and again this showed that scoring methods used were inaccurate and subjective.

- Proposed boundary changes are arbitrary, without an adequate detailed survey. There are no checks and balances to this, even though the positioning of the boundary line can change the price of an acre of land from about
£15,000 to over £1 million. There is no process to it, simply someone using a computer and a mouse – literally a mouse click can turn some land owners into millionaires. In some cases, the proposed boundary divides semi-detached houses, so that one is still inside the green belt and the other outside. In other cases, the boundary divides gardens, so that part of a garden is in, part out of the green belt. Due care and attention has not been given to producing proposed boundaries.

- In many cases, boundaries proposed do not comply with the requirements of the NPPF, which is given in the NPPF, paragraph 85, final bullet point, which states “define boundaries clearly, using physical features that are readily recognisable and likely to be permanent”. Given this NPPF definition, treelines, hedgerows, woodlands, etc should not be considered as potential Green Belt boundaries. In fact, in some cases proposed boundaries cross open fields, with no discernible features whatsoever. These are entirely inappropriate as a green belt boundary. The boundary proposed for Effingham village is reviewed in Annex 3.

It should also be noted that GBC implicitly recognise that insetting is likely to lead to more development within villages on sites that are not identified in the draft Local Plan. But there is no recognition of this in the housing target. As is noted, insetting would mean that the rate of windfall development would increase, but GBC have not provided a proper analysis of windfall development (such as that provided by Mole Valley District Council) and they have failed to recognise a higher rate of windfall development in showing how the housing target will be met – even though, via Policy D4, they are planning for it. Windfalls should be deducted from the housing target, and the need for additional sites would thus be substantially reduced. Windfall development should be properly assessed and identified within the housing target, with an appropriate increase in the rate of windfalls in any villages that are inset.

Although a flawed justification was provided for the insetting of villages, this does not apply to all the areas selected for insetting, many of which are not “villages”. Some of these are adjacent to an Area of Outstanding Natural beauty (AONB) and in at least one case some areas of AONB have been included in the inset area. These areas include:
- HM Prison, Ripley Road, Send
- Keogh Barracks
- Pirbright Barracks (small areas of AONB included in inset area)
- Pirbright Institute
- Henley Business Park
- Garlick Arch

No attempt has been made to justify the insetting of these sites. In the absence of any attempt at justification there is no reason to inset these areas.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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<tr>
<th>Comment ID: PSLPP16/15757</th>
<th>Respondent: 8806849 / Roland McKinney</th>
<th>Agent:</th>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D4</td>
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<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
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I OBJECT to this policy.

Submission Summary

There are effectively two separate parts to this policy, both are flawed, and in the case of insetting, fatally flawed. In the case of urban development there are numerous flaws, including:

- The plan envisions a large expansion of the traditional “bricks and mortar” retail sector, but this is a sector in long term decline, and so is not sustainable even in the medium term.
- The plan envisions that 40% of homes built will be affordable, but these will not provide appropriate accommodation for low paid workers, for example, those on the minimum wage, who cannot afford to buy “affordable” homes, nor can they pay so-called “affordable” rent. There is a great need for an expansion in social housing, especially in urban areas, where there is a greater concentration of low paid workers such as those employed in the retail, warehousing and distribution sectors.
- The number of homes planned in the urban area is too low – there is a need for regeneration in some areas of Guildford, but this is ignored and instead the plan concentrates on building homes on greenfield sites, which does not meet the needs for housing within the town, especially within the centre. This is not a sustainable policy as building outside the town has a disproportionate effect on road traffic. The analysis in Annexe 1 shows this to be the case when alternative methods of travel to work are analysed for two separate areas, one in the town centre and the second in a rural village.

In the case of insetting, the policy is fatally flawed, for three separate reasons.

- Firstly, it is based on an erroneous assumption. GBC justify the policy (in para 4.5.47) by suggesting, without any supporting data, that development in villages washed over by the green belt has been at a lower rate than within Guildford town. This was not the case, and statistics from the ONS censuses of 2001 and 2011 show that this assumption is incorrect. These statistics show that the growth rate in housing was higher in Effingham, a village washed over by the green belt, than in Merrow, which is not washed over by the green belt. In fact, the rate of increase in housing stock in Effingham was faster than the average for the borough.
- Secondly, insetting has been based on the Green Belt and Countryside Study, but the analysis in this document was flawed to the extent that it is valueless. It has serious flaws in its methodology, includes subjective judgements, and thus its conclusions are flawed - see Annexe 2 for detailed analysis These flaws are so serious that this study should be removed from the evidence base that supports the Local Plan.
- Finally, although a flawed justification was provided for the insetting of villages, this does not apply to all the areas selected for insetting, many of which are not “villages”, such as Pirbright Barracks. These sites are listed in the text below. No attempt has been made to justify the insetting of these sites, and in the absence of any justification they should remain in the Green Belt.

Urban development

There is a fundamental flaw in the draft Local Plan, in that there are not enough dwellings planned in urban areas, in particular, Guildford town centre. This is where the demand for affordable homes is most acute, a fact which is recognised in much of the draft Local Plan. Yet the plan then envisions that most dwellings will be built outside the urban area, so there is no continuity in the plan – if the demand for affordable homes is most acute within the town, then is where these dwellings should be built. There are sites available, for example, various sites in Woodbridge Meadows, Walnut Tree Close (including the area around the station) and North Street. Yet the focus in these areas is to provide a very limited number of dwellings, with the emphasis on additional retail space and more commercial premises. Given the profound changes in traditional retail, this is not a sustainable policy. There have been many examples of bankruptcies amongst traditional retailers, the most recent examples being BHS and Austin Reed, and previously Woolworths, Comet, etc. The British Retail Consortium forecast that by 2025 up to one third of those now employed in traditional retail could lose their jobs, due to a combination of factors. These included the continuation of the move to shopping via the internet and higher costs, from business rates and the introduction of the “living” wage. Recent figures show that online sales are still growing quickly, with more than 13% of total retail sales now made over the internet. Nor does an expansion in traditional retail chime with the objective of attracting highly paid jobs to the area – the majority of jobs in retail are low paid, and zero hours contracts are common. So any expansion in traditional bricks and mortar retail would create a greater demand for affordable and social housing – exactly the reverse of what is needed.
Even the major grocery retail chains have been affected by changes in retail habits – Tesco, Sainsbury's, Morrisons, etc are closing some stores, with no major large stores planned. Banks and other financial institutions are still closing some branches, so changes in town centres still have some way to go – but none of these changes are recognised in the draft Local Plan, which envisages no limit to traditional retail.

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Building the majority of homes outside urban areas is contrary to the advice of planners such as Lord Rogers, who has detailed the many advantages of increasing housing density in urban areas. The housing policy in this plan will result in a greater number of commuter journeys, creating more congestion, with an increase in air pollution across the borough. This is examined in detail in Annexe 1.

So there has to be a reappraisal of urban development plans, with more homes provided in urban areas, in particular in the centre of Guildford. As the council own many sites in the centre, these could be made available for development within the first 5 years of the plan, with mixed housing on these sites, including new social housing, which is sorely needed. Affordable housing is simply not affordable to anyone on the minimum wage, there is a need for a considerable expansion of social housing, a need that is not adequately recognised in the draft Local Plan.

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“Local planning authorities with Green Belts in their area should establish Green Belt boundaries in their Local Plans which set the framework for Green Belt and settlement policy. Once established, Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan. At that time, authorities should consider the Green Belt boundaries having regard to their intended permanence in the long term, so that they should be capable of enduring beyond the plan period.”

No exceptional circumstances have been demonstrated, with none given as justification in Policy D4 for the policy of insetting. Proposed green belt boundary changes are on a very large scale, as it is proposed to remove 14.4 km2 from the Green Belt, more than 6% of the existing area designated as green belt, and to create new green belt boundaries extending to more than 105 km. This is not a simple revision to the Green Belt, and a demonstration of exceptional circumstances is required for each and every change. This has not been done, not for a single proposed change.

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“Exceptional circumstances are required for any revision of the boundary, whether the proposal is to extend or diminish the Green Belt.”

Whilst each case is fact-sensitive and the question of whether circumstances are exceptional for these purposes requires an exercise of planning judgment, what is capable of amounting to exceptional circumstances is a matter of law, and a planner may err in law if he fails to adopt a lawful approach to exceptional circumstances. Once a Green Belt has been established and approved, it requires more than general planning concepts to justify an alteration.”
Each and every proposed change to the green belt boundary requires that exceptional circumstances be demonstrated, otherwise the changes are not lawful. This has not been done by GBC, not for any proposed change.

From paragraph 130 of this judgement

“In other words, something must have occurred subsequent to the definition of the Green Belt boundary that justifies a change. The fact that, after the definition of the Green Belt boundary, the local authority or an inspector may form a different view on where the boundary should lie, however cogent that view on planning grounds, that cannot of itself constitute an exceptional circumstance which necessitates and therefore justifies a change.”

“…..That, in his judgment, may now be so: but that falls very far short of the stringent test for exceptional circumstances that any revision of the Green Belt boundary must satisfy. There is nothing in this case that suggests that any of the assumptions upon which the Green Belt boundary was set has proved unfounded, nor has anything occurred since the Green Belt boundary was set that might justify the redefinition of the boundary.”

No changes that would warrant an alteration to green belt boundaries have been demonstrated by GBC, their so called “sensitivity analysis” was shallow and subjective, and no changes that may have occurred since the boundary was established were discussed. The changes proposed do not meet the standards set in this judgement. Instead, GBC maintain that it is housing need that creates blanket exceptional circumstances for changes proposed to the green belt. However, this is not the case. Following a meeting with local councillors and MPs in early 2014, Nick Boles wrote to Anne Milton MP to clarify the issue of exceptional circumstances and in this letter said:

“The written Ministerial Statement of 1 July 2013 set out the Government’s concern that some recent planning decisions have not accorded the Green Belt the level of protection that was the explicit policy intent of Ministers. It made clear that the single issue of unmet need – whether for conventional housing or for travellers sites – is unlikely to outweigh the harm to the Green Belt and other harm to constitute the “very special circumstances” justifying inappropriate development in the Green Belt.”

This was reaffirmed more recently in a letter from Brandon Lewis to all English MPs, dated 07/06/2016. In this letter, Brandon Lewis said

“The Government has put in place the strongest protection for the Green Belt. The Framework makes it clear than inappropriate development may be allowed only where very special circumstances exist, and that Green belt boundaries should be adjusted only where very special circumstances exist, through the Local Plan process and with the support of local people. We have been repeatedly clear that demand for housing alone will not change Green Belt boundaries.”

These quotations show that the insetting process has considerable hurdles to overcome, including as it does the revision to Green Belt boundaries that accompanies insetting. Thus the most important questions are – did the flawed Pegasus “Guildford Borough Green belt and Countryside Study” show unequivocally that villages to be inset are not open villages, making no or a minimal contribution to the openness of the Green Belt; and that there were exceptional circumstances (other than unmet housing need) that justify a change to the Green Belt, creating a new boundary around all these villages – more than 105 km of new boundary? The Pegasus study did not do this, and this was just one of its many flaws. Some of these flaws are discussed in detail in Annexe 2.

As shown above, development has occurred within villages, and the NPPF made it easier for additional development to take place within the green belt, via the provisions of paragraph 89, which specifically makes it easier for limited infill to occur and on a larger scale, for affordable housing to be built within villages washed over by the Green Belt. These provisions came into effect in 2012 when the NPPF was adopted and so the rate of increase in housing within villages is very likely to increase beyond that observed in the period between the 2001 and 2011 censuses.

It is clear from the most recent figures for planning applications to GBC in 2016 in Effingham that the pace of development within villages is changing, even with continued green belt protection. There is no requirement for insetting villages within the green belt, and a desire to increase development within the villages is not an adequate basis for changing green belt boundaries to permit insetting.

The final part of paragraph 4.5.47 is

“In accordance with national policy, the important character of these inset villages should instead be protected using other development management policies”.
This is not national policy, national planning policy is provided by the NPPF, and paragraph 86 of the NPPF is the relevant paragraph, which reads

“If it is necessary to prevent development in a village primarily because of the important contribution which the open character of the village makes to the openness of the Green Belt, the village should be included in the Green Belt. If, however, the character of the village needs to be protected for other reasons, other means should be used, such as conservation area or normal development management policies, and the village should be excluded from the Green Belt.”

There is thus no national policy that requires insetting. Instead, a judgement should be made for each village based on whether the village is open, and if it makes a contribution to the openness of the Green Belt. In fact, many of the villages proposed for insetting exhibit an open pattern of development, and make an important contribution to the openness of the green belt, for example, Effingham. This has not been considered, other than in the flawed Pegasus report, and the examination of their approach included in Annex 2 reveals how this analysis was flawed. No further consideration has been given by GBC to insetting, and so GBC’s policy of wholesale insetting does not accord with a national policy, real or imagined, as claimed.

In itself, there are many issues with insetting, and these include:

- According to the draft Local Plan, insetting is based largely on the findings of the Pegasus study, “ Guildford Borough Green Belt and Countryside Study. This report was very poor and various parts of the study criticised by many, including some borough councillors. It is perverse to continue with any recommendations of this study. In particular, a detailed review of this report for Effingham village showed that it was inaccurate and subjective. This review is attached as Annex 2.
- The settlement hierarchy was also subject to a detailed review and again this showed that scoring methods used were inaccurate and subjective.
- Proposed boundary changes are arbitrary, without an adequate detailed survey. There are no checks and balances to this, even though the positioning of the boundary line can change the price of an acre of land from about £15,000 to over £1 million. There is no process to it, simply someone using a computer and a mouse – literally a mouse click can turn some land owners into millionaires. In some cases, the proposed boundary divides semi-detached houses, so that one is still inside the green belt and the other outside. In other cases, the boundary divides gardens, so that part of a garden is in, part out of the green belt. Due care and attention has not been given to producing proposed boundaries.
- In many cases, boundaries proposed do not comply with the requirements of the NPPF, which is given in the NPPF, paragraph 85, final bullet point, which states “define boundaries clearly, using physical features that are readily recognisable and likely to be permanent”. Given this NPPF definition, treelines, hedgerows, woodlands, etc should not be considered as potential Green Belt boundaries. In fact, in some cases proposed boundaries cross open fields, with no discernible features whatsoever. These are entirely inappropriate as a green belt boundary. The boundary proposed for Effingham village is reviewed in Annex 3.

It should also be noted that GBC implicitly recognise that insetting is likely to lead to more development within villages on sites that are not identified in the draft Local Plan. But there is no recognition of this in the housing target. As is noted, insetting would mean that the rate of windfall development would increase, but GBC have not provided a proper analysis of windfall development (such as that provided by Mole Valley District Council) and they have failed to recognise a higher rate of windfall development in showing how the housing target will be met – even though, via Policy D4, they are planning for it. Windfalls should be deducted from the housing target, and the need for additional sites would thus be substantially reduced. Windfall development should be properly assessed and identified within the housing target, with an appropriate increase in the rate of windfalls in any villages that are inset.

Although a flawed justification was provided for the insetting of villages, this does not apply to all the areas selected for insetting, many of which are not “villages”. Some of these are adjacent to an Area of Outstanding Natural beauty (AONB) and in at least one case some areas of AONB have been included in the inset area. These areas include:

- HM Prision, Ripley Road, Send
- Keogh Barracks
- Pirbright Barracks (small areas of AONB included in inset area)
No attempt has been made to justify the insetting of these sites. In the absence of any attempt at justification there is no reason to inset these areas.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents: Policy D4_Insetting.pdf (1.3 MB)

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I object to this policy.

The Employment Land assessment was poor. It did not recognise the huge change that building on this scale would cause to the employment market. Building 693 new houses a year would mean that there would be about 1200 people on average, each year, entering the employment market. Guildford's economy has never grown at the rate that it would need to grow at to absorb these numbers of employees - for a period of 15 years, which is likely to include two downturns/recessions. What will happen is that more residents will commute out of the area to jobs outside the borough, creating more congestion on roads and overcrowding on trains.

AECOM, who produced this study presented an exaggerated view of the health of the local economy, through the selective use of statistics. A more careful review shows that whilst the local economy is strong, it is not as strong as the AECOM report suggests.

When it came to land use, the assumption by AECOM was very unambitious. In section 6.11.2 of their report, land use was considered, and the need for new land was justified. This was done by using an average derived from national averages. AECOM used this average to forecast the demand for employment land - but it was not appropriate to use an average, There was (and is) a need to be much more ambitious in the efficiency of land use in the borough as the borough has a high proportion of green belt land, and relative to other areas of the country, land is costly, so there was a need to be more ambitious in land use efficiency. It would have been appropriate to set a target above the national average, in fact a target at the highest level of land use efficiency, to be better than the best. This was not done, so consequently it was concluded that additional employment land was needed. Had a higher land use efficiency ratio been adopted, this additional employment land would not be needed. A high land efficiency, to be better than the best, could be achieved by ensuring that all future developments had to have associated car parking underground, underneath the buildings. This was not even suggested, so an opportunity to be ambitious was wasted.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to this policy.

There is no need for additional employment land. The need arose only because AECOM adopted an unambitious target for land use efficiency - the target to have a land use efficiency no better than national averages. The borough should be more ambitious in its land use efficiency than this, given that 89% of the borough is green belt and that land costs are high.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID:  PSLPP16/2528  Respondent:  8806849 / Roland McKinney  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E9

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to this policy.

How can GBC prevent the vacancy rate from increasing? There is a marked shift away from traditional retail, and it has been predicted by the BRC that up to one third of people employed in traditional retail will lose their jobs by 2015. Given this background, how can GBC possibly stop the vacancy rate from rising?

This is a King Canute policy.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID:  PSLPP16/2334  Respondent:  8806849 / Roland McKinney  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( No )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to this policy.

Given the high housing target this is accurately described as "homes for all" - homes for anyone from anywhere, so long as they can afford it. It is not a housing plan for local people, so it is not legally compliant. How could it be homes for all local residents when there is no mention of social housing and or this will be expanded to meet the needs of local people? There is a total reliance on the private sector, for both market housing and for rental. GBC have no control over the private sector, it can and will do what is right for themselves, not for others, not for the borough. This reliance on the private sector is extraordinarily short sighted. Private sector "affordable" housing for rent is much more costly than social housing. How will low paid workers afford "affordable" housing? So this is not a "homes for all" policy, it is a recipe for a huge increase in the cost of housing benefits for the nation. Then when this is too costly the government will change the rules and scale back benefits - so what will happen to private sector rentals then? There is a need for more social housing.

Using land efficiently is not just about housing density. Surface car parks are unsightly as well as being a very inefficient use of one of our most scarce resources - land. Large existing surface car parks, including those at the university, should be replaced by multi level car parks that include several underground levels, so as to limit the bulk of the car park above ground. Areas freed up could be used for housing, and in the case of the university, much needed on campus student accommodation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
so that they remain profitable for builders. But when house prices and rents are high, so-called affordable homes are not affordable to those with low paid jobs or on benefits. “Affordable” homes are not the same as social housing, or old style council housing, and are not a replacement for any social housing that is sold off. Across the borough, according to the most recent data from the ONS, in Feb 2016, there were 5,696 housing benefit claimants. These “affordable” homes will be of no use to these people, or others on benefits, or on low wages. There is nothing in this policy for these people, many of whom need social housing, which historically has been truly affordable.

The Policy Statement (blue text in the Strategy and Sites document) refers to working “to increase the number of affordable homes in the borough and meeting identified needs.” But there is nothing in this plan that will meet the needs of those on benefits, or on low wages.

The Policy goes on to say that on sites “providing five or more homes, or sites of 0.17 ha regardless of the number of homes, at least 40% of the homes must be affordable homes.” A site of 0.17 ha is only 0.4 acre, and many single homes are built on plots of this size. This is a very low threshold. No exemptions are given – for example, what about self-build housing, or shared ownership, etc? This policy does nothing to encourage various paths to property ownership, other than the affordable housing route – which for many people is simply not an option. It is poorly thought out and is based on data which is not accurate, including the West Surrey SHMA, which in any case should be revised because of the poor understanding of the borough’s population statistics that underpin the study and the Brexit vote.

In the wording of the text supporting this Policy there are many errors of fact, errors through omission and exaggerations in the introductory text to this policy. As an affordable homes policy should be a cornerstone of the Local Plan, some of these are reviewed in depth below.

**Paragraph 4.2.30**

The final sentence of this paragraph reads: “High demand and limited supply have resulted in one of the least affordable areas of the country to live in.”

This is a profound statement, but one that was made without any supporting analysis, so it appears to be based on supposition, not on fact. Relevant analysis would consist of looking at demand for housing through, for example, population growth; then at the supply of new homes and the balance between these – and then compare this with property price increases. Then a similar analysis should examine other areas too, to assess if Guildford Borough is different from other local authorities within the south east. Obviously, this type of detailed analysis is not possible in a submission on the draft Local Plan, but the fact that this statement was made in paragraph 4.2.30 without any supporting information is a major concern, as this unsupported statement in itself could be considered to be the driver for housing policies within this draft Local Plan.

There is no question that property prices are high within the borough, but this is largely a consequence of being close to London, with a reasonably fast train connection. A Local Plan is supposed to focus on local needs, not the needs of those who wish to move out from London. All of Surrey and the home counties have high prices and recent statistics show that the rate of price increases in the East has been higher than in the South East. High prices are not a phenomenon unique to Guildford. This is shown in Figure 1, which shows that price increases in Guildford are mirrored in Woking and Dorking, which are in neighbouring boroughs. In fact, this shows that over the last two years price increases in Dorking have been higher than in Guildford. This figure was generated on the Zoopla website.

[see attachments]

It is also incorrect to suggest that high prices are a consequence of an imbalance between supply and demand – there are many factors that have an impact on property prices; the supply and demand balance is only one of these. Although it is not appropriate to have a detailed critique of why housing costs are high, as one of the declared goals of the Local Plan is to increase affordability it is appropriate to comment on other factors that affect house prices, and this has been done in Annex 1. This also provides a borough wide analysis of the supply of housing between 2001 and 2011 and the demand for new housing, using census data.

This shows that the population of the borough increased by 7,482 persons, of whom 3,723 were full time students aged 18 and over. A few of these may have been Guildford residents but the vast majority would be new to the area. Some students find accommodation in student halls, and as this accommodation expanded during this time period, it has been assumed about 40% of the increase in student population would find accommodation in student halls, leaving 2,234 that would need accommodation in the town. With 4 students per house, this need would be equivalent to 559 houses.
Census data for 2011 revealed that the average household in the borough was 2.42 persons, so the increase in demand for housing caused by the increase in population (excluding students), assuming 2.42 persons/household, was 1,553 new houses.

Thus the total number of new dwellings required by Guildford’s population increase between 2001 and 2011 was 2,112 (559 plus 1,553). In fact, the census reveals that the number of new dwellings was 2,692 – so supply actually exceeded demand by a considerable margin, about 28%. Yet over this period Land Registry data shows the average house price in Guildford borough almost doubled. As supply exceeded demand, other factors beyond the supply and demand balance affected house prices. This means that the underlying premise behind the Local Plan is incorrect; house prices have not increased because of a supply/demand imbalance. At the very least this means that the 31 houses added to the housing target to promote affordability should not be included, but in fact the whole of the SHMA and Local Plan should be revised, to include a more accurate picture of the housing market, especially to examine the implications of Brexit.

However, there has been no detailed analysis by GBC of housing needs, this was contracted out to a consultant, and the housing model used by that consultant has not been subject to any scrutiny. The SHMA did not examine fundamental reasons for house price increases, nor did it properly examine the historic supply and demand balance across the area. Consequently, the SHMA is not fit for purpose, as no understanding of the fundamental workings of the housing market was shown in this study. Had a proper analysis been carried out it would have shown that in 2015/6 across the borough there were 2,510 housing transactions, and analysed the price bands of sales. Of these, 713 housing transactions were below £300,000, which is approximately what a couple on average earnings in the borough could borrow. A more detailed breakdown is given in Annexe 1.

**Paragraph 4.2.31**

In paragraph 4.2.31, the text of the opening sentence reads “The West Surrey Strategic Market Assessment 2015 indicates that approximately half of the Guildford households over the plan period will not be able to afford to buy or rent a home that meets their needs on the open market without subsidy.”

This sentence is plainly nonsense. The census data of 2011 showed that 66.6% of Guildford households either already owned or were in the process of buying their home. If the sentence refers to new households being formed in Guildford during the plan period, it should say so. If that were the case, it would not be surprising – the statistics on which the housing projections were based included a large increase in the number of full time students, a fact which was ultimately overlooked by GBC consultants, despite this being noted in several places in the SHMA. As shown in Annexe 1, census data shows 50% of the increase in population from 2001 to 2011 were students – and very few of these would be seeking to buy in Guildford, but are unlikely to take up a place at the university unless they had adequate funding, including the means to pay their rent.

**Paragraph 4.2.32**

Paragraph 4.2.32 discusses affordability in more depth and provides the ratio used by GBC to assess affordability. There are many definitions of affordability in use by different organisations and frequently this is a ratio between pay and house prices. GBC have decided to use a ratio which is of very limited value – the ratio of the lowest 25% of earnings to the lowest 25% of house prices. The higher this ratio, the less affordable the housing. This is a remarkable ratio as at the peak of home ownership in the UK, home ownership was just over 70% of total households. This is not because the remaining 30% did not want to own a house, although some did, but because in many cases home ownership was not a suitable option. This would apply to students, to migrant workers who wish only to work in the UK for a short time; people who do not want the responsibilities that comes with home ownership; people with temporary employment contracts, armed forces personnel, etc, etc. But GBC have chosen to consider affordability using the lowest paid – a group that have never been able to afford home ownership, or who may have no desire for home ownership. It is a bizarre ratio to use and is completely inappropriate to assess affordability in the borough.

It is more normal to consider the ratio between average pay and average property prices, though this is not an especially good ratio either, as average pay gives a certain weight to the lowest paid, who have never been able to afford home ownership. Average house prices are not a good measure either, as the sales of a few high cost properties will tend to push up average prices and distort the affordability ratio. It is much better to use the median property price in an affordability ratio. Another more relevant ratio is to use the average pay of first time buyers and the median price of properties purchased.
The text in the paragraph goes on to use government figures from 2013, quoting GBCs affordability ratio (bottom 25% of wages to bottom 25% of house prices) of 10.92 which was said to be “higher than Surrey’s ratio of 10.89”.

The difference between these two ratios was 0.03, or in percentage terms, 0.28%. In others words, given that affordability ratios are estimates, there is no significant difference between these numbers. So it was nonsense to infer that property in the borough was less affordable in 2013 than in the rest of Surrey.

The text also states that the most recent data for this affordability ratio is from 2013, but in fact up to date information is provided by way of an interactive map2 which shows that Guildford Borough has a better affordability ratio than all but one of its neighbouring boroughs. In other words, housing is more affordable in Guildford than in most neighbouring boroughs. Data provided by the ONS was from Q3 2014 to Q3 2015, as full details for 2015 were not available. This map (and a supporting spreadsheet) provides 2 ratios, for median earnings to median house prices and GBC’s preferred measure, lower quartile earnings to lower quartile house prices. These are given in Figure 1, and on GBC’s preferred lower quartile measure, Guildford is the most affordable of 6 of the 7 authorities listed, with only Rushmoor more affordable. On the more appropriate ratio of median pay to median property prices Guildford and Surrey Heath were essentially the same, with only Rushmoor again more affordable.

2 See https://communities.maps.arcgis.com/apps/MapSeries/index.html?appid=92675dad41214a52afcd4671783

Table 1 Affordability Ratio Comparisons

<table>
<thead>
<tr>
<th>Local Authority</th>
<th>Lower Quartile Ratio</th>
<th>Median Ratio</th>
</tr>
</thead>
<tbody>
<tr>
<td>Elmbridge</td>
<td>14.19</td>
<td>15.17</td>
</tr>
<tr>
<td>Woking</td>
<td>13.95</td>
<td>13.31</td>
</tr>
<tr>
<td>Waverly</td>
<td>13.37</td>
<td>14.67</td>
</tr>
<tr>
<td>Mole Valley</td>
<td>12.63</td>
<td>12.98</td>
</tr>
<tr>
<td>Surrey Heath</td>
<td>11.61</td>
<td>11.87</td>
</tr>
<tr>
<td><strong>Guildford Borough</strong></td>
<td><strong>10.89</strong></td>
<td><strong>11.94</strong></td>
</tr>
<tr>
<td>Rushmoor</td>
<td>8.95</td>
<td>7.85</td>
</tr>
</tbody>
</table>

This data shows clearly that GBC were incorrect to say that up to date affordability data was not available and more importantly, that of the local authorities that share a boundary with Guildford Borough, housing in Guildford Borough is actually more affordable than in almost all neighbouring local authorities.
Another indication of Guildford’s relative affordability was provided by an article in the Daily Telegraph. This was about a couple who had been resident in London, but had moved to Guildford so that they could save for a deposit, but who were considering a move back to London. A comparison was made of the costs of living in Guildford or London, including travel costs to work in London, which showed that annual costs in Guildford were lower by an estimated £3,052; about 16% cheaper living in Guildford than in London. This is why people are moving from London to Guildford – and is why if houses were built as per the Local Plan target, they would mostly be bought or rented by Londoners, not by residents of the borough.

Paragraph 4.2.23

This paragraph refers to sufficient housing to meet the needs of the borough’s population – but the proposed minimum of 693 dwellings a year is well in excess of the needs of the borough’s residents. The data used in the SHMA ignored the effect of full time students and so the housing number is very considerably in excess of the needs of the resident population. If this housing is delivered it will cause an increase in Guildford’s population that is considerably more than recent population growth – almost 5 times the rate of population growth during the period between the censuses of 2001 and 2011. The final part of the paragraph is nonsense “…..ensuring people with a wide variety of occupations in the borough and potentially reducing travel to work journeys.”

3 Daily Telegraph “Helping young renters get on the ladder” June 14, 2016

Housing proposed in the Local Plan is mostly in the countryside, with about 70% of the housing proposed on land that is currently in the Green Belt. These locations are some considerable distance from employment centres, many of which are located in central Guildford – so journeys to work will increase, not reduce, and congestion will get much worse. This issue is considered in detail in Annexe 2, which shows clearly that building new homes in the countryside will result in many more traffic movements than building homes within the urban areas of Guildford town.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents: Doc1.doc (555 KB)

Comment ID: PSLPP16/13777  Respondent: 8806849 / Roland McKinney  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Annexe 1

Housing Supply and Demand Balance Analysis in Guildford Borough: 2001 to 2011
As census data is considered by the Office for National Statistics (ONS) to be their “gold standard” this analysis uses only census data. Although data for subsequent years is available, this is based on many estimates and so analysis is more subjective. Across the borough, during the 10 year period between the two most recent censuses, the number of dwellings in the borough increased by 2,692, an average of 269 dwellings per year. During the same period, the population of the borough increased by 7,482 persons, but a high percentage of these were full time students, aged 18 and over. Some of these students may have been local, but as this was probably a small number, it was ignored. This data is summarised in Table 2, below.

Table 2 Census Data for Guildford Borough
Some of the increase in students would have found accommodation in students halls of residence (for example, the development in Manor Park opened in 2005) it is assumed that about 40% of the increase in student numbers were in student halls of residence, leaving 2,234 to find accommodation elsewhere. The majority of these would have found rooms in privately rented houses, categorised as “Homes of Multiple Occupation”. Assuming 4 students per house, the increase in student numbers would have needed 559 extra houses. The remainder of the population increase, the “permanent” resident population of Guildford, increased by 3,759 people. As the average number of people per household was 2.42 in 2011, a further 1,553 dwellings were needed for this increase in population. So to house the overall increase in population, including students, about 2,112 additional houses were needed – but 2,692 were built. Thus the number of houses needed in Guildford to house the population increase was actually substantially lower than the supply available; so the balance between supply and demand was not responsible for the increase in house prices over this period, when average property transaction prices across the borough almost doubled.

During the financial years 2001 to 2011, average property transaction prices across the borough are shown in Table 3. This includes average and median property prices for transactions in the years shown. In any given year there may be several high priced transactions which distort an average, and so the median price is also given – the median is the mid-range price, so that 50% of transactions were below this price with 50% above. It is a better indicator of the movement of prices than averages. Also shown is the number of transactions for each year.

<table>
<thead>
<tr>
<th>Year</th>
<th>Average Price £</th>
<th>Median price £</th>
<th>Transactions</th>
</tr>
</thead>
<tbody>
<tr>
<td>2001/2</td>
<td>218,637</td>
<td>172,000</td>
<td>3118</td>
</tr>
<tr>
<td>2002/3</td>
<td>254,406</td>
<td>199,995</td>
<td>3211</td>
</tr>
<tr>
<td>2003/4</td>
<td>275,070</td>
<td>220,000</td>
<td>3036</td>
</tr>
<tr>
<td>2004/5</td>
<td>294,235</td>
<td>240,000</td>
<td>2851</td>
</tr>
<tr>
<td>2005/6</td>
<td>303.612</td>
<td>246,250</td>
<td>2974</td>
</tr>
</tbody>
</table>

Table 3 Land Registry Property Prices in Guildford Borough
The data in Table 3 shows that prices increased very rapidly from 2001/2 to 2007/8, and that the number of transactions was quite constant, at about 3,050±200. This represented a turnover of about 5.6% of all of the dwellings in the borough (53,388 in the 2001 census). Then in 2008/9, prices fell, and stayed low for two years. If the balance between supply and demand were the only factor influencing house prices this would suggest a huge increase in supply – but this did not occur. It can be seen from this that the balance between supply and demand must have had a minor impact on house prices. In fact, determining factors were the availability and cost of credit, and the demand for housing outside London. Credit was freely available and credit costs (in real terms) were low, consequently house prices increased rapidly from 2001/2 to 2007/8.

Data from Table 3 is shown in graphical form in Figure 2, and the impact of the recession of 2008/9 is clear. It interrupted the increase in property prices – but the reduction in interest rates that accompanied this recession, which provided very low credit costs, resulted in property prices increasing again in 2010/11. Credit costs continue to be very low and when combined with the huge expansion in credit from quantitative easing, the price of fixed assets, including housing, increased sharply. Again, this had little, if anything, to do with the supply and demand balance for housing.

This picture of supply of housing exceeding demand across the borough is similar to the national picture. According to an article in the Guardian newspaper, across the nation between the years of 1997 and 2007, “the housing stock grew by 10%, but the population only grew by 5%. If house prices were a function of supply and demand, they should have fallen slightly over this period. They didn’t. They rose by more than 300%.” So the issue of high prices is a national issue, not confined to Guildford Borough, and is not solely because of the supply and demand balance. Building more houses to increase affordability within the borough will not have the desired effect. This conclusion (based on data) is at variance with the Local Plan, and shows clearly that the evidence base underpinning the Local Plan is suspect, and that the analysis in much of this data base, especially the West Surrey SHMA, is inadequate.

The cursory analysis above also indicates the severe impact of having an additional 693 dwellings coming onto the housing market. At the beginning of the recession, in 2008/9, there were only 1,481 property transactions across the borough. Adding 693 dwellings to this would create many problems for any existing householders who wished to sell. As new build housing would be attractive to anyone moving from London, and is more expensive than equivalent “used” housing, the average price for housing would probably not fall – but householders would be forced to reduce their selling price in order to sell. Given that the number of domestic property transactions in 2015/16 was 2,510, adding 693 houses to this mix would mean that redevelopment projects would not proceed. Existing run down areas of Guildford would become more run down – there would be no incentive to revitalise them under this proposed plan. Green field sites outside Guildford would provide the bulk of new dwellings – so large areas of Guildford would simply be left to decay. This is contrary to policies within the NPPF, specifically those policies that protect the Green Belt.

Figure 2 also shows that the median price is increasing more slowly than the average price, a clear illustration that the average price is not a good indicator of the housing market, due to the impact of a limited number of high value

<table>
<thead>
<tr>
<th>Year</th>
<th>Average Price</th>
<th>Median Price</th>
<th>Turnover</th>
</tr>
</thead>
<tbody>
<tr>
<td>2006/7</td>
<td>336,925</td>
<td>250,000</td>
<td>3294</td>
</tr>
<tr>
<td>2007/8</td>
<td>381,221</td>
<td>289,950</td>
<td>2867</td>
</tr>
<tr>
<td>2008/9</td>
<td>354,322</td>
<td>250,000</td>
<td>1481</td>
</tr>
<tr>
<td>2009/10</td>
<td>354,198</td>
<td>270,000</td>
<td>2127</td>
</tr>
<tr>
<td>2010/11</td>
<td>414,167</td>
<td>303,000</td>
<td>1916</td>
</tr>
<tr>
<td>2015/16</td>
<td>486,158</td>
<td>391,750</td>
<td>2510</td>
</tr>
</tbody>
</table>
A true picture of the housing market has not been presented in this Local Plan. A more accurate picture (for 2015/16) is given in Table 4, which shows, for example, that there were 183 housing transactions at a price equal to or lower than £200,000 during 2015/16.

Table 4 Housing Transactions in Guildford Borough, 2015/16

<table>
<thead>
<tr>
<th>Number of Transactions</th>
<th>Average of these</th>
</tr>
</thead>
<tbody>
<tr>
<td>14</td>
<td>£100,000</td>
</tr>
<tr>
<td>183</td>
<td>£200,000</td>
</tr>
<tr>
<td>713</td>
<td>£300,000</td>
</tr>
<tr>
<td>1312</td>
<td>£400,000</td>
</tr>
</tbody>
</table>

According to other ONS statistics, average earnings for Guildford residents in 2015 was £33,557 per year. A couple, with both on average earnings, using a multiple of 4.5 times earnings, could take out a mortgage for just over £300,000.

According to the 2015/16 Land Registry data they would have had a choice during 2015/16 of at least 713 properties. This suggests that the affordability issue in Guildford has been exaggerated in order to promote a pro-development agenda.

Factors that Affect House Prices and Affordability

Across the UK, much of the planned increase in house building is related to the issues of high house prices and affordability – building more houses to increase the supply has been the approach adopted by the government, even though this policy is high risk, for example, consider the collapse of the housing markets in Spain, Ireland, etc in 2008/9 as a consequence of their massive house building programmes. There has been no risk analysis associated with the policy, either nationally or locally in the borough. House building appears to have been put in place as a strategy to drive economic growth, so that a great deal of effort (and government subsidy) has been devoted to this policy, to the detriment of other important policies, such as regional and industrial.

Affordability is not just a question of increasing housing supply, it is much more complex and a proper analysis should examine associated questions such as: why have real wages in the UK increased so slowly? Slow growth in wages means that house prices have outstripped the growth in real wages, and so affordability ratios have fallen. A sound, sustainable economy will not be built by housebuilding alone and to pursue this path is to embark on a policy that could well end in ignominious failure, with a housing bust similar in scale to that experienced in Spain and Ireland. But what other factors are important in determining house prices and affordability?

When considering this issue of affordability, and the approach of building more dwellings, there is an implicit assumption that the only determinant of house prices is the balance between supply and demand. But this is a nonsensical assumption. In 2008, when house prices in many regions of the UK (and across the world) started to crash, this was not because of a sudden massive increase in supply. Many other factors were clearly at work. Other factors that are important in determining house prices include:

- The cost of credit – the interest rate: effectively this is set by government policy via the Treasury and then by the Bank of England. This has been extremely low for 5 years, and is set to remain low for the foreseeable future.
Even before the reduction in the Bank of England rate to 0.5%, the real cost of credit had been low for many years – largely because the governments preferred measure of inflation, the CPI, does not include a measure of housing costs. The current very low cost of credit means that mortgage payments as a percentage of take home pay are lower for first time buyers than during previous property booms of 2005-7 and 1989-90. House prices are set by what people can afford to pay, and so property prices have climbed.

- The availability of credit. At the very least this is regulated by government, but in practice it is effectively set by government policy, for example, quantitative easing has resulted in huge credit expansion leading to asset price inflation, including house price inflation. Current high house prices are a direct consequence of the economic policies of successive governments, spanning a period of at least 20 years.
- Various schemes to assist buyers such as “Help to Buy” have enabled house builders to increase or maintain prices, so that much of the subsidies government pays ends up as builders profits. This is because, for example, equity loans are available only on new build properties.
- Housing subsidies paid by the government. In 2015, about £24 billion was paid out as housing benefit, of which about £8.8 billion was paid to private landlords. Consequently, housing benefit has largely driven the buy to let boom. With a secure rental income, buy to let landlords can bid up the price of houses, beyond the reach of other buyers.
- The growth of “buy to leave”, which is driven largely by money from overseas, some of which comes from the black economy and illegal activities in overseas countries. Overseas buyers effectively use a house in the UK (predominantly London and its environs) as a safe deposit box in the sky. This has led to a significant number of properties in London being sold to overseas buyers, who have no intention of living there – but their investment is safe and likely to appreciate in value. In the years 2014 and 2015, Asian buyers alone paid $24 billion for UK property, of which $20 billion was in London. This forces London residents to move out to the suburbs and beyond, pushing up prices across the whole of the south east. Brexit and associated financial instability is likely to have an impact on this, and it may create a downturn in the London housing market.
- Taxes – not just stamp duty but other taxes contribute to the high final cost of a house. Taxes and levies on the excavation of raw materials from quarrying coupled with high landfill taxes increase the final cost of every house built, so that stamp duty is just another layer of tax – the icing on the taxation cake for government. What extraction taxes and energy policies have done is force the closure of British brick plants, cement makers, etc, etc. Now that there is a construction boom, building materials are being imported from all over Europe – bricks from Germany and further afield, roof tiles from Belgium, cement from France, etc. This leads to large increases in prices when there is an increase in construction – over the 5 years to 2016 brick prices increased by 25%, cement by 17%. The living wage will increase the pay of unskilled workers, such as labourers. Even in the recent past, a construction boom was a major stimulus for the British economy, but this is no longer the case because so much building material (and workers) are now imported. In 2015, the value of total imports of building materials from EU countries was £4.9 billion. In addition, the Landfill Tax ensures that land is not used efficiently – it is cheaper to build large surface area car parks than to excavate and build car parks underground so that even when multi-level car parks are built, they generally have no basement – because of the high cost of excavation due to high landfill taxes. Guildford town is a classic example of inefficient land use, with large surface car parks at the university; park and ride car parks, at the railway station, and at employers throughout the town. This is a grossly inefficient use of land, but this inefficient land use is a consequence of government policy.
- Profit margins of developers, which are currently somewhere between 20 to 30% on the cost of a house, even after high, exorbitant salaries are extracted from the companies for company executives. As an example, Berkeley Homes has in place the most generous bonus system ever put in place by a British company, with £1 billion due to be distributed to company executives if certain targets are met – and the company is on route to meet these targets, mainly because of its ability to set and maintain high house prices. The chairman of Berkeley Homes was one of the highest paid persons in the UK in 2015, with his benefits amounting to more than £22 million for the year. Profit margins enjoyed by housebuilders would not be tolerated in government regulated industries such as utility companies, or in food retailers, etc. It applies to the most expensive purchase the vast majority of purchasers will ever make, and it shows clearly that the housing market model used by the government (supply by the private sector only) is working only to benefit developers. It is functioning as a free market – but it is not a true free market because of the other factors that determine house prices such as government subsidies, including housing benefit. These create a win:win housing market for developers. The ability of developers to control housing supply is a major problem with the housing market – it is not the planning system that limits the supply of new dwellings, it is developers ensuring that they can maximise their profit margins by drip feeding new builds onto
the market. The Local Government Association stated that there are potentially 400,000 dwellings with planning permission but construction had not been started. So the problem is in the operation of the market, not in the planning process. Reforms to the way that the housing market operates are long overdue, for example, through a large social housing programme, managed by a national housing executive.

• Government regional policies also have an impact on house prices. This is evident in the way that property prices have or have not recovered after the property price crash in 2008. Not all regions currently have higher house prices than their 2007 peak values: This is clear evidence of an ineffective regional policy, and shows the publicity around creating a “northern powerhouse” is hyperbole. One strand of an effective regional policy would ensure that a genuine free market was allowed to run its course, so that as building in London and the south east became more difficult and expensive (due to strong planning policies protecting the Green Belt and countryside) development would be pushed to other regions, ensuring these regions grew. Instead, the government seek to make it easier for developers to build in areas with the highest growth, by weakening planning policies, so that development is concentrated in London and the south east, especially in the countryside. The effect of this policy (in reality the lack of an effective regional policy) means that demand for development of all types continues to grow in and around London, so that house prices can be increased and controlled by developers. This increases the wealth gap between the London plus the south east and other regions, and limits employment growth in these areas.

• Immigration has a major role in the supply and demand equation – if the rate of immigration were not so high, the demand for housing would be substantially lower. Migration Watch have estimated that at least 40% of the housing demand is due to immigration, but their estimate was based on a lower number of migrants than the current level of immigration, and does not include the impact of the children of migrants, nor does it include the demand from illegal immigration. Thus the government’s immigration policies have had a major impact on the demand for housing. Immigration also has an impact on pay – it helps keep pay levels low, so that employers are not forced to pay more to help with recruitment. This has an impact on affordability ratios. Although there is a construction boom, with a supposed shortage of skilled workers, pay within the construction industry has not increased as rapidly as it has done in the past. This is because employers can recruit immigrants, who will work for lower rates of pay, for example, 50% of sub-contractors working for Berkeley Homes are from eastern Europe. So not only does this policy have an impact on the supply part of the housing equation, but it also has an impact on the ability to afford housing by keeping pay rates lower than they would otherwise have been. A recent estimate by employers was that pay rates for skilled workers in construction have increased by 6%. Historically, this is a very low increase for pay rates in the middle of a construction boom. If immigration policies change as a consequence of the Brexit vote, the pressure placed on housing supply by immigrants will fall, and this should be reflected in revised housing policies.

Annexe 2
Contribution to Traffic Movements and Air Pollution
The Local Plan proposes building a minimum of 693 houses per year, of which 2,400 (17%) will be built within Guildford. The remainder (83%) will be built in the countryside. This is very much against advice from the Institute for Air Quality Management. Intuitively, it seems likely that this spatial distribution of housing would increase car and van journeys with a consequential increase in air pollution that is related primarily to vehicle emissions. This paper examines statistical evidence to assess the impact on vehicle journeys within the borough.

Spatial Vision
The spatial “vision” proposed in the Local Plan is the reverse of that recommended by the Institute for Air Quality Management, who said

“The pattern of land use determines the need for travel, which is in turn a major influence on transport related emissions. Decisions made on the allocation of land use will dictate future emissions, as many people and businesses will make significant use of road transport for journeys between places that form part of their daily lives.”

This has not been recognised in the spatial planning within this plan, which proposes that a large majority of new dwellings should be in rural areas, some considerable distance from the urban centre and employment centres. It is a plan that could have been written specifically to increase road traffic.

This report also suggested that:
“Ideally, air quality should be a prime consideration for long term planning, so that land is used and allocated in ways that minimise emissions and that reduce the exposure of people to air pollution.”

This has not been part of spatial planning, but it should have been, even though there is no statutory requirement to do so. However, there is a statutory requirement to declare an air quality management area (AQMA) in areas that are known to have high pollution levels, but this has not been done within the borough. This is despite requests to the council to set up an AQMA following air quality tests that show high pollution levels in at least one village which has high traffic levels.

**Sustainability**

To examine the claim that the draft Local Plan contributes to sustainability several areas could be analysed. One of these is the impact on traffic, to assess the impact of adding additional housing in the countryside rather than in Guildford centre. This can be gauged by comparing the likely impact on car ownership of building housing in a rural location as opposed to an urban area of Guildford. Effingham has been chosen for this, but it could be any of the rural villages in the borough, and the impact of additional housing in this village is compared with additional housing in an urban area, Walnut Tree Close/Station area. This can be done using census details, taken from the Office for National Statistics (ONS) publications, so that availability of cars and vans can be compared as well as methods of travelling to work.

What have traffic levels to do with sustainability?

Traffic is a major contributor to air pollution, and air pollution has a significant effect on health. In April 2014, Public Health England produced a report that reconfirmed the estimate by the Committee on the Medical Effects of Air Pollutants that approximately 29,000 deaths per year in the UK could be caused by pollution from man-made particulate matter. This report estimated that there were 55 deaths per year in the borough attributable to air pollution. Particulates are very small air borne particles and transport is the single largest contributor to particulate pollution.

But air pollution is not limited to air borne particles - it includes many other pollutants, and one group that affects human health, especially that of children, is the gaseous oxides of nitrogen, nitrogen dioxide (NO2) and nitrogen monoxide (NO). When taken together these are usually called NOX. Nationally, almost half of these gases are produced by transport. In a submission to the House of Commons Report “Action on Air Quality” published in November 2014, Dr Ian Mudway of King’s College, London said:

“We have also found effects on infant mortality rates, on pre-term birth and on cognitive performance in children. There is some interesting data emerging on traffic proximity, diesel emissions and traffic potentially autism spectrum disorders… The evidence over the last three or four years that children growing up near traffic in areas with high NO2 and primary particle emissions have stunted and impaired lung development is incredibly strong.”

As well as health aspects, road safety is also important – increased traffic levels means more congestion, more delays, more stress, and inevitably, more accidents.


Areas in London exceed the EU limits for various air-borne pollutants, in particular, NOx. This has been on a scale that will result in the imposition of substantial fines on the UK government – and the UK government has expressed a desire for this to be passed to local government in areas that are out of compliance. Although Guildford Borough has a very limited air pollution monitoring regime they have one station that regularly exceeds limits – that at Wisley. Even though this is very poorly sited (meaning that the actual NOx concentration in this area is considerably higher than that being recorded) it has consistently been above EU limits. Thus the borough’s taxpayers may have to share in the costs of the EU fine.

Since traffic has a major impact on air pollution, and as air pollution has a significant on health, especially that of children, it is an important element in sustainability – so the impact on traffic levels of housing policies should be assessed, in detail, before making claims that housing policies are “sustainable”.

**Detailed Traffic Comparisons**

Levels of car ownership vary substantially, as can be seen from the figure, taken from the data in Table 5. This data is taken from 2011 ONS Census data, as published in the series “Neighbourhood Statistics”. The average number of cars or vans per household is highest in Effingham, with an average of 1.9 cars or vans per
household in Effingham in 2011, compared to an average of 0.93 cars or vans per household in Woodbridge Meadows/Walnut the Station. This suggests that plans for high levels of development in the countryside go against all the ideals of achieving sustainable developments as car and van availability is an indicator of how often those vehicles will be used.

Table 5 Comparison of availability of cars or vans

<table>
<thead>
<tr>
<th></th>
<th>2011</th>
<th>2001</th>
</tr>
</thead>
<tbody>
<tr>
<td>Effingham (Parish)</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Average cars or vans/household</td>
<td>1.89</td>
<td>1.75</td>
</tr>
<tr>
<td>Households without cars or vans (%)</td>
<td>4.7</td>
<td>7.3</td>
</tr>
<tr>
<td>Woodbridge Meadows, Walnut Tree Close and the Station</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Average cars or vans/household</td>
<td>0.93</td>
<td>1.01</td>
</tr>
<tr>
<td>Households without cars or vans (%)</td>
<td>34.2</td>
<td>30.0</td>
</tr>
</tbody>
</table>

In Effingham, there are very few households that do not have a car or van available, at 4.7% of total households, compared to 34.2% in Woodbridge Meadows, Walnut Tree Close and the Station. Given the limited range of shops and services available in rural villages this should not be surprising. Most residents have to drive to be able to access basic health services, and for all but the most basic of shopping needs, employment opportunities, etc. This shows very clearly that it is very likely that there would be increased traffic on the roads throughout the borough as a consequence of additional housing in the countryside, and that this increase in traffic would be lower if additional housing were built in the centre of Guildford.

Experienced city planners such as Lord Rogers have called for increased density in towns and cities as a way to provide extra housing, provided increased density is accompanied by improved amenities and sensible traffic management plans. This is because of the benefits of increased density – towns and cities work better, with better public transport, better access to services, and a reduction in car journeys. Woodbridge Meadows, Walnut Tree Close and the Station are ideal locations for increased population density – the railway station is within walking distance, as is much of the town centre. This is recognised to a limited extent by the Masterplan prepared for Guildford Borough Council, but does not seem to have been recognised in the 2016 draft Local Plan.

As the 2011 census had details of the methods used to travel to work, it is possible to test if traffic implications are in line with these expectations. Methods of travel to work illustrate differing patterns of car and van use, with the details given in Table 6. In Effingham, only 14% of employed people who travel to work use public transport and almost 75% travel to work by car or van. Only 8% of those who travel to work walk or use a bicycle in Effingham, whereas in the Woodbridge Meadows/Station area the comparable figure is almost 33%.
Differences are illustrated in the figure showing the proportion of people who travel to work using public transport, walk or by bike. Building more houses in the countryside will result in many more car journeys – just to get to work. Many more would also be necessary, for residents to shop, to access financial and health services, etc. This shows clearly that car journeys would be minimised if new housing was concentrated in urban areas of Guildford. Sensible planning should seek to improve the ability to use these modes of transport and the impact on the number of car or van journeys is very clear from the comparisons made here. This type of analysis should be a feature when choosing to claim an option is “sustainable”, but it has not been a feature of the draft Local Plan. Claims made that building housing in rural areas is a sustainable option do not stand up to simple scrutiny, even without the consideration that it is proposed to build housing on the limited resource that is farmland. Table 6 Comparison of Methods Used to Travel to Work in 2011

<table>
<thead>
<tr>
<th>Travel to Work, 2011</th>
<th>Effingham etc</th>
<th>Woodbridge Meadows, etc</th>
</tr>
</thead>
<tbody>
<tr>
<td>Percentage of those in employment working from home</td>
<td>10.5</td>
<td>5.2</td>
</tr>
<tr>
<td>Percentage of those in employment travelling to work by car or van</td>
<td>66.9</td>
<td>34.4</td>
</tr>
<tr>
<td>Percentage of those in employment and who travel to work, by car or van</td>
<td>74.7</td>
<td>36.3</td>
</tr>
<tr>
<td>Percentage of those in employment travelling to work on foot or by bike</td>
<td>7.1</td>
<td>30.9</td>
</tr>
<tr>
<td>Percentage of those in employment and who travel to work, on foot or by bike</td>
<td>8.0</td>
<td>32.6</td>
</tr>
<tr>
<td>Percentage of those in employment travelling to work by public transport</td>
<td>13.9</td>
<td>27.4</td>
</tr>
<tr>
<td>Percentage of those in employment and who travel to work, by public transport</td>
<td>15.5</td>
<td>28.9</td>
</tr>
</tbody>
</table>

Conclusions
The spatial planning in this draft plan will increase traffic movements and consequently, air pollution. Air quality should be a constraint used to limit the housing target. Even with a lower housing target, instead of what is proposed a higher proportion of housing developments should be within Guildford town. This could be achieved by recognising that an expansion in retail and warehousing and distribution within the urban area is not sustainable, and the land set aside in the town centre for these used instead to provide housing. GBC should also have used the local plan to set targets for air quality, with proposals to reduce noxious emissions, for example, through the use of LPG fuelled public service vehicles, as is happening in other areas, such as Birmingham. This has not been done; there is no proposal to tackle existing air pollution or to alleviate the pollution caused by adding approximately 24,000 cars and vans to those already in use within the borough, based on car ownership levels in a rural village and an urban area in Guildford. This is the approximate number of vehicles that the proposed housing additions would bring, thought his number would vary, dependent on where
the additional houses are located. If all the proposed housing were within Guildford, then instead of 24,000 about 13,000 cars and vans would be added to the existing total. In the census of 2011, the total across the borough was just under 54,000 cars and vans.

The comparisons made above show that traffic and air quality has not been considered in the spatial allocation of housing. Sustainability claims have not been analysed in drawing up the housing proposals featured in the draft Local Plan. A simple comparison of only one aspect of sustainability, car use (with its associated air pollution), shows very clearly that building extra housing in Effingham (a typical rural area village) is the least sustainable option. As a method of travel to work, car use in Effingham was shown to be much higher than in an urban area of Guildford, so to limit increases in traffic and emissions from traffic, housing should be provided in areas closer to employment opportunities and with access to good public transport. This does not mean that no additional housing should be provided in the countryside, but this housing should be limited in quantity, in keeping with its Green Belt status.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2336  Respondent: 8806849 / Roland McKinney  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( No )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to this policy.

It is a Trojan Horse policy. It will lead to more housing under the guise of being for local people.

Not only that, but the legality of being able to say that houses must be kept in perpetuity for local people is questionable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2372  Respondent: 8806849 / Roland McKinney  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Whilst I agree with this policy, the reality is that the designation of the AONB is being weakened by the development proposals put forward within the Local Plan, specifically the development at Blackwell farm. A large area of this farm should have been placed under the AONB designation, but the review required to do this has left out areas that should have been in the review and slowed down reporting so that the designation has not been given as it should. Nevertheless, the AONB should Blackwell Farm be developed as is proposed, the view from the AONB would be negatively affected, as would the view of the AONB from Guildford.

In addition, the proposed new green belt boundaries include some small areas from AONB - so that these areas of AONB will no longer have green belt protection. Why is this being done? It is wholly unnecessary, and I object to it.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>PSLPP16/2404</th>
<th>Respondent:</th>
<th>8806849 / Roland McKinney</th>
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<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy P2</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( No )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to this policy.

My objections are detailed in the attachment.

Firstly, there is no national policy to remove villages from the green belt, this is a fallacy. National planning policy is set by the NPPF. The relevant paragraph is paragraph 86, which reads

"If it is necessary to prevent development in a village primarily because of the important contribution which the open character of the village makes to the openness of the Green Belt, then the village should be included in the Green Belt. If, however, the character of the village needs to be protected for other reasons, other means should be used, such as conservation area or normal development management policies, and the village should be excluded from the Green Belt"

It is inconceivable than none of the 15 villages to be inset make an important contribution to the openness of the Green Belt. The Key Evidence to justify this policy includes the Green Belt and Countryside Study, by Pegasus, which was a simple terrible study. Predetermination is evident in their approach, in the manipulation of data then produced, followed by dropping this data as it clearly showed the reverse of what they claimed. It was based entirely on subjective judgements and these should play no part in a policy which effects such radical change. There should be a transparent, objective process for assessing villages and this has not been done.

I especially object to the statement in the opening line of the Policy

"We will continue to protect the Metropolitan Green Belt..." Since when has protection included removing more than 6% of the land designated as green belt from that designation? What a peculiar form of protection - protect it by building on it. Death by a thousand cuts. This could have been written by George Orwell's Ministry of Truth, which appears to have taken up residence in Millmead.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:  [Policy P2 Green Belt.pdf](3.5 MB)
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( No ), is Legally Compliant? ( No )

Answer (if comment is on questions 1-7 of the questionnaire): ()

There is no definition of sustainable, so how can anyone judge whether or not any development proposed meets the sustainable criteria used GBC - not even a definition if we are told what those criteria are. So we have to judge sustainability for ourselves, using our own personal sustainability criteria. For myself, my sustainability criterion is very simple, and is "Will the changes proposed mean a better place for those who follow me?" Against this yardstick, this plan fails. If implemented, it would have a profound and long lasting negative impact on the countryside within the borough - a countryside that makes England unique, and here in GBC, we have some of the very best of the English countryside. The views that we take for granted have evolved over centuries, as has land uses for the land in the borough. But with very little thought, GBC can destroy them. Consider what the countryside will look like if all the developments planned are completed - Blackwell Farm would be lost and with it some of the most iconic views in the borough, both into the town and out from the town. Driving along the A3 from the M25 junction into Guildford there would be a large, high density urban area at Wisley, another a few miles further on at Garlick Arch, and then yet another at Goden Hill Farm. A large urban area will be created by the forced amalgamation of East and West Horsley, and another by the forced merger of Normandy and Flexford. But all will be well because Ash Green will be prevented from merging with Ash and Tongham! The wanton destruction of a countryside that took centuries to develop, and that is loved by thousands of residents and visitors alike And this is called "sustainable" - what nonsense!

The additional 25,000 to 30,000 cars that the developments will generate will increase air pollution very considerably - and this has not even been considered in the plan. This is roughly a 50% increase in the number of cars and vans within the borough. Across the borough there are areas that are already above legal limits - but Guildford has no AQMAs, and no action plan of any description to deal with existing levels of poor air quality - so what of the future? How can it be called sustainable to ignore a problem that already kills about 55 residents a year - how many more will die because of this extra pollution load? How many more children will have stunted brain and lung development because of the additional air pollution this extra traffic will bring? Does anyone within GBC even care? Apparently not, there is no policy to tackle air pollution within the plan. However, this means the plan is not legally compliant.

And what of the high quality farmland that is being lost - at Wisley, at Blackwell Farm and at other locations across the borough. The UK already imports 40% of food consumed (net) - but building on farmland means that our ability to feed ourselves will diminish even more. And yet GBC call this plan sustainable.

So, on behalf of those who will follow me, I am forced to say that this plan is not sustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
There is a major difference between the borough wide housing delivery strategy given here (in Policy S2) and that given in the LAA. Why? In the LAA, housing delivery in the first five years of the plan is given as 3,288 dwellings, plus a further 1,342 from outstanding permissions, a total of 4,630 over the first 5 years of the plan. Yet in the S2 Policy Statement above, the total is only 2,950, a difference of 1,680 dwellings per year over these five years. Which is correct? Why is there such a difference between documents, so much confusion? Given this confusion, why should I have faith in any of the documents produced or endorsed by GBC?

The simple truth is that housing need in the SHMA was grossly inflated. This local plan is supposed to provide housing for local residents - but how can this be so? Over the period of the plan, (if implemented) based on the average dwelling occupancy in the last census, the population of Guildford will increase at 4.5 times the rate seen between the two most recent censuses of 2001 and 2011. How could this housing be for local residents? Has there been an explosion in the local birth rate? Does the water supply of Guildford include an additive to ensure the delivery of triplets on every conceivable occasion? The answer to these questions is no - and so this is not a plan for local residents. This means the plan is legally non-compliant, Local plans are supposed to be for local residents. This plan is not.

This section of the plan is not sound, as it is clear the housing need has been grossly inflated. Not only has the housing need been exaggerated, but so too has the need for employees to feed the local economy, which is predicted to grow at a rate not seen in living memory. According to this, there will be boom but no busts, just a long continuous boom - a dream that even Gordon Brown in his most evangelical trance dared not enunciate. GBC have done what Gordon Brown failed to do - they have abolished busts, and so Guildford's economy will grow, grow, grow - for 15 solid years. What a fantasy.

The AECOM report on Guildford's economy propagated such a vision, sadly wholly false. It is astonishing to suggest, as the draft Local Plan does, that jobs can be created each and every year over a 15 year period at a rate never seen by Guildford in its past. The housing target of a minimum of 693 dwellings/yr will mean that there will be about an additional 1200 employees available per year - each and every year. Guildford would have to supply an additional 18,000 jobs over a 15 year period. To justify this, AECOM produced a report that included a selective use of statistics, used averaging when it was totally inappropriate, and had very limited ambition when it came to land use efficiency. But the best that they could suggest for GBC with regard to land use efficiency was that they should match the average land use efficiency of the country - in an area where land costs are high and green belt was 89% of the borough. Greater ambition would have been much more appropriate. So the section of the report that deals with the need for employment floor space is no better than the SHMA, or the Green Belt and Countryside Study. Any plan based on these documents could not be sound.

Supposedly, in meeting their duty to co-operate, GBC have engaged with two other local authorities. Yet 6 local authorities share a boundary with GBC. How can a housing report shared with 2 others adequately reflect the reality of the local housing market? The duty to co-operate has been glossed over.

Another reason for my objection is that this plan will do nothing for those dependent on social housing. It is fixated on home ownership, despite this not being a suitable option for a large percentage of the population. At the home ownership peak, locally, about 25% of homes were rented. Since then, wage rates have declined in real terms, and now, nationally, about 35% of residents rent. There is nothing in this plan for those whose only realistic option is to rent, whatever their circumstances or ambition. There is a need for a substantial expansion of social housing, but this is not recognised in this plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Answer (if comment is on questions 1-7 of the questionnaire): (Yes)

The evidence base is poor, with the results of various studies being produced to favour a pro development agenda, in line with the councils stated policy of "rolling back the green belt". One study that was particularly bad was the Green Belt and Countryside Study by Pegasus, especially Vol IV. The attempt at an update to this following earlier criticism was a charade. It was an entirely subjective report, and for a topic as important as this, objective methods should have been used. Green belt boundaries elected for inset areas were weak, and do not meet the requirements of the NPPF. This report has no place in the evidence base, it should be in the recycle bin.

Similarly, the AECOM report Employment Land needs Assessment was poor. It showed a selective use of statistics, to exaggerate the growth of Guildford's economy. It concentrated on only two employment sectors and barely commented on the predicted substantial decline in employment in retail and the impact this would have on overall employment. Worst of all, it was entirely unambitious in the use of employment land, suggesting Guildford should only use employment land with an average (across the country) efficiency. Guildford needs to be much more ambitious in its use of all land, not just employment land. The addition of 120 houses to the housing target to supply workers for the expected increase in employment in Guildford is a fantasy, and these should be removed.

Another report that was very poor was the SHMA. GL Hearn may have produced a large number of reports on this topic, but it seems this has made them complacent. They paid no attention to the suggestion that the ONS make concerning the use of their projections when producing housing estimates - that the underlying trends be understood. In Guildford's case this should have meant that the increase in student numbers was recognised and this effect removed from their calculations. As GL Hearn did not do this, the result was an estimated housing need which was grossly exaggerated - and to add an additional 25 houses for students to the target showed a complete lack of understanding of the basic numbers, as students were responsible for more than 50% of the population increase over the period measured by the ONS. Finally, the addition of 31 houses to promote affordability shows a total lack of understanding of the housing market. High prices are not just a consequence of supply and demand. In the 10 years, 2001 to 2011, the local supply of houses was greater than the demand for houses in the borough (based on the population increase) but house prices almost doubled during this period. High prices are a consequence of many factors. This report was poor quality.

Overall, the quality of the reports in the evidence base is poor and represents poor value for money - they were paid for by local council tax payers. There needs to be a recognition that reports should be properly scrutinised before they are accepted, or introduced into the evidence base. These poor quality reports should not be the cornerstone of the Local Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
No, I do not think the plan is legally compliant.

There is no adequate basis given for changing green belt boundaries, which although a complex issue is clear - there is a need for special special circumstances for each and every change and housing need alone is not an adequate basis for a green belt boundary change. In addition, there is a need for local support for boundary changes and this has not been tested. Many of the boundaries selected are weak and do not comply with the requirements of the NPPF. In at least one area, Effingham, residents have made clear their objection to boundary changes in surveys conducted by the Residents Association.

The draft Plan does not comply with Air Quality standards, there is no plan to introduce air quality management areas, despite some areas being outside legal limits. Under these circumstances there is a legal requirement to introduce an AQMA. This has not been done. There is also a lack of understanding regarding the need for an AQMA at Wisley. GBC maintain this is not needed as there are no residential properties close to the sensor. However, there is a need for an AQMA when the public have open access to the area, and this is the case. In fact, there are several people who are exposed to this pollution on a daily basis as they work in the cafe in the car park, almost directly opposite the sensor.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I believe that the duty to co-operate has not been fulfilled. Guildford shares its boundary with 6 neighbouring authorities, yet has consulted with only two. The West Surrey SHMA is a totally artificial construct, as the true housing area is much wider than just 3 authorities - Dorking in Mole Valley is a town that is just a few miles away from Guildford, but its housing market and that of Mole Valley was not considered.

In addition, in the Green Belt and Countryside Study, Vol IV (amended version) there is a recommendation that Mole Valley District Council be consulted before Effingham (which has a boundary with MVDC) was inset from the green belt. No evidence has been presented that shows that this has been done.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/464  Respondent: 8806849 / Roland McKinney  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (Yes)

I would like to participate so that I can explain why I believe the quality of the Green Belt and Countryside study is such that it should not be admitted to the evidence base, and that the policy of insetting villages should not be based on this study. As it also recommends new green belt boundaries I would like to have the opportunity to show why large sections of the boundary proposed by Pegasus, the authors of this report, do not meet the requirements for new green belt boundaries as laid down in the NPPF with specific reference to the proposed green belt boundary around Effingham. Much of this boundary was recommended by Pegasus in their report.

It would also give me an opportunity to comment on other reports in the evidence base that I consider to be poor quality, to show why house prices in the borough is not driven just by the balance between supply and demand, and that in fact, house prices in Guildford are not less affordable than many of the surrounding boroughs and to comment on the proposals for affordable housing.

I would also like to express my concern to the inspector that the approach to risk in the local plan is complacent - there has been no risk assessment regarding housing policies (what happens if there is a housing bust?) or what happens if infrastructure such as the planned railway stations, or sewerage treatment, water supplies etc are not actually completed in line with housing policies? It seems that numerous complacent assumptions about the delivery of infrastructure have been made and that the risk of non-delivery has not adequately been considered. The lack of an effective monitoring policy for infrastructure delivery is also a source of risk.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
The quality of this plan does not approach the quality of the 2003 plan. It is very sad that Guildford Borough Council's planning has been reduced to such a low level, especially when a template of a good plan was readily available.

Many Councillors demonstrate no real understanding of the issues and there is an astonishing level of turnover of officers who are involved in producing or are responsible for producing the plan. Despite having a very large planning department, GBC use consultants to produce evidence base documents, and there is no proper scrutiny of these documents when they are produced, either by officers or Councillors. This must create confusion in producing the various iterations of the local plan, and a high level of confusion is evident in the text, which if anything, is even worse than the previous iteration.

Anyone concerned with producing it should hang their heads in shame at the untruths and distortions that surround it, for example, "we will protect the green belt" - "we will only use 1.6% of green belt for housing" - when the truth is that there is no protection for the green belt, with more than 6% of land to be taken out of the green belt.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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### Comment ID: SQLP16/502
**Respondent:** 8806849 / Roland McKinney  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 7: Any other comments?

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire): ()**

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Vision and Ambition

I object to the lack of vision and ambition in this plan. The vision is to build 693 dwellings a year, an inflated housing target, produced by using a “black box” model that takes no account of anomalies in the ONS statistics for the borough that underpin this model. One such anomaly is the increase in the number of university students during the base years used to generate ONS population projections. Consultants used by GBC ignored this, so the housing target is far in excess of the needs of residents. This housing target will result in the boroughs permanent resident population increasing at 4.5 times the rate of population increase during the period 2001 to
2011, as measured by the censuses in these years. Given the existing strain on infrastructure in the borough the “vision” in this plan will create a nightmare for existing residents.

The only ambition in this plan is to build on a scale across the borough never before seen, driven by the ambition to “roll back the green belt”. There is no regeneration programme for urban areas of Guildford, and instead of using the Local Plan as an opportunity for redevelopment within Guildford’s deprived areas, the focus is on large developments outside Guildford, mostly in green belt. The plan has nothing for low paid workers in Guildford, and very little for young people who wish to live in the town. It is a plan to benefit developers, not residents; a plan rooted in the past, but one that has not learned the lessons of the past.

There are many contradictions within this draft Local Plan, and a few of examples of these are given below:

- The plan proposes a major increase in traditional “bricks and mortar” retail in the town centre, as well as an expansion in warehousing and distribution. Workers in these sectors tend to be among the lowest paid, at or just above the minimum wage. The plan places an emphasis on the provision of “affordable” housing, but those on the minimum wage cannot afford “affordable” housing, this a misnomer. Workers in these sectors need social housing, but there are no plans for a significant expansion in Guildford’s social housing.
- As well as an increase in town centre retail, etc it is proposed to locate new employment sites in or close to the urban area of Guildford. Only 20% of the housing proposed is to be within the town, with the remainder outside Guildford town. This means that if employers take up the buildings in the centre of the town (this is a big if, as in surveys many employers complain about congestion) workers in these employment centres will have to live outside the town. Inevitably this means they will rely on cars and vans to get to their place of work. This is not sustainable, Guildford already has a problem with congestion and air pollution.
- The rate of growth (averaging more than 693 dwellings a year to 2031) means if employment is to be provided locally (for about 1,200 new adult residents a year) Guildford’s economy would have to expand at a rate well above anything seen in the recent past, and be sustained at this rate for 16 years – a period when history indicates there will be at least two national/international economic downturns. This sustained growth would be unprecedented. Without this huge expansion in local employment, Guildford will become a dormitory town for workers commuting long distances to other areas. This is not sustainable.
- The delivery of housing is entirely in the hands of private companies that currently enjoy record profits due to their control of the delivery of new homes. These companies will simply not build if anything has a major impact on their profitability, be it a global economic downturn or a local oversupply of housing, whatever.
- Similarly, much of the infrastructure required has to be built by private companies, such as Thames Water and Network Rail, companies over which GBC have no powers. In effect, GBC are proposing a Local Plan over which they have minimal control. They have no powers to force the delivery of their targets in that plan. This means the plan is an exercise in fantasy, but a fantasy that currently blights the lives of thousands of people, especially those who live close to proposed development areas, and if implemented will blight the lives of thousands more.
- GBC have assumed the delivery of all vital infrastructure, but this is unwise. No risk assessment has been done to assess the risk and effect of the non-delivery of vital infrastructure within the time frame of this plan. These examples serve to illustrate inconsistencies within the plan. Other specific points addressing the declared “Vision and Ambition” are detailed below.

Spatial Vision

A plan that will increase car journeys as much as this one will, especially in an area that already suffers from heavy congestion with associated high levels of air pollution, could not be described as a “vision”. It is more of a nightmare than a vision. The Metropolitan Green Belt was established to prevent the urban sprawl that has blighted many countries, such as the USA, but the goal of this plan is to set aside the protection offered by the Green Belt, and to create urban sprawl, with large extensions to the urban area of Guildford and the creation of urban areas in the countryside, even where this is protected by its green belt status.

A contributor to the nightmare vision is the ongoing lack of investment in infrastructure, which will be exacerbated by this plan. In terms of infrastructure, the Surrey County Council Infrastructure Plan estimated that the borough would need
investment totalling £2.5 billion, based on the provision of about 9,300 dwellings through the period of the plan. GBC plan for at least 13,860 dwellings, most of them outside the urban areas of Guildford and so infrastructure needs will be higher than estimated. Of the £2.5 billion, SCC estimated that £2 billion would be available from various sources, leaving a shortfall of £0.5 billion. In an address to a council meeting, Mike Murray, speaking on behalf of Wisley Property Investments estimated that the developments outlined in the Local Plan would raise £100 million for infrastructure investment. This leaves an obvious shortfall of £400 million – but in fact the shortfall will be much greater than this, due to the housing target in the Local Plan being about 50% higher than in the Surrey County Council estimate, and because of probable changes to the Community Infrastructure Levy. This means that the borough cannot possibly meet its infrastructure needs, which is not recognised in the infrastructure plan that forms part of the evidence base of this Local Plan.

Another contributor to the nightmare vision is the lack of recognition of the air quality problem in some areas of the borough. That there is an air quality issue is illustrated by nitrogen dioxide (NO2) concentrations that are higher than the legal maximum. One of the proposed development sites is close to one of the “official” NO2 measuring stations, at Wisley, and this reveals that nitrogen dioxide concentrations have been higher than the legal maximum of an annual average of 40μg/m3 for several years. Other measurements have been made in villages that have roads that serve the A3 and have high traffic levels, and these have shown concentrations well in excess of the legal maximum concentrations, to the extent that one village has formally requested that their village be designated as an air quality management area. This has not been put into effect, and the whole issue of air quality has been entirely ignored in the Local Plan, specifically in the spatial vision. The spatial “vision” proposed in this plan is the reverse of that recommended by the Institute for Air Quality Management, who said “The pattern of land use determines the need for travel, which is in turn a major influence on transport related emissions. Decisions made on the allocation of land use will dictate future emissions, as many people and businesses will make significant use of road transport for journeys between places that form part of their daily lives.”

This has not been recognised in the spatial planning within this plan, which proposes that a large majority of new dwellings should be in rural areas, some considerable distance from the urban centre and employment centres. It is a plan that could have been written specifically to increase journeys by road, by cars and vans.

This report also suggested that:

“Ideally, air quality should be a prime consideration for long term planning, so that land is used and allocated in ways that minimise emissions and that reduce the exposure of people to air pollution, so that land is used and allocated in ways that minimise emissions and that reduce the exposure of people to air pollution.”

This has not been part of spatial planning, but it should have been, even though there is no statutory requirement to do so. However, there is a statutory requirement to declare an air quality management area (AQMA) in areas that are known to have high pollution levels, but this has not been done. The spatial planning in this draft plan will expose more people to air pollution. Instead of what is proposed, more housing developments should be within Guildford town, which could be achieved by recognising that an expansion in retail and warehousing and distribution is not sustainable, and the land set aside in the town centre for these used instead to provide housing. GBC should also have used the local plan to set targets for air quality planning, with proposals to reduce noxious emissions, for example, through the use of electric and LPG fuelled public service vehicles, as is happening in other areas, such as Birmingham. This has not been done; there is no proposal to tackle existing air pollution or to alleviate the pollution caused by adding approximately 30,000 cars and vans to those already in use within the borough. This is the approximate number of vehicles that the proposed housing additions would bring.

There are many areas where the text within the “spatial vision” section does not accord with reality, and a few examples are given below:
The opening text of the Spatial Vision reads

1 Land_Use Planning & Development Control: Planning for Air Quality, April 2015.

“The Local Plan: strategy and sites makes provision to meet the identified growth needs of the borough in terms of housing, employment and retail and leisure. This is achieved by maintaining the extent and function of the Green Belt in such a way as to protect the existing character of the borough through maintaining the clear distinction between urban and rural areas and safeguarding the natural built and historic environment”.

If this were what is planned, there would be little room for complaint. In fact, the clear distinction between urban and rural areas will be very considerably blurred with large holes punched into the green belt. More than 6% of the Green Belt will lose that designation.

The plan calls for a very large, high density development at Wisley, close to the boundary of the borough, in what is currently open countryside in the Green Belt. Another large development in the green belt is planned at Garlicks Arch, less than 3km south on the A3, and within another 3 km another at Gosden Hill Farm, both of which are in the Green Belt. When considering the view from the A3 the current appearance of open countryside from the junction with the M25 to Guildford along the A3 will be lost, replaced by two large developments in open countryside and a large extension to the urban area of Guildford, extending into the countryside. Thus the extent of the Green Belt will not be protected.

Two of the villages to be removed from the Green Belt are East Horsley and West Horsley, with a total of 363 ha (3.6 km2) to be removed from the Green Belt. The justification for insetting of villages is given in Policy D4, and this is to increase housing density within villages. From some of the plans given in the Local Plan showing proposed sites it is clear that it is expected that the provision of a number of development sites and the insetting of these villages is designed to lead to the coalescence of villages, such as East and West Horsley, and Normandy and Flexford. As the housing layout and style in these villages is an open pattern of development, they both make an important contribution to the openness of the green belt, and this will be lost because the housing density for the developments proposed (averaging approximately 18 dwellings/ha) is considerably higher than the average density in these settlements.

It is not clear why new green belt will be created in and around Ash and Tongham to prevent Ash and Tongham merging with the village of Ash Green, when the result of removing East and West Horsley from the Green Belt together with several new development sites will be their coalescence. If it was important to prevent existing villages from merging then both East and West Horsley would remain in the Green Belt, and proposed developments would be smaller, in proportion to the existing villages.

Similar considerations apply to the settlements of Flexford and Normandy. The area to be inset is approximately 134 ha (1.3 km2) including a very large 67 ha development site, located between the two settlements. This will result in the coalescence of the settlements of Normandy and Flexford. As both make an important contribution to the openness of the Green Belt, they should not be inset, and this development site is inappropriate development in the Green Belt. Again, if it is important to prevent existing settlements of Ash and Tongham merging with Ash Green, then similar considerations should apply to these settlements, especially given that they are washed over by the green belt, whereas Ash and Tongham are not.

The Spatial Vision goes on to say:

“The plan provides for the delivery of 13,860 homes by 2033. The preferred location for this development is existing brownfield sites. Over 2,800 units are proposed in the urban areas to take advantage of the existing infrastructure and services, reduce the need to travel and offer alternatives modes of transport to the private car.”

Or, to put it another way: 11,060 homes are proposed on sites which cannot take advantage of the existing infrastructure and services, which will increase the need to travel and which cannot offer alternatives modes of transport to the private car.

The low proportion of housing within the urban centre is because there is so much emphasis on providing employment sites within the urban area, for example, by expanding retail premises, etc but not enough on using these sites for housing – to take advantage of the benefits defined in the above quotation. There is no emphasis on using land in the urban area efficiently, for example, by replacing existing land hungry surface car parks with multiple level car parks, thus freeing up land for housing development. A few employment centres have multi-level car parks and this should be encouraged in other centres, and all new employment centres should be required to have multi- level car parks, ideally with several levels underground. Steps such as this would increase the availability of brownfield land within the urban area, and permit higher levels of housing provision. Another step would be to encourage the University of Surrey to do the same, to be more efficient in their land use, and to house a much higher proportion of students within the university campus – as they
The Local Plan includes the provision of additional sites and premises to meet employment needs across the borough, as well as 120 houses per year for new workers for new employers in the borough. However, the rosy picture painted in the employment report by the authors AECOM does not adequately reflect the actual condition of the local economy. The strength of the local economy as painted in the Employment Land Assessment Report 2 was exaggerated through the careful selection of supporting statistics. As an example, in the section with the heading Policy and Socio-Economics (page 1) the increase in employment within the borough was given as 4.1% during the period 2010 - 2013. This was a period when Guildford was still emerging from a recession, and so employment growth was strong, but not typical of a full business cycle. Employment growth over a longer period should have been given, to give a more accurate picture of the local economy. Using NOMIS statistics the number of residents employed in 2005 averaged 68,000 and this had increased to an average of 68,500 in 2015, so that the growth in employment of residents over this 10 year period was less than 1%. Note too that the average employment in 2015 was considerably lower than peak employment reached in 2007, when it was 74,400. According to NOMIS statistics there has been very considerable variations in the number of residents employed and this is not captured by the Employment Land Assessment report. Although the NOMIS statistics refer to employment by residents of the borough rather than jobs within the borough (a similar time series for these is not readily available), jobs available locally should be reflected in the employment of residents. In fact, NOMIS statistics also reveal that the average weekly pay of residents in the borough is significantly higher (6% higher in 2015) than pay for those employed within the borough, suggesting the local economy is weaker than neighbouring economies. Residents commute outside the borough to get higher pay.

It is astonishing that the Local Plan suggests that jobs can be created over a 15 year period at a rate well in excess of anything that Guildford has seen in the past. It is simply a nonsense to add an additional 120 houses so that additional workers will come to the borough. The housing target of a minimum of 693 per year will result in an additional adult population of about 1,200 potential employees per year, and the local economy will not be able to supply employment for these people. Historical employment data provides no evidence that over a 15 year period an additional 18,000 jobs will be created within the borough, given that the number of residents in employment increased by only 0.7% in the 10 years from 2005 to 2015. Consequently, a large majority of new residents will be forced to commute out of the borough to find employment, adding enormously to traffic congestion and air pollution.

There are many other instances of selective use of statistics in the Employment Land Assessment Report, far too many to elaborate on. As the report concludes there is a need for additional land for employment premises, and because a large part of this land set aside for employment is within Guildford town, it is worth commenting on a few more instances of the use of statistics. This is because this land should be used for housing within the town, which is where the need for housing is, not in the countryside beyond the town. In Section 6.6 of this report2, an explanation of employment forecasts were given. Data was used by AECOM from 3 separate forecasting organisations for employment growth between 2015 to 2033, namely

- Cambridge Econometrics
- Experian
- Oxford Economics

Guildford Borough Employment Land Assessment Report, AECOM, September 2015

These forecasts exhibited a very wide range – in the case of office employment the range was 0.55% to 1.18% per annum, so the highest forecast was 2.1 times the lowest. This may be acceptable in a short range forecast, but is wholly unacceptable for long range use. Similarly, the forecast for employment in the industrial/storage category ranged from 0.58% to 1.14%, so in this case the highest forecast was 2.0 times the lowest. Again, this range should be unacceptable for
use in long range forecasts. These individual forecasts were averaged by AECOM to provide a number used to project the requirement for floor space for these respective employment categories. In this case, with forecasts from various sources exhibiting such a wide range, averaging is not appropriate. As an example of the dangers of averaging consider a human with half of their body in a deep freeze, at about -25°C, and the other half in an oven at 100°C. Their average temperature would be 37.5°C – an ideal body temperature, but that would be irrelevant because they would be dead. Averaging must take account of the range, etc and this has not been done. In fact, the variation given in these separate forecasts indicate that the quality of the forecasts is very debateable, given that they are all for the same variable, and over an extended period of time each forecast would result in a very different outcome. Averaging them is not a robust approach.

In addition, the emphasis on just these two employment categories is unwise as the total employment market is important – it is likely employment in some employment categories will fall, so if there is growth in any employment category it must serve to mop up those unemployed as a consequence of business closures, as well as create new opportunities. Concentrating on just two employment categories weakens this report, and lessens the credibility of its conclusions. Finally, statistics given for actual changes within Guildford cover the period 2004 to 2012 – but this should be unacceptable for a report published in September 2015, data up to and including 2014 must have been available at the time of publication.

A final example of the selective use of statistics is from section 6.11.2, in which the OPDM Employment Land Reviews Guidance Note is quoted. This was used to provide a ratio used in producing forecasts for land requirements, namely 1:0.45. However, using an average of the medians was inappropriate in Guildford – land costs are high in the borough, and a large part of the borough (89%) is designated green belt and so using this average ratio betrayed a lack of ambition to use land efficiently. An ambitious goal would be to do better than the best, and this would be provided by using an average ratio slightly beyond the range given, for example, 1:0.60. This could be achieved, for example, by ensuring that all car parking was provided by underground parking, beneath buildings, so that open space could be retained, and by building several storeys above ground where this is possible. Surface car parking and single storey buildings are inefficient in their land use. Using an average land to premises ratio, as AECOM did, showed a total lack of ambition to use land efficiently. Using land efficiently would mean there would be no requirement for additional land to be set aside for employment purposes – and this land could be used instead for housing.

Overall, the Employment Land Assessment displayed a selective use of statistics to give an inaccurate overoptimistic picture of the growth potential in local economy as well as displaying a complete lack of ambition to use land efficiently. Consequently, its conclusions regarding land requirements for employment use should be disregarded. In the paragraphs devoted to transport, there is a statement “During the plan period Guildford will experience significant improvements to transport infrastructure including new stations at Guildford West (Park Barn) and Guildford East (Merrow). This is presented as a factual statement. However, Network Rail has made no commitment to approval of these stations, despite having recently published a study that examines investment needs on this route up to 2043. In this study, the possibility of these new stations is mentioned, but only as a response to the consultation that preceded the publication of the report. Details given of proposed projects that will be included in their next spending plans (to cover the period 2019 to 2024) include no provision of any description for these new stations, and in fact the emphasis is on increasing the number of trains per hour during peak periods. Adding a further two stops would reduce the ability to add additional trains, and so goes against the need to increase capacity on the line by adding trains. Thus it seems highly unlikely that these new stations would be provided within the time frame of this Local Plan, if ever. In addition, it is clear from the Network Rail report that changes to platforms in Guildford Station will not be made in the next budget period (up to 2024) and that the inclusion of this project in the next budget period (after 2024) is dependent on further studies. Similar timing constraints apply to the electrification of the North Downs Railway. So the delivery of many of the infrastructure improvements, particularly new stations, within the timeframe of the Local Plan is, at best, doubtful. To present their provision as a certainty was simply dishonest.
Finally, according to the Spatial Vision, the delivery of housing as described in the plan is predicated on the delivery of infrastructure, yet there is no monitoring system in place to ensure that infrastructure is delivered, with necessary services provided. As an example, consider the need for GP services. It is possible to build a doctor’s surgery, but there is a national shortage of GPs, so there are considerable problems in recruiting doctors needed to man existing surgeries. Thus building premises are no guarantee that services will follow, even assuming funds are available. No monitoring systems or programmes are described in this spatial vision and so one has to assume there are none in place to monitor this programme to ensure that services, as part of necessary infrastructure, are actually delivered. No red lines for specific developments have been provided, so that it is clear exactly what infrastructure must be provided before a specific development can be started. As no monitoring systems are in place, there is nothing in this vision to suggest that the promise made by Councillors, that infrastructure will be delivered before additional housing is built, will be honoured.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/464  Respondent: 8806849 / Roland McKinney  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
- directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
- ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
- adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.
- We object

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/2266  Respondent: 8806849 / Roland McKinney  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
2.1. Policy S2: Planning for the Borough
I object to this policy. Specifically, I object to the housing target of 12,426 as this has been developed using a model that uses assumptions that have not been made public. Essentially the model uses population statistics that are developed over a 5-year period, but these are projected forward to 2034. Population statistics should not be used in this way unless accompanied by an analysis of underlying factors that could cause changes to current population trends. Factors such as changes in death rates or changes in immigration levels have not been considered. A more thorough analysis was performed by Neil MacDonald of NMSS and his conclusion was that a lower housing target would be appropriate for the borough.

2.2. Policy H1 (and H13): Homes For All
I object to policy H1 as it fails to adequately consider the provision of social housing which is desperately needed. A paragraph (4.2.8) that considered housing density has been deleted from the previous iteration of the draft plan, but densification of housing within Guildford town is an alternative to building on Green Belt sites. Lord Rodgers and many other planners make cogent arguments for the densification of towns and cities, but these have been ignored. It is essential that land is used efficiently, especially previously developed land. A further objection is to the housing target for students – one objective should be to provide accommodation on the campus for all first-year students as well as for at least 60% of other students. This would make more housing available within the town.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp17q/413  Respondent: 8806849 / Roland McKinney  Agent:


Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): (No)

1. I object to the draft Local Plan because overall the draft Plan is not sound, and the changes made have not improved it. There are many reasons for believing the plan is not sound, and I have given some of these below. I have given others in objections previously made, and these should be considered with those given below as there is a great deal of detail relevant to this draft Local Plan in my previous submissions.

1.2. This draft Local Plan does not comply with the planning guidelines given in the NPPF, for example, it does not provide exceptional circumstances that are required to be shown before building in the Green Belt can be approved. It contravenes NPPF policies in many other ways, for example, one of the purposes of the Green Belt is to ensure that recycling of previously developed land will occur, and this draft Plan does not do that, about 70% of the dwellings proposed are to be built on green fields, most of which are part of the Green Belt.

1.3. There has been no application of constraints to the housing target. There are many appropriate constraints, such as the existing heavy burden on local infrastructure, which will be further overloaded if the proposed housing target is adopted. One symptom of the infrastructure overload is heavily congested roads across the borough, which gives rise to serious air pollution - but this is not recognised within the draft Plan. There is a need to adopt policies that will improve air quality and ignoring air quality issues is a serious defect in the draft Plan, and so it should be rejected.

1.4. This draft Plan lacks credibility in that it proposes to expand retail space within the town, despite the fact that there are already many unoccupied retail shops within the town. Current retail trends include an ongoing move to internet shopping and home delivery, reducing the importance of bricks and mortar retail outlets. This move is likely to be accelerated by
rapidly increasing costs associated with fixed retail premises, such as government mandated increases in labour costs (increases in the minimum wage, auto-enrolment pensions, apprentice levy, etc) and higher business rates. Given increasing costs, it is possible that current trends in retail will impact on leisure outlets, with a growing emphasis on the home delivery of, for example, meals, leading to the closure of some food outlets. The draft Plan does not take account of current trends, nor does it examine the future impact of these trends and means the current draft Plan is not fit for purpose.

1.5. Risk analysis within the plan is inadequate, for example, the risk associated with building too many dwellings has not been considered. That there is a risk associated with a high housing target was shown by the examples of the national housing markets in, for example, Spain and Ireland, in the period 2007 to 2009. It was also noteworthy that the house building programmes in these two countries provided dwellings well in excess of actual need. Despite this being obvious, the price of housing actually increased – until the financial markets crashed in 2007. This was followed by house price crashes that caused great hardship to many households in both countries. It is simply folly to adopt a housing target that is greatly in excess of previously delivered housing without the concomitant consideration of the risks associated with this policy.

1.6. The social housing policy within the draft plan is inadequate and relies on the private sector to deliver “affordable” housing. One of the lessons from the Grenfell Tower disaster is that the current management of social housing is inadequate – witness the installation across the country of external panels that are now deemed to fail flammability tests. This shows the need to re-examine social housing provision and management at both a national and local level. In the specific case of Grenfell, the management company apparently ignored residents’ concerns regarding fire safety equipment and policies. This failure undoubtedly contributed to the disaster. Up to now, Guildford Borough Council have ignored valid concerns regarding their Local Plan, and this bodes ill for the future. The draft Local Plan should be rejected and the council told to think again regarding the provision and management of social housing.

1.7. The draft Plan assumes that house prices are simply a consequence of the balance between supply and demand, and that supplying more houses will result in lower prices. Examples previously cited – Spain and Ireland show that this is not the case. Even though there was a glut of houses, prices in these countries did not fall until after the financial crash. High house prices in the borough (and nationally) are a result of many factors, it is too simplistic to assume prices are determined only by supply. Note that nationally and locally house prices fell or were stagnant during 2008 and 2009 – but this was not because of a huge expansion in the supply of housing. The monetary policies of successive national governments have resulted in an unprecedented period of low interest rates and have fuelled an asset price boom, especially in housing. To compound the effects of asset price inflation, real wages have fallen during the last 10 years – the Office of National Statistics estimated that real wages have fallen by 3.1% since May 2008. This means that the affordability ratio between house prices and wages is very high – but this is not just a supply/demand issue. The draft Plan should be rejected because it is unrealistic to assume house prices are a consequence of only the balance between supply and demand. It should recognise the importance of other factors, with due consideration given to these.

1.8. Guildford Borough needs a large expansion in dwellings for first time buyers and in social housing. Ideally, these would be located close to transport hubs, to reduce the reliance on motor vehicles – and transport hubs are within Guildford Town. Yet much of the housing proposed will be outside the town, with only approximately 10% of the housing proposed inside the town centre. Residents in sites located at some distance from transport hubs will be reliant on motor vehicles – resulting in increased congestion and air pollution. This draft Plan should be rejected because of poor spatial planning.

1.9. Yet another weakness in the draft plan is the lack of the consideration of alternatives, such as using more brownfield sites within the town for housing. The absence of any reasoning for arriving at a plan that proposes building about 70% of housing outside the town on countryside and Green Belt sites suggests that alternatives have not been adequately considered, and so the draft Plan should be rejected.

1.10. Many of the studies and reports that make up the evidence base are weak, with some being indefensible, such as the Green Belt and Countryside Study. Many councillors have commented negatively on this study, yet the conclusions from it have been used to shape the draft plan. There are other examples of poor studies, such as those that underpin the housing target and the Employment Needs Assessment. A plan based on a weak evidence base is bound to be fatally flawed and so the draft Plan should be rejected.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
I am writing to object to the proposed local plan for Normandy and the scale of new development being considered.

I was very surprised to learn that it is being planned to increase the number of homes in Normandy by 100% - adding 1,100 new homes, plus a secondary school for 1,500 pupils, and 6 traveller pitches.

I am well aware that there is a housing shortage, and that we should be prepared to expect a level of new homes in Normandy, but to double the number of homes will be an excessive intrusion in a mainly rural area, and must surely be against planning policies and principles.

The land between Normandy and Flexford is, I am told, Grade 3 arable and pastoral land, and this plan will cover this entire area with housing. As this is the only remaining open rural area in the Thames Basin Heaths Special Protection Area, then surely the area requires special protection itself.

The TBHSPA is designed to protect rare species, but if we continue to break up large open areas then even common species are likely to become rare.

To add such a large number of houses, suddenly filling in an area that was not urbanised and largely open rural land, is bound to have a much higher impact on the areas needing protection than if the same number were added to the edge of an existing highly urbanised area, or to a brownfield site.

We are lucky in Normandy not to have many street lights, we can actually sleep in the dark, and see the stars at night. I doubt that such a large development would be allowed without a lot more street lighting being required to meet modern standards. This increased light will be unwelcome not just for the people living in and Normandy and Flexford, but also for the wildlife.

We already have two very difficult junctions at the bottom of Glaziers Lane and Westwood Lane (particularly this one), and these will only get more difficult and dangerous with the significant increase in cars (approx 2 per home), plus all the extra traffic that a school for 1,500 pupils will create. The local roads are not designed for such a volume of traffic.

Just because someone says they will build a school should not be a good enough reason for excessive new development in green belt and open fields. There is no need for a school here, and to build so many homes to provide pupils for a school that wasn’t needed is ridiculous. Research says there are enough brownfield sites in Surrey for well over a million homes. So surely there will be a brownfield site on the outskirts of Guildford that can provide that school where it’s needed – not in the middle of nowhere. Not only that but if Ash Manor and Kings college are undersubscribed then where is the so called need for a school between the two.
I have also seen it mentioned that there would be much needed new retail space provided as part of this development, as if the people of Normandy and Flexford were suffering from a lack of shops. These days it’s unnecessary to have shops on the doorstep as the supermarket will deliver almost anything you could need at anytime – if we needed the luxury of local shops, we wouldn’t choose to live here in the first place.

Please don’t break the election promise to always protect the green belt

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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<th>Comment ID: PSLPA16/3035</th>
<th>Respondent: 8807041 / Alcis Ltd (Tim Buckley)</th>
<th>Agent:</th>
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<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North</td>
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Additionally, there is not the infrastructure to support the numbers of people and cars you suggest and I very much doubt the council or the developers will do anything meaningful that will make a difference to accommodate these increases and putting traffic lights up does not count as meaningful. To expect the wonderful words such as “appropriate”, “sustainable”, “less reliant on cars” to actually happen is just naïve.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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<th>Comment ID: PSLPA16/3036</th>
<th>Respondent: 8807041 / Alcis Ltd (Tim Buckley)</th>
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I have worked incredibly hard, risking my life in dangerous places to be able to afford to live here in the location and environment that I choose. It is a nice, expensive area [Response has been redacted due to statements being considered defamatory, derogatory, inflammatory or offensive in nature].

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

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<th>Comment ID: PSLPS16/6122</th>
<th>Respondent: 8807041 / Alcis Ltd (Tim Buckley)</th>
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**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:
I live near an already overwhelmed choke point at the cross roads between Effingham common road and Forest Road, near Effingham Junction station. In the morning and evening this is clogged, the idea that building another 2,000 homes on Wisley airfield, many of who’s owners will drive to the station, will not have a significant detrimental impact on the lives of the current population is incorrect. The idea that putting in traffic controls will be sufficient to cover this up is incorrect.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

It is often difficult to park in Guildford and approaches impossible during the winter months.

We do not have the infrastructure to cope with any more building. Do we not have brown field sites which are not used? We build office spaces we don’t need, why not build affordable houses. But we don’t need or want whole new towns or villages.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I have lived in the Guildford area for most of my life. During that time London has spread right out to the M25 and its impact beyond. I drive 16 miles to work and it usually takes me about an hour and can easily take longer. And it doesn’t take a great deal and the whole of Guildford can be backed up with traffic. We are clearly not coping with the number of people who live here already.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5407  Respondent: 8807617 / Anne Heine-Carmichael  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Behind my house – walking distance is the village of Blackheath. The heath is an area of Outstanding Natural Beauty and of Special Scientific Interest. Is it to become an island amongst suburbia?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5409  Respondent: 8807617 / Anne Heine-Carmichael  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

You have been elected to look after our best interests and I do not believe anyone locally believes that getting rid of the green belt is either in our interests or should be within your remit without a vote. And I do not believe that anyone who lives locally wants further urban sprawl here.

We are looking to you to stand up to demands which are unreasonable and not wanted by the majority of local people.

You can take this email as a NO to taking any local villages out of the Greenbelt.

Many thanks. I appreciate the privilege we have of living in a democracy and being able to express our concerns.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Policy D4: I object to the insetting of villages (meaning in fact, removal of villages from Green Belt protections) and the fact that they will be suffer from higher density development and the resulting increase in traffic, use of infrastructure which is already under pressure. We object in particular to the insetting of West Clandon, Send and the Horsleys. This will have a detrimental impact on Green Belt openness and the views in and out of the AONB in direct contravention of Policy P1 and P2.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Objection to the Guildford 2016 Local Plan

I object to the 2016 Draft Local Plan as a whole and in particular we object to the specific issues (listed below). I believe that this deeply flawed Local Plan will have a direct and detrimental effect on the amenity currently enjoyed by residents of East Clandon and to the even greater detriment to our neighbouring villages of West Clandon, Ripley, West and East Horsley. It erodes the openness of the Green Belt and endangers the beauty and views in and out of the Surrey Hills AONB.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to the Settlement Boundary which has been imposed on East Clandon without any consultation. This imposition provides no protection to further development outside of the settlement boundary (Policy P2 para 4.3.25) and is deemed by us as being unnecessary in an already tightly developed ancient and rural conservation village with high archaeological potential. We demand that this proposal be removed as it will endanger the openness of the Green Belt, the views in and out of the AONB (protection of the AONB Policy P1) and the character of our village.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPP16/3636  **Respondent:** 8808321 / Ian Peacock  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )

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1. Policy P2 – Green Belt: I object to this significant erosion of the Green Belt with the proposals for large towns being developed on Green Belt land thereby removing the openness of the Green Belt. We note in particular the huge developments proposed for the North East quadrant of the borough which will adversely affect our amenity, but also unfairly targets our tranquil rural villages because we can provide ‘dormitory’ facilities for commuters to London. These developments directly affecting our villages are the proposals for Wisley Airfield, Gosden Hill Farm, various farms and tracts in the Horsleys and Garlicks Arch at Send.

Further, on the erosion of Green Belt and we object that Policy P2 is not met where it states that Green Belt should be protected. I object to the disproportionate use of Green Belt land for housing – some 65% of the housing proposed is on Green Belt and with little consideration being given to redevelopment of brown field sites.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPP16/3640  **Respondent:** 8808321 / Ian Peacock  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )
I object that GBC are contravening the NPPF framework stipulation in paragraph 87 with the proposed developments at Gosden Hill Farm, Ripley, East and West Horsley and Garlicks Arch, Send. Paragraph 87 states “As with previous Green Belt policy, inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances.” and GBC have not proven any special circumstance for developing on these Green Belt areas.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3637  Respondent: 8808321 / Ian Peacock  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to Policy S1 not offering sustainable development as regards roads and rail infrastructure which currently does not cope with demand, congestion on the A3 in particular, but also other A roads in the area such as the A247, the A246 and then there is the already overcrowded and slow train system for those already living in the borough and needing to commute to London. No pre-emptive planning has been made to alleviate these real problems which will be much exacerbated by large increases in housing.

I specifically want you to note the winding, narrow and dangerous route via the A247 through West Clandon which then drives people to use a cut-out with the even narrower rural road, the Ripley Road, through East Clandon to and from the A3. This will be much exacerbated with the large increase in housing twinned with large increase in cars and travel.

Continuing with Policy S1 (Presumption in favour of Sustainable Development) I object that this is not being met and that GBC are contravening this when it is clear that no fixed plans are available to improve the provision of shops, medical facilities, schools in our immediate area (besides roads and rail already mentioned) to service us. If the GBC were serious about improving the infrastructure and sustainability of our communities, they would have secured plans and funding to ensure these facilities are available and not just at the behest and hoped-for goodwill from the developers. Further, how will developers be held accountable to their promises to build infrastructure? Stories are legion of developers reneging on commitments as the ‘money runs out’ even though vast profits will be made from turning agricultural and Green Belt land into highly valuable housing land.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/3621  Respondent: 8808321 / Ian Peacock  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
My specific points are:

1. I object to Policy S2 for the proposed provision of the very high overall housing numbers of 13,800 new homes (690 new dwellings being built every year for 20 years) and we object on two grounds: these housing numbers have been imposed on us with no real consultation being undertaken with the residents of East Clandon and the borough as a whole. Secondly, the housing numbers are based on a high-growth economic development plan which in itself has had no consultation with us and this combined with estimated demand from London residents will turn Guildford into a dormitory town for London.

Further, I object to the fact that no real economic or housing demand factors have been provided by the borough planners to substantiate the very high housing target of 13,800 new dwellings over the next 20 years. This is in direct contravention of the NPPF’s requirement for the planning authority to provide meaningful consultation.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: SQLP16/703  Respondent: 8808321 / Ian Peacock  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the fact that GBC have not met the requirements of the NPPF Paragraph 155 which imposes an explicit obligation to have early and meaningful consultation. This has not been met in a number of areas by GBC. We have not had a meaningful consultation on imposing a settlement boundary on East Clandon, on the absence of meaningful economic and population growth figures for Guildford showing various scenarios with high, medium and low growth scenarios being offered.

I demand that there should be a significant challenge to the GBC scenario planning and the housing and growth numbers should be revised and especially in the light of uncertainty and change which will accompany Britain’s withdrawal from the EU.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: SQLP16/704  Respondent: 8808321 / Ian Peacock  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
1. I object to the fact that GBC have not met the requirements of the NPPF Paragraph 155 which imposes an explicit obligation to have early and meaningful consultation. This has not been met in a number of areas by GBC. We have not had a meaningful consultation on imposing a settlement boundary on East Clandon, on the absence of meaningful economic and population growth figures for Guildford showing various scenarios with high, medium and low growth scenarios being offered.

I demand that there should be a significant challenge to the GBC scenario planning and the housing and growth numbers should be revised and especially in the light of uncertainty and change which will accompany Britain’s withdrawal from the EU.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/433  Respondent: 8808673 / A Ayres  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I have to say that including Wisley Airfield will be the ruination of the Horsely’s and surrounding areas. Already Ockham Rd. North & South is unable to take large vehicles These vehicles cannot pass one another without using the pavements of which we have very limited amount. Solution: Build NEW TOWNS as per Crawley, Milton Keynes, and Stevenage

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/342  Respondent: 8808769 / R F Wills  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

There are NO exceptional circumstances or justification for removing much of West Horsley and other villages from the Green Belt. W. Horsley has many listed and historic bldgs. and a ‘country feel’ which is why most people who live in the area do so.

The roads and infrastructure are already at full capacity as indeed are most of this part of the S.E.. Witness the appalling misery on the M25 and A3, & Cobham roundabout. If you had a vital journey (say to the airport) you would not take the chance by using the main roads. Even the ‘rat-runs’ are getting impossible. This is seriously affecting the quality of life in...
the area, for which GBC is largely responsible. The parking in the villages is already insufficient, and there are long queues for the Surgeries. A&E in G'ford is already often unable to cope.

The Green Belt was sensibly devised to control urban sprawl, and it is at times like these that it should be strengthened.

There is often flooding on local roads, and one sees people driving round wasting fuel etc. to cope with these problems.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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I would like to make some comments about the draft plan. We note that A41 was removed from the list of sites in the previous plan which is very good news, but we also understand that much of the site is being retained for the possible rebuilding of a local school. We would object most strongly as it is part of an 'open' area backing on to West Horsley Place which is a Grade one property. The AONB in the S part of Horsley would look over this area, and clearly most of West Horsley should be left in the Green Belt. There are many listed properties and many rural views to be retained. It seems that the Borough Council continues to pursue it's reckless 2014 decision to take many of the rural villages out of the Green Belt, which policy is almost unanimously hated

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID:</th>
<th>PSLPS16/1081</th>
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<th>8809121 / Steven Heard</th>
<th>Agent: Development Planning Consultants (Richard Cooke)</th>
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The Policy is not Sound in that a satisfactory explanation and clear reasoning and evidence is not shown as to how the Council has allocated Site A22 and its surrounds.

The selected site does not use all the land that is ready and available for housing.

Some 2 ha of land immediately to the north of the site and shown coloured green on the attached Plan (known as Tangle Place Farm south and bounded by Tangle Lane to the West and the boundary of the 400m SPA zone to the North) ) is fully available for housing purposes and shares exactly the same planning considerations as the allocated site A22.

The Council has submitted no clear reasoning and evidence why this site should be excluded for development. Indeed the published evidence base in the GBCS expressly indicates that the land is within a Projected Development Area (SITE J3).

Based on the Councils density guidelines some 80 new dwellings could be built here.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents: tangley Place farm south.pdf (785 KB)

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Comment ID: pslp172/2652  Respondent: 8809121 / Steven Heard  Agent: Development Planning Consultants  (Richard Cooke)

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A22

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy site A22 : Keens Lane

The Amendment no 7 on the Plan appendix describes a change to this Policy as "incorrect GB boundary" I cannot see where any change is being made. The increase in the number of units is not justified in any way.

The incursion of the site into the 400m SPA zone is not justified and is dependent on further approval by Natural England. As such it cannot be relied on as an allocation at this stage.

This site remains poorly drawn and illogical and not reflective of the character of the Green Belt hereabouts.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/1953  Respondent: 8809217 / Betty Welland  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Shalford (south)
Do you consider this section of the document: complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

"New version of Guildford local plan- objection to shalford green belt/settlement boundary."

I object very strongly to the proposal put forward- particularly as the roads around shalford and already heavily congested. I hope this proposal never come to fruition.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPA16/1403  **Respondent:** 8809441 / Cameron Brown  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document: complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Objections to Guildford Borough Council Proposed Local Plan (June 2016)

I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPS16/2534  **Respondent:** 8809441 / Cameron Brown  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document: complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. You are well aware from previous correspondence that there are numerous specific reasons why the proposed development on this site is unsuitable and you yourselves refused the development proposal unanimously very recently. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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</table>

I object most strongly to your proposals for wholesale changes to the Green Belt around Ockham, Ripley and Send. This serves the purpose of providing a buffer between the urban sprawl of London and Guildford itself. There are brownfield sites where housing can be provided without encroaching on the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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</table>

I object to the disproportionate allocation of housing in this particular part of the borough. Over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys, an area that at present has only 0.3% of the population of GBC.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the fact that air quality concerns have not been taken seriously – air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Reference 16/P/01397 Fairlands Farm

I also object to this application.

Again the land is Green Belt. The reason given for dropping the nearby Liddington Hall and Fairlands sites from the Draft Local Plan was because of the "high sensitivity Green Belt". The same should apply to the Fairlands Farm site. The arguments in the application that there are "highly exceptional" reasons is nonsense. The community benefits are slight and Fairlands already has a thriving community centre and playing fields. The community benefits are arguably greater as the development exists today. To argue that Guildford does not have five years of housing supply is to disregard the Regulation 19 consultation that ends this month. The legislation cannot have intended to allow this sort of opportunism.

I also object on the grounds of increased traffic as per my objection to the Keens Lane development.

I confirm that I am happy for my comments to be made public & require an acknowledgement of this objection

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Site A22

I strongly object to the inclusion of land off Keens Lane, Worplesdon (Site A22) in the GBC Draft Local Plan for the proposed development of 140 homes and a care home and believe this is inappropriate for three main reasons:

1. The area is Green Belt, which should be retained and not built on. Surrey County Council is historically the creator of the Green Belt and has previously agreed to:

   To use its power to protect Surrey's Green Belt.

   1a To support the National Planning Policy Framework (section 9 - paragraphs 79 to 92) and the Government's policy of protecting the Green Belt.

   1b To make Surrey's MPs and the County's Districts and Boroughs aware of this resolution.

   1c That any Green Belt development in the County is in line with the needs and wishes of Surrey residents.

ON THIS POINT ALONE THIS DEVELOPMENT MUST NOT BE INCLUDED INTO THE PLAN AND ANY DEVELOPMENT APPROVED.

1. Keens Lane is a narrow lane and building more homes leading onto the already over busy Worplesdon Road and Aldershot Road via Gravetts Part. Parts of these lanes are little more than single track and used widely by walkers and horse riders. To increase traffic levels will potentially endanger human life.

2. The proposed development site is close to Whitmoor Common and a Site of Special Scientific Interest, and would have a damaging effect on ecology and it is also bounded by Broadstreet Common. The open nature of Worplesdon should be retained. The land is part of the important wildlife corridor between Whitmoor and Broadstreet Commons. As such, developing the site would conflict with NPPF paras 113, 117, 118, and 119.

Historical previous applications in the area have been turned down by the inspectorate for the following reasons:

The proposed development, in my opinion, would further impair the efficiency of both the A323 and A322 which, as principal roads connecting Guildford to the M3 and the major growth area, must be safeguarded..."

In 1983, the County Engineer wrote to the then MP concerning the Surrey Structure Plan: "Accordingly the County Council as Highway Authority will seek to prevent the grant of any planning permission which would significantly increase traffic to the south of Liddington Hall". In 1985, in spite of the above, an attempt was made by the County Council to build on Liddington Hall Farm, which at that time they owned. The Inspector recommended: "In my judgement, the discharge to A3222/A323 of traffic from 700 dwellings additional to that arising from expected development at Tilehouse, Stoughton and from general growth of traffic would add unacceptably to prevailing congestion and danger on the main framework roads."

In 2003, the Officer Report to the Executive on the Deposit Draft Surrey Structure Plan 2002 stated:

"The findings thusfar suggest that the transport impacts associated with the north west community [the Liddington Hall site] would be significant and difficult to resolve."

The traffic on our local roads has increased significantly over the past few years making these comments in my opinion even more relevant.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: PSLPP16/5061</th>
<th>Respondent: 8810017 / Alison White</th>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I wish to object to the Guildford Plan Planning Policy (Local Plan Consultation) The huge number of homes proposed takes insufficient account of major transport and infrastructure problems. The numbers used are far too high as evidenced by the data gathered and published by the Guildford Residents Association. Evidence gathered prior to Brexit which should also be factored shows the figure for new home should be 510 per year from 2013 to 2033.

Guildford Borough Council needs to be transparent about the calculations used to produce their figures.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy A22: Land north of Keens Lane, Guildford - OBJECT
I object most strongly to the increase of housing provision for this site in the revised 2017 Local Plan. The site is totally unsuitable for this type of development anyway and any increase in housing numbers will just compound the problems. The adverse factors are so strong that I find it amazing the site is being put forward for an increase of any size. Some of them are listed below:

a) It is good Green Belt. The reason given for dropping the neighbouring Liddington Hall site is because of the "high sensitivity Green Belt". The same should apply to the Keens Lane site.

b) It is part of the important wildlife corridor between Whitmoor and Broadstreet Commons. As such, developing the site would conflict with NPPF paras 113, 117, 118, and 119.
c) It is very close to the SPA of Whitmoor Common and the damage to the Common from the development could not be gainsaid (see the comment on Policy 5). None of the SANGs that have been suggested would offer anything like an alternative.

d) It would add to the chronic traffic congestion in the sector. Traffic is a major factor that has been cited in the rulings in the rejection of three previous proposed developments in this immediate area:

In 1976, the inspector recommended: "The proposed development, in my opinion, would further impair the efficiency of both the A323 and A322 which, as principal roads connecting Guildford to the M3 and the major growth area, must be safeguarded ...".

In 1983, the County Engineer wrote to the then MP concerning the Surrey Structure Plan: "Accordingly the County Council as Highway Authority will seek to prevent the grant of any planning permission which would significantly increase traffic to the south of Liddington Hall". In 1985, in spite of the above, an attempt was made by the County Council to build on Liddington Hall Farm, which at that time they owned. The Inspector recommended: "In my judgement, the discharge to A322/A323 of traffic from 700 dwellings additional to that arising from expected development at Tilehouse, Stoughton and from general growth of traffic would add unacceptably to prevailing congestion and danger on the main framework roads."

In 2003, the Officer Report to the Executive on the Deposit Draft Surrey Structure Plan 2002 stated: "The findings thus far suggest that the transport impacts associated with the north west community the Liddington Hall site] would be significant and difficult to resolve."

The only thing that has changed is that the traffic levels have increased hugely. These previous rulings are vital and cannot be ignored.

e) Keens Lane & Tangley Lane are too narrow largely for two cars to pass each other, mostly without pavement, partly with high banks & are used widely by horse riders and walkers and the increase in traffic generated by the development (or any development here) presents a hazard.

f) Both the land and lanes are often flooded in winter months due to a high water table. Further development will exacerbate this problem.

All in all this development should not be allowed to go ahead.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/1328  Respondent: 8810113 / Louise Stewart  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. The housing needs assessment is flawed in various respects and overstates housing need. In addition since it was produced, the referendum Brexit decision has almost certainly reduced future housing need and rendered the previous assessment seriously out of date. As a result any assessment of Green Belt sites which took place to consider whether “exceptional circumstances” existed to outweigh the harm to the Green Belt was based on false premises and should be reconsidered.

2. Having determined housing need the Council was entitled to consider constraints before determining the housing number. I believe that as well as being entitled to do this the Council was required to give proper consideration to constraints. The scarcity of sites outside the Green Belt as well as infrastructure (most notable roads) considerations all represented constraints which should have been taken into account in determining the final housing number. Accordingly in this regard my objection to the allocation of Green Belt sites is twofold. First I believe constraints should have been applied. Secondly I believe the Council did not properly consider constraints and that their decision making process was flawed and thus subject to being set aside by the Inspector.

3. Even if having properly applied constraints there is a need to develop in the Green Belt then specific Green Belt sites should not be included in the plan unless “exceptional circumstances” for development are proven in relation to that specific site, as stipulated repeatedly in the NPPF. The Green Belt should trump short-term considerations such as perceived housing need, as case law has established. There needs to be a specific balancing exercise conducted on each Green Belt site weighing the harm to the Green Belt against the very special circumstances which are argued in favour of development at that particular site. There is no evidence this has been done. Instead the council have appeared to say that having chosen a housing needs figure and decided it cannot be met without building on Green Belt then there is no need for any further consideration and any convenient Green Belt site can be allocated for building at will.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/1330  Respondent: 8810113 / Louise Stewart  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
1. APPENDIX D

I OBJECT to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)

- The “objectively assessed need” figure of 693 homes a year is too high.
- A professional review by NMSS has concluded that, even basing the calculations on a period of stronger economic and student growth, the housing need figure should be revised down to 510 homes a year and the method changed to consider student housing need separately due to the distorting effects.
- The current SHMA inflates the proposed housing figure due to
  - failure to correct for errors in the historical data for international migration flows,
  - issues with the way it considers students and affordability and
  - flaws in the method for estimating the number of homes needed to support job growth.
- It is unacceptable that demographic and economic model assumptions have been withheld and cannot be checked making the process unaccountable.

The Plan’s proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the borough, it is over double the previous figure of 322 used in previous plans. The SHMA report methodology is I believe inaccurate; it inflates the needs of the borough by distorted student numbers. However, it is based on commercially confidential modelling assumptions that cannot be checked or reviewed. There is no transparency to this evidence base and it is therefore impossible to assess its accuracy. This is not democratic and is not appropriate for consultation of the Plan.

The National Planning Policy Framework allows the overall housing target to be reduced to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/2383  Respondent: 8810113 / Louise Stewart  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A25

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. POLICY A25 - Gosden Hill Farm

I OBJECT to Policy A25 with proposals for Gosden Hill Farm.

The Green Belt at this point serves the important function of separating West Clandon from the edge of urban Guildford. Development here will cause the two to coalesce defeating one of the objectives of the Green Belt. If this development proceeds I believe the narrow strip of Green Belt remaining between Guildford and Clandon at this point will be too narrow and will come under further pressure.

It will represent an undesirable ribbon development along the A3. It will be highly visible from the A3 when approaching Guildford and will, in conjunction with A43a at Garlick’s Arch give the appearance of almost continuous development from Send through to Guildford.
The Plan does not put forward any evidence that exceptional circumstances exist to justify removing this site from the Green Belt.

The development will overburden the local road network and increase congestion on the A3 and A247 through the centre of West Clandon. This is already very heavily used whilst being unsuitable for designation as an A road. In places it is too narrow for two lorries to pass causing them to mount the pavement.

Note the following accident data:

2010 –2014 from Crashmap data

- Clandon Cross Roads Area to Bulls Head - 17 incidents
- Bulls Heads Head to Bennett Way - 8 incidents
- Bennett Way to Higheotts Lane - 15 incidents
- Tithebarn Lane to Portsmouth Road Birch Close - 8 incidents

2015

- 21 Oct 2015 – A247 near shell garage - Three vehicles collided causing delays
  Surrey Fire and Rescue deployed.

2016

- 15 April 2016 12 year old boy injured in The Street – A247 closed in both directions
- 28 April 2016 A3 West Clandon London bound between A247 Tythebarns Lane (Burntcommon and M25J10 (Wisley Interchange) congestion on A3 to A3100 Clay Lane Burpham
- 30 6 2016 Motorcyclists with injuries airlifted to hospital Send Marsh Road

Attempts have been made over many years to reduce traffic, traffic speeds and accident risks through West Clandon, however little has been achieved as the road cannot be widened and SCC is reluctant to impose further speed limits as congestion is already very high.

I object most strongly to the proposal for a link road to bring traffic from the Gosden Hill development to the proposed 4 way junction at Burnt Common. This has the potential to generate large volumes of traffic (including commercial vehicles) on the A247 through West Clandon - a road which is already under traffic stress (see below).

The land in Gosden Hill does exactly what the Greenbelt was designed to achieve. It provides a green buffer between the Guildford Urban Area and West Clandon, gives Burpham a defined green boundary and breathing space and it hides Guildford town from visitors until they pass the off-slip to Burpham.

No exceptional circumstances have been demonstrated for building on this site and therefore it does not comply with paragraphs 87-89 of the NPPF. It stops the sprawl of Guildford town, assists in safeguarding the countryside from encroachment and assists in urban regeneration by encouraging the recycling of derelict and other urban land. All of these are requirements of the NPPF.

The scale of Gosden Hill is out of proportion to West Clandon. It would have four times the amount of housing plus shops, offices/factories, GP surgery, schools. Development on this scale would blight a historic village with a history going back to the doomsday book and beyond.

Gosden Hill is the most obvious location for the north end of an A3 tunnel. It has rising ground and is situated just before the urban area. If it is built on, it will be very difficult to construct a tunnel.

The development will generate in the region of 6,000 vehicles which will pour on to the A3 which is stationary every day during rush hours. The linking of the A3100, B2215 and A247 would channel thousands of cars through the narrow, winding road through West Clandon, a road where large lorries mount the pavement virtually every day and through Send and Ripley which are also severely constrained.
The volume of traffic will greatly increase air pollution which is particularly critical given the proposal to build two schools.

Currently, a two way junction at the site would require vehicles wanting to go north on the A3 to go through Burpham which is grid-locked every day.

Burpham’s sewers are at capacity. Sewage would have to be pumped to Slyfield for processing, a project of enormous cost.

There is inadequate fresh water in Guildford and current supplies could not meet the needs of a development of this size.

Electricity supply is also inadequate and would require a big infrastructure development.

The railway station was rejected by Guildford Borough Council in 1984 because it feared Gosden Hill would become a dormitory estate for London.

The wording of the Local Plan with regard to Gosden Hill is so loose that the developer could virtually do whatever it wants.

The remaining agricultural land between Gosden Hill and West Clandon is so small that it is highly likely to be uneconomic and therefore a prime candidate for further development which would roll the Guildford Urban Area over West Clandon towards East Clandon and Wisley.

If the Strategic Sites are developed, the north of Guildford will deliver 36%, 5,036 houses towards the total of around 14,000. The infrastructures of the existing villages and the A3 will be overwhelmed by the scale of development.

A new on-slip at Burpham would only be 1.8km from the on-slip at Burnt Common which is against Highway England’s requirement of 2km.

Development of the A3 at best will not start until after 2020 and the building of a tunnel, which is only an “aspiration” in the Local Plan, is likely to be many years after. In the meantime given that developers build houses to provide cash-flow for infrastructure, Gosden Hill will have a crippling effect on villages like West Clandon and the A3.

Gosden Hill already has surface water problems. Merrow Stream crosses the site. No hydrological survey has been carried out to assess the implications. Electricity pylons run through the centre of Gosden Hill which have health and safety issues.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID: PSLPS16/2384</th>
<th>Respondent: 8810113 / Louise Stewart</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43</td>
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<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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1. POLICY A43 AND A43a – Garlick’s Arch

I OBJECT to Policy A43 and A43a on Garlick’s Arch.

The site was only inserted in the draft plan at a late stage just before publication of the consultation draft which is a shabby way for the Council to proceed. The site is not a sustainable site being far from any infrastructure facilities and transport links. The bus service is infrequent and it is almost certain any future residents will rely almost entirely on cars for journeys. Similarly any employees at the employment areas will almost undoubtedly arrive and leave by car.

The site is susceptible to flooding and will not make a suitable site.

The Green Belt at this point serves the important function of separating West Clandon from Send. Building here will cause the two to coalesce defeating one of the objectives of the Green Belt.

I have seen no evidence that exceptional circumstances exist to justify removing this site from the Green Belt or that this important issue has been addressed. The Green Belt and Countryside study did not even consider this site.

It is understood the Council’s eyes may have been turned by the possibility of receiving for free the land which might be used for new A3 slip roads in return for allowing this development, thus justifying it as some form of enabling development. However the slip road land if needed could be safeguarded in the plan and acquired by compulsory purchase when required. Lack of current funding for the slip road is not a justification for allowing the development of this site. If the slip road is genuinely needed then government funding will be available for it. (One of the reasons for turning down the so called enabling development proposal intended to fund the rebuilding of the Howard of Effingham School was that the redevelopment of the school was not essential. As and when it became essential Government funding would become available. Accordingly enabling development was not necessary. The same principle applies here.)

The A247 running south past this site through the centre of West Clandon is already very heavily used whilst being unsuitable for designation as an A road. In places it is too narrow for two lorries to pass causing them to mount the pavement- often at speed. It has narrow bends with poor sight lines, an infants school and a hump-backed bridge concealing the entrance road to the station for southward traffic. In addition, there are no continuous footpaths which forces pedestrians to cross and re-cross the road. Development at Garlick’s Arch will only exacerbate the problem and make the road even more congested and unsafe for pedestrians.

The development will cause harm to the ancient woodland on and by the site.

Taken together with the Gosden Hill site, there will be a ribbon of development along the A3 in contrast to the current “soft” edge approach to Guildford.

Garlick’s Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8). There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).

The Plan states the preference is to making the best use of previously developed land. Yet at the 11th hour a perfectly acceptable brownfield site at Burnt Common, capable of accommodating approximately 100 houses, was removed from the Plan and replaced with the Garlick’s Arch site. There was no proper consultation in relation to the inclusion of this site. Why was a brownfield site removed and replaced with a Greenfield site? There is no evidence that Section 18 of the Planning and Compulsory Purchase Act 2004, which requires local planning authorities to produce a Statement of Community Involvement, has been complied with for this site. This only came to light for local residents following a Council meeting on 11th May 2016.

Moreover, Guildford Borough Council’s own Green Belt & Countryside Report does not address Garlick’s Arch at all, so there is no evidence base to support the inclusion of this site.

National Planning Policy promotes sustainable developments, with sustainable transport. With ever reducing bus services in the area and no train station within reasonable walking distance it is impossible for any development on this site to offer a sustainable transport solution. Development on this site is wholly inappropriate (Policy I3).
The stream, which runs through the site, is identified as having a high risk of flooding by the Environment Agency. There are other sites that do not flood that can be developed and therefore this site should be removed from the Plan (Policy P4).

This site is bordered by Ancient Woodland and within it a number of trees are protected by Tree Preservation Orders (Policy D3).

The site has an abundance of wildlife, some of which are protected. It is home to many types of owls and bats, with the woods having cuckoos and woodpeckers. In addition there are regular sightings of badgers, deer and red kites. The development of the site will result in the loss of habitat. No wildlife report has been conducted on the site. (Policy I4)

It is clear that with this site being added at the 11th hours no infrastructure planning has been undertaken. The Infrastructure Schedule makes no provision for any infrastructure improvements for this site. How will the local services such as schools and doctors cope, many of which are already at capacity? (Policy I1)

Furthermore, several electricity pylon runs through the site, which will have the potential to be a health hazard for any residents.

I OBJECT to the inclusion of the land for new on/off ramps at Burnt Common (A43a)

The addition north facing ramps to the A3 at Burnt Common would be a disaster for local communities. There is no requirement for local traffic to access the A3 to the north, but the addition will draw in a huge amount of ‘through’ traffic. The route from London/M25 to Woking or would now be through Burnt Common and Send. Equally traffic from the east of Guildford (Merrow etc) and the A25 will now go through West Clandon and Burnt Common. This will cause immense damage to those areas on small roads which cannot be improved.

This Plan does not address the needs of local communities or the Borough in this regard. There has again been no Section 18 consultation on this.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5275  Respondent: 8810113 / Louise Stewart  Agent:  

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

8. POLICY D3

I OBJECT to the damage to the historic environment as a result of the scale of the proposed development (Policy D3)

I OBJECT to the local plan based on the impact it will have on the special countryside of the borough.

The proposed development at Garlick’s Arch (A43) will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
1. **POLICY D3**

I OBJECT to Policy D3 - Historic environment

I object to this policy as it is very weak and I do not think it is clear enough in its support for the conservation of the historic environment. It provides for development which will “enhance” heritage assets which I fear is a developer’s charter as it leaves plenty of room for abuse.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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1. **POLICY D4**

I OBJECT to Policy D4 - Development in urban areas and inset villages

The policy should place much greater emphasis on residential development in the existing urban centres. In this way housing needs can be met without resorting to large developments in the Green Belt. There are urban areas in need of regeneration but these are ignored in favour of Green Belt development.

The policy should not be applied to the villages which should remain in the Green Belt. Unrestricted application of this policy to the villages intended to be inset will change their characters radically and for the worse. The development it encourages will increase traffic and congestion disproportionately.

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/5272  Respondent: 8810113 / Louise Stewart  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. POLICY E1

I OBJECT to the sustainable employment policy (Policy E1)

I object to the inclusion of a strategic employment site at Gosden Hill Farm. Employment sites should be concentrated on previously developed land in more sustainable locations with good transport links where the infrastructure can support development. Warehousing, distribution and industrial premises cause considerable commercial traffic, noise, pollution and general disruption. They are not good neighbours for schools and 2000 houses. Many of the jobs will be taken by people outside the area leading to additional congestion in Burpham and on the A3.

I object to the inclusion of a strategic employment site at Garlick’s Arch. It is in a non-sustainable location remote from any facilities of any kind and with poor public transport links. It is unlikely jobs there will be taken by local residents and it is likely all travel to and from work will be by car adding to local congestion. Employment sites should be concentrated on previously developed land in more sustainable location with good transport links where the infrastructure can support development.

The site is in any event subject to frequent flooding and unsuitable for development.

If developed, the new employment site at Garlick’s Arch, Send Marsh/Burnt Common (A43), would be treated as a Strategic Employment Site.

The proposed development of up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8) at Garlick’s Arch (A43) is in the scheme of industrial development relatively small. Just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m. The Garlick’s Arch site which is in the Green Belt should not be developed as a Strategic Employment Site when there is a suitable alternative brownfield site very close by, which is far more sustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/5273  Respondent: 8810113 / Louise Stewart  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. **POLICY E2**

I OBJECT to the location for new employment floorspace (Policy E2)

I object to this policy. It would be more sensible to confine new office and research and development floor space to the urban Guildford area. I also oppose the policy of expanding the Research Park onto Blackwell Farm. No exceptional circumstances, as defined under the NPPF, have been advanced to justify incursion into this permanent and high-quality area of Green Belt.

Proposals for new industrial, warehousing and storage (use Class B1c, B2 and B8) floorspace will be directed to the Industrial Strategic Employment Sites.

There is no need for the new employment floorspace to be located at Garlick’s Arch or Gosden Hill Farm, when near to these sites at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5274  Respondent: 8810113 / Louise Stewart  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. **POLICY E5**

I OBJECT to the loss of rural employment (Policy E5)

Policy E5 supports the retention and development of local services and community facilities in our inset and identified villages. Yet the development at Garlick’s Arch (A43) would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises. The Plan does not promote rural employment; rather it will result in the loss of existing local rural businesses.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5288  Respondent: 8810113 / Louise Stewart  Agent:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. POLICY E6

I OBJECT to Policy E6 - The leisure and visitor experience.

The policy should acknowledge that whilst in some areas new and enhanced leisure facilities are valuable (for example the new Opera House at West Horsley Place Towers), much tourism depends on the undeveloped nature of Green Belt areas surrounding Guildford. Accordingly the policy should recognise that in many rural areas new and enhanced visitor facilities may be unnecessary and counterproductive, particularly away from existing buildings and development. For example the attraction of Newlands Corner is its undeveloped nature. Significant development of visitor facilities there is likely to diminish rather than increase its attractions. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment. Heritage sites and the Green Belt are particularly vulnerable to harm.

Tourism and visitors do not depend on new visitor “attractions” and could actually be damaged by them, as compellingly argued in the current debate over Newlands Corner. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment/“Disneyfication”. Heritage sites and the Green Belt are particularly vulnerable to harm.

Guildford has many “leisure and visitor attractions” already. The case for creating more is not made and no examples are given. Instead, the plan’s explicit priorities should be:

1. To protect the Borough’s prime leisure and tourism asset, its countryside, from inappropriate development. This is all the more valuable because of its accessibility from London, the rest of Britain and the Continent, in that order. Rural residents are its custodians and require no Council interference. Economically, the most valuable forms of tourism, such as walking and cycling, require no new development. In the overcrowded South-East of England, lack of development is a leisure and tourism asset, not a liability.

2. To help make Guildford’s river landscape less off-putting and support town-break packages for high-value tourists. To achieve this, the policy needs to define what leverage, if any, Council planners have to influence normal tourism market mechanisms.

3. To help private providers market local tourism. This need not involve extra spending. The Council could, for instance, help co-ordinate ready-made, local tourism packages under a distinctive brand at an all-in price. An “English town break” (including B&B accommodation, a walking tour of Guildford, a pub lunch in the Surrey Hills, a visit to Wisley Gardens and a National Trust property and a Southwest Trains travelcard for a day out in London) would be highly attractive to many European visitors who currently by-pass Guildford to go to Bath, Oxford or Cambridge instead.

4. To rule out the redevelopment of scarce rural hotel sites (e.g. Thatchers, East Horsley, earmarked for 40 new houses under Site A37 of the plan yet just a short walk from the new opera house).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5281  Respondent: 8810113 / Louise Stewart  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E7
I OBJECT to Policy E7 Guildford Town Centre

The policy “vision” describes protecting the Guildford’s unique setting and historical character and sets out some of the ways this will be done. However none of this is included in the formal Policy wording in the blue box. I suspect the Vision wording is effectively of little or any force. These principles should be included in the formal policy.

There should be a much greater focus on residential use of the town centre where many people would like to live and where the necessary amenities and infrastructure exist. The policy misses the opportunity to propose forward looking sustainable residential development plans in, for example the Walnut Tree Close area, where very significant numbers of new homes could be provided. Such town centre sites could meet much of the housing need over the plan period without harming the countryside.

There is an urgent need for a strategy to focus on brownfield redevelopment before considering development outside the existing urban area.

The policy does not address any of the major issues raised by the Council’s own Town Centre Master Plan, the Guildford Vision Group’s proposal for new river and rail crossings or plans for the redevelopment of Guildford Station, all of which are already the subject of public discussion.

The policy also fails to provide guidance on design requirements, as required by the NPPF.

The policy and surrounding text concentrates too much on shopping without regard to its nature which risks a proliferation of dull high-street chain stores. The policy should seek to enhance Guildford’s character and encourage a wider variety of small shops including locally owned businesses and shops of use to consumers. (For example there is no butcher in Guildford.)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
1. POLICY H1

I OBJECT to Policy H1 – Homes for all. Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan period. It fails to set rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions.

The housing mix is based on out-of-date, pre-Brexit projections and on assumptions set out in a flawed SHMA that has not been scrutinised or evaluated.

I support higher density development in the urban area, without resorting to dehumanising, high-rise buildings that developers commonly claim are necessary for financial viability. Much of Guildford town could usefully be regenerated with 4-5 storey blocks with landscaping and underground parking, as often seen on the Continent and, recently, in London.

Student accommodation should provided for 100% of new students and more than 60% of existing students, which would free up ideal family accommodation in the urban area. Other university cities (e.g. Oxford) insist on higher percentages than those proposed in the plan. In my view, the Council’s timidity is a case of “regulatory capture” by Surrey University, which has failed to use its existing planning permissions (dating from 2004) to accommodate 3,000 students or to improve the efficient development of its campus (e.g. by building on its extensive and under-used surface car parks). If all students are accommodated in this way, 2,000 homes would be freed up in town and there would be no need to build on the Hog’s Back.

It is not appropriate to release Green Belt land to house students who could be accommodated on the Surrey campus or other university sites. The plan should take account of the university’s ability to house its own students and reduce the housing number accordingly.

Guildford borough has already a higher proportion of traveller sites than most comparable boroughs. Over-provision is inappropriate given other constraints.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5280  Respondent: 8810113 / Louise Stewart  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. POLICY H2

I OBJECT to this policy on affordable homes (Policy H2) on the grounds of feasibility and that it should be more firm and explicit on unviability in paragraph 4.2.40.

In particular a scheme is only unviable if the value of developing the land (including some allowance for development risk and a normal level of profit) falls below the sale value of the land for alternative non-premium uses such as agriculture. The price paid for the land is not relevant. The possibility of avoiding the affordable housing obligation through use of unviability arguments only serves to inflate land values. It will become clear that developments are unviable when developers start selling land for alternative non-development uses.
It should be noted in the plan that because of Guildford's relative popularity as a place to live combined with its location close to others towns and within the London Commuter belt no amount of building will meet demand. Similarly no amount of affordable housing will ever meet demand.

In addition the definition of an ‘affordable home’ is 80% of market value. With even a 2 bedroom flat in Guildford now having a market value of +£360,000 the discounted price is still not going to be affordable to anyone on a normal income.

And at what point will ‘affordable homes’ be able to go onto the market at full market price?

As we have seen with council houses it is not long before the discounted property is sold at full market value with the original owner simply pocketing the profit.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5285  Respondent: 8810113 / Louise Stewart  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. POLICY H3

I OBJECT to Policy H3 – Rural Exception Homes as this Trojan horse policy. It says that homes can be built anywhere near a settlement of any form (including agricultural land and the AONB). These homes are meant for people with a village connection, but they could be for anyone on the Guildford borough housing list. To make the housing viable, or to improve the “mix” this can include “market” housing (i.e. normal commercial development which in Guildford usually means large executive homes). This policy means building anywhere, and ignoring all historic planning restrictions.

The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove “exceptional circumstances.”

The wording of the policy is far too wide and drives a coach and horses though all other aspects of planning policy. As drafted the planning authority could be obliged to grant permission for inappropriate and unsuitable developments.

The wording provides no ability to balance the desirability of the development against other considerations including harm to the Green Belt or the AONB. (If the housing would meet identified need and adjoins a settlement under this policy wording permission would have to be granted even in the most sensitive AONB location, even if more suitable locations are available.) The policy should include the need for a balancing exercise including consideration whether more suitable locations exist.

The policy wording should not allow market housing. The ability to include market housing is likely to inflate land values, leading to a self-perpetuating need to include market housing. It may lead to spurious developer led proposals which will be difficult to resist.

The policy wording should define small, either in land size or number of units. I am concerned that if small is left undefined the policy could be used to justify significant developments. In the context of the plan a development of 150
homes might be argued as small. (If Wisley at 2,500 homes is a big development then 500 homes might be a medium development and 150 could be small.)

The policy wording should be restricted to adjoining sites or define the concept of being "closely related". In particular I believe adding the concept of safe and easy walking distance extends the potential radius within which sites will be argued to be “closely related” Many people would regard a mile or so as an easy walking distance. (School children are expected to walk further than that before being eligible for free school travel.)

The wording of the policy itself does not require the local connection requirement for tenants to be secured in perpetuity - only the affordability must be secured in perpetuity. (For example housing could be built for retired Cabinet Ministers under this policy so long as the first tenant was required to have a local connection.) The introduction to the policy mentions this point, but it is not part of the policy itself and may carry little weight at appeal.

The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove “exceptional circumstances.” The size and location of sites should be better defined and it should be clear market housing cannot be included.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/5276  Respondent: 8810113 / Louise Stewart  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. POLICY II

I OBJECT, due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy II)

Our villages are already suffering from severe congestion for much of the day, for example the Newark Road & Rose Lane junction in the centre of Ripley and the A247 through West Clandon. The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.

Furthermore, many of the country lanes around the villages of Ripley, Send and Clandon are narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition.

I OBJECT to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces.

Many of the affected villages, such as West Clandon, already suffer from traffic congestion. Further development around these villages will only result in more traffic and more parking problems.

With some 5,000 houses being proposed close to the village of Ripley, the roads serving the village will become even more congested. Cycling has become an ever popular past time, particularly at weekends hundreds of cyclists past through the villages on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and
with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road accidents involving cyclists as a result of the development proposed under the local plan.

The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the road becoming ever more dangerous for pedestrians.

The council has a statutory obligation to protect the public and the additional traffic flows will bring added accidents, noise, pollution and injury of the public. In the case of West Clandon the Street often only has a narrow footpath on one side of the road making it very dangerous, especially when vehicles mount the pavements.

This policy as it is inappropriate and inadequate and fails to respond to the challenges raised by the proposed significant Green belt developments. The borough’s infrastructure is already heavily strained. However the plan’s determination to build large housing estates across the Guildford countryside significantly increases the need for infrastructure investment without securing the means for its provision. Placing housing in the established urban areas would reduce the need for enhanced infrastructure as would a more realistic housing number.

The policy wording says nothing about roads and traffic. The Council’s methodology for assessing traffic congestion - averaging it over periods of several hours and ignoring the effects of junctions - simply hides the problem, which will get worse as development proceeds. The schemes referred to in this policy will not solve existing congestion and the local road network has not been given sufficient consideration. Some proposed development locations would require highway schemes that are unlikely ever to happen.

Adequate infrastructure provision is a pre-condition of sustainable development. But in this plan it is an afterthought buried away in Policy I1. By prioritising greenfield over urban, brownfield regeneration, the plan creates insurmountable (and unnecessary) obstacles for itself. Common sense suggests a local plan should first assess the Borough’s infrastructure capacity for sustainable development, and then tailor development accordingly. This plan, however, assumes infrastructure will follow on the heels of housebuilding as if by magic. It makes implementation critically dependent on providers outside the Council’s control and on the vagaries of CIL income. Instead of recognising this as a key constraint, the plan is based on hope. It is also highly likely that developers faced with the imposition of large infrastructure requirements will go to court to invoke the NPPF provision that prevents authorities from imposing conditions that make a development non-viable.

Policy I1 requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.

Despite the Garlick’s Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents in the locality will see their quality of life significantly deteriorate in many ways.

Many of the utilities in the Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers. No plans to improve these services should mean no development of the Garlick’s Arch site.

Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are already at capacity and suffering from funding cuts or freezes. Any further development without funding will place further stress upon existing health services.

Police services are seeing funding reduced. The development of the proposed 13,860 homes during the plan period will stretch the police services further and is unsustainable.

There is no provision of the increased capacity of Guildford hospital, where is this assessed and remedied?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Attached documents:

Comment ID: PSLPP16/5277  Respondent: 8810113 / Louise Stewart  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. POLICY I2

I OBJECT due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2)

I object to this policy as it is too vague and optimistic. Significant improvements to the road infrastructure are like to be many years away even if they ever happen. The draft plan, however, commits to building massive housing estates in the countryside before any of these road improvements are in place. This is inappropriate and will lead to massive traffic disruption during the construction phase and will add permanently to an already congested network (about 3,000 private cars from the 2,100 new homes at Wisley Airfield alone).

Road infrastructure represents a major constraint that should have been applied to the housing target at a much earlier stage in the plan process and not left as an unresolved difficulty in the draft plan.

There is no certainty that either the A3 or M25 in the borough will be improved to increase capacity and reduce congestion during the Plan period. Highways England has no plans to even examine improving the A3 before 2020. I have considerable concerns that development of the large residential sites identified at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), will take place before any improvements are made to the trunk road network. The A3 and M25 are already at capacity during peak hours and any development prior to improvement of these roads will only make the situations worse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5263  Respondent: 8810113 / Louise Stewart  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to the fact that the infrastructure has not been properly assessed and is inadequate to deal with current housing levels, with such a large increase in housing the roads will not be able to accommodate the huge increase in traffic. There are currently serious delays on all roads during the rush hour and they are busy at all times of the day.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/5278  Respondent: 8810113 / Louise Stewart  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. POLICY I3

I OBJECT to poor air quality concerns (Policy I3)

Paragraph 4.6.27 of the Plan states that “Development must also mitigate its traffic impacts, including its environmental impacts and impacts on amenity and health.” The significant level of development being proposed, particularly in the north east of the borough will lead to considerable further congestion, despite any attempts to mitigate this through travel plans. This will be particularly acute in built up residential areas and will only lead to greater levels of air pollution, which will have a detrimental effect on local residents and their health and can result in early death.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/5264  Respondent: 8810113 / Louise Stewart  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to building on the Green Belt because the essential characteristic of Green Belt is its openness and permanence (National Planning Policy Framework paragraph 79).

I set out below my objections to specific policies and matters within the Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
### 1. POLICY P2

I OBJECT to not protecting the Green Belt (Policy P2)

This policy does not sufficiently safeguard the Green Belt even though Green Belt constitutes 89% of the borough and should be the cornerstone of all local planning policy. The Green Belt is not the Council’s to give away and once it is gone it is gone forever. Sacrificing areas of the Green Belt to a developer influenced growth agenda is a betrayal of future generations and does not constitute sustainable development.

The Green Belt should be protected in perpetuity, but Policy P2 seeks to justify excessive development in supposedly protected areas. This is in breach of party manifesto commitments and contrary to previous responses to public consultation. It is disreputable to argue, as the Council does, that the Plan would involve the loss of “only” 1.6% of the borough’s Green Belt. Leaving aside the reliability of that statistic, the NPPF does not set an “acceptable” percentage. The fact remains that the plan proposes that 65% of the housing plus industrial development be built on land to be taken out of the Green Belt.

Paragraph 4.3.16 is seriously deficient in simply stating that the Council considers that exceptional circumstances exist to justify amendment of Green Belt boundaries. The exceptional circumstances are not identified. It is clear from national guidance that unmet housing need is not on its own an exceptional circumstance. Even to the extent that exceptional circumstances exist, these have to be balanced against the harm to the Green Belt in the specific sites proposed to be taken out of the Green Belt. This balancing exercise appears not to have been done.

The Countryside Study which the Council may argue fulfilled the need to demonstrate the exceptional circumstances required to justify removal of areas from the Green Belt was a simplistic tick box exercise. Within limits it may have answered certain questions about different attributes of different areas of Green Belt but it did not carry out the balancing exercise needed to determine whether specific exceptional circumstances justified removal of specific areas of land from the Green Belt. I believe that each of the identified Green Belt site proposed to be removed from the Green Belt should be carefully assessed against any exceptional circumstances in deciding whether it should be removed from the Green Belt in the final plan. This exercise should bear in mind that housing need in itself is not an exceptional circumstance and nor is the Council’s growth aspiration. An important consideration is that more housing need could be met on urban sites than is currently planned. The Plan has fallen into the developers’ hands and developers prefer building on undeveloped land rather than brown field sites.

I note that the Summer 2016 edition of "About Guildford" (published by the Council) on page 5 states that "... the Plan rejects any schemes that would have a detrimental impact on the Green Belt." This is demonstrably untrue and I consider this to be a deliberate untruth which compromises the consultation process. I would ask that this untruth be corrected and the consultation period restarted after the correction has been given the same distribution as the original statement. (I assume the document was delivered to most houses in the Borough.) I reserve the right to argue before the inspector that the consultation process was flawed and ineffective because of this.

I object to the “insetting” of 14 villages from the Green Belt. Contrary to assertions made in the Plan process many of these villages do contribute to the openness of the Green Belt and there is no need to inset them.

I also object to the wholesale extensions to the settlement boundaries in many villages to allow for infilling and that infilling is also proposed outside the settlement boundaries of 11 further villages. Many Guildford villages are linear. It is all too easy to square off boundaries by including countryside bounded on only one or two sides by existing development,
claiming it contributes nothing to the “openness” of the Green Belt, a term which neither the plan nor the NPPF defines. The NPPF’s other 4 tests of Green Belt status, including the prevention of urban sprawl, are ignored. Effectively, this policy makes all villages within the Green Belt vulnerable to large blocks of new development and seems almost calculated to secure the rejection of the plan as a whole.

To “inset” two-thirds of the borough’s rural villages on the grounds that they no longer contribute to the purposes of the Green Belt is extreme and inherently implausible, given the borough’s location on the edge of Metropolitan London. I cannot see how such extensive areas fail to contribute to the purposes of the Green Belt under the NPPF, but this could quickly be the case if the proposed “insetting” and boundary extensions go ahead.

This policy is wildly disproportionate in terms of any foreseeable development need and has caused tidal waves of opposition from residents. It flies in the face of NPPF paragraph 17’s aim of “empowering local people to shape their surroundings” and other NPPF provisions.

Paragraph 4.3.17 states that “the general extent of the Green Belt has been retained.” I believe this should be deleted as an untruth.

In addition I OBJECT to the proposals to remove from the Green Belt the so called ‘strategic sites’ of Wisley Airfield (A35), Gosden Hill Farm (A25) and Garlick’s Arch (A43) and all other strategic sites. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these sites and villages (as mere housing need does not constitute a ‘special circumstance’) to be taken from the Green Belt. Once taken from the green belt they will be lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached.

GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site.

Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

**Comment ID:** PSLPP16/5289  **Respondent:** 8810113 / Louise Stewart  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()
1. SITES - POLICIES A1 TO A57

I OBJECT to all strategic sites proposed in the draft Plan to be built in the Green Belt.

1. I object to the identification and allocation of sites in this plan without regard to Green Belt, infrastructure or other constraints. The plan says that “allocating these sites does not grant planning permission for development.” However, each of the sites will be removed from the Green Belt and will be available in principle for development and non-Green Belt uses. The inclusion of these sites without detailed site by site justification shows contempt for the thousands of detailed comments the Council have received about individual sites ever since the Issues and Options consultation in 2013. The plan has hardly changed since the Council received 20,000 objections to its first draft plan in 2014. The Inspector considering the plan may conclude that the consultation has not been properly conducted.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

| Comment ID: | PSLPP16/5270  | Respondent: | 8810113 / Louise Stewart  | Agent: |
|-------------|---------------|-------------|--------------------------|
| Document:   | Proposed Submission Local Plan: strategy and sites 2016 / Policy P4 |
| Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( ) |
| Answer (if comment is on questions 1-7 of the questionnaire): | () |

4. POLICY P4

I OBJECT to development in areas which are at risk of flooding (Policy P4)

National Planning Policy states that Local Plans should take account of climate change over the longer term, including factors such as flood risk. It goes on to say that new development should be planned to avoid increased vulnerability to the range of impacts arising from climate change.

The Plan states that in accordance with national planning practice guidance, the Level 1 SFRA has been used to guide development towards areas at the lowest risk of flooding and identify areas unsuitable for development. However, the document concludes that land outside of the area of flood risk is not capable of accommodating all of the borough’s identified development needs. A Level 2 SFRA has therefore also been produced and will help the Council apply the exceptions test (as described in the NPPG) as necessary to development proposals in areas at risk of flooding.

The site at Garlick’s Arch (A43) is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. Knowing the area well I am aware that this site often floods during the winter months and the flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

| Comment ID: | PSLPP16/5265  | Respondent: | 8810113 / Louise Stewart  | Agent: |
|-------------|---------------|-------------|--------------------------|
| Document:   | Proposed Submission Local Plan: strategy and sites 2016 / Policy P4 |
| Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( ) |
| Answer (if comment is on questions 1-7 of the questionnaire): | () |
1. POLICY S1

I OBJECT to this Policy as the development proposed will not be sustainable (Policy S1)

The NPPF states that the presumption in favour of sustainable development “should be seen as a golden thread running through both plan-making and decision-taking.” As the first policy in the Plan, Policy S1 ought to set a clear framework. Instead, no definition of “sustainable development” is given. The policy also fails to set out any principles for applying sustainable development in practice to local planning decisions, which often have serious long-term impacts.

The policy states that it aims “to secure development that secures the economic, social and environmental conditions in the area”. This fails to recognise that economic growth, social justice and environmental protection often conflict. The policy does not say how each element is to be weighted or conflicts resolved. As a practical guide to the planning decision to be taken in the Plan period it is seriously deficient. The policy is likely to be used by developers to justify inappropriate developments on economic grounds. Under this policy, virtually any development will qualify as “sustainable”, in breach of the NPPF’s most important guideline.

Policy S1 is also seriously deficient in making no mention of the Green Belt. The Green Belt is a long term Government policy enshrined in primary legislation to protect green areas in perpetuity. The Green Belt is a living example of sustainable development in practice and is one of the most important factors affecting sustainable development in the area covered by the Plan and should be acknowledged in this policy. Policy S1 should include a commitment to protect the Green Belt from inappropriate development and to uphold Green Belt boundaries and protections. This would set at least one clear boundary to planning decisions. The Plan and the Council have treated the Green Belt as a developable land bank rather than as a constraint to development.

The commitment to approve planning applications “wherever possible” and “without delay” reveals the pro-development bias of the plan. Countervailing references to sustainability are so vague that the NPPF presumption in favour of sustainable development becomes a presumption in favour of any development at all.

This policy also ignores, as if they are inconvenient constraints, most of the 12 Core Planning Principles set out in NPPF paragraph 17.

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact on existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill Farm (A25) are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are also unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick’s Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.
The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/5266  Respondent: 8810113 / Louise Stewart  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. POLICY S2

I OBJECT to the Borough Wide Strategy (Policy S2)

The borough wide strategy is poorly considered. It proposes 13,860 homes being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

The housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.

The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guildford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

The assumptions and calculations in the SHMA are widely regarded as flawed and even before Brexit, produced an inflated housing needs number. The figure of 13,860 new homes is completely unsubstantiated. It has not been scrutinised by Councillors despite repeated requests for debate. The assumptions and calculations underlying the model are hidden, protected by a claim to intellectual property by a commercial sub-contractor used in preparing the SHMA. I have serious doubts about the objectivity of the SHMA because it has been produced by consultants whose website openly proclaims their pro-development agenda leading to reasonable suspicion that the figures are inflated. Guildford’s OAN is not
transparent but has been taken on trust by the authors of the plan. Given that almost every element of the plan is predicated on this OAN, the plan as a whole cannot be considered “sound”.

The status of the 13,860 figure is ambiguous. The Council has said that the housing number and the OAN are identical because the OAN is “deliverable” and is by definition objective and cannot be contradicted. The OAN is only deliverable because of the Council’s cavalier approach to the Green Belt in contravention of the NPPF, ministerial statements and local and national Conservative Party manifesto commitments. The plan also states that infrastructure or other constraints may in due course affect deliverability. It is also unlikely that the number of houses can be built at the rate proposed. In recent years, housing starts have on average been less than half the proposed rate. This is not because developers do not have the land or cannot get planning permission. Constraints in the supply chain and maintaining profit levels have been more important.

The plan cannot be considered “deliverable”. In addition, the number of homes proposed, plus existing planning permissions, plus expected “windfall” sites, exceeds the total of 13,860. So how many homes (taking account of these adjustments) do the Council want built? The plan does not say. Without this figure it is hard to see how anything else can be planned. This undermines the validity of the whole consultation. It is unreasonable to ask the public to approve a “plan” that fails to propose a target number that takes all the standard constraints and adjustments realistically into account, leaving the Council to set one without further consultation. Even if the OAN are not flawed, it is at best only a baseline figure and should not be passed off as a policy proposal.

It is unreasonable to embark on a radical transformation of the borough on the basis of an unclear housing target. Most of Guildford Borough is highly protected from development (89% Green Belt, 44% AONB and about 75% protected by SPA). Whether or not increasing the number of dwellings by up to a quarter is desirable, it would be a major and irreversible change, arguably turning a largely rural borough into a mainly urban or suburban one like Woking. The scale of the housing number increases the onus for it to be seen to be sound. A substantially lower number, on the other hand, would remove the need to build on Green Belt or open countryside, and instantly meet the single biggest public objection to the plan as a whole.

The Plan in general and this policy in particular does not address the point that Guildford exists as part of London’s commuter belt. Any increase in supply of housing in Guildford, particularly if the increase is proportionately greater than elsewhere in the commuter belt, will simply result in a shift of population into the area. It will not reduce prices or increase availability except imperceptibly. The Plan also ignores the point that many of those working in the area live elsewhere. Accordingly in considering the housing number the Plan should take into account that in this part of London’s commuter belt, demand for housing is, in practical terms, unlimited.

This policy does not take proper accounts of the constraints to development which exist, principally posed by the Green Belt and by infrastructure limitations. I believe the Council is under a duty to properly consider applying these constraints. It is clear the Council has failed to do this. This approach differs from all the other boroughs in Surrey. The Plan appears to have deliberately been manipulated towards a growth agenda without disclosing why this is being done. The housing that is needed should be concentrated on urban brown field sites and through increasing the housing density of existing built up urban areas.

The development of 13,860 homes in the Plan period with 65% in the Green Belt does not constitute sustainable development. It will have a permanently detrimental impact on the Borough in general and on West Clandon and surrounding area in particular. The developments at Garlick’s Arch and Gosden Hill Farm do not meet the needs of the local communities. The road infrastructure in and around West Clandon will be unable to cope with additional demand. The edge of urban Guildford will creep that much closer to West Clandon, thus negating the purposes of the Green Belt in the area which include safeguarding the countryside from encroachment, checking the unrestricted sprawl of large built up areas and preventing neighbouring towns merging into one another.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill Farm (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of
identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment ID: SQLP16/892</th>
<th>Respondent: 8810113 / Louise Stewart</th>
<th>Agent:</th>
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<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. **Questions posed by Guildford Borough Council as part of its consultation.**

Questions from GBC

24.A. **Question 1: The evidence base and submission documents**

The Proposed Submission Local Plan: strategy and sites is based on up-to-date evidence. The evidence base documents contributing to the preparation of the plan are listed in Appendix D and can be found on our website (links open in a new window).

Do you agree that the evidence used for the Proposed Submission Local Plan Strategy and Sites is adequate, up-to-date and relevant?

**ANSWER**

I do not agree that the evidence used for the Proposed Submission Local Plan Strategy and Sites is adequate, up-to-date and relevant.

The fundamental driving forces for much of the development proposed in the Plan (particularly that on Green Belt land) are based on:

1. An excessive ambition to expand the local economy which is neither warranted nor wanted by the local population. Guildford is already one of the highest ‘value creation’ areas in the country and has one of the lowest unemployment rates. There is no evidence that massive and accelerated expansion is required.

1. SHMA figures which are neither transparent nor justifiable, especially in view of previous figures set. Independent assessments of the SHMA (eg from Guildford Residents’ Association and David Reeve) show it is set far too high and so cannot be said to be adequate, up to date or relevant.
In addition the recent vote to leave the EU and the impact this will have on the economy and migration have not been taken into account.

The Plan should be re-assessed and the methodology for arriving at housing need figures should be fully transparent.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/893  Respondent: 8810113 / Louise Stewart  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 2: Legal compliance

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

24.B. Question 2: Legal Compliance

Do you consider the Proposed Submission Local Plan: strategy and sites as a whole is legally compliant? Please provide the following information being as precise as possible:

- why you consider it is or is not legally compliant and
- what change(s) (if any) you consider necessary to make it legally compliant, explaining why this is the case.

ANSWER

I do not consider the Proposed Submission Local Plan: strategy and sites as a whole to be legally compliant because it mainly ignores the consultation process for the 2014 draft Plan it is claimed to be based on.

That consultation process was absolutely clear by some +20,000 responses that that Plan was flawed and no development should be carried out on Green Belt land.

Instead this 2016 draft Plan actually increases the number of dwellings being built on the Green Belt, in direct contradiction to the consultation process, yet is stated to be a Regulation 19 proposal.

As a result I do not see how the 2016 draft Plan can be Legally Compliant.

The 2016 draft Plan should be re-assessed and should take into account the views of the majority of responses from the consultation process for the 2014 draft Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/894  Respondent: 8810113 / Louise Stewart  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

24.C. Question 3: Soundness

Do you consider the Proposed Submission Local Plan: strategy and sites as a whole to be sound? Please provide the following information being as precise as possible:

- why you consider it is or is not sound and
- what change(s) (if any) you consider necessary to make it sound, explaining why this is the case.

ANSWER

I do not consider the Proposed Submission Local Plan: strategy and sites as a whole to be sound, because, but not limited to, the following reasons:

1. "Only sites that propose sustainable solutions have been included in the Plan and the Plan rejects any schemes that would have a detrimental effect on the green belt." Summer 2016 edition of "About Guildford" (published by the Council) on page 5. This is demonstrably untrue and appears designed to bias the consultation process.
2. The housing OAN figure has been calculated by a process which is not transparent. It has not been properly examined by Councillors before being adopted.
3. The OAN has been adopted as the housing number without the application of any constraints to take account of Guildford's circumstances, including in particular the Green Belt, AONB and road infrastructure. National policy permits such constraints to be applied and it is inappropriate not to consider the need to do this.
4. The draft Plan does not accord with the NPPF policies on protecting the Green Belt.

Exceptional circumstances need to be shown to justify removing areas from the Green Belt and this has not been done. The housing need number is not justification in itself according to published ministerial statements Having properly calculated an OAN, constraints should be applied to it to reflect the Green Belt, AONB and infrastructure. Each proposed Green Belt site then needs to be justified on its own merits. The benefits of the proposed development need to be identified together with the harm to the Green Belt. Only if there are exceptional circumstances and following a proper balancing exercise demonstrating that these exceptional circumstances outweigh the harm to the Green Belt can the proposal proceed. The draft Plan does not demonstrate that this has been done. The housing number has been used as a blanket justification for all Green Belt sites-which amount to 65% of the proposed housing number.

1. Whatever the justification for the assumptions made in calculating the OAN, those assumptions are now almost certainly incorrect following the referendum.
2. The housing number is at least twice the achieved rate of building in the Borough over the last few years. There is no evidence in the Plan to show that this rate is achievable and sustainable.
3. Much of the infrastructure required to support the level of development proposed is outside the Council’s control. The Infrastructure Plan is long on possibilities and aspirations and very short on commitments. The infrastructure requirements placed on developers are supposed to be in place before development commences. This is utterly unrealistic and indicates a lack of knowledge of developer’s business models which depend on positive cash flow. It seems very clear that at best, infrastructure provision will seriously lag development and leave higher levels of congestion than now. This will reduce the quality of life for residents through congestion and disruption.
4. The 40-45% requirement for affordable homes together with infrastructure such as railway stations, park and ride facilities, schools and roads is highly likely to be challenged on a site by site basis by developers using the NPPF provision that Councils cannot impose conditions which make development non-viable.
5. GBC has not included details of its Town Centre Master Plan and urban development proposals in time for and as a part of the Guildford Local Plan consultation.
6. GBC has failed to provide an Infrastructure Report in time for and as a part of the Guildford Local Plan consultation.

7. GBC has proposed an OAN of 693 houses per annum in the GL Hearn West Surrey Strategic Housing Market Assessment (SHMA) which many, including independent assessors, consider unsound.

8. Highways England will not start to consider what it intends to do as regards the A3 in the vicinity of Guildford until 2018.

9. Network Rail have not made available for the public consultation any plans for a new railway station at Merrow with an adjacent Park & Ride for 1,000 cars.

10. The GBC proposals for Gosden Hill Farm do not appear to be in coordination with the Neighbourhood Plan for Burpham.

11. The draft Local Plan will cause further linear development along the A3 between Burpham and West Clandon PC and encroachment onto open Green Belt countryside in clear conflict with the National Planning Policy Framework.

12. The proposal for Garlick’s Arch was added to the draft Local Plan without any prior consultation under Regulation 18.

13. The Land Availability Assessment (LAA) indicates a range of planning difficulties for Gosden Hill Farm and Burpham which have to be met by the developer involved. These include Electricity Grid supply problems and foul sewage and surface water issues that suggest the development proposed cannot easily be implemented both technically and financially.

14. No adequate explanation is given as to how the aspirational proposal for a tunnel will be used to overcome traffic issues relating to the quality of life and amenity of Burpham, West Clandon, Send and Ripley citizens.

15. In common with many others I do not believe the housing figure has been properly calculated and believe it overstates housing need. The Council has prevented councilors or others from properly considering the SHMA by refusing to make public the basis on which it was drawn up.

16. The housing figure, when properly recalculated, should be subject to constraints to reflect Guildford's circumstances, including in particular the Green Belt and road infrastructure. National policy permits such constraints to be applied and it is inappropriate not to consider the need to do this.

17. Even once a housing number has been calculated it cannot be used to justify taking land out of the Green Belt on a wholesale basis.

18. Cast iron commitment should be included in the plan that development can only commence when required infrastructure improvements have been secured.

19. The status of the text which accompanies each policy box is not clear. If the accompanying text does not have the force of policy a number of the policies (i.e. the text in blue) are so vague and general that they commit the Council to very little.

The draft Plan should be re-assessed with housing on brownfield sites made a priority over commercial development and Greenfield sites and each of the above points addressed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
24.D. Question 4: Duty to cooperate

Do you consider the Proposed Submission Local Plan: strategy and sites as a whole has complied with the Duty to cooperate? Please provide the following information being as precise as possible:

- why you consider it has or has not complied with the Duty to cooperate and
- what change(s) (if any) you consider necessary to make it comply with the duty to cooperate, explaining why this is the case.

ANSWER

I do not consider the Proposed Submission Local Plan: strategy and sites as a whole has complied with the Duty to cooperate.

This 2016 draft of the Local Plan clearly demonstrates Guildford Borough Council’s refusal to co-operate with the wishes and requirements of the vast majority of the residents in its Borough.

The Council has failed to co-operate with the results of the consultation process for the 2014 draft Plan which was meant to inform and guide this 2016 draft Plan.

Despite campaigning on a clear statement ‘Conservatives Say Green Belt To Stay’, the ruling party on GBC is now intent on pushing through a Plan which will devastate Green Belt land and extend the Guildford Urban Area to further merge into surrounding rural villages.

This is not cooperation by any definition.

In addition the Council has failed to cooperate in providing any transparency to the housing need figures commissioned by the Council from GL Hearn.

The 2016 draft Local Plan should be reassessed with a reviewed and transparent SHMA and revised to reflect the views of the residents of the Borough, who pay for Guildford Borough Council to act in their interests, and not those of developers and central government.

I trust that the objections made above are fully taken into consideration and that the 2016 draft Local Plan is amended accordingly.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to the fact that new sites have been proposed in this consultation which have not previously been considered, which is not appropriate at this stage.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: SQLP16/890  Respondent: 8810113 / Louise Stewart  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 7: Any other comments?

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Re: Responses to Guildford Borough Proposed Submission Local Plan (June 2016)

I OBJECT in the strongest possible terms to the Guildford Borough Proposed Submission Local Plan (June 2016). This Plan is unsustainable, unworkable and, in many provisions, unnecessary.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/3851  Respondent: 8810145 / Claire Waters-Duke  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A26

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I am writing to object to the development of a 1800 home development and a new business Park on the beautiful Blackwell Farm.

Apart from the stunning views that the Hogs Back provides, the area is classified as the Surrey Hills, which I believe is a ANOB and should be protected.

The wildlife of which there is many would be destroyed and the additional traffic would be a nightmare. The area does not have the infrastructure for this development.

It should be on brownfield land and it would destroy tourism who like to walk in the area.

I totally object to this development.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/3224  Respondent: 8810145 / Claire Waters-Duke  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A46

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

To whom it may concern:

I am writing to object to the proposed development at Normandy, Surrey for the following reasons:

I gather GBC are required to demonstrate ‘exceptional circumstances’ to justify the release of Site A46 from the Green Belt. There is NO clear evidence of any exceptional circumstances within the Local Plan that justify this. It does not take into account the red sensitivity status of the site, and there is no evidence why such a vast development needs to be developed on this sensitive area, as opposed to other more well suited locations.

I gather the whole reason this development is being proposed is because of the ‘so called’ need for a Secondary school in the area, otherwise this site would not even be considered. However councillor Keith Witham I believe has conducted an extensive survey which highlighted that within the local secondary schools there are currently 736 vacancies at the nearest secondary schools serving the Western parishes – not accounting for the 480 extra at the new Technical College to open in 2018 – a combined capacity of 1,216. In addition I believe SCC has already approved expansions at the County School, Guildford and St Peters. In addition to this, the birth-rate in Guildford has fallen over the past two years, so this is another reason why deciding to proceed now, could be a devastating waste of our countryside. The case for the need for a new secondary school in Normandy is therefore not proven or needed and therefore I believe this development should not go ahead.

TRANSPORT & ROADS

The roads surrounding the proposed site are already full of traffic, and roads such as Westwood Lane and Glaziers Lane, are just not designed for the volume of traffic proposed. The huge lorries that we currently have to cope with, along with cars travelling too fast, I’ve already had two cats killed within a year on Glaziers Lane, they can’t cope with the volume of traffic as it currently stands, let alone any further development. Cars don’t stick to the speed limit and young children are already vulnerable on these roads, let alone if lots of other cars were to come along. The railway bridges are old and won’t cope with the additional cars and the headroom of the Westwood Lane bridge would prohibit double decker buses from accessing the proposed school.

ENVIRONMENTAL CONSIDERATIONS
A development on this scale, would kill off thousands of beautiful wildlife that surround the area. This is an environment-sensitive location next to one of the component SSSIs of the Thames Basin Heaths Special Protection Area for birds.

There are many vitally important ecological networks that surround the proposed development area namely Ancient and Semi-natural Woodland, Veteran Trees, Hedgerows, Semi-improved Grassland, Farmland and a Stream, this proposed development would destroy a number of these habitats including Semi-natural Woodland, Veteran and Mature Trees, Hedgerows, Farmland and Semi-improved Grassland, plus would have indirect effects on Ancient Woodland habitat and the Stream through pollution (light, noise, litter and diffuse land and road runoff). A number of protected species have been recorded within either the proposed development site or 500m to 1km of the proposed development site. These include Hedgehogs, Dormice, Great Crested Newts, Barn Owls, Stag Beetles, Skylarks, Common Toads, Common Lizards, Grass Snakes, Adders, Slow worms, Badgers and Bats (including potential roosts within a number of veteran and mature oaks and other trees across the proposed development site and within the woodland blocks).

Light pollution from this proposed development on this scale would be starkly visible from Surrey Hills Area of Outstanding Natural Beauty (AONB).

Effect on surrounding woodland and stream habitats that adjoin these roads including the SNCI’s of Normandy Common, Normandy Pond and Wyke Churchyard.

I also think the pollution levels of the increased traffic in the area, could well be damaging for people’s health, particularly those of the elderly and young, of which, Normandy has many.

**INFRASTRUCTURE**
The local roads, Church, Primary School, Doctors and Library just can’t cope with such a huge development planned.

**To SUM UP**

I moved to Normandy nine years ago, as I loved the open green fields and rural and small village like feel. Having the green open fields provide a great environment for enjoying the benefits of fresh air and exercise, both for me and my children. It’s a great place for children to learn and enjoy the wildlife, to see a deer bouncing along, or a rabbit running past or looking at all the colours on a Jay. It’s a great environment and one that is likely to be ruined if a huge concrete development was to be placed into the heart of the community.

While I understand that **SOME** development might need to take place, I do not feel that Normandy is a suitable place for such a vast development to be considered. Especially when there is no **EVIDENCE** that shows we have a need for it. **PLEASE do not destroy the beautiful area that I live in and the habitat of so much wildlife**

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
I object to the proposed development sites A37, A38, A40, A41 & A 39.

The cumulative impact on these development site would immense. The number of houses proposed is excessive & disproportionate in relation to the rest of the borough. It will destroy the rural character of the communities.

These sites will put unsustainbale strain on already stretched local facilities & infrastructure, including, public transport, parking, schooling, medical facilities, sewage, surface drainage (already prone to flooding) & shops.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/5134  Respondent: 8810241 / Helen Buttery  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the proposed development site Of the Three Farms Meadows A35. This has been previously rejected by the Guildford Planning Committee on 14 separate grounds. This site should be rejected once again for all of the previous reasons it was rejected.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/10361  Respondent: 8810241 / Helen Buttery  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the proposal to remove East & West Horsley villages from the Green belt.

I object to the proposal to extend the boundaries of settlement areas of the Horsleys.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/10363  Respondent: 8810241 / Helen Buttery  Agent:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

If each village across the south had an additional 10 house built would this not rectify the need for more housing? Rather than ruining the peace & tranquility of villages why not try & enhance them. Don't build on Greenbelt land. There are no exceptional reasons to do so within the Horsleys or surrounding area for that matter.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPA16/582  **Respondent:** 8810369 / C M Evans  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Shalford (south)

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to GBC’s proposal for the following reasons:

- Over 700 residents signed a petition last year objecting to the proposed settlement boundary change. This issue has united the community with widespread support from local clubs and organisations. I cannot imagine their views will have changed.
- If GBC support the expressed views of the local residents to protect the fields from development they should retain them within the current green belt boundary and keep them outside the village settlement boundary. The boundaries have been there a long time SO THERE IS NO VALID REASON TO CHANGE THEM.
- The elevation of this land which is 32 feet above King’s Road is the highest in the local area and any housing development built on it would tower over the village community facilities and the surrounding area.
- The land contributes to the open character of the village and provides a green and pleasant setting.
- Lastly- access to this land is via Chinthurst I stress the word Lane which already suffers from fast and through traffic to the detriment and often danger of local residents and pedestrians. This Lane does not need more traffic.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPP16/971  **Respondent:** 8810657 / Mike Peters  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S2
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT in the strongest possible terms to the above plan. As a retired person I do not have the facilities or the resources to enter into every aspect of this plan. But I particularly OBJECT to those sections listed below appertaining to the area of West Horsley and the adjacent areas proposals.

I OBJECT in detail and in general to this plan

I particularly OBJECT to the method whereby this plan has regurgitated inaccurate, badly researched and unjustified information and is an obvious ploy to get around the previous objections voiced within West Horsley and, indeed, in all the villages affected.

I OBJECT to being forced to undertake this exercise again and that my previous OBJECTIONS have been put aside. This cannot be democratic.

I OBJECT to Policy Q: Green Belt and the Countryside: Surrey Hills Area of Outstanding Natural Beauty (AONB)

I am totally opposed to the plan affecting all the Guildford Villages and to West Horsley’s removal from the Green Belt by insetting and extending the 2003 boundaries. There are no exceptional circumstances or other justification for the new Green Belt boundaries that will result from the proposed insetting. This study is flawed.

The West Horsley Parish is well established with low housing density settlements with a considerable number of historic buildings and the Council fails to make a case for locating large numbers of homes in the Horsley or neighbouring villages.

I OBJECT to the Polices S1 Presumption in favour of Sustainable Development, Borough Wide Strategy, HI Homes for all, H2 Affordable Homes.

No accurate or acceptable case has been made for provision for 13,800 new homes over the period 2013 to 2033. The number of homes is too high and unsustainable in Guildford’s villages. The current infrastructure is strained and at breaking point and there are no plans for addressing the infrastructure

The proposals for West Horsley are clearly unsustainable for the proposed high volumes of new housing development

I OBJECT to the development of 385 homes on the proposed sites in West Horsley. The proposals are at much higher densities than currently in the village and will be totally out of character with the existing mix of different housing styles and the layout of the village.

I OBJECT particularly to the proposals for site A40 in that this is the area I know best. The A40 site is unsuitable for development and the Guildford Council has several times rejected applications to build on the site. It has a high water table, is prone to flooding in even medium rain fall and in high rainfall there are problems with flooding of the roads and the overflow of sewage. The work to make such a site suitable for development, even for a third of the homes specified would be out of proportion to any return on capital invested.

The drainage affects are acknowledged by the water authorities who point out that the downstream effects are sizeable and probably uneconomic.

Importantly this is an area of calm, peace and quiet within the green belt and I am reliably informed that there are several species of orchids growing and the land is full of wild life which needs preservation.
The development proposals throughout the village- and also in terms of the knock on effect of the Wisely Airfield proposals- are unsustainable in terms of schooling, drainage, roads capacity, shopping and Rail Station parking, and lack of public transport.

The roads are already at capacity and breaking up under the strain. Traffic uses Ockham Road North as a cut through/rat run when the A3 and M25 are busy or blocked (frequently these days) and this is acknowledged by Surrey County Council roads authority.

There is a major strain on schooling in the area and on medical services. There are few jobs in the area and the practicalities of commuting to London or, indeed to Guildford are heavily affected by the plan.

The strain on the current rail service is obvious and it all but impossible to park at the Horsley rail Station where the parking even after extension work is problematical.

I OBJECT on the grounds that there is no proven need for so many houses to be built in Horsley. It is totally unproven and risks the formation of a dormitory township devoid of infrastructure that could manage such an influx of people and cars.

Any forecast of housing needs is also rendered out of date by the current Referendum related to immigration which will lead to a much lower demand for housing in the future.

It is my understanding that in West Horsley the recent survey of the village in 2014, identified a limited need for only 20 affordable homes.

In summary: Guildford Council’s plans are highly suspect and need investigating in depth. Inquiries should be made into the reasons for the document which, for example, must have been completed before the democratic decision, widely applauded, to refuse planning for the Wiseley Airfield site proposal. Yet this proposal appeared again in the council’s plan. The allocation of developments to the various villages are dubious.

Why build on the Green Belt when there is room and land for development within the immediate area of the town of Guildford where it is likely there could be an increased demand.

The National Planning Policy Framework requires that new residential development must respect the character and density of housing in any areas and be limited in quantity by the availability of infrastructure and local facilities.

I couple with that the need and the desire of the people of the area to preserve the GREEN BELT.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/3992   Respondent: 8810849 / Charles Lee   Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I OBJECT to the proposed Infrastructure Schedule (Appendix C)

The Infrastructure Schedule sets out the key infrastructure requirements on which the delivery of the plan depends. For each of the Key Allocated Sites in the borough it identifies infrastructure projects that are required, except for Garlick’s Arch (A43) which is not mentioned. It is clear that the Plan takes no account of the infrastructure required for this site and is therefore not fit for purpose.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/4018  Respondent: 8810849 / Charles Lee  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the proposed Infrastructure Schedule (Appendix C)

The Infrastructure Schedule sets out the key infrastructure requirements on which the delivery of the plan depends. For each of the Key Allocated Sites in the borough it identifies infrastructure projects that are required, except for Garlick’s Arch (A43) which is not mentioned. It is clear that the Plan takes no account of the infrastructure required for this site and is therefore not fit for purpose.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/3991  Respondent: 8810849 / Charles Lee  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)

° The “objectively assessed need” figure of 693 homes a year is too high.
° A professional review by NMSS has concluded that, even basing the calculations on a period of stronger economic and student growth, the housing need figure should be revised down to 510 homes a year and the method changed to consider student housing need separately due to the distorting effects.
The current SHMA inflates the proposed housing figure due to

- failure to correct for errors in the historical data for international migration flows,
- issues with the way it considers students and affordability and
- flaws in the method for estimating the number of homes needed to support job growth.

- It is unacceptable that demographic and economic model assumptions have been withheld and cannot be checked making the process unaccountable.

The Plan’s proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the borough, it is over double the previous figure of 322 used in previous plans. The SHMA report methodology is I believe inaccurate; it inflates the needs of the borough by distorted student numbers. However, it is based on commercially confidential modelling assumptions that cannot be checked or reviewed. There is no transparency to this evidence base and it is therefore impossible to assess its accuracy. This is not democratic and is not appropriate for consultation of the Plan.

The National Planning Policy Framework allows the overall housing target to be reduced to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/4020  Respondent: 8810849 / Charles Lee  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)

- The “objectively assessed need” figure of 693 homes a year is too high.
- A professional review by NMSS has concluded that, even basing the calculations on a period of stronger economic and student growth, the housing need figure should be revised down to 510 homes a year and the method changed to consider student housing need separately due to the distorting effects.
- The current SHMA inflates the proposed housing figure due to
  - failure to correct for errors in the historical data for international migration flows,
  - issues with the way it considers students and affordability and
  - flaws in the method for estimating the number of homes needed to support job growth.
- It is unacceptable that demographic and economic model assumptions have been withheld and cannot be checked making the process unaccountable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: PSLPS16/7434  Respondent: 8810849 / Charles Lee  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A25

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Gosden Hill development being in the Local Plan. The land in Gosden Hill does exactly what the Greenbelt was designed to achieve. It provides a green buffer between the Guildford Urban Area and West Clandon, gives Burpham a defined green boundary and breathing space and it hides Guildford town from visitors until they pass the off-slip to Burpham.

No exceptional circumstances have been demonstrated for building on this site and therefore it does not comply with paragraphs 87-89 of the NPPF. It stops the sprawl of Guildford town, assists in safeguarding the countryside from encroachment and assists in urban regeneration by encouraging the recycling of derelict and other urban land. All requirements of the NPPF.

The scale of Gosden Hill is out of proportion to West Clandon. It would have four times the amount of housing plus shops, offices/factories, GP surgery, schools. Development on this scale would blight a historic village with a history going back to the doomsday book and beyond.

Gosden Hill is the most obvious location for the north end of an A3 tunnel. It has rising ground and is situated just before the urban area. If it is built on, it will be very difficult to construct a tunnel.

The development will generate in the region of 6,000 vehicles which will pour on to the A3 which is stationary every day during rush hours. The linking of the A3100, B2215 and A247 would channel thousands of cars through the narrow, winding road through West Clandon, a road where large lorries mount the pavement virtually every day and through Send and Ripley which are also severely constrained.

The volume of traffic will greatly increase air pollution which is particularly critical given the proposal to build two schools.

Currently, a two way junction at the site would require vehicles wanting to go north on the A3 to go through Burpham which is grid-locked every day.

Burpham’s sewers are at capacity. Sewage would have to be pumped to Slyfield for processing, a project of enormous cost.

There is inadequate fresh water in Guildford and current supplies could not meet the needs of a development of this size.

Electricity supply is also inadequate and would require a big infrastructure development.

The railway station was rejected by Guildford Borough Council in 1984 because it feared Gosden Hill would become a dormitory estate for London.

The wording of the Local Plan with regard to Gosden Hill is so loose that the developer could virtually do whatever it wants.

The remaining agricultural land between Gosden Hill and West Clandon is so small that it is highly likely to be uneconomic and therefore a prime candidate for further development which would roll the Guildford Urban Area over West Clandon towards East Clandon and Wisley.

If the Strategic Sites are developed, the north of Guildford will deliver 36%, 5,036 houses towards the total of around 14,000. The infrastructures of the existing villages and the A3 will be overwhelmed by the scale of development.
A new on-slip at Burpham would only be 1.8km from the on-slip at Burnt Common which is against Highway England’s requirement of 2km.

Development of the A3 at best will not start until after 2020 and the building of a tunnel, which is only an “aspiration” in the Local Plan is likely to be many years after. In the meantime given that developers build houses to provide cash-flow for infrastructure, Gosden Hill will have a crippling effect on villages like West Clandon and the A3.

Gosden Hill already has surface water problems. Merrow Stream crosses the site. No hydrological survey has been carried out to assess the implications. Electricity pylons run through the centre of Gosden Hill which have health and safety issues.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** PSLPS16/7483  **Respondent:** 8810849 / Charles Lee  **Agent:**

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A25

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ( )

I OBJECT to Gosden Hill development being in the Local Plan The land in Gosden Hill does exactly what the Greenbelt was designed to achieve. It provides a green buffer between the Guildford Urban Area and West Clandon, gives Burpham a defined green boundary and breathing space and it hides Guildford town from visitors until they pass the off-slip to Burpham.

No exceptional circumstances have been demonstrated for building on this site and therefore it does not comply with paragraphs 87-89 of the NPPF. It stops the sprawl of Guildford town, assists in safeguarding the countryside from encroachment and assists in urban regeneration by encouraging the recycling of derelict and other urban land. All requirements of the NPPF.

The scale of Gosden Hill is out of proportion to West Clandon. It would have four times the amount of housing plus shops, offices/factories, GP surgery, schools. Development on this scale would blight a historic village with a history going back to the doomsday book and beyond.

Gosden Hill is the most obvious location for the north end of an A3 tunnel. It has rising ground and is situated just before the urban area. If it is built on, it will be very difficult to construct a tunnel.

The development will generate in the region of 6,000 vehicles which will pour on to the A3 which is stationary every day during rush hours. The linking of the A3100, B2215 and A247 would channel thousands of cars through the narrow, winding road through West Clandon, a road where large lorries mount the pavement virtually every day and through Send and Ripley which are also severely constrained.

The volume of traffic will greatly increase air pollution which is particularly critical given the proposal to build two schools.

Currently, a two way junction at the site would require vehicles wanting to go north on the A3 to go through Burpham which is grid-locked every day.

Burpham’s sewers are at capacity. Sewage would have to be pumped to Slyfield for processing, a project of enormous cost.
There is inadequate fresh water in Guildford and current supplies could not meet the needs of a development of this size.

Electricity supply is also inadequate and would require a big infrastructure development.

The railway station was rejected by Guildford Borough Council in 1984 because it feared Gosden Hill would become a dormitory estate for London.

The wording of the Local Plan with regard to Gosden Hill is so loose that the developer could virtually do whatever it wants.

The remaining agricultural land between Gosden Hill and West Clandon is so small that it is highly likely to be uneconomic and therefore a prime candidate for further development which would roll the Guildford Urban Area over West Clandon towards East Clandon and Wisley.

If the Strategic Sites are developed, the north of Guildford will deliver 36%, 5,036 houses towards the total of around 14,000. The infrastructures of the existing villages and the A3 will be overwhelmed by the scale of development.

A new on-slip at Burpham would only be 1.8km from the on-slip at Burnt Common which is against Highway England’s requirement of 2km.

Development of the A3 at best will not start until after 2020 and the building of a tunnel, which is only an “aspiration” in the Local Plan is likely to be many years after. In the meantime given that developers build houses to provide cash-flow for infrastructure, Gosden Hill will have a crippling effect on villages like West Clandon and the A3.

Gosden Hill already has surface water problems. Merrow Stream crosses the site. No hydrological survey has been carried out to assess the implications. Electricity pylons run through the centre of Gosden Hill which have health and safety issues.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPS16/7435  **Respondent:** 8810849 / Charles Lee  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the inclusion of the land at Garlick’s Arch, Send Marsh/Burnt Common and Ripley (A43)

Garlick’s Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8). There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).

The Plan states the preference is to making the best use of previously developed land. Yet at the 11th hour a perfectly acceptable brown field site at Burnt Common, capable of accommodating approximately 100 houses, was removed from the Plan and replaced with the Garlick’s Arch site. There was no proper consultation in relation to the inclusion of this site. Why was a brownfield site removed and replaced a Greenfield site? There is no evidence that Section 18 of the Planning and Compulsory Purchase Act 2004, which requires local planning authorities to produce a Statement of Community
Involvement, has been complied with for this site. This only came to light for local residents following a Council meeting on 11th May 2016.

Moreover, Guildford Borough Council’s own Green Belt & Countryside Report does not address Garlick’s Arch at all, so there is no evidence base to support the inclusion of this site.

National Planning Policy promotes sustainable developments, with sustainable transport. With ever reducing bus services in the area and no train station within reasonable walking distance it is impossible for any development on this site to offer a sustainable transport solution. Development on this site is wholly inappropriate (Policy I3).

The stream, which runs through the site, is identified as having a high risk of flooding by the Environment Agency. There are other sites that do not flood that can be developed and therefore this site should be removed from the Plan (Policy P4).

This site is bordered by Ancient Woodland and within it a number of trees are protected by Tree Preservation Orders (Policy D3).

The site has an abundance of wildlife, some of which are protected. It is home to many types of owls and bats, with the woods having cuckoos and woodpeckers. In addition there are regular sightings of badgers, deer and red kites. The development of the site will result in the loss of habitat. No wildlife report has been conducted on the site. (Policy I4)

It is clear that with this site being added at the 11th hours no infrastructure planning has been undertaken. The Infrastructure Schedule makes no provision for any infrastructure improvements for this site. How will the local services such as schools and doctors cope, many of which are already at capacity? (Policy I1)

Furthermore, several electricity pylons run through the site, which will have the potential to be a health hazard for any residents.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/7484  Respondent: 8810849 / Charles Lee  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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Garlick’s Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8). There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).

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Furthermore, several electricity pylon runs through the site, which will have the potential to be a health hazard for any residents.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/7436  Respondent: 8810849 / Charles Lee  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the inclusion of the land for new on/off ramps at Burnt Common (A43a)

The addition north facing ramps to the A3 at Burnt Common would be a disaster for local communities. There is no requirement for local traffic to access the A3 to the north, but the addition will draw in a huge amount of ‘through’ traffic.

The route from London/M25 to Woking or would now be through Burnt Common and Send. Equally traffic from the east of Guildford (Merrow etc) and the A25 will now go through West Clandon and Burnt Common. This will cause immense damage to those areas on small roads which cannot be improved.

This Plan does not address the needs of local communities or the Borough in this regard. There has again been no Section 18 consultation on this.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/7485  Respondent: 8810849 / Charles Lee  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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This Plan does not address the needs of local communities or the Borough in this regard. There has again been no Section 18 consultation on this.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16541  Respondent: 8810849 / Charles Lee  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the damage to the historic environment as a result of the scale of the proposed development (Policy D3)

I OBJECT to the local plan based on the impact it will have on the special countryside of the borough.

The proposed development at Garlick’s Arch (A43) will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
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<th>Comment ID: PSLPP16/16648</th>
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Answer (if comment is on questions 1-7 of the questionnaire): ()

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E1</td>
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</tbody>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the sustainable employment policy (Policy E1)

If developed, the new employment site at Garlick’s Arch, Send Marsh/Burnt Common (A43), would be treated as a Strategic Employment Site.

The proposed development of up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8) at Garlick’s Arch (A43) is in the scheme of industrial development relatively small. Just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m. The Garlick’s Arch site which is in the Green Belt should not be developed as a Strategic Employment Site when there is a suitable alternative brownfield site very close by, which is far more sustainable.

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I OBJECT to the location for new employment floorspace at Garlick’s Arch – Site A43 (Policy E2)

Proposals for new industrial, warehousing and storage (use Class B1c, B2 and B8) floorspace will be directed to the Industrial Strategic Employment Sites.

There is no need for the new employment floorspace to be located at Garlick’s Arch, when just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16540  Respondent: 8810849 / Charles Lee  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the loss of rural employment (Policy E5)

Policy E5 supports the retention and development of local services and community facilities in our inset and identified villages. Yet the development at Garlick’s Arch (A43) would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises. The Plan does not promote rural employment; rather it will result in the loss of existing local rural businesses.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16647  Respondent: 8810849 / Charles Lee  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
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Attached documents:

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Comment ID: PSLPP16/16547  Respondent: 8810849 / Charles Lee  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E6

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY E6 - The leisure and visitor experience

I OBJECT. Tourism and visitors do not depend on new visitor “attractions” and could actually be damaged by them, as compellingly argued in the current debate over Newlands Corner. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment/Disneyfication. Heritage sites and the Green Belt are particularly vulnerable to harm.

Guildford has many “leisure and visitor attractions” already. The case for creating more is not made and no examples are given. Instead, the plan’s explicit priorities should be:

1. To protect the borough’s prime leisure and tourism asset, its countryside, from inappropriate development. This is all the more valuable because of its accessibility from London, the rest of Britain and the Continent, in that order. Rural residents are its custodians and require no Council interference. Economically, the most valuable forms of tourism, such as walking and cycling, require no new development. In the overcrowded South-East of England, lack of development is a leisure and tourism asset, not a liability.
2. To help make Guildford’s river landscape less off-putting and support town-break packages for high-value tourists. To achieve this, the policy needs to define what leverage, if any, Council planners have to influence normal tourism market mechanisms.
3. To help private providers market local tourism. This need not involve extra spending. The Council could, for instance, help co-ordinate ready-made, local tourism packages under a distinctive brand at an all-in price. An “English town break” (including B&B accommodation, a walking tour of Guildford, a pub lunch in the Surrey Hills, a visit to Wisley Gardens and a National Trust property and a SouthWest Trains travelcard for a day out in London) would be highly attractive to many European visitors who currently by-pass Guildford to go to Bath, Oxford or Cambridge instead.
4. To rule out the redevelopment of scarce rural hotel sites (e.g. Thatchers, East Horsley, earmarked for 40 new houses under Site A37 of the plan yet just a short walk from the new opera house).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I OBJECT (POLICY H1 – Homes for all) Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan period. It fails to set rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions.

The housing mix is based on out-of-date, pre-Brexit projections and on assumptions set out in a flawed SHMA that has not been scrutinised or evaluated.

I support higher density development in the urban area, without resorting to dehumanising, high-rise buildings that developers commonly claim are necessary for financial viability. Much of Guildford town could usefully be regenerated with 4-5 storey blocks with landscaping and underground parking, as often seen on the Continent and, recently, in London.

Student accommodation should provided for 100% of new students and more than 60% of existing students, which would free up ideal family accommodation in the urban area. Other university cities (e.g. Oxford) insist on higher percentages than those proposed in the plan. In my view, the Council’s timidity is a case of “regulatory capture” by Surrey University, which has failed to use its existing planning permissions (dating from 2004) to accommodate 3,000 students or to improve the efficient development of its campus (e.g. by building on its extensive and under-used surface car parks). If all students were accommodated in this way, 2,000 homes would be freed up in town and there would be no need to build on the Hog’s Back.

Guildford borough has already a higher proportion of traveller sites than most comparable boroughs. Over-provision is inappropriate given other constraints.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPP16/16654  **Respondent:** 8810849 / Charles Lee  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16546  Respondent: 8810849 / Charles Lee  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY H3 – Rural Exception Homes

I OBJECT  This is a Trojan horse policy. It says that homes can be built anywhere near a settlement of any form (including agricultural land and the AONB). These homes are meant for people with a village connection, but they could be for anyone on the Guildford borough housing list. To make the housing viable, or to improve the “mix” this can include “market” housing (i.e. normal commercial development which in Guildford usually means large executive homes). This policy means building anywhere, and ignoring all historic planning restrictions.

The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove “exceptional circumstances.”

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16655  Respondent: 8810849 / Charles Lee  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16533  Respondent: 8810849 / Charles Lee  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces.

Many of the affected villages, such as West Clandon, already suffer from traffic congestion. Further development around these villages will only result in more traffic and more parking problems.

With some 5,000 houses being proposed close to the village of Ripley, the roads serving the village will become even more congested.

These narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the road becoming ever more dangerous for pedestrians AND you have given no consideration to this point.

The council has a statutory obligation to protect the public and the additional traffic flows will bring added pollution and risk to injury of the public. In the case of West Clandon the Street often only has a narrow footpath on one side of the road making it very dangerous, especially when vehicles mount the pavements.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16542  Respondent: 8810849 / Charles Lee  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1
I OBJECT, due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1)

Our villages are already suffering from severe congestion for much of the day, for example the Newark Road & Rose Lane junction in the centre of Ripley. The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.

Furthermore, many of the country lanes around the villages of Ripley, Send and Clandon are narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
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Attached documents:

Comment ID: PSLPP16/16641  Respondent: 8810849 / Charles Lee  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16650  Respondent: 8810849 / Charles Lee  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the local plan based on the impact it will have on the special countryside of the borough.

The proposed development at Garlick’s Arch (A43) will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees.

1. I OBJECT, due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy II)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16651  Respondent: 8810849 / Charles Lee  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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Furthermore, many of the country lanes around the villages of Ripley, Send and Clandon are narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition.

1. I OBJECT to the lack of proper infrastructure planning for sites (Policy II)

Policy II requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.

Despite the Garlick’s Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents’ in the locality will see their quality of life significantly deteriorate in many ways.

Many of the utilities in the Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers. No plans to improve these services should mean no development of the Garlick’s Arch site.

Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are already at capacity and suffering from funding cuts or freezes. Any further development without funding will place further stress upon existing health services.

Police services are seeing funding reduced. The development of the proposed 13,860 homes during the plan period will stretch the police services further and is unsustainable.

There is no provision of the increased capacity of Guildford hospital, where is this assessed and remedied?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I OBJECT due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2)

There is no certainty that either the A3 or M25 in the borough will be improved to increase capacity and reduce congestion during the Plan period. Highways England has no plans to even examine improving the A3 before 2020. I have considerable concerns that development of the large residential sites identified at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), will take place before any improvements are made to the trunk road network. The A3 & M25 are already at capacity during peak hours and any development prior to improvement of these roads will only make the situations worse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/16652  Respondent: 8810849 / Charles Lee  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2)

There is no certainty that either the A3 or M25 in the borough will be improved to increase capacity and reduce congestion during the Plan period. Highways England has no plans to even examine improving the A3 before 2020. I have considerable concerns that development of the large residential sites identified at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), will take place before any improvements are made to the trunk road network. The A3 & M25 are already at capacity during peak hours and any development prior to improvement of these roads will only make the situations worse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/16544  Respondent: 8810849 / Charles Lee  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I OBJECT to poor air quality concerns (Policy I3)

Paragraph 4.6.27 of the Plan states that “Development must also mitigate its traffic impacts, including its environmental impacts and impacts on amenity and health.” The significant level of development being proposed, particularly in the north east of the borough will lead to considerable further congestion, despite any attempts to mitigate this through travel plans. This will be particularly acute in built up residential areas and will only lead to greater levels of air pollution, which will have a detrimental effect on local residents and their health and can result in early death.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/16653  Respondent: 8810849 / Charles Lee  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )

I OBJECT to not protecting the Green Belt (Policy P2)

I OBJECT to any proposal to take land out of the Greenbelt as is suggested with villages such as Ripley, Send and Clandon as well as sites of Wisley Airfield (A35) and Garlick’s Arch (A43). The National Planning Policy states clearly that it requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt and that housing need is not such an exceptional circumstance.
There are no exceptional circumstances for these villages (as mere housing need does not constitute a ‘special circumstance’ and the land to be taken from the Green Belt.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached. GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16640  Respondent: 8810849 / Charles Lee  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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There are no exceptional circumstances for these villages (as mere housing need does not constitute a ‘special circumstance’ and the land to be taken from the Green Belt.

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16537  Respondent: 8810849 / Charles Lee  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I OBJECT to development in areas which are at risk of flooding (Policy P4)

National Planning Policy states that Local Plans should take account of climate change over the longer term, including factors such as flood risk. It goes on to say that new development should be planned to avoid increased vulnerability to the range of impacts arising from climate change.

The Plan states that in accordance with national planning practice guidance, the Level 1 SFRA has been used to guide development towards areas at the lowest risk of flooding and identify areas unsuitable for development. However, the document concludes that land outside of the area of flood risk is not capable of accommodating all of the borough’s identified development needs. A Level 2 SFRA has therefore also been produced and will help the Council apply the exceptions test (as described in the NPPG) as necessary to development proposals in areas at risk of flooding.

The site at Garlick’s Arch (A43) is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. Knowing the area well I am aware that this site often floods during the winter months and the flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16644  Respondent: 8810849 / Charles Lee  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?
I OBJECT to the Local Plan as the development proposed will not be sustainable (Policy S1)

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is no way sustainable. It will have a permanently detrimental impact existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are just unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
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The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16536  Respondent: 8810849 / Charles Lee  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the Borough Wide Strategy (Policy S2)

a. The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

b. The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.
These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guilford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16643  Respondent: 8810849 / Charles Lee  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/4458 Respondent: 8810849 / Charles Lee Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A25

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to the changed policy A25 Gosden Hill for the development of 1700 homes which is still far too much.
2. There is no need for housing on this site because the local plan housing target is incorrect and inflated and ignores constraints.
3. Gosden Hill is located entirely within the Green Belt. No exceptional circumstances have been demonstrated for building on this site and therefore development here does not meet paragraphs 87-89 of the NPPF. Furthermore, Gosden Hill performs all five functions of green belt,
4. The site has no provision for foul or surface water sewerage and adjoining sewerage is at capacity
5. The Green Belt at this point serves the important function of separating West Clandon from the edge of urban Guildford. Development here will cause the two to coalesce defeating one of the objectives of the Green Belt. If this development proceeds I believe the narrow strip of Green Belt remaining between Guildford and Clandon at this point will be too narrow and will come under further pressure. It will represent an undesirable ribbon development along the A3. It will be highly visible from the A3 when approaching Guildford and will, in conjunction with A43a at Garlick’s Arch give the appearance of almost continuous development from Send through to Guildford.
6. The development of this site cannot be sustainable and will cause massive congestion onto surrounding roads. The development will generate in the region of 6,000 vehicles which will exit straight on to the A3 which is stationary every day during rush hours. The linking of the A3100, B2215 and A247 would channel thousands of cars through the narrow, winding road through West Clandon.
7. I object to the proposal for a link road to bring traffic from the Gosden Hill development to the proposed 4 way junction at Burnt Common. This has the potential to generate large volumes of traffic (including commercial vehicles) on the A247 through Send and West Clandon - a road which is already under traffic stress (see below).
8. The volume of traffic will greatly increase air pollution which is particularly critical given the proposal to build two schools.

9. A new on-slip at Burpham would only be 1.8km from the on-slip at Burnt Common which is against Highway England’s requirement of 2km.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/4459  Respondent: 8810849 / Charles Lee  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to the changed policy A43 Garlick’s Arch for 400 homes and 6 travelling show people pitches
2. It ignores all the thousands of previous objections made by local people
3. There is no proven demand for travelling show people plots in this location
4. There is no need for putting houses on this site because the local plan housing target is incorrect and inflated and ignores constraints.
5. The allocation of 28.9 ha is an excessive land grab into the Green Belt. If we take a normal density of 30 homes per ha and it is at the end of the day proven that there is a need for 400 homes in this location the land requirement is 13 ha not 28.9 ha which is more than double. This replicates a similar over land grab at Burnt Common where the factor is 7 times the land required.
6. This confirms the worrying impression that GBC have a pre-determined policy of building on the Green Belt at every opportunity. The arithmetic does not stack up. One would have thought that they would as custodians of the green Belt be intent on conserving it rather than exploiting it.
7. The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.
8. Garlick’s Arch (A43) is in an unsustainable location. It does not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. The site is unsuitable due to lack of access to sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick’s Arch in the Infrastructure Plan. Residents will be dependent on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.
9. The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.
10. I object to the proposal to remove Garlick’s Arch from the Green Belt. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for this land to be taken from the Green Belt. Once taken the green belt is lost forever. There is a real danger that the loss of this Green Belt will result in urban sprawl and the neighbouring villages merging into one another. The significant development in West Clandon, Send and Ripley will result in the character of these villages being lost and the countryside encroached.
11. I object to the development at Garlick’s Arch because of flood risk. The site at Garlick’s Arch is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river
I object to poor air quality concerns (Policy I3). Paragraph 4.6.27 of the Plan states that “Development must also mitigate its traffic impacts, including its environmental impacts and impacts on amenity and health.” The significant level of development being proposed, particularly in the north east of the borough will lead to considerable further congestion, despite any attempts to mitigate this through travel plans. This will be particularly acute in built up residential areas and will only lead to greater levels of air pollution, which will have a detrimental effect on local residents and their health.
25. I object to the inclusion of the land at Garlick’s Arch, Send Marsh/Burnt Common and Ripley (A43). Garlick’s Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8). There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).

26. It is clear that with this site being added at the eleventh hour and no infrastructure planning has been undertaken. The Infrastructure Schedule makes no provision for any infrastructure improvements for this site. How will the local services such as schools and doctors cope, many of which are already at capacity? (Policy I1)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/4460  Respondent: 8810849 / Charles Lee  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A58

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to Policy A 58 at Burnt Common and to the proposed inclusion of Burnt Common as an Industrial Strategic Employment Site
2. This previous allocation for B1c, B2 and B8 development was removed from the 2014 draft due to all the objections made previously.
3. The word “minimum” is a change from the previous “maximum” in the 2016 plan and since that time there has been a decline in demand for industrial land. This change alone is unacceptable since even if there was a need to build 7,000 sq m at Burnt Common this development would only require 1.4 ha at a standard plot ratio density of 50% not 9.26 ha. There is no justification for zoning an additional 7.86 ha in the Green Belt.
4. There is in fact no justification for building any more industrial development in the borough particularly at Burnt Common. The current industrial pipeline of granted consents of 38,357sqm in B1c, B2 or B8 use class space is double the 19,000 sq m said to be needed by Aecom who justify the need for new space on top of the existing pipeline by a completely unsubstantiated suggestion that “there is the possibility that some pipeline developments may not come forward at all, or be developed in different quantities by use class than has been consented.”
5. There is no need to build industrial or warehouse development in the middle of the Green Belt when Slyfield and Guildford still have empty sites and industrial units.
6. The 2017 Employment Land Need Assessment shows a reduction in demand to 3.9 hectares for industrial land for the whole borough not a huge over allocation of 9.26 hectares at Send in the Green Belt.
7. The Employment Land Needs Assessment update 2017 (ELNA) states “that the pipeline for employment floorspace defined by planning permissions yet to be implemented and prior approvals suggests the potential for an additional 33,607sqm of B use class floorspace to come forward. This figure comprises a net loss of 4,750sqm of B1a use class floorspace and a net gain of 38,357sqm in B1c, B2 or B8 use class space.”
8. 38,357 sq m of B1c, B2 or B8 use class is quite sufficient supply for the plan period and is in fact more space than the 3.9 ha of industrial land that is said to be needed for the plan period by Aecom. Since if you were to develop 3.9 ha at a plot ratio of 50% it would provide new industrial development of 19,000 sq m approximately half of current planning permissions granted. This does not justify the need for new development of industrial space on the Green Belt in such areas as Burnt Common.
9. The reality of demand for industrial space is that it is both nationally and locally in decline and this is evidenced by old existing permissions that have not been taken up and developed. The ELNA alludes incorrectly to the poor quality of existing space being a “constraint” on supply and fails to acknowledge that this assertion cannot apply to potential newly developed space e.g. the undeveloped pipeline of 38,357sqm.
10. The impact on small surrounding roads will create traffic gridlock.
11. It will join up existing villages and defeat the purpose of the Green Belt.
12. The ongoing poor quality of the updated research undertaken by Aecom in the Employment Land Needs Assessment 2017 does not support industrial development on land in the Green Belt at Burnt Common.
13. The Aecom research is generally superficial and lacks sufficient detail and analysis between B1c, B2 and B8 use classes and no reliable individual analysis has been undertaken of the widely different supply and demand dynamics of light industrial, general industrial and warehousing and distribution floor space.
14. The potential inclusion of a waste management facility mentioned at paragraph 4.4.23a lacks enough detail for proper consultation and is completely inappropriate.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** pslp171/2887  **Respondent:** 8810849 / Charles Lee  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The Plan now states: “the presumption in favour of sustainable development will not automatically apply to policies relating to sites protected under the Birds and Habitats Directives and/or designated as Sites of Special Scientific Interest (SSSIs), land designated as Green Belt, Local Green Space, the Surrey Hills Area of Outstanding Natural Beauty, designated heritage assets and locations identified as at risk of flooding.”

Gosden Hill and Blackwell Farm (both currently in the green belt) are called “urban extensions” surely a euphemism for urban sprawl? Garlick’s Arch and Burnt Common developments take land from the green belt to extend Ripley/Send. One of the important specific purposes of the green belt is to prevent urban sprawl.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** pslp17q/553  **Respondent:** 8810849 / Charles Lee  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Question 4: Duty to cooperate

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
The NPPF states para 155: “Early and meaningful engagement and collaboration with neighbourhoods, local organisations and businesses is essential. A wide section of the community should be proactively engaged, so that Local Plans, as far as possible, reflect a collective vision and a set of agreed priorities for the sustainable development of the area, including those contained in any neighbourhood plans that have been made.”

The changes in this latest version of the Guildford Local Plan show little or no willingness of Guildford Borough Council to reflect a collective vision. Despite the many thousands of responses to previous versions of the Plan which overwhelmingly rejected building on Green Belt land this latest version has as much, if not more, building on the Green Belt and increased problems of infrastructure and traffic which will bring increased noise and air pollution and danger to residents.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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<tr>
<th>Comment ID:</th>
<th>PSLPA16/3608</th>
<th>Respondent: 8811009 / Rosalind Gleeson</th>
<th>Agent:</th>
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<tr>
<td><strong>Document:</strong></td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base</td>
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<td><strong>I believe the number which has been given of 693 as an annual target for new housing is far too high. We have still not been given information about how this number was arrived at, or whether it has been checked - it appears to have been provided by a company whose claim is that they represent developers.</strong></td>
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<td><strong>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</strong></td>
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<td><strong>Very little thought seems to have been given to problems of infrastructure (traffic, schools, hospitals etc) as they stand at the moment, never mind how they would be increased by such proposed new development.</strong></td>
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<td>Respondent: 8811009 / Rosalind Gleeson</td>
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<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy P2</td>
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<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<td>The destruction of the greenbelt is disgraceful, immoral and not even necessary. Brownfield sites are available, as are alternative arrangements for eg students and the elderly.</td>
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<td><strong>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</strong></td>
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| Comment ID: PSLPP16/15104 | Respondent: 8811009 / Rosalind Gleeson | Agent: |
|---------------------------|----------------------------------------|
| **Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S2 |
| Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( ) |
| Answer (if comment is on questions 1-7 of the questionnaire): () |
| Local opinion as expressed by individual residents and residents associations and representatives are still being ignored by the council. |
| **What changes (2016)/further amendments (2017) do you suggest should be made to the document?** |
| Attached documents: |

| Comment ID: pslp172/637 | Respondent: 8811009 / Rosalind Gleeson | Agent: |
|-------------------------|----------------------------------------|
| **Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy A26 |
| Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( ) |
| Answer (if comment is on questions 1-7 of the questionnaire): () |
| We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which: |
| • disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8] |
• directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
• ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
• adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPS16/123  **Respondent:** 8811233 / Sally Carpenter  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Introduction

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I have sever concerns about the proposals for over 500 new home in Horsley.

In particular sites A36 A37 and A39

which will all bring extra traffic directly onto Ockham Road South/North which is already too busy and too narrow for existing traffic flows and will also be exacerbated by all the other proposed extra house building in the nearby areas eg Wisley airfield.

The station car park is often full already and has no spare capacity.

The Medical centre and schools are already under pressure and I think it is entirely inappropriate to increase the local population

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPA16/2196  **Respondent:** 8812097 / Clare Benzikie  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I OBJECT to the proposed Infrastructure Schedule (Appendix C)

The Infrastructure Schedule sets out the key infrastructure requirements on which the delivery of the plan depends. For each of the Key Allocated Sites in the borough it identifies infrastructure projects that are required, except for Garlick’s Arch (A43) which is not mentioned. It is clear that the Plan takes no account of the infrastructure required for this site and is therefore not fit for purpose.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
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<tr>
<th>Comment ID:</th>
<th>PSLPA16/2204</th>
<th>Respondent:</th>
<th>8812097 / Clare Benzikie</th>
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<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)

- The “objectively assessed need” figure of 693 homes a year is too high.
- A professional review by NMSS has concluded that, even basing the calculations on a period of stronger economic and student growth, the housing need figure should be revised down to 510 homes a year and the method changed to consider student housing need separately due to the distorting effects.
- The current SHMA inflates the proposed housing figure due to
  - failure to correct for errors in the historical data for international migration flows,
  - issues with the way it considers students and affordability and
  - flaws in the method for estimating the number of homes needed to support job growth.
- It is unacceptable that demographic and economic model assumptions have been withheld and cannot be checked making the process unaccountable.

The Plan’s proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the borough, it is over double the previous figure of 322 used in previous plans. The SHMA report methodology is I believe inaccurate; it inflates the needs of the borough by distorted student numbers. However, it is based on commercially confidential modelling assumptions that cannot be checked or reviewed. There is no transparency to this evidence base and it is therefore impossible to assess its accuracy. This is not democratic and is not appropriate for consultation of the Plan.

The National Planning Policy Framework allows the overall housing target to be reduced to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>8812097 / Clare Benzikie</th>
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<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Appendix F: Policies overview map</td>
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</table>
I OBJECT to all strategic sites proposed in the draft Plan to be built in the Green Belt.

1. I object to the identification and allocation of sites in this plan without regard to Green Belt, infrastructure or other constraints. **The plan says that “allocating these sites does not grant planning permission for development.”** However, each of the sites will be removed from the Green Belt and will be available in principle for development and non-Green Belt uses. The inclusion of these sites without detailed site by site justification shows contempt for the thousands of detailed comments the Council have received about individual sites ever since the Issues and Options consultation in 2013. The plan has hardly changed since the Council received 20,000 objections to its first draft plan in 2014. The Inspector considering the plan may conclude that the consultation has not been properly conducted.

2. The housing needs assessment is flawed in various respects and overstates housing need. In addition since it was produced, the referendum Brexit decision has almost certainly reduced future housing need and rendered the previous assessment seriously out of date. As a result any assessment of Green Belt sites which took place to consider whether “exceptional circumstances” existed to outweigh the harm to the Green Belt was based on false premises and should be reconsidered.

3. Having determined housing need the Council was entitled to consider constraints before determining the housing number. I believe that as Ill as being entitled to do this the Council was required to give proper consideration to constraints. The scarcity of sites outside the Green Belt as Ill as infrastructure (most notable roads) considerations all represented constraints which should have been taken into account in determining the final housing number. Accordingly in this regard our objection to the allocation of Green Belt sites is twofold. First I believe constraints should have been applied. Secondly I believe the Council did not properly consider constraints and that their decision making process was flawed and thus subject to being set aside by the Inspector.

4. Even if having properly applied constraints there is a need to develop in the Green Belt then specific Green Belt sites should not be included in the plan unless “exceptional circumstances” for development are proven in relation to that specific site, as stipulated repeatedly in the NPPF. The Green Belt should trump short-term considerations such as perceived housing need, as case law has established. There needs to be a specific balancing exercise conducted on each Green Belt site weighing the harm to the Green Belt against the very special circumstances which are argued in favour of development at that particular site. There is no evidence this has been done. Instead the council have appeared to say that having chosen a housing needs figure and decided it cannot be met without building on Green Belt then there is no need for any further consideration and any convenient Green Belt site can be allocated for building at will.
I OBJECT to Policy A25 with proposals for Gosden Hill Farm.

The Green Belt at this point serves the important function of separating West Clandon from the edge of urban Guildford. Development here will cause the two to coalesce defeating one of the objectives of the Green Belt. If this development proceeds I believe the narrow strip of Green Belt remaining between Guildford and Clandon at this point will be too narrow and will come under further pressure.

It will represent an undesirable ribbon development along the A3. It will be highly visible from the A3 when approaching Guildford and will, in conjunction with A43a at Garlick's Arch give the appearance of almost continuous development from Send through to Guildford.

The Plan does not put forward any evidence that exceptional circumstances exist to justify removing this site from the Green Belt.

The development will overburden the local road network and increase congestion on the A3 and A247 through the centre of West Clandon. This is already very heavily used whilst being unsuitable for designation as an A road. In places it is too narrow for two lorries to pass causing them to mount the pavement.

Note the following accident data:

2010 – 2014 from Crashmap data

- Clandon Cross Roads Area to Bulls Head - 17 incidents
- Bulls Heads Head to Bennett Way - 8 incidents
- Bennett Way to Highcotts Lane - 15 incidents
- Tithebarn Lane to Portsmouth Road Birch Close - 8 incidents

2015

- 21 Oct 2015 – A247 near shell garage - Three vehicles collided causing delays
  
  Surrey Fire and Rescue deployed.

2016

- 15 April 2016 12 year old boy injured in The Street – A247 closed in both directions
- 28 April 2016 A3 West Clandon London bound between A247 Tythebarns Lane (Burntcommon and M25J10 (Wisley Interchange) congestion on A3 to A3100 Clay Lane Burpham
- 30 6 2016 Motorcyclists with injuries airlifted to hospital Send Marsh Road

Attempts have been made over many years to reduce traffic, traffic speeds and accident risks through West Clandon, however little has been achieved as the road cannot be widened and SCC is reluctant to impose further speed limits as congestion is already very high.

I object most strongly to the proposal for a link road to bring traffic from the Gosden Hill development to the proposed 4 way junction at Burnt Common. This has the potential to generate large volumes of traffic (including commercial vehicles) on the A247 through West Clandon - a road which is already under traffic stress (see below).

The land in Gosden Hill does exactly what the Greenbelt was designed to achieve. It provides a green buffer between the Guildford Urban Area and West Clandon, gives Burpham a defined green boundary and breathing space and it hides Guildford town from visitors until they pass the off-slip to Burpham.

No exceptional circumstances have been demonstrated for building on this site and therefore it does not comply with paragraphs 87-89 of the NPPF. It stops the sprawl of Guildford town, assists in safeguarding the countryside from encroachment and assists in urban regeneration by encouraging the recycling of derelict and other urban land. All of these are requirements of the NPPF.
The scale of Gosden Hill is out of proportion to West Clandon. It would have four times the amount of housing plus shops, offices/factories, GP surgery, schools. Development on this scale would blight a historic village with a history going back to the doomsday book and beyond.

Gosden Hill is the most obvious location for the north end of an A3 tunnel. It has rising ground and is situated just before the urban area. If it is built on, it will be very difficult to construct a tunnel.

The development will generate in the region of 6,000 vehicles which will pour on to the A3 which is stationary every day during rush hours. The linking of the A3100, B2215 and A247 would channel thousands of cars through the narrow, winding road through West Clandon, a road where large lorries mount the pavement virtually every day and through Send and Ripley which are also severely constrained.

The volume of traffic will greatly increase air pollution which is particularly critical given the proposal to build two schools.

Currently, a two way junction at the site would require vehicles wanting to go north on the A3 to go through Burpham which is grid-locked every day.

Burpham’s sewers are at capacity. Sewage would have to be pumped to Slyfield for processing, a project of enormous cost.

There is inadequate fresh water in Guildford and current supplies could not meet the needs of a development of this size.

Electricity supply is also inadequate and would require a big infrastructure development.

The railway station was rejected by Guildford Borough Council in 1984 because it feared Gosden Hill would become a dormitory estate for London.

The wording of the Local Plan with regard to Gosden Hill is so loose that the developer could virtually do whatever it wants.

The remaining agricultural land between Gosden Hill and West Clandon is so small that it is highly likely to be uneconomic and therefore a prime candidate for further development which would roll the Guildford Urban Area over West Clandon towards East Clandon and Wisley.

If the Strategic Sites are developed, the north of Guildford will deliver 36%, 5,036 houses towards the total of around 14,000. The infrastructures of the existing villages and the A3 will be overwhelmed by the scale of development.

A new on-slip at Burpham would only be 1.8km from the on-slip at Burnt Common which is against Highway England’s requirement of 2km.

Development of the A3 at best will not start until after 2020 and the building of a tunnel, which is only an “aspiration” in the Local Plan, is likely to be many years after. In the meantime given that developers build houses to provide cash-flow for infrastructure, Gosden Hill will have a crippling effect on villages like West Clandon and the A3.

Gosden Hill already has surface water problems. Merrow Stream crosses the site. No hydrological survey has been carried out to assess the implications. Electricity pylons run through the centre of Gosden Hill which have health and safety issues.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/4310  Respondent: 8812097 / Clare Benzikie  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy A43 and A43a on Garlick’s Arch.

The site was only inserted in the draft plan at a late stage just before publication of the consultation draft which is a shabby way for the Council to proceed. The site is not a sustainable site being far from any infrastructure facilities and transport links. The bus service is infrequent and it is almost certain any future residents will rely almost entirely on cars for journeys. Similarly any employees at the employment areas will almost undoubtedly arrive and leave by car.

The site is susceptible to flooding and will not make a suitable site.

The Green Belt at this point serves the important function of separating West Clandon from Send. Building here will cause the two to coalesce defeating one of the objectives of the Green Belt.

I have seen no evidence that exceptional circumstances exist to justify removing this site from the Green Belt or that this important issue has been addressed. The Green Belt and Countryside study did not even consider this site.

It is understood the Council's eyes may have been turned by the possibility of receiving for free the land which might be used for new A3 slip roads in return for allowing this development, thus justifying it as some form of enabling development. However the slip road land if needed could be safeguarded in the plan and acquired by compulsory purchase when required. Lack of current funding for the slip road is not a justification for allowing the development of this site. If the slip road is genuinely needed then government funding will be available for it. (One of the reasons for turning down the so called enabling development proposal intended to fund the rebuilding of the Howard of Effingham School was that the redevelopment of the school was not essential. As and when it became essential Government funding would become available. Accordingly enabling development was not necessary. The same principle applies here.)

The A247 running south past this site through the centre of West Clandon is already very heavily used whilst being unsuitable for designation as an A road. In places it is too narrow for two lorries to pass causing them to mount the pavement- often at speed. It has narrow bends with poor sight lines, an infants school and a hump-backed bridge concealing the entrance road to the station for southward traffic. In addition, there are no continuous footpaths which forces pedestrians to cross and re-cross the road. Development at Garlick’s Arch will only exacerbate the problem and make the road even more congested and unsafe for pedestrians.

The development will cause harm to the ancient woodland on and by the site.

Taken together with the Gosden Hill site, there will be a ribbon of development along the A3 in contrast to the current “soft” edge approach to Guildford.

Garlick’s Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8). There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).

The Plan states the preference is to making the best use of previously developed land. Yet at the 11th hour a perfectly acceptable brown field site at Burnt Common, capable of accommodating approximately 100 houses, was removed from the Plan and replaced with the Garlick’s Arch site. There was no proper consultation in relation to the inclusion of this site. Why was a brownfield site removed and replaced with a Greenfield site? There is no evidence that Section 18 of the Planning and Compulsory Purchase Act 2004, which requires local planning authorities to produce a Statement of Community Involvement, has been complied with for this site. This only came to light for local residents following a Council meeting on 11th May 2016.
Moreover, Guildford Borough Council’s own Green Belt & Countryside Report does not address Garlick’s Arch at all, so there is no evidence base to support the inclusion of this site.

National Planning Policy promotes sustainable developments, with sustainable transport. With ever reducing bus services in the area and no train station within reasonable walking distance it is impossible for any development on this site to offer a sustainable transport solution. Development on this site is wholly inappropriate (Policy I3).

The stream, which runs through the site, is identified as having a high risk of flooding by the Environment Agency. There are other sites that do not flood that can be developed and therefore this site should be removed from the Plan (Policy P4).

This site is bordered by Ancient Woodland and within it a number of trees are protected by Tree Preservation Orders (Policy D3).

The site has an abundance of wildlife, some of which are protected. It is home to many types of owls and bats, with the woods having cuckoos and woodpeckers. In addition there are regular sightings of badgers, deer and red kites. The development of the site will result in the loss of habitat. No wildlife report has been conducted on the site. (Policy I4)

It is clear that with this site being added at the 11th hours no infrastructure planning has been undertaken. The Infrastructure Schedule makes no provision for any infrastructure improvements for this site. How will the local services such as schools and doctors cope, many of which are already at capacity? (Policy I1)

Furthermore, several electricity pylon runs through the site, which will have the potential to be a health hazard for any residents.

**I OBJECT** to the inclusion of the land for new on/off ramps at Burnt Common (A43a)

The addition north facing ramps to the A3 at Burnt Common would be a disaster for local communities. There is no requirement for local traffic to access the A3 to the north, but the addition will draw in a huge amount of ‘through’ traffic.

The route from London/M25 to Woking or would now be through Burnt Common and Send. Equally traffic from the east of Guildford (Merrow etc) and the A25 will now go through West Clandon and Burnt Common. This will cause immense damage to those areas on small roads which cannot be improved.

This Plan does not address the needs of local communities or the Borough in this regard. There has again been no Section 18 consultation on this.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
I OBJECT to the damage to the historic environment as a result of the scale of the proposed development (Policy D3)

I OBJECT to the local plan based on the impact it will have on the special countryside of the borough.

The proposed development at Garlick’s Arch (A43) will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSSLPP16/9339  Respondent: 8812097 / Clare Benzikie  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy D3 - Historic environment

I object to this policy as it is very weak and I do not think it is clear enough in its support for the conservation of the historic environment. It provides for development which will “enhance” heritage assets which I fear is a developer’s charter as it leaves plenty of room for abuse.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSSLPP16/9345  Respondent: 8812097 / Clare Benzikie  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy D4 - Development in urban areas and inset villages

The policy should place much greater emphasis on residential development in the existing urban centres. In this way housing needs can be met without resorting to large developments in the Green Belt. There are urban areas in need of regeneration but these are ignored in favour of Green Belt development.

The policy should not be applied to the villages which should remain in the Green Belt. Unrestricted application of this policy to the villages intended to be inset will change their characters radically and for the worse. The development it encourages will increase traffic and congestion disproportionately.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9278  Respondent: 8812097 / Clare Benzikie  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the sustainable employment policy (Policy E1)

I object to the inclusion of a strategic employment site at Gosden Hill Farm. Employment sites should be concentrated on previously developed land in more sustainable locations with good transport links where the infrastructure can support development. Warehousing, distribution and industrial premises cause considerable commercial traffic, noise, pollution and general disruption. They are not good neighbours for schools and 2000 houses. Many of the jobs will be taken by people outside the area leading to additional congestion in Burpham and on the A3.

I object to the inclusion of a strategic employment site at Garlick’s Arch. It is in a non-sustainable location remote from any facilities of any kind and with poor public transport links. It is unlikely jobs there will be taken by local residents and it is likely all travel to and from work will be by car adding to local congestion. Employment sites should be concentrated on previously developed land in more sustainable location with good transport links where the infrastructure can support development.

The site is in any event subject to frequent flooding and unsuitable for development.

If developed, the new employment site at Garlick’s Arch, Send Marsh/Burnt Common (A43), would be treated as a Strategic Employment Site.

The proposed development of up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8) at Garlick’s Arch (A43) is in the scheme of industrial development relatively small. Just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m. The Garlick’s Arch site which is in the Green Belt should not be developed as a Strategic Employment Site when there is a suitable alternative brownfield site very close by, which is far more sustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9284  Respondent: 8812097 / Clare Benzikie  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E2
**Comment ID:** PSLPP16/9290  **Respondent:** 8812097 / Clare Benzikie  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

**I OBJECT** to the location for new employment floorspace (Policy E2)

I object to this policy. It would be more sensible to confine new office and research and development floor space to the urban Guildford area. I also oppose the policy of expanding the Research Park onto Blackwell Farm. No exceptional circumstances, as defined under the NPPF, have been advanced to justify incursion into this permanent and high-quality area of Green Belt.

Proposals for new industrial, warehousing and storage (use Class B1c, B2 and B8) floorspace will be directed to the Industrial Strategic Employment Sites.

There is no need for the new employment floorspace to be located at Garlick’s Arch or Gosden Hill Farm, when near to these sites at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/9357  **Respondent:** 8812097 / Clare Benzikie  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E5

**I OBJECT** to the loss of rural employment (Policy E5)

Policy E5 supports the retention and development of local services and community facilities in our inset and identified villages. Yet the development at Garlick’s Arch (A43) would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises. The Plan does not promote rural employment; rather it will result in the loss of existing local rural businesses.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/9357  **Respondent:** 8812097 / Clare Benzikie  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy E6
I OBJECT to Policy E6 - The leisure and visitor experience.

The policy should acknowledge that whilst in some areas new and enhanced leisure facilities are valuable (for example the new Opera House at West Horsley Place Towers), much tourism depends on the undeveloped nature of Green Belt areas surrounding Guildford. Accordingly the policy should recognize that in many rural areas new and enhanced visitor facilities may be unnecessary and counterproductive, particularly away from existing buildings and development. For example the attraction of Newlands Corner is its undeveloped nature. Significant development of visitor facilities there is likely to diminish rather than increase its attractions. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment. Heritage sites and the Green Belt are particularly vulnerable to harm.

Tourism and visitors do not depend on new visitor “attractions” and could actually be damaged by them, as compellingly argued in the current debate over Newlands Corner. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment/"Disneyfication”. Heritage sites and the Green Belt are particularly vulnerable to harm.

Guildford has many “leisure and visitor attractions” already. The case for creating more is not made and no examples are given. Instead, the plan’s explicit priorities should be:

1. To protect the borough’s prime leisure and tourism asset, its countryside, from inappropriate development. This is all the more valuable because of its accessibility from London, the rest of Britain and the Continent, in that order. Rural residents are its custodians and require no Council interference. Economically, the most valuable forms of tourism, such as walking and cycling, require no new development. In the overcrowded South-East of England, lack of development is a leisure and tourism asset, not a liability.

2. To help make Guildford’s river landscape less off-putting and support town-break packages for high-value tourists. To achieve this, the policy needs to define what leverage, if any, Council planners have to influence normal tourism market mechanisms.

3. To help private providers market local tourism. This need not involve extra spending. The Council could, for instance, help co-ordinate ready-made, local tourism packages under a distinctive brand at an all-in price. An “English town break” (including B&B accommodation, a walking tour of Guildford, a pub lunch in the Surrey Hills, a visit to Wisley Gardens and a National Trust property and a Southwest Trains travelcard for a day out in London) would be highly attractive to many European visitors who currently by-pass Guildford to go to Bath, Oxford or Cambridge instead.

4. To rule out the redevelopment of scarce rural hotel sites (e.g. Thatchers, East Horsley, earmarked for 40 new houses under Site A37 of the plan yet just a short walk from the new opera house).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9333   Respondent: 8812097 / Clare Benzikie   Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E7

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I OBJECT to Policy E7 Guildford Town Centre

The policy “vision” describes protecting the Guildford’s unique setting and historical character and sets out some of the ways this will be done. However none of this is included in the formal Policy wording in the blue box. I suspect the Vision wording is effectively of little or any force. These principles should be included in the formal policy.

There should be a much greater focus on residential use of the town centre where many people would like to live and where the necessary amenities and infrastructure exist. The policy misses the opportunity to propose forward looking sustainable residential development plans in, for example the Walnut Tree Close area, where very significant numbers of new homes could be provided. Such town centre sites could meet much of the housing need over the plan period without harming the countryside.

There is an urgent need for a strategy to focus on brownfield redevelopment before considering development outside the existing urban area.

The policy does not address any of the major issues raised by the Council’s own Town Centre Master Plan, the Guildford Vision Group’s proposal for new river and rail crossings or plans for the redevelopment of Guildford Station, all of which are already the subject of public discussion.

The policy also fails to provide guidance on design requirements, as required by the NPPF.

The policy and surrounding text concentrates too much on shopping without regard to its nature which risks a proliferation of dull high-street chain stores. The policy should seek to enhance Guildford’s character and encourage a wider variety of small shops including locally owned businesses and shops of use to consumers. (For example there is no butcher in Guildford.)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9320  Respondent: 8812097 / Clare Benzikie  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy H1 – Homes for all. Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan period. It fails to set rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions.

The housing mix is based on out-of-date, pre-Brexit projections and on assumptions set out in a flawed SHMA that has not been scrutinised or evaluated.

I support higher density development in the urban area, without resorting to dehumanising, high-rise buildings that developers commonly claim are necessary for financial viability. Much of Guildford town could usefully be regenerated with 4-5 storey blocks with landscaping and underground parking, as often seen on the Continent and, recently, in London.

Student accommodation should provided for 100% of new students and more than 60% of existing students, which would free up ideal family accommodation in the urban area. Other university cities (e.g. Oxford) insist on higher percentages than those proposed in the plan. In my view, the Council’s timidity is a case of “regulatory capture” by Surrey University,
which has failed to use its existing planning permissions (dating from 2004) to accommodate 3,000 students or to improve the efficient development of its campus (e.g. by building on its extensive and under-used surface car parks). If all students were accommodated in this way, 2,000 homes would be freed up in town and there would be no need to build on the Hog’s Back.

It is not appropriate to release Green Belt land to house students who could be accommodated on the Surrey campus or other university sites. The plan should take account of the university's ability to house its own students and reduce the housing number accordingly.

Guildford borough has already a higher proportion of traveller sites than most comparable boroughs. Over-provision is inappropriate given other constraints.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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<th>Comment ID:</th>
<th>PSLPP16/9326</th>
<th>Respondent:</th>
<th>8812097 / Clare Benzikie</th>
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<td><strong>Document:</strong></td>
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**I OBJECT** to this policy on affordable homes (Policy H2) on the grounds of feasibility and that it should be more firm and explicit on unviability in paragraph 4.2.40.

In particular a scheme is only unviable if the value of developing the land (including some allowance for development risk and a normal level of profit) falls below the sale vale of the land for alternative non-premium uses such as agriculture. The price paid for the land is not relevant. The possibility of avoiding the affordable housing obligation through use of unviability arguments only serves to inflate land values. It will become clear that developments are unviable when developers start selling land for alternative non-development uses.

It should be noted in the plan that because of Guildford's relative popularity as a place to live combined with its location close to others towns and within the London Commuter belt no amount of building will meet demand. Similarly no amount of affordable housing will ever meet demand.

In addition the definition of an ‘affordable home’ is 80% of market value. With even a 2 bedroom flat in Guildford now having a market value of +£360,000 the discounted price is still not going to be affordable to anyone on a normal income.

And at what point will ‘affordable homes’ be able to go onto the market at full market price?

As we have seen with council houses it is not long before the discounted property is sold at full market value with the original owner simply pocketing the profit.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

| Comment ID:  | PSLPP16/9351  | Respondent:  | 8812097 / Clare Benzikie  | Agent: |
I OBJECT to Policy H3 – Rural Exception Homes as this Trojan horse policy. It says that homes can be built anywhere near a settlement of any form (including agricultural land and the AONB). These homes are meant for people with a village connection, but they could be for anyone on the Guildford borough housing list. To make the housing viable, or to improve the “mix” this can include “market” housing (i.e. normal commercial development which in Guildford usually means large executive homes). This policy means building anywhere, and ignoring all historic planning restrictions.

The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove “exceptional circumstances.”

The wording of the policy is far too wide and drives a coach and horses though all other aspects of planning policy. As drafted the planning authority could be obliged to grant permission for inappropriate and unsuitable developments.

The wording provides no ability to balance the desirability of the development against other considerations including harm to the Green Belt or the AONB. (If the housing would meet identified need and adjoins a settlement under this policy wording permission would have to be granted even in the most sensitive AONB location, even if more suitable locations were available.) The policy should include the need for a balancing exercise including consideration whether more suitable locations exist.

The policy wording should not allow market housing. The ability to include market housing is likely to inflate land values, leading to a self-perpetuating need to include market housing. It may lead to spurious developer led proposals which will be difficult to resist.

The policy wording should define small, either in land size or number of units. I am concerned that if small is left undefined the policy could be used to justify significant developments. In the context of the plan a development of 150 homes might be argued as small. (If Wisley at 2,500 homes is a big development then 500 homes might be a medium development and 150 could be small.)

The policy wording should be restricted to adjoining sites or define the concept of being “closely related”. In particular I believe adding the concept of safe and easy walking distance extends the potential radius within which sites will be argued to be “closely related” Many people would regard a mile or so as an easy walking distance. (School children are expected to walk further than that before being eligible for free school travel.)

The wording of the policy itself does not require the local connection requirement for tenants to be secured in perpetuity - only the affordability must be secured in perpetuity. (For example housing could be built for retired Cabinet Ministers under this policy so long as the first tenant was required to have a local connection.) The introduction to the policy mentions this point, but it is not part of the policy itself and may carry little weight at appeal.

The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove “exceptional circumstances.” The size and location of sites should be better defined and it should be clear market housing cannot be included.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ( )**

I OBJECT, due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1)

Our villages are already suffering from severe congestion for much of the day, for example the Newark Road & Rose Lane junction in the centre of Ripley and the A247 through West Clandon. The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.

Furthermore, many of the country lanes around the villages of Ripley, Send and Clandon are narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition.

I OBJECT to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces.

Many of the affected villages, such as West Clandon, already suffer from traffic congestion. Further development around these villages will only result in more traffic and more parking problems.

With some 5,000 houses being proposed close to the village of Ripley, the roads serving the village will become even more congested. Cycling has become an ever popular past time, particularly at weekends hundreds of cyclists past through the villages on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road accidents involving cyclists as a result of the development proposed under the local plan.

The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the road becoming ever more dangerous for pedestrians.

The council has a statutory obligation to protect the public and the additional traffic flows will bring added accidents, noise, pollution and injury of the public. In the case of West Clandon the Street often only has a narrow footpath on one side of the road making it very dangerous, especially when vehicles mount the pavements.

This policy as it is inappropriate and inadequate and fails to respond to the challenges raised by the proposed significant Green belt developments. The borough’s infrastructure is already heavily strained. However the plan’s determination to build large housing estates across the Guildford countryside significantly increases the need for infrastructure investment without securing the means for its provision. Placing housing in the established urban areas would reduce the need for enhanced infrastructure as would a more realistic housing number.

The policy wording says nothing about roads and traffic. The Council’s methodology for assessing traffic congestion - averaging it over periods of several hours and ignoring the effects of junctions - simply hides the problem, which will get worse as development proceeds. The schemes referred to in this policy will not solve existing congestion and the local road network has not been given sufficient consideration. Some proposed development locations would require highway schemes that are unlikely ever to happen.

Adequate infrastructure provision is a pre-condition of sustainable development. But in this plan it is an afterthought buried away in Policy I1. By prioritizing greenfield over urban, brownfield regeneration, the plan creates insurmountable (and unnecessary) obstacles for itself. Common sense suggests a local plan should first assess the borough’s infrastructure capacity for sustainable development, and then tailor development accordingly. This plan, however, assumes infrastructure
will follow on the heels of housebuilding as if by magic. It makes implementation critically dependent on providers outside the Council’s control and on the vagaries of CIL income. Instead of recognizing this as a key constraint, the plan is based on hope. It is also highly likely that developers faced with the imposition of large infrastructure requirements will go to court to invoke the NPPF provision that prevents authorities from imposing conditions that make a development non-viable.

Policy I1 requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.

Despite the Garlick’s Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents’ in the locality will see their quality of life significantly deteriorate in many ways.

Many of the utilities in the Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers. No plans to improve these services should mean no development of the Garlick’s Arch site.

Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are already at capacity and suffering from funding cuts or freezes. Any further development without funding will place further stress upon existing health services.

Police services are seeing funding reduced. The development of the proposed 13,860 homes during the plan period will stretch the police services further and is unsustainable.

There is no provision of the increased capacity of Guildford hospital, where is this assessed and remedied?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9308  Respondent: 8812097 / Clare Benzikie  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2)

I object to this policy as it is too vague and optimistic. Significant improvements to the road infrastructure are like to be many years away even if they ever happen. The draft plan, however, commits to building massive housing estates in the countryside before any of these road improvements are in place. This is inappropriate and will lead to massive traffic disruption during the construction phase and will add permanently to an already congested network (about 3,000 private cars from the 2,100 new homes at Wisley Airfield alone).

Road infrastructure represents a major constraint that should have been applied to the housing target at a much earlier stage in the plan process and not left as an unresolved difficulty in the draft plan.

There is no certainty that either the A3 or M25 in the borough will be improved to increase capacity and reduce congestion during the Plan period. Highways England has no plans to even examine improving the A3 before 2020. I have
considerable concerns that development of the large residential sites identified at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), will take place before any improvements are made to the trunk road network. The A3 & M25 are already at capacity during peak hours and any development prior to improvement of these roads will only make the situations worse.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

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<td>I OBJECT to poor air quality concerns (Policy I3)</td>
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<td>Paragraph 4.6.27 of the Plan states that “Development must also mitigate its traffic impacts, including its environmental impacts and impacts on amenity and health.” The significant level of development being proposed, particularly in the north east of the borough will lead to considerable further congestion, despite any attempts to mitigate this through travel plans. This will be particularly acute in built up residential areas and will only lead to greater levels of air pollution, which will have a detrimental effect on local residents and their health and can result in early death.</td>
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<td>I OBJECT to not protecting the Green Belt (Policy P2)</td>
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<td>This policy does not sufficiently safeguard the Green Belt even though Green Belt constitutes 89% of the borough and should be the cornerstone of all local planning policy. The Green Belt is not the Council’s to give away and once it is gone it is gone forever. Sacrificing areas of the Green Belt to a developer influenced growth agenda is a betrayal of future generations and does not constitute sustainable development. The Green Belt should be protected in perpetuity, but Policy P2 seeks to justify excessive development in supposedly protected areas. This is in breach of party manifesto commitments and contrary to previous responses to public</td>
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consultation. It is disreputable to argue, as the Council does, that the Plan would involve the loss of “only” 1.6% of the borough’s Green Belt. Leaving aside the reliability of that statistic, the NPPF does not set an “acceptable” percentage. The fact remains that the plan proposes that 65% of the housing plus industrial development be built on land to be taken out of the Green Belt.

Paragraph 4.3.16 is seriously deficient in simply stating that the Council considers that exceptional circumstances exist to justify amendment of Green Belt boundaries. The exceptional circumstances are not identified. It is clear from national guidance that unmet housing need is not on its own an exceptional circumstance. Even to the extent that exceptional circumstances exist, these have to be balanced against the harm to the Green Belt in the specific sites proposed to be taken out of the Green Belt. This balancing exercise appears not to have been done.

The Countryside Study which the Council may argue fulfilled the need to demonstrate the exceptional circumstances required to justify removal of areas from the Green Belt was a simplistic tick box exercise. Within limits it may have answered certain questions about different attributes of different areas of Green Belt but it did not carry out the balancing exercise needed to determine whether specific exceptional circumstances justified removal of specific areas of land from the Green Belt. I believe that each of the identified Green Belt site proposed to be removed from the Green Belt should be carefully assessed against any exceptional circumstances in deciding whether it should be removed from the Green Belt in the final plan. This exercise should bear in mind that housing need in itself is not an exceptional circumstance and nor is the Council’s growth aspiration. An important consideration is that more housing need could be met on urban sites than is currently planned. The Plan has fallen into the developers’ hands and developers prefer building on undeveloped land rather than brown field sites.

I note that the Summer 2016 edition of "About Guildford" (published by the Council) on page 5 states that "... the Plan rejects any schemes that would have a detrimental impact on the Green Belt." This is demonstrably untrue and I consider this to be a deliberate untruth which compromises the consultation process. I would ask that this untruth be corrected and the consultation period restarted after the correction has been given the same distribution as the original statement. (I assume the document was delivered to most houses in the Borough.) I reserve the right to argue before the inspector that the consultation process was flawed and ineffective because of this.

I object to the “insetting” of 14 villages from the Green Belt. Contrary to assertions made in the Plan process many of these villages do contribute to the openness of the Green Belt and there is no need to inset them.

I also object to the wholesale extensions to the settlement boundaries in many villages to allow for infilling and that infilling is also proposed outside the settlement boundaries of 11 further villages. Many Guildford villages are linear. It is all too easy to square off boundaries by including countryside bounded on only one or two sides by existing development, claiming it contributes nothing to the “openness” of the Green Belt, a term which neither the plan nor the NPPF defines. The NPPF’s other 4 tests of Green Belt status, including the prevention of urban sprawl, are ignored. Effectively, this policy makes all villages within the Green Belt vulnerable to large blocks of new development and seems almost calculated to secure the rejection of the plan as a whole.

To “inset” two-thirds of the borough’s rural villages on the grounds that they no longer contribute to the purposes of the Green Belt is extreme and inherently implausible, given the borough’s location on the edge of Metropolitan London. I cannot see how such extensive areas fail to contribute to the purposes of the Green Belt under the NPPF, but this could quickly be the case if the proposed “insetting” and boundary extensions go ahead.

This policy is wildly disproportionate in terms of any foreseeable development need and has caused tidal waves of opposition from residents. It flies in the face of NPPF paragraph 17’s aim of “empowering local people to shape their surroundings” and other NPPF provisions.

Paragraph 4.3.17 states that “the general extent of the Green Belt has been retained.” I believe this should be deleted as an untruth.

In addition I OBJECT to the proposals to remove from the Green Belt the so called ‘strategic sites’ of Wisley Airfield (A35), Gosden Hill Farm (A25) and Garlick’s Arch (A43) and all other strategic sites. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt.
There are no exceptional circumstances for these sites and villages (as mere housing need does not constitute a ‘special circumstance’) to be taken from the Green Belt. Once taken from the green belt they will be lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached.

GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site.

Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/9272  **Respondent:** 8812097 / Clare Benzikie  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):**

I OBJECT to development in areas which are at risk of flooding (Policy P4)

National Planning Policy states that Local Plans should take account of climate change over the longer term, including factors such as flood risk. It goes on to say that new development should be planned to avoid increased vulnerability to the range of impacts arising from climate change.

The Plan states that in accordance with national planning practice guidance, the Level 1 SFRA has been used to guide development towards areas at the lowest risk of flooding and identify areas unsuitable for development. However, the document concludes that land outside of the area of flood risk is not capable of accommodating all of the borough’s identified development needs. A Level 2 SFRA has therefore also been produced and will help the Council apply the exceptions test (as described in the NPPG) as necessary to development proposals in areas at risk of flooding.

The site at Garlick’s Arch (A43) is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. Knowing the area well I am aware that this site often floods during the winter months and the flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPP16/9252  **Respondent:** 8812097 / Clare Benzikie  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

I OBJECT to this Policy as the development proposed will not be sustainable (Policy S1)

The NPPF states that the presumption in favour of sustainable development “should be seen as a golden thread running through both plan-making and decision-taking.” As the first policy in the Plan, Policy S1 ought to set a clear framework. Instead, no definition of “sustainable development” is given. The policy also fails to set out any principles for applying sustainable development in practice to local planning decisions, which often have serious long-term impacts.

The policy states that it aims “to secure development that secures the economic, social and environmental conditions in the area”. This fails to recognize that economic growth, social justice and environmental protection often conflict. The policy does not say how each element is to be weighted or conflicts resolved. As a practical guide to the planning decision to be taken in the Plan period it is seriously deficient. The policy is likely to be used by developers to justify inappropriate developments on economic grounds. Under this policy, virtually any development will qualify as “sustainable”, in breach of the NPPF’s most important guideline.

Policy S1 is also seriously deficient in making no mention of the Green Belt. The Green Belt is a long term Government policy enshrined in primary legislation to protect green areas in perpetuity. The Green Belt is a living example of sustainable development in practice and is one of the most important factors affecting sustainable development in the area covered by the Plan and should be acknowledged in this policy. Policy S1 should include a commitment to protect the Green Belt from inappropriate development and to uphold Green Belt boundaries and protections. This would set at least one clear boundary to planning decisions. The Plan and the Council have treated the Green Belt as a developable land bank rather than as a constraint to development.

The commitment to approve planning applications “wherever possible” and “without delay” reveals the pro-development bias of the plan. Countervailing references to sustainability are so vague that the NPPF presumption in favour of sustainable development becomes a presumption in favour of any development at all.

This policy also ignores, as if they are inconvenient constraints, most of the 12 Core Planning Principles set out in NPPF paragraph 17.

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill Farm (A25) are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are also unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/9259  Respondent: 8812097 / Clare Benzikie  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ) , is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the Borough Wide Strategy (Policy S2)

The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

The housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.

The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”.

Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guilford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

The assumptions and calculations in the SHMA are widely regarded as flawed and even before Brexit, produced an inflated housing needs number. The figure of 13,860 new homes is completely unsubstantiated. It has not been scrutinized by Councillors despite repeated requests for debate. The assumptions and calculations underlying the model are hidden, protected by a claim to intellectual property by a commercial sub-contractor used in preparing the SHMA. I have serious doubts about the objectivity of the SHMA because it has been produced by consultants whose website openly proclaims their pro-development agenda leading to reasonable suspicion that the figures are inflated. Guildford’s OAN is not transparent but has been taken on trust by the authors of the plan. Given that almost every element of the plan is predicated on this OAN, the plan as a whole cannot be considered “sound”.

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The status of the 13,860 figure is ambiguous. The Council has said that the housing number and the OAN are identical because the OAN is "deliverable" and is by definition objective and cannot be contradicted. The OAN is only deliverable because of the Council's cavalier approach to the Green Belt in contravention of the NPPF, ministerial statements and local and national Conservative Party manifesto commitments. The plan also states that infrastructure or other constraints may in due course affect deliverability. It is also unlikely that the number of houses can be built at the rate proposed. In recent years, housing starts have on average been less than half the proposed rate. This is not because developers do not have the land or cannot get planning permission. Constraints in the supply chain and maintaining profit levels have been more important.

The plan cannot be considered "deliverable". In addition, the number of homes proposed, plus existing planning permissions, plus expected "windfall" sites, exceeds the total of 13,860. So how many homes (taking account of these adjustments) do the Council want built? The plan does not say. Without this figure it is hard to see how anything else can be planned. This undermines the validity of the whole consultation. It is unreasonable to ask the public to approve a "plan" that fails to propose a target number that takes all the standard constraints and adjustments realistically into account, leaving the Council to set one without further consultation. Even if the OAN were not flawed, it is at best only a baseline figure and should not be passed off as a policy proposal.

It is unreasonable to embark on a radical transformation of the borough on the basis of an unclear housing target. Most of Guildford Borough is highly protected from development (89% Green Belt, 44% AONB and about 75% protected by SPA). Whether or not increasing the number of dwellings by up to a quarter is desirable, it would be a major and irreversible change, arguably turning a largely rural borough into a mainly urban or suburban one like Woking. The scale of the housing number increases the onus for it to be seen to be sound. A substantially lower number, on the other hand, would remove the need to build on Green Belt or open countryside, and instantly meet the single biggest public objection to the plan as a whole.

The Plan in general and this policy in particular does not address the point that Guildford exists as part of London's commuter belt. Any increase in supply of housing in Guildford, particularly if the increase is proportionately greater than elsewhere in the commuter belt, will simply result in a shift of population into the area. It will not reduce prices or increase availability except imperceptibly. The Plan also ignores the point that many of those working in the area live elsewhere. Accordingly in considering the housing number the Plan should take into account that in this part of London's commuter belt, demand for housing is, in practical terms, unlimited.

This policy does not take proper accounts of the constraints to development which exist, principally posed by the Green Belt and by infrastructure limitations. I believe the Council is under a duty to properly consider applying these constraints. It is clear the Council has failed to do this. This approach differs from all the other boroughs in Surrey. The Plan appears to have deliberately been manipulated towards a growth agenda without disclosing why this is being done. The housing that is needed should be concentrated on urban brown field sites and through increasing the housing density of existing built up urban areas.

The development of 13,860 homes in the Plan period with 65% in the Green Belt does not constitute sustainable development. It will have a permanently detrimental impact on the Borough in general and on West Clandon and surrounding area in particular. The developments at Garlick’s Arch and Gosden Hill Farm do not meet the needs of the local communities. The road infrastructure in and around West Clandon will be unable to cope with additional demand. The edge of urban Guildford will creep that much closer to West Clandon, thus negating the purposes of the Green Belt in the area which include safeguarding the countryside from encroachment, checking the unrestricted sprawl of large built up areas and preventing neighboring towns merging into one another.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill Farm (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.
The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/1262  Respondent: 8812097 / Clare Benzikie  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I do not agree that the evidence used for the Proposed Submission Local Plan Strategy and Sites is adequate, up-to-date and relevant.

The fundamental driving forces for much of the development proposed in the Plan (particularly that on Green Belt land) are based on:

1. An excessive ambition to expand the local economy which is neither warranted nor wanted by the local population. Guildford is already one of the highest ‘value creation’ areas in the country and has one of the lowest unemployment rates. There is no evidence that massive and accelerated expansion is required.

1. SHMA figures which are neither transparent nor justifiable, especially in view of previous figures set. Independent assessments of the SHMA (eg from Guildford Residents’ Association and David Reeve) show it is set far too high and so cannot be said to be adequate, up to date or relevant.

In addition the recent vote to leave the EU and the impact this will have on the economy and migration have not been taken into account.

The Plan should be re-assessed and the methodology for arriving at housing need figures should be fully transparent.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/1268  Respondent: 8812097 / Clare Benzikie  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 2: Legal compliance

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I do not consider the Proposed Submission Local Plan: strategy and sites as a whole to be legally compliant because it mainly ignores the consultation process for the 2014 draft Plan it is claimed to be based on.

That consultation process was absolutely clear by some +20,000 responses that that Plan was flawed and no development should be carried out on Green Belt land.

Instead this 2016 draft Plan actually increases the number of dwellings being built on the Green Belt, in direct contradiction to the consultation process, yet is stated to be a Regulation 19 proposal.

As a result I do not see how the 2016 draft Plan can be Legally Compliant.

The 2016 draft Plan should be re-assessed and should take into account the views of the majority of responses from the consultation process for the 2014 draft Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/1274  Respondent: 8812097 / Clare Benzikie  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I do not consider the Proposed Submission Local Plan: strategy and sites as a whole to be sound, because, but not limited to, the following reasons:

1. “Only sites that propose sustainable solutions have been included in the Plan and the Plan rejects any schemes that would have a detrimental effect on the green belt.” Summer 2016 edition of “About Guildford” (published by the Council) on page 5. This is demonstrably untrue and appears designed to bias the consultation process.

2. The housing OAN figure has been calculated by a process which is not transparent. It has not been properly examined by Councillors before being adopted.

3. The OAN has been adopted as the housing number without the application of any constraints to take account of Guildford's circumstances, including in particular the Green Belt, AONB and road infrastructure. National policy permits such constraints to be applied and it is inappropriate not to consider the need to do this.

4. The draft Plan does not accord with the NPPF policies on protecting the Green Belt. Exceptional circumstances need to be shown to justify removing areas from the Green Belt and this has not been done. The housing need number is not justification in itself according to published ministerial statements Having properly calculated an OAN, constraints should be applied to it to reflect the Green Belt, AONB and infrastructure. Each proposed Green Belt site then needs to be justified on its own merits. The benefits of the proposed development need to be identified together with the harm to the Green Belt. Only if there are exceptional circumstances and following a proper balancing exercise demonstrating that these exceptional circumstances outweigh the harm to the Green Belt can the proposal proceed. The draft Plan does not demonstrate that this has been done. The housing number has been used as a blanket justification for all Green Belt sites-which amount to 65% of the proposed housing number.

1. Whatever the justification for the assumptions made in calculating the OAN, those assumptions are now almost certainly incorrect following the referendum.
2. The housing number is at least twice the achieved rate of building in the Borough over the last few years. There is no evidence in the Plan to show that this rate is achievable and sustainable.

3. Much of the infrastructure required to support the level of development proposed is outside the Council’s control. The Infrastructure Plan is long on possibilities and aspirations and very short on commitments. The infrastructure requirements placed on developers are supposed to be in place before development commences. This is utterly unrealistic and indicates a lack of knowledge of developer’s business models which depend on positive cash flow. It seems very clear that at best, infrastructure provision will seriously lag development and leave higher levels of congestion than now. This will reduce the quality of life for residents through congestion and disruption.

4. The 40-45% requirement for affordable homes together with infrastructure such as railway stations, park and ride facilities, schools and roads is highly likely to be challenged on a site by site basis by developers using the NPPF provision that Councils cannot impose conditions which make development non-viable.

5. GBC has not included details of its Town Centre Master Plan and urban development proposals in time for and as a part of the Guildford Local Plan consultation
6. GBC has failed to provide an Infrastructure Report in time for and as a part of the Guildford Local Plan consultation
7. GBC has proposed an OAN of 693 houses per annum in the GL Hearn West Surrey Strategic Housing Market Assessment (SHMA) which many, including independent assessors, consider unsound
8. Highways England will not start to consider what it intends to do as regards the A3 in the vicinity of Guildford until 2018
9. Network Rail have not made available for the public consultation any plans for a new railway station at Merrow with an adjacent Park & Ride for 1,000 cars
10. The GBC proposals for Gosden Hill Farm do not appear to be in coordination with the Neighbourhood Plan for Burpham
11. The draft Local Plan will cause further linear development along the A3 between Burpham and West Clandon PC and encroachment onto open Green Belt countryside in clear conflict with the National Planning Policy Framework
12. The proposal for Garlick’s Arch was added to the draft Local Plan without any prior consultation under Regulation 18.
13. The Land Availability Assessment (LAA) indicates a range of planning difficulties for Gosden Hill Farm and Burham which have to be met by the developer involved. These include Electricity Grid supply problems and foul sewage and surface water issues that suggest the development proposed cannot easily be implemented both technically and financially.
14. No adequate explanation is given as to how the aspirational proposal for a tunnel will be used to overcome traffic issues relating to the quality of life and amenity of Burpham, West Clandon, Send and Ripley citizens
15. In common with many others I do not believe the housing figure has been properly calculated and I believe it overstates housing need. The Council has prevented councillors or others from properly considering the SHMA by refusing to make public the basis on which it was drawn up.
16. The housing figure, when properly recalculated, should be subject to constraints to reflect Guildford's circumstances, including in particular the Green Belt and road infrastructure. National policy permits such constraints to be applied and it is inappropriate not to consider the need to do this.
17. Even once a housing number has been calculated it cannot be used to justify taking land out of the Green Belt on a wholesale basis.
18. Cast iron commitment should be included in the plan that development can only commence when required infrastructure improvements have been secured.
19. The status of the text which accompanies each policy box is not clear. If the accompanying text does not have the force of policy a number of the policies (i.e. the text in blue) are so vague and general that they commit the Council to very little.

The draft Plan should be re-assessed with housing on brownfield sites made a priority over commercial development and Greenfield sites and each of the above points addressed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: SQLP16/1280  Respondent: 8812097 / Clare Benzikie  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 4: Duty to cooperate

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I do not consider the Proposed Submission Local Plan: strategy and sites as a whole has complied with the Duty to cooperate.

This 2016 draft of the Local Plan clearly demonstrates Guildford Borough Council’s refusal to co-operate with the wishes and requirements of the vast majority of the residents in its Borough.

The Council has failed to co-operate with the results of the consultation process for the 2014 draft Plan which was meant to inform and guide this 2016 draft Plan.

Despite campaigning on a clear statement ‘Conservatives Say Green Belt To Stay’, the ruling party on GBC is now intent on pushing through a Plan which will devastate Green Belt land and extend the Guildford Urban Area to further merge into surrounding rural villages.

This is not cooperation by any definition.

In addition the Council has failed to cooperate in providing any transparency to the housing need figures commissioned by the Council from GL Hearn.

The 2016 draft Local Plan should be reassessed with a reviewed and transparent SHMA and revised to reflect the views of the residents of the Borough, who pay for Guildford Borough Council to act in their interests, and not those of developers and central government.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/2916  Respondent: 8812833 / Simon P Hill  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

There is also a lack of any real evidence for the need for these massive housing developments. They will not significantly reduce the cost of local housing for local people because in the main they will attract people from outside of the area and our local people in need of housing won't be able to afford them.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Comment ID: PSLPS16/5983  Respondent: 8812833 / Simon P Hill  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A25

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to site A25 Gosden Hill Farm. This is a massive over development of 2000 homes in the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/5984  Respondent: 8812833 / Simon P Hill  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to site A35 Wisley Airfield. Yet another massive 2000 home development that is inappropriate and unsustainable and again in the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/5980  Respondent: 8812833 / Simon P Hill  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I object to the late inclusion of site A43 Garlicks Arch

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/5981  Respondent: 8812833 / Simon P Hill  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

Do you consider this section of the document; complies with the Duty to Cooperate?  ( ), is Sound?  ( ), is Legally Compliant?  ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to site A43a the on and off ramp at Burnt Common / Clandon as this will make the traffic problems currently suffered by Ripley and Send far worse, attracting vehicles from a wide area into trying to access the A3 and M25. When there is an accident or breakdown on the A3 or M25 the villages and surrounding become grid locked, this proposal will cause this to happen even sooner.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/5982  Respondent: 8812833 / Simon P Hill  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A45

Do you consider this section of the document; complies with the Duty to Cooperate?  ( ), is Sound?  ( ), is Legally Compliant?  ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to site A45 The Talbot. This is over development in a conservation area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/5985  Respondent: 8812833 / Simon P Hill  Agent:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to A57 The Paddocks- 4 traveller pitches.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12133  Respondent: 8812833 / Simon P Hill  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to any erosion of the Green Belt. It was put in place to prevent developments merging together and causing loss of identity of villages and settlements. These proposed developments will cause Burpham, Clandon, Send, Ripley, Wisley and Ockham to be merged into one massive housing estate with thousands of extra people and their vehicles clogging our roads, overwhelming our health services, schools and local amenities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/12132  Respondent: 8812833 / Simon P Hill  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to any "in-setting" (i.e.removal) of any villages from the protection of the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<td>I object to the local plan as the developments proposed are not sustainable (Policy S1).</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<td>I object to the disproportionate amount of development in our area of the borough.</td>
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<th>Respondent: 8812897 / Fiona Atkinson</th>
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<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley South</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<td>I write to object to the above Submission. We have lived in West Horsley for 6 years, locating here from another rural area for job purposes. This area is not only an area of outstanding beauty, it is also a protected Greenbelt site, implemented following the war. To get rid of this protection, is to give away part of the values so many people fought for, and will be taken from our children.</td>
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Although I understand the need for more jobs and housing, there are areas in the UK desperate for development to improve income in the area, such as parts of Wales that have lost local industry. Countries such as India have managed to develop business and technology sites in new areas, and it is very short-sighted if we cannot develop similar infrastructure. Over-developing one area will increase division in the UK. Some development is needed, but it must retain the village feel in rural areas and therefore should be based on small developments, that use brown sites where possible, or small areas of land that will not impact greatly on local roads and services. The A246 for example, blocks as soon as there is a problem on the A3. Large developments will cause further traffic problems/congestion, as well as put further pressure on schools and health centres. If we are not careful, London/Guildford will become an urban sprawl, with loss of access to the countryside for everyone.

We need to support local communities to develop their own relationships and support networks. Developing large estates where people commute to work in other areas does not promote this process. In-fill of development of 4-12 houses across a few small sites supports local families and jobs, without turning the villages into a suburb where no-one knows anyone, with a loss of access to countryside and ways of life. At present, West and East Horsl both have strong communities and support networks.

There are people in other areas of the country desperate for opportunities to work and to develop their communities, and they are not being heard as each borough focusses on their local target, and not the wider picture. Industry needs encouragement to support this process, and I hope others can see and support this.

The numbers of houses suggested in East and West Horsley are too large for the size of the villages, would put further pressure on roads and services, and reduce Greenbelt, land meant to be protected for generations. In the time we have lived here, we have seen re-introduction of live-stock, both sheep and cows to local land, which is a fantastic achievement. The forested areas help manage pollution, a growing problem in the area.

I understand the challenges ahead are hard, but once rural areas are lost, they cannot be regained. I hope that these views can be considered.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to these proposals because insufficient information has been given in order for the residents to make a proper assessment.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/326  Respondent: 8813185 / Nigel Wright  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Draft Local Plan: Strategies and Sites June 2016

I’m writing to set out my objections to the above plan as follows

- Here in Green Lane we have had raw sewage spewing from the manhole cover in inclement weather presenting a health risk. If the 120 extra houses off Green Lane/Ockham Road North were built this would be much worse. I note again that after last week’s rain the manhole cover in Green Lane appears to be caving in again.
- Thames Water has advised Guildford Borough that the area’s wastewater network is unlikely to be able to support the demand anticipated from all the proposed developments.
- There is a continuing lack of state primary school places in the village. The Raleigh school which serves both East and West Horsley is full every year and this has been the situation for many years. I understand Cranmore and Glenesk are also nearly full (not that private education would be an option for those in “affordable” housing).
- Secondary school places are limited in number at the Howard of Effingham School and other secondary schools involve a much longer journey of time and distance from the village to reach them, indeed 11 years ago we were doubtful about getting our son into the Howard.
- Where are all these extra people going to work? There would seem few employment opportunities in the immediate area and limited transport links elsewhere – very limited parking at Horsley and Effingham station and a long, dark walk for some, particularly the proposed 120 houses at the site nearest this address.
- Shouldn’t government be concentrating on brownfield development as a priority rather than ruining the green belt and all the social, health and wildlife benefit the green belt brings. There should be no need to build on any green fields if brownfield (previously developed) land is used efficiently. (That does not mean garden-grabbing!).
- As a working man, I find it extremely difficult to get any convenient appointments at the Horsley Medical Centre – how will it cope with an even larger village population?
- Due to the lack of public transport in this area, owning a car is vital, so each new household would have at least one car which would congest the local roads (already in poor condition) even more.

All in all, this is an unsatisfactory plan for the village and representation should be made to keep East & West Horsley firmly in the Green Belt and resist this excessive housing plan.

All of the above would apply in the event of the ridiculous development at Wisley Airfield should go ahead. How can this even be considered in the Local Plan if it was recently rejected.

Perhaps Parliament should consider the effects of net migration in the UK and honour its pledge to reduce this – that would cut the need for so many houses and reducing the Green Belt!
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/4000  Respondent: 8813281 / P J Ryan  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I have grave doubts over the proposed number of new houses arising from the SHMA. This number was generated by a Consultants mathematical model which has not been revealed in the Plan nor I believe to GBC. Never the less GBC, without factual evidence justifying their decision increased the target number of houses by some 70% higher than the national estimates of population growth in the Borough. Before any final decisions on numbers are made I feel it incumbent upon GBC to give an adequate reason for their decision making.

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/16582  Respondent: 8813281 / P J Ryan  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E8

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Station Parade is designated as a “District Centre”. A visit to this Parade of shops will immediately show the facilities available fall well below those required for such a classification and totally fall short of those required for future Urban development.

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/16583  Respondent: 8813281 / P J Ryan  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Local schools are full. Medical facilities would find it difficult to cope. Drainage is inadequate. Roads are already overloaded and in a parlous state. Village car parking is already overloaded with no room for expansion. Railway Station Parking is already at capacity with no room for expansion.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I refer to the proposal to build 593 new houses in the Horsleys and would make the following comments and objections:

1. In order to carry out the proposed build programme The Horsleys are to be removed from the Green Belt. As I understand it such actions can only be taken in the most exceptional circumstances. What are these exceptional circumstances? As far as I can see such circumstances have not been demonstrated and therefore may be unlawful

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
The proposers of the Plan have failed to provide sound reasons for the extension of the boundaries of the “Settlement Areas” of the Horsleys other than to increase the land available for future development. If these changes are allowed such a precedent would be a disaster for all rural areas.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

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<td>Answer (if comment is on questions 1-7 of the questionnaire): ( )</td>
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<td>Should the Plan be adopted West Horsley would increase by some 35%, a figure greater than any other single area in the Borough. If it is inevitable more houses are to built, GBC is urged to ensure a fair and equitable spread of this development.</td>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
<td>Attached documents:</td>
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<th>Respondent: 8813345 / Alison Craze</th>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ( )</td>
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<td>I do not agree that Guildford Town Centre should have an increase in retail space. In my view Guildford should encourage development of more town centre housing, so that there is a pleasant environment in the evenings when the shops are closed.</td>
<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
<td>Attached documents:</td>
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<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
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This letter is regarding the proposed developments in the Parish of West Clandon. Namely Gosden Hill, Burntcommon and 4 way A3 Junction.

We have been residents of West Clandon for twenty three years. We moved to this village because of its rural location and we would be very disappointed to see West Clandon lose its village atmosphere and become a suburb of Guildford. One of the attractions of the local area for residents and tourists is the concept of an historic town like Guildford surrounded by quaint and attractive villages. It would be such a shame to see the area become a sprawling metropolis. Environmentally and aesthetically it would be a crime to destroy the green belt. Also any dent to the Green Belt philosophy is harmful. Small or large or least painful it does not matter as it can only lead down the slippery path, ie where would it end?

The main criticism that can be made about West Clandon is the traffic on the main road running through the village on the A247. West Clandon Road is a narrow two lane road and both lorries and cars hurtle down the road at high speeds. Our house literally shakes on occasions. There is a very narrow section of the road where we are frequently forced up onto the curb by oncoming traffic on the opposite side. Our car has been damaged by being side-swiped at this narrow section. The increase in vehicles that would occur should any of the proposed developments take place would be devastating to the local community resulting in more traffic jams, pollution and risk to human life.

In addition any development would place a burden on existing services in the parish such as rubbish collection and general maintenance of the village to name a few problem areas.

We understand that Central Government may feel that they have to pressurise local authorities to increase the building of homes and schools and a travellers site but the impact of such developments in the local community is immense.

For this reason we sincerely hope that the proposed developments will be considered in light of the impact on the existing community and the proposals denied.

Thank you for your consideration of our concerns.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
1. I object to the changed policy A25 Gosden Hill for the development of 1700 homes which is still far too much.
2. There is no need for housing on this site because the local plan housing target is incorrect and inflated and ignores constraints.
3. Gosden Hill is located entirely within the Green Belt. No exceptional circumstances have been demonstrated for building on this site and therefore development here does not meet paragraphs 87-89 of the NPPF. Furthermore, Gosden Hill performs all five functions of green belt,
4. The site has no provision for foul or surface water sewerage and adjoining sewerage is at capacity
5. The Green Belt at this point serves the important function of separating West Clandon from the edge of urban Guildford. Development here will cause the two to coalesce defeating one of the objectives of the Green Belt. If this development proceeds I believe the narrow strip of Green Belt remaining between Guildford and Clandon at this point will be too narrow and will come under further pressure. It will represent an undesirable ribbon development along the A3. It will be highly visible from the A3 when approaching Guildford and will, in conjunction with A43a at Garlick's Arch give the appearance of almost continuous development from Send through to Guildford.
6. The development will generate in the region of 6,000 vehicles which will exit straight on to the A3 which is stationary every day during rush hours. The linking of the A3100, B2215 and A247 would channel thousands of cars through the narrow, winding road through West Clandon.
7. I object to the proposal for a link road to bring traffic from the Gosden Hill development to the proposed 4 way junction at Burnt Common. This has the potential to generate large volumes of traffic (including commercial vehicles) on the A247 through Send and West Clandon - a road which is already under traffic stress (see below).
8. The volume of traffic will greatly increase air pollution which is particularly critical given the proposal to build two schools.
9. A new on-slip at Burpham would only be 1.8km from the on-slip at Burnt Common which is against Highway England’s requirement of 2km.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/4789  Respondent: 8813409 / P Trusler  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? (), is Sound? (), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to the changed policy A43 Garlick’s Arch for 400 homes and 6 travelling show people pitches
2. It ignores all the thousands of previous objections made by local people
3. There is no proven demand for travelling show people plots in this location
4. There is no need for putting houses on this site because the local plan housing target is incorrect and inflated and ignores constraints.
5. The allocation of 28.9 ha is an excessive land grab into the Green Belt. If we take a normal density of 30 homes per ha and it is at the end of the day proven that there is a need for 400 homes in this location the land requirement is 13 ha not 28.9 ha which is more than double. This replicates a similar over land grab at Burnt Common where the factor is 7 times the land required.
6. This confirms the worrying impression that GBC have a pre-determined policy of building on the Green Belt at every opportunity. The arithmetic does not stack up. One would have thought that they would as custodians of the green Belt be intent on conserving it rather than exploiting it.
11. I object to the development at Garlick's Arch because of flood risk. The site at Garlick’s Arch is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. Knowing the area well I am aware that this site often floods during the winter months and the flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.

12. I object to the loss of rural employment on the site. The development at Garlick’s Arch would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises.

13. I object to the potential loss of Ancient Woodland on the site. The proposed development at Garlick’s Arch will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees that existed in the year 1600.

14. I object due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1). Our villages are already suffering from severe congestion for much of the day, for example the Newark Road and Rose Lane junction in the centre of Ripley and the A247 through West Clandon. The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.

15. Furthermore, many of the country lanes around the villages of West Clandon, East Clandon, Ripley, and Send are narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition. I object to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces.

16. Many of the affected villages, such as West Clandon, East Clandon, Send and Ripley, already suffer from parking problems. Further development around these villages will only result in more traffic and more parking problems.

17. With some 5000 houses being proposed close to the villages of West Clandon, East Clandon, Send and Ripley, the roads serving the village will become even more congested. Cycling has become a popular past time, particularly at weekends hundreds of cyclists past through the village on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road accidents involving cyclists as a result of the development proposed under the local plan.

18. The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the roads becoming even more dangerous for pedestrians.

19. I object to the lack of proper infrastructure planning for sites (Policy I1). Policy I1 requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.
20. Despite the Garlick’s Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents’ in the locality will see their quality of life significantly deteriorate in many ways.

21. Many of the utilities in the West Clandon, East Clandon, Burpham, Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers. No plans to improve these services should mean no development of the Garlick’s Arch site.

22. Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are already at capacity and suffering from funding cuts or freezes. Any further development without funding will place further stress upon existing health services.

23. I object due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2). There is no certainty that either the A3 or M25 in the borough will be improved to increase capacity and reduce congestion during the Plan period. Highways England has no plans to even examine improving the A3 before 2020. I have considerable concerns that development of the large residential sites identified at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), will take place before any improvements are made to the trunk road network. The A3 & M25 are already at capacity during peak hours and any development prior to improvement of these roads will only make the situations worse.

24. I object to poor air quality concerns (Policy I3). Paragraph 4.6.27 of the Plan states that “Development must also mitigate its traffic impacts, including its environmental impacts and impacts on amenity and health.” The significant level of development being proposed, particularly in the north east of the borough will lead to considerable further congestion, despite any attempts to mitigate this through travel plans. This will be particularly acute in built up residential areas and will only lead to greater levels of air pollution, which will have a detrimental effect on local residents and their health.

25. I object to the inclusion of the land at Garlick’s Arch, Send Marsh/Burnt Common and Ripley (A43). Garlick’s Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8). There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).

26. It is clear that with this site being added at the eleventh hour and no infrastructure planning has been undertaken. The Infrastructure Schedule makes no provision for any infrastructure improvements for this site. How will the local services such as schools and doctors cope, many of which are already at capacity? (Policy I1)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/4790  Respondent: 8813409 / P Trusler  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A58

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to Policy A 58 at Burnt Common and to the proposed inclusion of Burnt Common as an Industrial Strategic Employment Site
2. This previous allocation for B1c, B2 and B8 development was removed from the 2014 draft due to all the objections made previously.
3. The word “minimum” is a change from the previous “maximum” in the 2016 plan and since that time there has been a decline in demand for industrial land. This change alone is unacceptable since even if there was a need to
build 7,000 sq m at Burnt Common this development would only require 1.4 ha at a standard plot ratio density of 50% not 9.26 ha. There is no justification for zoning an additional 7.86 ha in the Green Belt.

4. There is in fact no justification for building any more industrial development in the borough particularly at Burnt Common. The current industrial pipeline of granted consents of 38,357sqm in B1c, B2 or B8 use class space is double the 19,000 sq m said to be needed by Aecom who justify the need for new space on top of the existing pipeline by a completely unsubstantiated suggestion that “there is the possibility that some pipeline developments may not come forward at all, or be developed in different quantities by use class than has been consented.”

5. There is no need to build industrial or warehouse development in the middle of the Green Belt when Slyfield and Guildford still have empty sites and industrial units.

6. The 2017 Employment Land Need Assessment shows a reduction in demand to 3.9 hectares for industrial land for the whole borough not a huge over allocation of 9.26 hectares at Send in the Green Belt.

7. The Employment Land Needs Assessment update 2017 (ELNA) states “that the pipeline for employment floorspace defined by planning permissions yet to be implemented and prior approvals suggests the potential for an additional 33,607sqm of B use class floorspace to come forward. This figure comprises a net loss of 4,750sqm of B1a use class floorspace and a net gain of 38,357sqm in B1c, B2 or B8 use class space.”

8. 38,357 sq m of B1c, B2 or B8 use class is quite sufficient supply for the plan period and is in fact more space than the 3.9 ha of industrial land that is said to be needed for the plan period by Aecom. Since if you were to develop 3.9 ha at a plot ratio of 50% it would provide new industrial development of 19,000 sq m approximately half of current planning permissions granted. This does not justify the need for new development of industrial space on the Green Belt in such areas as Burnt Common.

9. The reality of demand for industrial space is that it is both nationally and locally in decline and this is evidenced by old existing permissions that have not been taken up and developed. The ELNA alludes incorrectly to the poor quality of existing space being a “constraint” on supply and fails to acknowledge that this assertion cannot apply to potential newly developed space e.g. the undeveloped pipeline of 38,357sqm.

10. The impact on small surrounding roads will create traffic gridlock.

11. It will join up existing villages and defeat the purpose of the Green Belt.

12. The ongoing poor quality of the updated research undertaken by Aecom in the Employment Land Needs Assessment 2017 does not support industrial development on land in the Green Belt at Burnt Common.

13. The Aecom research is generally superficial and lacks sufficient detail and analysis between B1c, B2 and B8 use classes and no reliable individual analysis has been undertaken of the widely different supply and demand dynamics of light industrial, general industrial and warehousing and distribution floor space.

14. The potential inclusion of a waste management facility mentioned at paragraph 4.4.23a lacks enough detail for proper consultation and is completely inappropriate.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/3211  Respondent: 8813409 / P Trusler  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
The Plan now states: “the presumption in favour of sustainable development will not automatically apply to policies relating to sites protected under the Birds and Habitats Directives and/or designated as Sites of Special Scientific Interest (SSSIs), land designated as Green Belt, Local Green Space, the Surrey Hills Area of Outstanding Natural Beauty, designated heritage assets and locations identified as at risk of flooding.”

Gosden Hill and Blackwell Farm (both currently in the green belt) are called “urban extensions” surely a euphemism for urban sprawl? Garlick’s Arch and Burnt Common developments take land from the green belt to extend Ripley/Send. One of the important specific purposes of the green belt is to prevent urban sprawl.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp17q/650  Respondent: 8813409 / P Trusler  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Question 4: Duty to cooperate

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The NPPF states para 155: “Early and meaningful engagement and collaboration with neighbourhoods, local organisations and businesses is essential. A wide section of the community should be proactively engaged, so that Local Plans, as far as possible, reflect a collective vision and a set of agreed priorities for the sustainable development of the area, including those contained in any neighbourhood plans that have been made.”

The changes in this latest version of the Guildford Local Plan show little or no willingness of Guildford Borough Council to reflect a collective vision. Despite the many thousands of responses to previous versions of the Plan which overwhelmingly rejected building on Green Belt land this latest version has as much, if not more, building on the Green Belt and increased problems of infrastructure and traffic which will bring increased noise and air pollution and danger to residents.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/2373  Respondent: 8813505 / Peter Grimble  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I OBJECT to lack of transparency regarding the evidence report by GL Hearn and thereby any verification of the SHMA figure of 693 homes per annum

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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I OBJECT to Policy A25 Gosden Hill as being totally inappropriate and unsustainable development of 2000 homes in the Green Belt, which will see coalescence and urban sprawl from Burpham to West Clandon

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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I OBJECT to Policy A35 Former Wisley Airfield as being totally inappropriate and unsustainable development of 2000 homes in the Green Belt

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43</td>
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<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
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</table>
I OBJECT to the inclusion of strategic site Policy(A43 Garlick's Arch and its late substitution in the Local Plan with no prior consultation with the local community. This site should be protected as it is agricultural land that is previously undeveloped and within the Green Belt. There is no sound reasoning as to why the Garlick's Arch site was substituted at the last minute on 24th May 2016 in preference to the original site A43 Land at Burnt Common Warehouse which is an existing brownfield site with industrial space, provision for at least a further 7000sqm of industrial employment space and an additional 100 homes which is more in keeping with the acceptable growth in housing numbers for the residents of Send, Burnt Common, Send Marsh and Ripley. The development of 400 homes at the Garlick's Arch site will cause coalescence with Send, Send Marsh, Burnt Common and Ripley thus losing forever the independent identity of each village and hamlet.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/4550  Respondent: 8813505 / Peter Grimble  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy A43a, the proposed on/off ramps to the A3 at Burnt Common as this will inevitably cause traffic chaos on the local road network throughout Ripley, Burnt Common, Send and West Clandon, with absolutely no possibility of mitigation due to the nature of our rural roads and lanes.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/4551  Respondent: 8813505 / Peter Grimble  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A45

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I OBJECT to Policy A45 The Talbot Ripley as this is over development in an open space within the Green Belt

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/4552  Respondent: 8813505 / Peter Grimble  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A57

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy A57 The Paddocks for the provision of 4 traveller pitches in Rose Lane as this is in excess of current requirements within the borough

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9868  Respondent: 8813505 / Peter Grimble  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to all insetting of villages from the Green Belt, in particular for Ripley, Send Marsh/Burnt Common, Send and East/West Horsley

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/9869  Respondent: 8813505 / Peter Grimble  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<td>I OBJECT to development in areas which are at risk of flooding (Policy P4) such as site A43 Garlick's Arch which is designated as flood zone 3 by the Environment Agency</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<tr>
<td>I OBJECT to the Local Plan as the proposal of 13,860 homes proposed will not be sustainable policy S1 and it will have a permanently detrimental effect by overdevelopment in existing communities, in particular Ripley, Send, East/West Horsley and West Clandon</td>
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<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<tr>
<td>I OBJECT to the disproportionate amount (36%) of all proposed development being in one area of the borough from Wisley to Burpham creating a narrow ribbon effect along the A3</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the proposed Infrastructure Schedule.

The Infrastructure Schedule sets out the key infrastructure requirements on which the delivery of the plan depends. For each of the Key Allocated Sites in the borough it identifies infrastructure projects that are required, except for Garlick's Arch (A43) which is not mentioned. It is clear that the Plan takes no account of the infrastructure required for this site and is therefore not fit for purpose.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/820  Respondent: 8813601 / Gaenor Richards  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough as being too high.

- The "objectively assessed need" figure of 693 homes a year is too high.
- A professional review by NMSS has concluded that, even basing the calculations on a period of stronger economic and student growth, the housing need figure should be revised down to 510 homes a year and the method changed to consider student housing need separately due to the distorting effects.
- The current SHMA inflates the proposed housing figure due to
  - failure to correct for errors in the historical data for international migration flows,
  - issues with the way it considers students and affordability and
  - flaws in the method for estimating the number of homes needed to support job growth.
  - It is unacceptable that demographic and economic model assumptions have been withheld and cannot be checked making the process unaccountable.
The Plan's proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the borough, it is over double the previous figure of 322 used in previous plans. The SHMA report methodology is I believe inaccurate; it inflates the needs of the borough by distorted student numbers. However, it is based on commercially confidential modelling assumptions that cannot be checked or reviewed. There is no transparency to this evidence base and it is therefore impossible to assess its accuracy. This is not democratic and is not appropriate for consultation of the Plan.

The National Planning Policy Framework allows the overall housing target to be reduced to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: PSLPS16/1343</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A25</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT strongly to the Gosden Hill development (A25) being in the Local Plan at all. The land in Gosden Hill does exactly what the Greenbelt was designed to achieve. It provides a green buffer between the Guildford Urban Area and West Clandon, gives Burpham a defined green boundary and breathing space and it hides Guildford town from visitors until they pass the off-slip to Burpham.

No exceptional circumstances have been demonstrated for building on this site and therefore it does not comply with paragraphs 87-89 of the NPPF. It stops the sprawl of Guildford town, assists in safeguarding the countryside from encroachment and assists in urban regeneration by encouraging the recycling of derelict and other urban land. These are all requirements of the NPPF.

The scale of Gosden Hill is out of proportion to West Clandon. It would have four times the amount of housing plus shops, offices/factories, GP surgery, schools. Development on this scale would blight a historic village with a history going back to the Doomsday Book and beyond.

Gosden Hill is the most obvious location for the north end of an A3 tunnel. It has rising ground and is situated just before the urban area. If it is built on, it will be very difficult to construct a tunnel.

The development will generate in the region of 6,000 vehicles which will pour on to the A3 which is already stationary every day during rush hours. The linking of the A3100, 62215 and A247 would channel thousands of cars through the narrow, winding road through West Clandon, a road where large lorries mount the pavement virtually every day (potentially threatening the lives of the village's residents and children walking to school) and through Send and Ripley which are also already severely constrained.

The volume of traffic will greatly increase air pollution which is particularly critical given the proposal to build two schools.

Currently, a two way junction at the site would require vehicles wanting to go north on the A3 to go through Burpham which is grid-locked every day.
Burpham's sewers are at capacity. Sewage would have to be pumped to Slyfield for processing, a project of enormous cost. There is inadequate fresh water in Guildford and current supplies could not meet the needs of a development of this size. Electricity supply is also inadequate and would require a big infrastructure development.

The railway station was rejected by Guildford Borough Council in 1984 because it feared Gosden Hill would become a dormitory estate for London.

The wording of the Local Plan with regard to Gosden Hill is so loose that the developer could virtually do whatever it wants.

The remaining agricultural land between Gosden Hill and West Clandon is so small that it is highly likely to be uneconomic and therefore a prime candidate for further development which would roll the Guildford Urban Area over West Clandon towards East Clandon and Wisley.

If the Strategic Sites are developed, the north of Guildford will deliver 36%, 5,036 houses towards the total of around 14,000. The infrastructures of the existing villages and the A3 will be overwhelmed by the scale of development.

A new on-slip at Burpham would only be 1.8km from the on-slip at Burnt Common which is against Highway England's requirement of 2km.

Development of the A3 at best will not start until after 2020 and the building of a tunnel, which is only an "aspiration" in the Local Plan is likely to be many years after. In the meantime given that developers build houses to provide cash-flow for infrastructure, Gosden Hill will have a crippling effect on villages like West Clandon and on the A3.

Gosden Hill already has surface water problems. Merrow Stream crosses the site. No hydrological survey has been carried out to assess the implications. Electricity pylons run through the centre of Gosden Hill which have health and safety issues.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ()**

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I OBJECT to the inclusion in the Local Plan of the land at Garlick's Arch, Send Marsh/Burnt Common and Ripley (A43)

Garlick's Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8). There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).

The Plan states the preference is to making the best use of previously developed land. Yet at the 11th hour a perfectly acceptable brown field site at Burnt Common, capable of accommodating approximately 100 houses, was removed from the Plan and replaced with the Garlick's Arch site. There was no proper consultation in relation to the inclusion of this site.
Why was a brownfield site removed and replaced with a Greenfield site? There is no evidence that Section 18 of the Planning and Compulsory Purchase Act 2004, which requires local planning authorities to produce a Statement of Community Involvement, has been complied with for this site. This only came to light for local residents following a Council meeting on 11th May 2016.

Moreover, Guildford Borough Council's own Green Belt & Countryside Report does not address Garlick's Arch at all, so there is no evidence base to support the inclusion of this site.

National Planning Policy promotes sustainable developments, with sustainable transport. With ever reducing bus services in the area and no train station within reasonable walking distance it is impossible for any development on this site to offer a sustainable transport solution. Development on this site is wholly inappropriate (Policy 13).

The stream, which runs through the site, is identified as having a high risk of flooding by the Environment Agency. There are other sites that do not flood that can be developed and therefore this site should be removed from the Plan (Policy P4).

This site is bordered by Ancient Woodland and within it a number of trees are protected by Tree Preservation Orders (Policy D3).

The site has an abundance of wildlife, some of which are protected. It is home to many types of owls and bats, with the woods having cuckoos and woodpeckers. In addition there are regular sightings of badgers, deer and red kites. The development of the site will result in the loss of habitat. No wildlife report has been conducted on the site. (Policy 14)

It is clear that with this site being added at the 11th hours no infrastructure planning has been undertaken. The Infrastructure Schedule makes no provision for any infrastructure improvements for this site. How will the local services such as schools and doctors cope, many of which are already at capacity? (Policy 11)

Furthermore, several electricity pylons run through the site, which will have the potential to be a health hazard for any residents.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

*Attached documents:*

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**Comment ID:** PSLPS16/1347  **Respondent:** 8813601 / Gaenor Richards  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ()**

I OBJECT to the inclusion of the land for new on/off ramps at Burnt Common (A43a)

The addition north facing ramps to the A3 at Burnt Common would be a disaster for local communities. There is no requirement for local traffic to access the A3 to the north, but the addition will draw in a huge amount of 'through' traffic.

The route from London/M25 to Woking or would now be through Burnt Common and Send. Equally traffic from the east of Guildford (Merrow etc) and the A25 will now go through West Clandon and Burnt Common. This will cause immense damage to those areas on small roads which cannot be improved.

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Page 3212 of 3335
This Plan does not address the needs of local communities or the Borough in this regard. There has again been no Section 18 consultation on this.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/2752  Respondent: 8813601 / Gaenor Richards  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the damage to the historic environment as a result of the scale of the proposed development.

I OBJECT to the local plan based on the impact it will have on the special countryside of the borough.

The proposed development at Garlick's Arch (A43) will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/2748  Respondent: 8813601 / Gaenor Richards  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the sustainable employment policy.

If developed, the new employment site at Garlick's Arch, Send Marsh/Burnt Common (A43), would be treated as a Strategic Employment Site.

The proposed development of up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (BB) at Garlick's Arch (A43) is in the scheme of industrial development relatively small. Just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m. The Garlick's Arch site which is in the Green Belt should not be developed as a Strategic Employment Site when there is a suitable alternative brownfield site very close by, which is far more sustainable.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2750  Respondent: 8813601 / Gaenor Richards  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the location for new employment floorspace at Garlick's Arch -Site A43.

Proposals for new industrial, warehousing and storage (use Class B1c, B2 and B8) floorspace will be directed to the Industrial Strategic Employment Sites.

There is no need for the new employment floorspace to be located at Garlick's Arch, when just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2751  Respondent: 8813601 / Gaenor Richards  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the loss of rural employment.

Policy ES supports the retention and development of local services and community facilities in our inset and identified villages. Yet the development at Garlick’s Arch (A43) would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises. The Plan does not promote rural employment; rather it will result in the loss of existing local rural businesses.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
I OBJECT. Tourism and visitors do not depend on new visitor "attractions" and could actually be damaged by them, as compellingly argued in the current debate over Newlands Corner. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment/"Disneyfication". Heritage sites and the Green Belt are particularly vulnerable to harm.

Guildford has many "leisure and visitor attractions" already. The case for creating more is not made and no examples are given.

Instead, the plan's explicit priorities should be:

1. To protect the borough's prime leisure and tourism asset, its countryside, from inappropriate development. This is all the more valuable because of its accessibility from London, the rest of Britain and the Continent, in that order. Rural residents are its custodians and require no Council interference. Economically, the most valuable forms of tourism, such as walking and cycling, require no new development. In the overcrowded South-East of England, lack of development is a leisure and tourism asset, not a liability.

2. To help make Guildford's river landscape less off-putting and support town-break packages for high-value tourists. To achieve this, the policy needs to define what leverage, if any, Council planners have to influence normal tourism market mechanisms.

3. To rule out the redevelopment of scarce rural hotel sites (e.g. Thatchers, East Horsley, earmarked for 40 new houses under Site A37 of the plan yet just a short walk from the new opera house).

I trust that the objections made above are fully taken into consideration and that the Plan is amended accordingly.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I OBJECT policy H1 (Homes for all).

Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan period. It fails to set rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions.

The housing mix is based on out-of-date, pre-Brexit projections and on assumptions set out in a flawed SHMA that has not been scrutinised or evaluated.

I support higher density development in the urban area, without resorting to dehumanising, high rise buildings that developers commonly claim are necessary for financial viability. Much of Guildford town could usefully be regenerated with 4-5 storey blocks with landscaping and underground parking, as often seen on the Continent and, recently, in London.

Student accommodation should be provided for 100% of new students and more than 60% of existing students, which would free up ideal family accommodation in the urban area. Other university cities (e.g. Oxford) insist on higher percentages than those proposed in the plan. In my view, the Council’s timidity is a case of "regulatory capture" by Surrey University, which has failed to use its existing planning permissions (dating from 2004) to accommodate 3,000 students or to improve the efficient development of its campus (e.g. by building on its extensive and under-used surface car parks). If all students were accommodated in this way, 2,000 homes would be freed up in town and there would be no need to build on the Hog’s Back.

Guildford borough has already a higher proportion of traveller sites than most comparable boroughs. Over-provision is inappropriate given other constraints.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2785  Respondent: 8813601 / Gaenor Richards  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy H3

I OBJECT - This is a Trojan horse policy. It says that homes can be built anywhere near a settlement of any form (including agricultural land and the AONB). These homes are meant for people with a village connection, but they could be for anyone on the Guildford borough housing list. To make the housing viable, or to improve the "mix" this can include "market" housing (i.e. normal commercial development which in Guildford usually means large executive homes). This policy means building anywhere, and ignoring all historic planning restrictions.
The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove "exceptional circumstances."

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2760  Respondent: 8813601 / Gaenor Richards  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the local plan, due to the congestion that development will cause to the local village roads and the lack of road infrastructure.

Our villages are already suffering from severe congestion for much of the day, for example the Newark Road & Rose Lane junction in the centre of Ripley. The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.

Furthermore, many of the country lanes around the villages of Ripley, Send and Clandon are narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition.

I OBJECT to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces.

Many of the affected villages, such as West Clandon, already suffer from traffic congestion. Further development around these villages will only result in more traffic and more parking problems.

With some 5,000 houses being proposed close to the village of Ripley, the roads serving the village will become even more congested. Cycling has become an ever popular past time, particularly at weekends hundreds of cyclists past through the villages on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road accidents involving cyclists as a result of the development proposed under the local plan.

The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the road becoming ever more dangerous for pedestrians.

The council has a statutory obligation to protect the public and the additional traffic flows will bring added pollution and risk to injury of the public. In the case of West Clandon the street often only has a narrow footpath on one side of the road making it very dangerous, especially when vehicles mount the pavements.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/2767  Respondent: 8813601 / Gaenor Richards  Agent:
I OBJECT to the lack of proper infrastructure planning for sites.

Policy I1 requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.

Despite the Garlick's Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents in the locality will see their quality of life significantly deteriorate in many ways.

Many of the utilities in the Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers. No plans to improve these services should mean no development of the Garlick's Arch site.

Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are already at capacity and suffering from funding cuts or freezes. Any further development without funding will place further stress upon existing health services.

Police services are seeing funding reduced. The development of the proposed 13,860 homes during the plan period will stretch the police services further and is unsustainable.

There is no provision of the increased capacity of Guildford hospital, where is this assessed and remedied?

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
I OBJECT to poor air quality concerns.

Paragraph 4.6.27 of the Plan states that "Development must also mitigate its traffic impacts, including its environmental impacts and impacts on amenity and health." The significant level of development being proposed, particularly in the north east of the borough will lead to considerable further congestion, despite any attempts to mitigate this through travel plans. This will be particularly acute in built up residential areas and will only lead to greater levels of air pollution, which will have a detrimental effect on local residents and their health and can even result in premature death.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

I OBJECT to not protecting the Green Belt.

I OBJECT strongly to the proposals to remove the villages of Ripley, Send and Clandon from the Green Belt, together with sites of Wisley Airfield (A35) and Garlick's Arch (A43). National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or for development on Green Belt. There are no exceptional circumstances for these villages and the land to be taken from the Green Belt. Mere housing need does not constitute a 'special circumstance'. And once taken the green belt is lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached. GBC's Green Belt and Countryside Report does not address Garlick's Arch, so there is no evidence base to support including this site.
Rather than developing Garlick's Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** PSLPP16/2747  **Respondent:** 8813601 / Gaenor Richards  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to development in areas which are at risk of flooding.

National Planning Policy states that Local Plans should take account of climate change over the longer term, including factors such as flood risk. It goes on to say that new development should be planned to avoid increased vulnerability to the range of impacts arising from climate change.

The Plan states that in accordance with national planning practice guidance, the Level 1 SFRA has been used to guide development towards areas at the lowest risk of flooding and identify areas unsuitable for development. However, the document concludes that land outside of the area of flood risk is not capable of accommodating all of the borough's identified development needs. A Level 2 SFRA has therefore also been produced and will help the Council apply the exceptions test (as described in the NPPG) as necessary to development proposals in areas at risk of flooding.

The site at Garlick's Arch (A43) is identified on the Environment Agency's flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council's SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding.

Knowing the area well I am aware that this site often floods during the winter months and the flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** PSLPP16/2744  **Respondent:** 8813601 / Gaenor Richards  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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Page 3220 of 3335
As a long term resident of West Clandon, a village in which my children have grown up, and my grandchildren are now
growing up, I have given this issue considerable thought. As a result, please find below my objections to Guildford
Borough Proposed Submission Local Plan (June 2016).

I OBJECT in the strongest possible terms to the Guildford Borough Proposed Submission Local Plan (June 2016) overall.
This Plan is unsustainable, unworkable and, in many provisions, unnecessary.

Furthermore, I set out below my objection to specific policies and matters within the Plan.

1. I OBJECT to the Local Plan as the development proposed will not be sustainable.

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National
Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact
on existing local communities by over-development, particularly for the villages between Guildford and the M25, including
Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development
proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick's Arch (A43) and Gosden Hill (A25) are in unsustainable locations. The
former two sites do not benefit from railway stations within easy walking distance and bus services across rural
villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are just
unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure
for Garlick's Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should
be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable
transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further
vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will
suffer as a result.

1. I OBJECT to the Borough Wide Strategy

A - The borough wide strategy is poorly It proposes 13,860 housing being developed across the borough and does
not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This
approach differs from all the other Borough Councils in Surrey.

B - The Housing number is based on pre-Brexit data for economic and population growth, including migration.
These now need to be revised downwards, possibly quite significantly.

C - The housing number is based on an arbitrary Housing Market Area (HMA): the "West Surrey" tri-borough
area of Guildford, Woking and Waverly. An HMA should be an area within which a majority of people live,
work, shop or study. On any common sense view, "West Surrey" is much too small. Half of Guildford borough's
residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the
borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to
the West; but all lie well outside "West Surrey". Puzzlingly, the adjacent district of Rushmoor, minutes from
Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in
the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is
in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public
consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however,
does not make "West Surrey" reliable. The area is artificial, and so therefore are the housing numbers derived from it. For
instance, by juxtaposing Guildford with Woking it appears that Guildford residents are being asked to build homes on open
countryside to meet its bigger, urban neighbour's "need". Guildford wants to build 7 sites of over 500 units, compared with
only 4 across Surrey's 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick's Arch (Ripley/Send border) (A43) and Gosden Hill (Clandon) (AZS) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. This will result in undesired coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick's Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages and a permanently detrimental impact on each of these currently distinct communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: pslp172/4721</th>
<th>Respondent: 8813601 / Gaenor Richards</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A25</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

C.i. Policy 25 Gosden Hill – My Objections

1. The volume of traffic will greatly increase air pollution which is particularly critical given the proposal to build two schools.
2. The development of this site cannot be sustainable and will cause massive congestion onto surrounding roads. The development will generate in the region of 6,000 vehicles which will exit straight on to the A3 which is stationary every day during rush hours. The linking of the A3100, B2215 and A247 would channel thousands of cars through the narrow, winding road through West Clandon.
3. The site has no provision for foul or surface water sewerage and adjoining sewerage is at capacity.
4. There is no need for housing on this site because the local plan housing target is incorrect and inflated and ignores constraints.
5. I object to the changed policy A25 Gosden Hill for the development of 1700 homes which is still far too much.
6. Gosden Hill is located entirely within the Green Belt. No exceptional circumstances have been demonstrated for building on this site and therefore development here does not meet paragraphs 87-89 of the NPPF. Furthermore, Gosden Hill performs all five functions of green belt.
7. The Green Belt at this point serves the important function of separating West Clandon from the edge of urban Guildford. Development here will cause the two to coalesce defeating one of the objectives of the Green Belt. If this development proceeds I believe the narrow strip of Green. Belt remaining between Guildford and Clandon at this point will be too narrow and will come under further pressure. It will represent an undesirable ribbon development along the A3. It will be highly visible from the A3 when approaching Guildford and will, in conjunction with A43a at Garlick's Arch give the appearance of almost continuous development from Send through to Guildford.
8. I object to the proposal for a link road to bring traffic from the Gosden Hill development to the proposed 4 way junction at Burnt Common. This has the potential to generate large volumes of traffic (including commercial vehicles) on the A247 through Send and West Clandon - a road which is already under traffic stress (see below).
9. A new on-slip at Burpham would only be 1.8km from the on-slip at Burnt Common which is against Highway England’s requirement of 2km.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<td>Proposed Submission Local Plan: strategy and sites 2017 / Policy A43</td>
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| 1. | I object to the changed policy A43 Garlick’s Arch for 400 homes and 6 travelling show people pitches |
| 2. | It ignores all the thousands of previous objections made by local people |
| 3. | There is no proven demand for travelling show people plots in this location |
| 4. | There is no need for putting houses on this site because the local plan housing target is incorrect and inflated and ignores constraints. |
| 5. | The allocation of 28.9 ha is an excessive land grab into the Green Belt. If we take a normal density of 30 homes per ha and it is at the end of the day proven that there is a need for 400 homes in this location the land requirement is 13 ha not 28.9 ha which is more than double. This replicates a similar over land grab at Burnt Common where the factor is 7 times the land required. |
| 6. | This confirms the worrying impression that GBC have a pre-determined policy of building on the Green Belt at every opportunity. The arithmetic does not stack up. One would have thought that they would as custodians of the green Belt be intent on conserving it rather than exploiting it. |
| 7. | The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy. |
| 8. | Garlick’s Arch (A43) is in an unsustainable location. It does not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. The site is unsuitable due to lack of access to sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be dependent on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided. |
| 9. | The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result. |
| 10. | I object to the proposal to remove Garlick’s Arch from the Green Belt. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for this land to be taken from the Green Belt. Once taken the green belt is lost forever. There is a real danger that the loss of this Green Belt will result in urban sprawl and the neighbouring villages merging into one another. The significant development in West Clandon, Send and Ripley will result in the character of these villages being lost and the countryside encroached. |
| 11. | I object to the development at Garlick’s Arch because of flood risk. The site at Garlick’s Arch is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed |
as part of the Council’s SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river 
flooding. Knowing the area well I am aware that this site often floods during the winter months and the flooding 
is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-
commissioned to accurately reflect the actual flooding risks of each site.

12. I object to the loss of rural employment on the site. The development at Garlick’s Arch would result in the loss of 
four existing successful rural businesses, which have been in existence for over 30 years and another two 
businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their 
premises.

13. I object to the potential loss of Ancient Woodland on the site. The proposed development at Garlick’s Arch will 
have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs 
centrally through the site, which includes over 80 ancient oak trees that existed in the year 1600.

14. I object due to the congestion that development will cause to the local village roads and the lack of road 
infrastructure (Policy I1). Our villages are already suffering from severe congestion for much of the day, for 
example the Newark Road and Rose Lane junction in the centre of Ripley and the A247 through West Clandon. 
The proposed development under the plan will cause greater congestion in and around our villages. The Plan 
does not provide an achievable strategy for improving capacity on these local roads.

15. Furthermore, many of the country lanes around the villages of West Clandon, East Clandon, Ripley, and Send are 
narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition. I 
object to the development proposed in the local plan, which will result in more traffic using these narrow roads 
and a further deterioration in the road surfaces.

16. Many of the affected villages, such as West Clandon, East Clandon, Send and Ripley, already suffer from parking 
problems. Further development around these villages will only result in more traffic and more parking problems.

17. With some 5000 houses being proposed close to the villages of West Clandon, East Clandon, Send and Ripley, 
the roads serving the village will become even more congested. Cycling has become a popular past time, 
particularly at weekends hundreds of cyclists past through the village on the way to the Surrey Hills. With no 
proper cycle lanes on the narrow local roads surrounding the village and with greater vehicle traffic being 
generated from these developments there is a real danger that there will be an increase in road accidents 
involving cyclists as a result of the development proposed under the local plan.

18. The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development 
will result in the roads becoming ever more dangerous for pedestrians.

19. I object to the lack of proper infrastructure planning for sites (Policy I1). Policy I1 requires the delivery of 
improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the 
infrastructure requirements and that the projects identified will be implemented when required, if at all.

20. Despite the Garlick’s Arch site (A43) being a significant site for development, no infrastructure projects have 
been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, 
the existing residents’ in the locality will see their quality of life significantly deteriorate in many ways.

21. Many of the utilities in the West Clandon, East Clandon, Burpham, Ripley and Send area are at, or very close to 
capacity, such as the electrical network and sewers. No plans to improve these services should mean no 
development of the Garlick’s Arch site.

22. Without proper planning and a commitment to fund new healthcare facilities, existing services such as the 
Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are 
already at capacity and suffering from funding cuts or freezes. Any further development without funding will 
place further stress upon existing health services.

23. I object due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2). There is no 
certainty that either the A3 or M25 in the borough will be improved to increase capacity and reduce congestion 
during the Plan period. Highways England has no plans to even examine improving the A3 before 2020. I have 
considerable concerns that development of the large residential sites identified at Wisley Airfield (A35), 
Garlick’s Arch (A43) and Gosden Hill (A25), will take place before any improvements are made to the trunk 
road network. The A3 & M25 are already at capacity during peak hours and any development prior to 
improvement of these roads will only make the situations worse.

24. I object to poor air quality concerns (Policy I3). Paragraph 4.6.27 of the Plan states that “Development must also 
mitigate its traffic impacts, including its environmental impacts and impacts on amenity and health.” The 
significant level of development being proposed, particularly in the north east of the borough will lead to 
considerable further congestion, despite any attempts to mitigate this through travel plans. This will be 
particularly acute in built up residential areas and will only lead to greater levels of air pollution, which will have 
a detrimental effect on local residents and their health.
25. I object to the inclusion of the land at Garlick’s Arch, Send Marsh/Burnt Common and Ripley (A43). Garlick’s Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8). There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).

26. It is clear that with this site being added at the eleventh hour and no infrastructure planning has been undertaken. The Infrastructure Schedule makes no provision for any infrastructure improvements for this site. How will the local services such as schools and doctors cope, many of which are already at capacity? (Policy I1)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<td>Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A58</td>
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C.iii. Policy A58 Burnt Common – My Objections

1. I object to Policy A 58 at Burnt Common and to the proposed inclusion of Burnt Common as an Industrial Strategic Employment Site

2. This previous allocation for B1c, B2 and B8 development was removed from the 2014 draft due to all the objections made previously.

3. The word “minimum” is a change from the previous “maximum” in the 2016 plan and since that time there has been a decline in demand for industrial land. This change alone is unacceptable since even if there was a need to build 7,000 sq m at Burnt Common this development would only require 1.4 ha at a standard plot ratio density of 50% not 9.26 ha. There is no justification for zoning an additional 7.86 ha in the Green Belt.

4. There is in fact no justification for building any more industrial development in the borough particularly at Burnt Common. The current industrial pipeline of granted consents of 38,357sqm in B1c, B2 or B8 use class space is double the 19,000 sq m said to be needed by Aecom who justify the need for new space on top of the existing pipeline by a completely unsubstantiated suggestion that “there is the possibility that some pipeline developments may not come forward at all, or be developed in different quantities by use class than has been consented."

5. There is no need to build industrial or warehouse development in the middle of the Green Belt when Slyfield and Guildford still have empty sites and industrial units.

6. The 2017 Employment Land Need Assessment shows a reduction in demand to 3.9 hectares for industrial land for the whole borough not a huge over allocation of 9.26 hectares at Send in the Green Belt.

7. The Employment Land Needs Assessment update 2017 (ELNA) states “that the pipeline for employment floorspace defined by planning permissions yet to be implemented and prior approvals suggests the potential for an additional 33,607
sqm of B use class floorspace to come forward. This figure comprises a net loss of 4,750sqm of B1a use class floorspace and a net gain of 38,357sqm in B1c, B2 or B8 use class space.”

8. 38,357 sq m of B1c, B2 or B8 use class is quite sufficient supply for the plan period and is in fact more space than the 3.9 ha of industrial land that is said to be needed for the plan period by Aecom. Since if you were to develop 3.9 ha at a plot ratio of 50% it would provide new industrial development of 19,000 sq m approximately half of current planning permissions granted. This does not justify the need for new development of industrial space on the Green Belt in such areas as Burnt Common.

9. The reality of demand for industrial space is that it is both nationally and locally in decline and this is evidenced by old existing permissions that have not been taken up and developed. The ELNA alludes incorrectly to the poor quality of existing space being a “constraint” on supply and fails to acknowledge that this assertion cannot apply to potential newly developed space e.g. the undeveloped pipeline of 38,357sqm.

10. The impact on small surrounding roads will create traffic gridlock.

11. It will join up existing villages and defeat the purpose of the Green Belt.

12. The ongoing poor quality of the updated research undertaken by Aecom in the Employment Land Needs Assessment 2017 does not support industrial development on land in the Green Belt at Burnt Common.

13. The Aecom research is generally superficial and lacks sufficient detail and analysis between B1c, B2 and B8 use classes and no reliable individual analysis has been undertaken of the widely different supply and demand dynamics of light industrial, general industrial and warehousing and distribution floor space.

14. The potential inclusion of a waste management facility mentioned at paragraph 4.4.23a lacks enough detail for proper consultation and is completely inappropriate.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/3176  Respondent: 8813601 / Gaenor Richards  Agent: 

Document:  Proposed Submission Local Plan: strategy and sites 2017 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. Policy S1 Presumption in favour of Sustainable Development– My Objections

The Plan now states: “the presumption in favour of sustainable development will not automatically apply to policies relating to sites protected under the Birds and Habitats Directives and/or designated as Sites of Special Scientific Interest (SSSIs), land designated as Green Belt, Local Green Space, the Surrey Hills Area of Outstanding Natural Beauty, designated heritage assets and locations identified as at risk of flooding.”

Gosden Hill and Blackwell Farm (both currently in the green belt) are called “urban extensions” surely a euphemism for urban sprawl? Garlick’s Arch and Burnt Common developments take land from the green belt to extend Ripley/Send.

One of the important specific purposes of the green belt is to prevent urban sprawl.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp17q/642  Respondent: 8813601 / Gaenor Richards  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2017 / Question 4: Duty to cooperate

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. Duty to Cooperate – My Objections

The NPPF states para 155: “Early and meaningful engagement and collaboration with neighbourhoods, local organisations and businesses is essential. A wide section of the community should be proactively engaged, so that Local Plans, as far as possible, reflect a collective vision and a set of agreed priorities for the sustainable development of the area, including those contained in any neighbourhood plans that have been made.”

The changes in this latest version of the Guildford Local Plan show little or no willingness of Guildford Borough Council to reflect a collective vision.

Despite the many thousands of responses to previous versions of the Plan which overwhelmingly rejected building on Green Belt land this latest version has as much, if not more, building on the Green Belt and increased problems of infrastructure and traffic which will bring increased noise and air pollution and danger to residents.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPA16/2575  Respondent: 8814337 / Rachel Harris  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I am writing to raise my concerns about the local plan for the Horsleys. The scale of new housing is disproportionate to the village, and would add to the current problems with overloaded infrastructure: roads, parking, schools, the medical centre. All of these are problems at the moment, so it is not realistic to suggest that the village can cope with a further 600 new homes.

The Horsleys are villages, with a unique village character and the plan would destroy this. Furthermore the Horsleys are currently in the green belt and I don't believe it is correct to change this status.

Finally the Wisley development would also have a huge knock on impact on our infrastructure, in particular roads and parking.

I object to the principle of loading such a high amount of additional housing into this green belt area, and I think more work should be done to reconsider whether all these homes are necessary, and to look at brownfield and urban sites.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I am writing yet again to object to the proposed removal of East and West Horsley from the Green Belt because the “exceptional circumstances” required before taking this action have not been demonstrated. The Metropolitan Green belt was promised to us after the war and it was to prevent urban sprawl by keeping this land open. To build a large number of houses in the Horsleys would completely change the character of the villages. Furthermore, this latest Plan is based on the use of out of date estimates of population growth. The population projections used to underpin this entire local plan were recognizably wrong at the outset and there major doubt concerning housing numbers.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/5860  Respondent: 8814689 / Sarah Tait  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Objections to Guildford Borough Council Proposed Local Plan (June 2016) and to the continued inclusion in the plan of the Former Wisley Airfield (FWA), now known as Three Farms Meadows (TFM) –

Allocation A35 - for the phased development of a new settlement of up to 2100 dwellings

I object to the draft Local Plan for the following key reasons:

1) I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.

2) I object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.

3) I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans.

4) I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).

5) I object to the threat the Local Plan poses to the historic rural village of Ockham and the blight on properties there. The plan calls for a village of 159 residences (with narrow lanes, no streetlights, very few pavements and many listed houses) to be subsumed into a 2,000+ dwelling development, with urban-style buildings up to five storeys high and a population density higher than most London boroughs.

6) I object to the detrimental impact on transport, local roads and road safety. I specifically object to:
1. The assertion that the development will result in a meaningful shift to cycling and walking. The development is too isolated, and even within the development itself too spread out to anticipate a reduced reliance on private cars
2. The increased volume of car traffic. A proposed development of 2,068 homes would result in an estimated 4,000 additional cars on the roads
3. The congestion this traffic will cause on the narrow rural roads in Ockham and the surrounding areas, exacerbated by wide vehicles including increased bus and HGV movements
4. The danger this traffic will be to local cyclists and pedestrians, due to the absence of any cycling paths and the lack of pedestrian footpaths (and the space to provide them)
5. The increase in the already severe congestion on the Strategic Road Network of the A3 and M25. A further planning application at RHS Wisley (with a significant increase in visitor traffic) and a proposed 600 pupil secondary school on the site would add additional congestion at the M25/A3 junction as well as local roads. No development can proceed without significant infrastructure enhancements to the A3 and M25. Partial improvement works on the A3 south of the site are not due to start until 2019 at the earliest
6. The lack of suitable public transport. The local rail stations of Effingham and Horsley cannot cope with the proposed increase in passenger traffic and car parking is already at capacity

7) I object to the fact that insufficient consideration has been given to the environmental and ecological value of the site, in relation to the Thames Basin Heaths Special Protection Area (SPA), Sites of Special Scientific Interest (SSSI) and Site of Nature Conservation Interest (SNCI).

8) I object to the fact that air quality concerns have not been taken seriously – air pollution in many parts of the borough, and particularly at the M25/A3 junction, is in excess of EU-permitted levels. Additional traffic will exacerbate this situation, impacting the health of all current and future residents. No account is being taken of the acid deposition on the Thames Basin Heaths SPA and the irreversible impact of the habitat degradation.

9) I object to the fact that the proposed plan does not meet the needs and desires of local communities, as evidenced through the Ockham Parish Plan. The top two responses as to why local residents enjoy life in Ockham are (1) access to the countryside and clean air and (2) the peace and quiet afforded by wide open spaces. Over 90% wish to see both the historic features of the village maintained and the village’s green spaces, including the FWA/TFM, protected.

10) I object to the continued inclusion of a site (the former Wisley Airfield, - now known as Three Farm Meadows) - where the planning application has already been unanimously rejected by GBC’s Planning Committee.

After 14 months of consideration (and various extensions and amendments), Wisley Property Investments Ltd’s (WPIL) planning application was unanimously rejected by GBC on 8th April 2016 on the recommendation of GBC Planning Officers, who cited the same grave concerns highlighted in this letter.

Serious concerns about this site have also been raised by a broad number of authoritative sources across the UK, including Highways England, Thames Water, NATS and the Environment Agency.

I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Stated Government policy is that areas should only be taken out of the Green Belt in exceptional circumstances and you have not demonstrated that those circumstances apply in the case of the Horsleys. It is accepted that on your planning watch you have permitted some infill development in the main East Horsley village, but south of the A246 there have been no extra dwellings in decades. Indeed, you have previously advised me that the Warren and Rowbarns Way are in an Area of Outstanding Natural Beauty - i.e. the Surrey Hills. In the circumstances, how can you possibly permit a re-designation from AONB status to a planning free-for-all; that would be an act of quite inexcusable planning vandalism?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7396  Respondent: 8815009 / Stuart Southall  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I am writing regarding the revised local plan you have recently published which, despite its volume (no doubt designed to befuddle those who elect you), appears to wholly ignore earlier feedback and to contain fatal flaws.

Firstly, as regards likely population demands, your projections (such as they are) need to be re-visited in the light of Brexit. Your proposal for up to 533 new homes in the Horsleys with possibly another 2,000 on the Wisley site (under two miles away) would represent a disgraceful urbanisation of what is still a predominantly countryside area, with little thought given to the infrastructure consequences and certainly no guarantees that these will all be addressed in advance of any building.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/7406  Respondent: 8815009 / Stuart Southall  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Your papers also contain comments on the type of housing that you would wish to see in the Horsleys. Here again your approach is flawed as 533 new homes of the type you describe would be wholly out of keeping with the village. It is an observable fact that many Horsley houses are large and on large plots and that is why people have bought them. Furthermore, you reflect this fact in the heavy Council tax bills we pay from which Horsley residents derive few benefits.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPA16/2457  **Respondent:** 8817121 / Celia Howard  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to lack of transparency regarding the evidence report by GL Hearn and thereby any verification of the SHMA figure of 693 homes per annum

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPA16/1215  **Respondent:** 8817121 / Celia Howard  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Send

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I write to strongly object to the G.B.C. suggesting removal of Send and local villages from the green belt.

How sad, if we should finish up as gridlocked corridor from Guildford to Woking – another Camberley Frimley, Farnborough and Cove scenario. Over development in our villages leaves us desperately under catered for, for schooling, doctors, transport, roads etc.

Here in Send we are so lucky to still have some farm land, water meadows and open space. This supports wildlife, plants and animals and gives pleasure to local people and visitors.

Be careful what you vote to ruin for us all.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy A25 Gosden Hill as being totally inappropriate and unsustainable development of 2000 homes in the Green Belt, which will see coalescence and urban sprawl from Burpham to West Clandon

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy A35 Former Wisley Airfield as being totally inappropriate and unsustainable development of 2000 homes in the Green Belt

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I OBJECT to the inclusion of strategic site Policy(A43 Garlick's Arch and its late substitution in the Local Plan with no prior consultation with the local community. This site should be protected as it is agricultural land that is previously undeveloped and within the Green Belt. There is no sound reasoning as to why the Garlick's Arch site was substituted at the last minute on 24th May 2016 in preference to the original site A43 Land at Burnt Common Warehouse which is an existing brownfield site with industrial space, provision for at least a further 7000sqm of industrial employment space and an additional 100 homes which is more in keeping with the acceptable growth in housing numbers for the residents of Send, Burnt Common, Send Marsh and Ripley. The development of 400 homes at the Garlick's Arch site will cause coalescence with Send, Send Marsh, Burnt Common and Ripley thus losing forever the independent identity of each village and hamlet.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/4926  Respondent: 8817121 / Celia Howard  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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I OBJECT to Policy A43a, the proposed on/off ramps to the A3 at Burnt Common as this will inevitably cause traffic chaos on the local road network throughout Ripley, Burnt Common, Send and West Clandon, with absolutely no possibility of mitigation due to the nature of our rural roads and lanes.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/4927  Respondent: 8817121 / Celia Howard  Agent: 

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A45

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I OBJECT to Policy A45 The Talbot Ripley as this is over development in an open space within the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/4928  Respondent: 8817121 / Celia Howard  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A57

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )

I OBJECT to Policy A57 The Paddocks for the provision of 4 traveller pitches in Rose Lane as this is in excess of current requirements within the borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/10223  Respondent: 8817121 / Celia Howard  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )

I OBJECT to all insetting of villages from the Green Belt, in particular for Ripley, Send Marsh/Burnt Common, Send and East/West Horsley.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/10225  Respondent: 8817121 / Celia Howard  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ( )</td>
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</table>

I OBJECT to development in areas which are at risk of flooding (Policy P4) such as site A43 Garlick's Arch which is designated as flood zone 3 by the Environment Agency.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
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<th>Comment ID:</th>
<th>PSLP16/10221</th>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ( )</td>
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</tbody>
</table>

I OBJECT to the Local Plan as the proposal of 13,860 homes proposed will not be sustainable policy S1 and it will have a permanently detrimental effect by overdevelopment in existing communities, in particular Ripley, Send, East/West Horsley and West Clandon.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
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<tr>
<th>Comment ID:</th>
<th>pslp172/4126</th>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ( )</td>
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</table>

I OBJECT to the disproportionate amount (36%) of all proposed development being in one area of the borough from Wisley to Burpham creating a narrow ribbon effect along the A3.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
### Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A42

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire): ( )**

A42 I object to 60 houses on the sight of Clockbarn Nurseries.

The access from A247 into semi rural Tannery Lane is already hazardous and the lane in poor conditions and liable toflooding in places.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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### Comment ID: pslp172/4130  **Respondent:** 8817121 / Celia Howard  **Agent:**

### Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire): ( )**

I object to the 400 houses and travellers sight on Garlicks Arch.

This bis much too many houses the only reason they will be affordable is because of the travellers sight.

We are a very quirt village with areas of greenbelt all around and it will be detrimental to the environment wild life and services to the villagers as the doctors surgeries hospital appointments and school places are all in short supply now

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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### Comment ID: pslp171/2292  **Respondent:** 8817121 / Celia Howard  **Agent:**

### Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire): ( )**

---
Greenbelt Policy 2 Paragraph 4.3.15.

Further expansion of the Send Business Park means more large vehicles entering the lane and beyond the Tannery the lane becomes rural and is unsuitable for large lorries that come from Polesdon Lane on their Sat Nav getting stuck and lost by the time they reach the Papercourt Farm.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/4610  Respondent: 8817153 / Paul Ives  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We have noted the amendments, however the proposed mitigation in Requirements (4) and Policy 43a below is totally inadequate to avoid excessive traffic on the existing country lanes – please see Para 3 (d) of Ref A. Planning application 15/P00012 was refused by GBC for very good reasons and it is unreasonable to retain Policy A35 in the Draft Local Plan. There could be more appropriate uses for the land, such as sports and leisure facilities, including minimal staff housing.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/4611  Respondent: 8817153 / Paul Ives  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A36

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We applaud the decision to omit this policy from the Draft Local Plan. This policy would have increased traffic access risk on a dangerous bend of the A246.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/4617  Respondent: 8817153 / Paul Ives  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A41
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<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<tr>
<td>We agree with the decision to omit this policy from the Draft Local Plan. This is an area of unspoilt agricultural land.</td>
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<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
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<tr>
<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<tr>
<td>We agree that this policy should be omitted from the Draft Local Plan.</td>
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<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
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<th>Respondent: 8817153 / Paul Ives</th>
<th>Agent:</th>
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<tbody>
<tr>
<td>This appears to be a suitable site for light industrial use, provided that the pastoral nature of the area is maintained by sensitive planning, including landscaping and tree planting.</td>
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<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
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<td>Attached documents:</td>
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</table>
Regrettably, while Guildford Borough Council continues to claim that it is defending the Green Belt, it is still attempting to impose excessive housing density therein. The residents of East Horsley feel very strongly about the potential impact of the changes proposed in the plan and deplore the removal of its green belt status by making it an ‘inset’ within the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/343  Respondent: 8817185 / Irene Cope  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to policy S1

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/348  Respondent: 8817185 / Irene Cope  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
AFFORDABLE HOMES ????

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: SQLP16/344  Respondent: 8817185 / Irene Cope  Agent: 

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Question 2: Legal compliance

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to POLICY S2

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: SQLP16/345  Respondent: 8817185 / Irene Cope  Agent: 

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT TO POLICY H1 {HOMES FOR ALL }

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: SQLP16/346  Respondent: 8817185 / Irene Cope  Agent: 

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I OBJECT TO POLICY H2 {AFFORDABLE HOMES}

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/347  Respondent: 8817185 / Irene Cope  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 5: The examination

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

NO THANK YOU

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/4153  Respondent: 8817377 / Mark Silcock  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the exaggerated “housing need” figure of 13,860 which is far too high and results in the completely unnecessary development of the Green Belt. The way students, economic need and affordability are calculated inflates the housing need.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/4154  Respondent: 8817377 / Mark Silcock  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Send

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to all the proposed sites in Send because they were not included in the previous consultation in 2014. Unlike the rest of the borough Send has not been properly consulted and all its sites have been changed substantially.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/7721  Respondent: 8817377 / Mark Silcock  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the large proposed development at of 2,000 houses at Wisley Airfield, 2,000 houses at Gosden Hill and 1,850 houses at Blackwell Farm because it will destroy large areas of Green Belt and agricultural land and produce congestion on the A3 and surrounding roads including Send.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/7720  Respondent: 8817377 / Mark Silcock  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the proposed new interchange onto the A3 at Burnt Common because it would be disastrous for Send and the (A247) would be at a standstill all day.

I object to the proposed new interchange onto the A3 at Burnt Common because the Transport Evidence is incomplete and unreliable and shows there will be congestion because Send would be used as a cut through to the A3/M25.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Comment ID: PSLPP16/17077  Respondent: 8817377 / Mark Silcock  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the fact that infrastructure requirements have not been properly considered and are inadequate to deal with proposed housing levels. Roads, doctors and schools will be unable to cope.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17075  Respondent: 8817377 / Mark Silcock  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the removal of Send from the Green Belt because the village and its countryside provides a necessary space between Woking and Guildford.

I object to all proposals to build on the Green Belt at Send and elsewhere in the borough because all the development that is really needed can be accommodated in Guildford’s urban brownfield areas much closer to existing transport hubs.

I object to the building on the Green Belt at Send at Garlick’s Arch, Clockharn Nurseries and Send Hill because it is not justified by any special circumstances and the fact that Green Belt is meant to be permanent and not continually reduced.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/17079  Respondent: 8817377 / Mark Silcock  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
The NPPF states that the presumption in favour of sustainable development “should be seen as a golden thread running through both plan-making and decision-taking.” Standing at the head of the draft plan, Policy S1 ought to set a clear framework. Instead, no definition of “sustainable development” is given. The policy also fails to set out any principles for applying sustainable development in practice to local planning decisions, which often have serious long-term impacts.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment ID: PSLPP16/17078</th>
<th>Respondent: 8817377 / Mark Silcock</th>
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<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Policy S2</td>
<td><strong>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</strong></td>
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<td><strong>Answer (if comment is on questions 1-7 of the questionnaire): ( )</strong></td>
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I object to the fact that 70% of the proposed 13,860 houses are targeted at the Green Belt strung along the A3 which will destroy the open amenity of the borough and produce gridlock on the A3 and surrounding roads including the A247 which are all already at 100% capacity.

I object to the complete failure of GBC to identify sufficient brownfield sites within the urban area which should be targeted first for development before the open countryside and the Green Belt and the failure to include the Town Centre Masterplan 2015 within the plan.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

<table>
<thead>
<tr>
<th>Comment ID: PSLPA16/2595</th>
<th>Respondent: 8817409 / Danial Winchester</th>
<th>Agent:</th>
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<tbody>
<tr>
<td><strong>Document:</strong> Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Normandy and Flexford</td>
<td><strong>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</strong></td>
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<td><strong>Response to Guildford Borough Council Draft Local Plan – 18th July 2016</strong></td>
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I am a resident in Flexford (which is one of 6 distinctly separate hamlets within Normandy Parish) and I have lived here for 5 years. I am a fully qualified ecologist who is a full member of the Chartered Institute of Ecology and Environmental Management (CIEEM) and I have work as an ecological consultant for 11 years and for a number of clients, many of which are developers. I am therefore fully aware of the needs for housing.
However, as a local resident I object to the Guildford Borough Council Draft Local Plan with the proposed developments on sites A46 and A47 in Normandy and Flexford on the following number of issues;

1. Effect on Biodiversity including loss of and damage to habitats which act as wildlife corridors and impact on the Thames Basin Heaths Special Protection Area (TBH SPA).
2. Development on Green Belt
3. Insufficient evidence on the need for new schools on Site A46 and therefore the justification for 1,100 homes with associated retail units and residential/care
4. Increased road traffic along a series of local roads that do not have the capacity to sustain this increase in traffic. This is both during the development with site traffic and post development with increase in vehicles due to the new schools, retail area, housing and residential/care home.
5. Limited capacity of rail services serving Wanborough Station and also the current limited capacity for Wanborough Station to serve an increase in passengers from the proposed developments in Sites A46 and A47, due to platform size, no disabled access and limited car and cycle use.
6. Flooding issues on both proposed development Sites A46 and A47 and also within the Normandy and Flexford areas, such as the approach to Wanborough Station itself.

Taking each issue in turn I shall elaborate below.

1. Effect on Biodiversity including loss of and damage to habitats which act as wildlife corridors

Background

There are a number of nationally and locally important sites for nature conservation within and adjoining the Parish of Normandy.

Normandy Parish includes a large part of Ash Ranges which form part of the Thames Basin Heaths Special Protection Area (TBH SPA), which is a statutory designated site and designated for its rare birds, specifically woodlark, nightjar and Dartford warbler, under the EC Birds Directive. This site also forms part of the Thursley, Ash, Pirbright and Chobham Special Area of Conservation (SAC), also a statutory designated site and designated for its North Atlantic wet heaths, European dry heaths and peat bogs.

Ash Ranges also form part of the Ash to Brookwood Heaths Site of Special Scientific Interest (SSSI), which is a statutory designated site and designated for its dry heathland, wet heathland and bog, bryophytes (lichens and mosses), invertebrates (such as the scarce bog bush cricket and tiger beetle), birds (such as hobby, stonechat, yellowhammer, reed bunting, tree pipit, meadow pipit and the previously mentioned SPA bird species), and reptiles (all six native species including the European Protected Species sand lizard and smooth snake).

Within a radius of 2 km from site A47 there are eight non-statutory designated sites. These sites are known as Sites of Nature Conservation Importance (SNCIs) and are selected for the habitats and flora/fauna they support. They are of County or local wildlife importance.

The proposed development site (site A46) contains several areas of ancient woodland. Ancient woodland is defined by Natural England as a site that has had continuous woodland cover since at least 1600 AD. It is a Habitat of Principal Importance (HPI) and is an irreplaceable, wildlife-rich habitat known to support more biodiversity than any other UK land habitat.

The two main areas in or bordering site A46 in the Draft Plan are Pussey’s and Walden's Copses. In addition, there are two smaller areas, the offset east-west trending belt of woodland west of Pussey’s Copse and the smaller north-south trending belt south of Walden's Copse. This woodland is clearly ancient (as identified from associated ground flora such as wood sorrel, primroses, bluebells, wood anemones and early purple orchids), but is not included in the Surrey Ancient Woodland Inventory because it is slightly under the minimum registration size of two hectares. Regardless of the size, I strongly believe this valuable and irreplaceable woodland should be treated as if it was protected and therefore be left intact. The
current developer plan shows a road bisecting this woodland; which if implemented would destroy a precious wildlife corridor.

There is an avenue of mature pedunculate oak trees towards the centre of the footpath that crosses site A46, which are registered on the Ancient Tree Inventory, and other individual trees on the site which the Woodland Trust regards as valuable in terms of conservation. I have undertaken bat activity surveys (following the latest Bat Conservation Trust (BCT) Bat Survey Guidelines) of this avenue of mature pedunculated oaks and also the mature trees that border Fiddlers with the footpath across site A46 and have recorded a high amount of foraging activity from common pipistrelle bats. Judging by the amount of activity within 30 minutes after sunset this indicates that a bat roost is close by, possibly in one of the many cracks, crevices, splits and woodpecker holes within the trees. The loss of these trees or even any disturbance from lighting would have an impact on those bats and their roosts.

Site A46 falls within 4 one kilometre grid squares (SU9250, SU9350, SU9251 and SU9351) which combine to form a tetrad. From bird records obtained by surveys from Friends of Normandy Wildlife (of which I am a member) and BirdTrack (a collaborative online recording package from the British Trust for Ornithology, RSPB and BirdWatch Ireland) 15 Red listed birds, based on Birds of Conservation Concern4; 2015 (BoCC4), have been recorded from the A46 tetrad. These birds include: woodcock, cuckoo, starling, fieldfare, song thrush, mistle thrush, redwing, house sparrow, linnet, skylark, yellowhammer, lesser redpoll, wood warbler (not recorded for 5+ years), tree pipit (not recorded for 5+ years) and herring gull.

As well as these Red listed birds a further 18 species occurring on the Amber list (BoCC4) have been recorded from the tetrad, including mute swan, mallard, common sandpiper, black- headed gull, common gull, stock dove, tawny owl, swift, kingfisher, kestrel, house martin, willow warbler, dunnock, meadow pipit, bullfinch, reed bunting and greylag goose. Barn owl and red kite have been recorded hunting and possibly nesting on site A46. Skylark has been recorded by myself nesting in a field adjoining site A47 and from personal observation great white egrets and grey heron’s forage on site A47 in winter.

A resident backing onto Pussey’s Copse and site A46 has reportedly seen a dormouse (European Protected Species) using a dormouse nest box in their garden (the description given to me seem unlikely to another small mammal specis) and, since these animals are known to occupy ancient woodland more frequently than recent woodland, we feel that there is every chance they are present on site A46 and the surrounding woodlands and hedgerows.

Normandy and Flexford are important areas for breeding and foraging hedgehogs, which are in serious decline nationally. Hedgehogs are a Species of Principal Importance and predominantly rely on woodlands and hedgerows (a number of which are on or adjoin site A46 as previously stated) to forage, shelter and breed and use those areas and adjoining gardens as wildlife corridors. An increase in traffic and disturbance by people and pets will have a negative impact on the hedgehog population in Normandy and Flexford.

All the habitats within or adjoining the proposed development site of A46 and some of site A47 are Priority Habitats of Principal Importance under the NERC Act, plus a number

of protected species (European Protected Species, Species of Principal Importance and those protected under The Wildlife and Countryside Act (1981) as amended) have been recorded within either the proposed development site or 500m to 1km of the proposed development site. These include hedgehogs, dormice, great crested newts, common toads, barn owls, skylarks, stag beetles, common lizards, grass snakes, adders, slow worms, badgers and bats.

The proposed development of site A46 would destroy a number of these habitats including Semi-natural Woodland, Veteran and Mature Trees, Hedgerows, Farmland and Semi- improved Grassland, plus would have indirect effects on Ancient Woodland habitat and the Stream through pollution (light, noise, litter and diffuse land and road runoff), predation and disturbance by increased number of cats and dogs (187 cats (cat ownership being 17/100 households) and 264 dogs (dog ownership being 24/100 households) and by people (potential fires and vandalism of trees).
Site A47 is a Site of Nature Conservation Importance (Little Flexford SNCI), which was selected for its botanical interest and for records of water voles within the stream that runs through the site, and the Flax Pond. Water voles are UK’s fastest declining mammal species and are a highly important local species and indicator of a healthy freshwater ecosystem.

Surrey Wildlife Trust have identified the Normandy and Flexford areas as a ‘Water Vole Alert Area’. The Flax Pond has anecdotal records of great crested newts (European Protected Species).

The National Planning Policy Framework (NPPF) states that “The purpose of planning is to help to achieve sustainable development” and it describes three “dimensions” relevant to this aim: economic, social and environmental. The explanation for how the environmental aspect plays a role includes the statement “…..helping to improve biodiversity, use natural resources prudently…..” (see point 7 of the section in the NPPF dealing with achieving sustainable development).

In section 11 of the NPPF headed “Conserving and enhancing the natural environment”, it is stated that planning policy should protect and enhance valued landscapes and minimise impacts on biodiversity, providing net gains in biodiversity wherever possible to halt the overall decline in biodiversity, by promoting “the preservation, restoration and re-creation of priority habitats, ecological networks and the protection and recovery of priority species populations…..”.

Guildford Borough Council (GBC) interprets the NPPF through their ‘Policy I4’ which emphasises the commitment to biodiversity stating: "The Council will conserve and enhance biodiversity and will seek opportunities for habitat restoration and creation, particularly within and adjacent to Biodiversity Opportunity Areas (BOAs)”. BOAs are set out by Surrey Nature Partnership.

Proposals for development must demonstrate how they will deliver appropriate net gains in biodiversity. Where proposals fall within or adjacent to a BOA, biodiversity measures should support that BOA’s objectives. The Supplementary Planning Document (SPD) will set out guidance on how this can be achieved. European sites designated as Special Protection Areas (SPAs) and Special Areas of Conservation (SACs), National Sites of Special Scientific Interest (SSSIs), local SNCIs and Local Nature Reserves are all shown on the Policies Map or as subsequently updated.

Policy I4 goes on to say that "Permission will not be granted for proposals that are likely to materially harm the nature conservation interests of local sites unless clear justification is provided that the need for development clearly outweighs the impact on biodiversity."

It is clear that the proposals for development in Normandy and Flexford directly conflict with these policies and I strongly object to these development proposals as Guildford Borough Council have failed to show how they will conserve and enhance biodiversity.

The effect from the proposed development on Thames Basin Heaths Special Protection Area (TBH SPA).

I strongly believe that the Plan is unsound in relation to site A46 as the Habitats Regulations Assessment prepared for Guilford Borough Council does not take sufficient account of the impact that this huge proposed development specifically will have upon the TBH SPA which is a European Site as defined under the Habitats Directive and Conservation of Habitats and Species Regulations 2010 (as amended).

The proposed development is considerably less than five kilometres away from the TBH SPA and not much beyond the 400m exclusion zone, occupying an area between under 1km, to just over 2km, from the TBH SPA. It has been indicated that the cumulative effect of further residential development up to 5km from protected heathlands will have a significant adverse effect on the heaths. Furthermore, Natural England believes that recreational use of the heaths arising from housing developments up to 5km away from a SPA will create disturbance to rare bird populations. As stated previously the TBH SPA is an internationally important habitat for three rare species of bird - the Dartford warbler, nightjar and woodlark. The latter two are ground nesting and therefore particularly susceptible to disturbance from people and animals.
The results of a survey in 2008 showed that more than 83% of visitors to the TBH SPA arrived by car and that 70% of those had come from within 5km of its access point. A very large proportion of the TBH SPA visitors are dog walkers, many of whom visit a particular site on a regular basis. Two hundred and sixty-four dogs are likely to come with the proposed development, the current ratio of dogs per household being 24/100, so this could potentially attract between 26 and 132 extra dog-walkers a day.

In order to deter dog-walkers from visiting the TBH SPA, any Suitable Alternative Green Space (SANG) in the proposed development would have to be of exceptional quality, as the Nightingale Road and Dolley's Hill entrances to the TBH SPA are only either 5 minutes away by car, or 20 minutes on foot. Whatever the size, the SANG would be a very small area in which to exercise 264 dogs. A small number of irresponsible dog owners, who do not scoop the poop, will make such a small area unattractive for walk and play, and potentially create a health risk. This is already a problem on Normandy Common SNCI.

Another factor is that some areas where a SANG might be located are muddy in wet weather and throughout the winter, whereas many of the tracks on the TBH SPA are dry in wet weather, (including the winter). For those dissatisfied with the proposed SANG for whatever reason, or those wanting a longer walk, the natural alternative is the TBH SPA. If only 10% of dog owners use the TBH SPA, there would be 26 extra dogs a day using the TBH SPA; if 50% do, it would be an extra 132 dogs a day.

There is currently little evidence to suggest that SANGs have any net gain benefit for biodiversity, as often they are used as open recreation sites for dog walkers rather than creation of and protection of habitats as mitigation for those lost through development of which the SANG is proposed for.

1. Development on Green Belt

According to the NPPF "the essential characteristics of Green Belts are their openness and their permanence". Paragraph 4.3.1.2 of the Plan (under Policy P2) states that "only those villages whose open character makes an important contribution to the Green Belt should be included in the Green Belt". I strongly believe that the land in both sites A46 and A47 makes an unparalleled contribution to the Green Belt which stretches from Guildford in the east to Ash and Tongham in the west. If this area is inset and built upon in the manner proposed it will be the beginning of urban sprawl across this stretch of countryside which Green Belt policy was designed to prevent.

It will break up wildlife corridors and degrade habitats. The Government have indicated that Green Belt is supposed to be protected, but Guildford Borough Council are trying to justify development in this area when they themselves designated it as having a 'Red' status under their system for quantifying sensitivity (red being the most sensitive and least likely to be developed). Guildford Borough Council have therefore totally ignored all policies on Biodiversity when proposing to inset these areas.

Site A46 was not previously proposed in an earlier consultation and is not appropriate development at this stage in the 2016 local plan consultation. In 2014’s consultation it was ‘safeguarded’. It was not removed from the Metropolitan Green Belt. And ‘Exceptional circumstances’ have not been demonstrated or approved by the inspectorate. In the Solihull ruling, a boundary cannot be drawn around sections of land and urbanised. This also includes site A47.

Policy D4 states that ‘new development within inset villages will have particular regard to ‘important’ views of the village from the surrounding landscape’. The urbanisation of the site A46 proposal will impact on views from the Surrey Hills Area of Outstanding Natural Beauty (AONB), during daylight hours and from light pollution during darkness.

Green Belt in planning practice guidance states, ‘Unmet housing need (including for traveller sites) is unlikely to outweigh the harm to the Green Belt and other harm to constitute the ‘Exceptional Circumstances’ justifying inappropriate development on a site within Green Belt (NPPF).
1. Insufficient evidence on the need for new schools on Site A46 and therefore the justification for 1,100 homes with associated retail units and residential/care.

There is no proven need for a secondary school and a primary school for site A46. In its last submission to Guildford Borough Council (July 2014), Surrey County Council, in its official response, said: "A site within the proposed urban extension at Blackwell Farm, with all necessary access infrastructure built in and a catchment surrounding the site, would be a more sustainable location in transport terms for a new secondary school to serve the western side of Guildford."

Why has Guildford Borough Council not heeded this advice from Surrey County Council?

The birth rate has fallen in the past 2 years and secondary schools to the west of the Borough are undersubscribed as stated below from direct research by Councillor Keith Witham of Surrey County Council.

Undersubscribed Secondary Schools

**Kings College, Guildford.**

The school is currently **57% undersubscribed**. The capacity at the school is 900 pupils, and there are only 389 on the school roll (43% utilised) with 511 vacancies. Kate Carriett, Principal at Kings College has said very clearly and I quote: "There is absolutely no need for another school in Guildford, its crystal clear". She also said that when Kings College is fully subscribed, there is capacity on that site to further expand the school, to accommodate more pupils well into the 2020's if then needed.

The New Guildford University Technical College

This is due to open in 2018, and will take 240 pupils from the age of 14 in its first year, and that will double to 480 places, relieving pressure on other schools.

**Christ's College** is already taking 30 more pupils a year than its admission number, because it has the space and capacity to do so, and is willing to take more still as it has further capacity.

Ash Manor, Ash

The capacity of the school is 1,050 and it has 940 pupils, so is **undersubscribed by 110 places**. When Cllr Keith Witham met the Head Teacher and Chairman of Governors he was told that if needed they are supportive of the school being expanded to take more pupils by 30 places a year (so a total of an extra 150). They also expressed very strong concerns about a new school in Normandy and Flexford, just three miles from their front door, and the possible negative effects on Ash Manor.

Connaught School

This is near Ash, just over the County Boundary in Hampshire - but is also **undersubscribed by 90 places** and available to Surrey children.
Hoe Valley Free School, Woking.

This brand new Secondary school only opened last September. It has an intake of 120 per year, with currently 95 pupils, so is undersubscribed in its first year by 25. But it will build up with 120 new places available every year for 7 years - making a total capacity of 840. It has no catchment area, and although will mainly serve Woking, will welcome applications from Guildford parents.

So there are currently 736 vacancies at the nearest secondary schools serving the western parishes - not accounting for the 480 extra at the new Technical College to open in 2018 - a combined capacity of 1,216. And in addition to those Surrey County Council has already approved expansions at the County School, Guildford and St Peters.

Normandy and Flexford’s ‘needs and priorities have not been decided by the resident’s’, NPPF 1 ‘provides a framework within which local people and their parish councils can produce their own distinctive local and neighbourhood plans reflecting their needs and priorities of their communities’.

Site A46 is an inappropriate use of a rural area for ‘town uses’.

Planning Policy and a developer (Taylor Wimpey) led building proposal (urban centre) have decided Normandy and Flexford’s ‘needs and priorities’ of which include 715 homes, 385 flats/apartments, 1,500 place secondary school, a primary school for 420 pupils, residential or care home, parade of shops, and the Borough’s allocation of 6 showman pitches, 8 flats by Wanborough Railway Station, 8 flats in Glazier’s Lane by new access, and 4,700 sq metres of retail which will permanently destroy Normandy and Flexford’s rural environment.

NPPF 155 states ‘early and meaningful engagement and collaboration with neighbourhoods, local organisations is essential’ This has clearly not happened. Evidence has indeed shown that at least 2 years ago documentation for site A46 was submitted on behalf of Taylor Wimpey to Guildford Borough Council Planning Policy. At this stage No ‘meaningful engagement’ was made or requested from the local people.

I strongly believe that Guildford Borough Council have breached the NPPF and are being led by a developer namely Taylor Wimpey. Interestingly, Taylor Wimpey have close associations with Normandy and Flexford through family members of the founding business directors of Taylor Woodrow.

1. Increased road traffic along a series of local roads that do not have the capacity to sustain this increase in This is both during the development with site traffic and post development with increase in vehicles due to the new schools, retail area, housing and care home.

If the proposed development goes ahead, there will be an increase in pollution with respect to air quality, noise and light levels, particularly where cars have to queue at junctions or obstructions. The transport strategy proposed by Guildford Borough Council for this strategic site contains no scheduled improvements for Glaziers Lane (D60 classified road) and very few for Wanborough Hill and Westwood Lane (C16 classified road), which are rural lanes. The A323 Guildford/ Aldershot Road to the north of the site will also be affected, and very few improvements to that road are planned.

There would be access issues relating to visibility and safety for pedestrians and cyclists, which could be difficult to resolve given that the roads are fundamentally rural roads, and the existing structures of the Westwood Lane Railway bridge and the Glaziers Lane Railway Road bridge. The restricted headroom of the Westwood Lane bridge would also prohibit double decker buses from accessing the proposed school.
This will affect not only the people living in the area but also local wildlife. Natural England addressed this issue in: "The ecological effects of air pollution from road transport" (2016) which states that: "Biodiversity 2020 identifies air pollution as a direct threat to biodiversity in England. Many habitats of nature conservation importance in the UK are adapted to low nutrient conditions and/or are vulnerable to acidification, and are sensitive to additional airborne nitrogen oxides (NOx), sulphur dioxide (SO2) and ammonia (NH3), as well as to nitrogen deposition and acid deposition." In addition, noise from traffic can result in hearing loss in animals. It masks important environmental clues and animal signals. It can result in stress and induce behavioural effects, such as abandonment of territory. With regard to light, predators use light to hunt, and prey species use darkness as cover. Thus increased light at night alters the predator/prey balance and can also affect breeding behaviour in many species, including bats, birds, badgers and amphibians.

The environment and the wildlife in and around the four designated SNCIs on the A323 in Normandy i.e. Wyke Churchyard SNCI, Normandy Common SNCI, Wanborough and Normandy Woods SNCI (northernmost wood) and Wyke School Woods SNCI, all of which border the road, will be adversely affected by increased traffic and associated pollution. The UK BAP and Habitat of Principal Importance Traditional Orchard Habitat in Glaziers Lane will also be affected. The Normandy Traditional Community Orchard is home to a number of species and some of these are Notable Rare or Scarce species.

Another road where traffic will also be significantly increased is the A324. This borders the Thames Basin Heaths Special Protection Area and increased traffic and pollution will therefore have an adverse effect on the heathland and acid grassland.

The increase in volume of traffic resulting from the proposed A46 development will reduce Biodiversity and harm wildlife. The transport strategy for the area does nothing to mitigate for this and does little to reduce the number of additional motorised vehicles on the roads around the site.

The potential combination of A3 road improvements and major site work on site A46 and A47 over the next 15 years would be catastrophic for Normandy and Flexford’s link up roads (namely Wanborough Hill and Westwood Lane C16, and Glazier’s Lane D60). The construction traffic, continual noise and pollution generated by the developer will be excessive. Planning Policy has not fully considered the location of the site and traffic impact that site A46 and A47 will have on this rural community.

Scenario 5 demonstrates that if Flexford and Normandy is fully developed approximately 800 traffic movements will occur every hour.

Research has shown that 5% of the population die from premature death caused by inadequate air quality from traffic pollution. This will lead to significant health issues, especially for residents who border the three sides of the proposed developments of site A46 and the railway embankment bordering the south, plus those residents in The Paddocks who border the proposed development of site A47. No regard has been given for the well-being of residents. I strongly believe this development is ‘unsustainable’.

1. Limited capacity of rail services serving Wanborough Station and also the current limited capacity for Wanborough Station to serve an increase in passengers from the proposed developments in Sites A46 and A47, due to platform size, no disabled access and limited car and cycle

Although Guildford Borough Council state that the proposed developments of sites A46 and A47 are sustainable due to the close proximity of rail services serving Wanborough Station, there is little public evidence to suggest that Network Rail or indeed South West Trains have been consulted on whether there are plans to improve Wanborough Station or indeed provide additional train services serving Wanborough Station in order to cope with an increase in passengers. There is currently no disabled access to the Guildford bound line. The current platform size is insufficient to cope with an increase in passengers and there is limited car and cycle spaces outside the station entrance.

1. Flooding issues on both proposed development sites A46 and A47 and also within the Normandy and Flexford areas, such as the approach to Wanborough Station itself.
As site A46 is within 5km of the Thames Basin Heaths Special Protection Area (Policy 1: Sustainable Development), Guildford Borough Council should have considered the Habitats Regulations (NPPF) ‘water stress’. This has not been considered. Guildford Borough Council’s Surface Water Management Plan (SWMP) has excluded the land north of site A46, flood risk 3a and 3b (identified on the Environment Agency’s flood risk map). Loss of 3b an ‘effective flood-plain’ will severely impact on the surrounding areas on the SWMP.

The approach to the Wanborough Station is often flooded during often regular persistant or heavy rain to the extent that it is impassable by pedestrians and cyclists. I have not seen any evidence of flood improvement measures being proposed for this road. Surely this will have an impact on the increased usage of Wanborough Station and rail services if the proposed development in sites A46 and A47 go ahead.

Sites A46 and A47 are regularly flooded, particularly A47 which makes the very idea of using those sites for housing and schools, residential or care home and retail units as completely nonsensical as there is a serious risk to lives and damage to properties in those areas that regularly flood.

Although my comments relate to the proposed development sites A46 and A47 in Normandy and Flexford. I do have wider concerns over Guildford Borough Council’s Draft Local Plan.

The proposed ‘Growth’ indicated in this Draft Local Plan is based on the Strategic Housing Market Assessment (SHMA). The SHMA is the evidence base which Guildford Borough Council housing targets are based on. The SHMA statistics are distorted by large numbers from University of Surrey (Guildford) and has disproportionately increased the ‘need’ for houses. The Office for National Statistics (ONS) downgraded Guildford’s population growth.

The confidential commercial model used to calculate the SHMA numbers cannot be checked (Guildford Borough Council do not hold the model), and this has been taken on trust which I strongly believe is not satisfactory. Indeed on the 24th May 2016, some Councillors raised these concerns regarding the SHMA produced by G.L. Hearn, (this is the most critical piece of evidence in the Draft Local Plan) but the majority vote indicated that the full council meeting was satisfied that the SHMA was ‘a professional document’.

I object to Policy E2.

I believe that all new office and research and development (use Class B1a and B1b) floor space should be within Guildford town centre.

I object to the policy of expanding the Research Park onto Blackwell Farm and do not believe there are exceptional circumstances to justify incursion into this permanent and high quality area of Green Belt. The proposal to expand the 65,000 sq m by 9,000 sq m (existing allocation) with an additional 35,000 sq m amounts to an increase of 67% of the Research Park which is not required.

Although, Guildford Borough Council refused the last planning application for proposed housing ‘new village’ development at Wisley Airfield, I remain concerned that this site still remains with the 2016 Guildford Borough Council Draft Local Plan as a potential site for development. I object to this site being developed as I strongly believe it will lead to the loss of biodiversity on the site and adjacent habitats, including the SNCI and have a negative impact on the SPA of Wisley and Ockham Commons. There would also be a serious impact on road infrastructure on both the A3/M25 Junction and local roads into Ockham.

I do hope that my opinions in this consultation are considered seriously.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/2200  Respondent: 8817505 / Michael Hughes  Agent:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I wish to object to areas of the proposed Local Plan with respect to Site A46 Normandy and Flexfords Strategic Site.

Firstly this was not considered as a strategic site in the first consultation and is not only now being considered for development but being urbanised which is in conflict with the Solihull ruling.

There is indeed a need for some development within the village in particular for affordable housing of a standard and size which would allow residents to downsize as their circumstances change and for young people to either rent or purchase a home. There is also a need for sheltered housing. Both this and the opportunity to downsize would free up larger housing units for those wishing to purchase this type of accommodation.

These needs were shown in a survey which was taken within Normandy some years ago. GBC have certainly not engaged with the local residents concerning their needs. The size of the planned development will completely change the nature of Normandy. It seems likely that many of the proposed dwellings would not be purchased by local people or even Guildford residents but by people working in London and wishing to avoid the high cost of housing in the city by moving to an area outside the city but with good transport links. In which case there would be little benefit to Normandy residents.

There also appears to be some confusion in the language being used to justify the development of this land. It has been stated that the only reason for developing this site is because of the intention to build a school here whilst at the same time it is being claimed that the school is necessary here because of the number of pupils likely to be generated by the development of 1000 homes.

Whilst I agree that a further school will be required in the west of the GBC area, the Roker site would be far more suitable due both its position and the better links with the local bus system as well as the links which could be established with Merrist Wood College.

The question remains as to why when Taylor Wimpey submitted a plan for this development over 2 years ago no 'meaningful engagement' was made with the local community regarding the plan, most finding out only with the presentation of the final draft to the local plan. This is certainly not up to the standard of transparency in local government which should be expected and which would allow a full and meaningful dialogue regarding local residents needs.

The development as planned would require major upgrades to infrastructure in the area. Both sewage and drainage systems require investment now and this need would be far more extensive than presently required to support the level of housing suggested. The local road system is already overloaded yet the draft plan was voted through without the Strategic Transport Report having been made available and scrutinized, surely a most important document considering the traffic chaos which already exists in the Borough.

The draft plans, proposal to build 693 housing units per year is way beyond Guildfords needs and is more in line with London’s intentions which appear to be to turn all surrounding towns into suburbs. Proposals already having been submitted for rail services to Guildford and others to come under TFL.

There is no proof of 'Exceptional Circumstances' existing which would allow Normandy and Flexford's boundaries to be changed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
The proposed change to 'Inset' of Flexford, Walden Cottages, homes in Guildford road and Northern end of Glaziers Lane and The Palm House Nurseries Travellers Site and its should not be completed and these should remain washed over by the Green Belt. The small pockets of what would become urban land could be more densely developed including the practice of Garden grabbing which can ruin the area. Development could also gradually be extended on the edges of these areas gradually eroding the openness of the Green Belt.

There are also the problems concerning infrastructure in the area which is already stretched. The main sewage system is already too small in diameter and would need considerable upgrade if any large scale development is made. This also applies to water supply, electricity and broadband which is already struggling to maintain an adequate service. The problems with road transport and the large number of heavy goods vehicles in the area are already well known by GBC. The removal of the plan for 50 homes A47 is also welcome as that area is prone to flooding and as such should not be developed as per national policy as well as the above reasons.

The housing which is required in the area are small developments of rental and truly affordable housing such as the cottages in Szarbo Crescent which which allow older residents to downsize, freeing larger housing and are also suitable as starter homes.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
The removal of the plan for 1100 homes on site A46 is welcomed however should other proposals in the draft be carried out the danger is that this land will gradually be developed should developers put forward a convincing argument to GBC. The worst scenario would be the piecemeal development of the area over an extended period which would create housing but no appropriate facilities. This land has been noted by inspectors as essential for the openness of the green belt in the area and this is even more important with the new developments which are proposed, and some approved in the Ash and Tongham area which are gradually reducing the area of open land separating Aldershot and its attached conurbation from Guildford.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/2490  Respondent: 8817537 / Kim Meredith  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy A44

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to site allocation A44 Send Hill as it is documented as having unsafe land fill waste which is currently vented.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4017  Respondent: 8817537 / Kim Meredith  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to including the Wisley Airfield (A35) site in the Local Plan as the GBC Planning committee have already unanimously voted rejecting the proposed plan of 2,000 homes etc.

I object to including the Wisley Airfield (A35) site in the Local Plan as concerns have already been raised by authoritative sources such as Highways England, Thames Water, NATS and the Environment Agency.

I object to the huge development plans for the Wisley Airfield (A35) site as the surrounding infrastructure is unable to cope as it stands right now and would definitely fail with the addition of 2,000 houses etc. producing extra cars on the road, people at stations, children in schools, patients at health care units.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
I object to the proposed site allocation of Garlick’s Arch (A43) as it is an ancient woodland in a Green Belt protected area and should stay as such. Once destroyed it can never be replaced.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

I object to the infrastructure requirements being ignored in the Send, Ripley, Clandon, Wisley and Gosden Hill areas. All the roads, medical facilities, public transport, schools etc. are already at full capacity and cannot be stretched any further.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to the last minute site allocation A43a for a new on/off slip roads onto the A3 as the local roads already have a congestion problem. All the local small roads would be at daily gridlock due to the HUGE influx of through traffic.

I object to the danger of the increased volume of traffic that will arise from the A43a on/off ramps to pedestrians and cyclists. Many of our small local roads do not have pavements and very few cycle lanes.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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I object to the building of 40 houses and travellers pitches on A44 Send Hill site as the small single track road is not capable of being used regularly by increased traffic of any kind and it is not possible to make it any bigger.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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I object to site allocation A25 Gosden Farm as the impact of the extra traffic through Send and Ripley to access the A3/M25 would be vast.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**
**Comment ID:** PSLPP16/4028  **Respondent:** 8817537 / Kim Meredith  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

I object to the additional load that will be caused to public transport in the Send, Ripley, Clandon, Wisley and Gosden Farm areas with increased population. There is a lack of public transport. Local stations are already overcrowded. Car parks already overflow into neighbouring residential roads. Bus services in the area have recently been reduced.

I object to health suffering due to vastly increased air, noise and light pollution of all the additional traffic that would pass through the Send, Ripley and Clandon areas. The A3/M25 pollution is already in excess of permitted levels and building 2,000 extra homes with their extra vehicles at Wisley Airfield (A35) will only increase this.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** PSLPP16/4030  **Respondent:** 8817537 / Kim Meredith  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

I object to building 45 houses at Clockbarn Nursery Send (A42) because of inadequate access and traffic volume. Tannery Lane is too small a narrow country lane to take any more traffic. The junction with Send Road is already very hazardous for vehicles emerging into the main road. There is already planning permission for 64 houses at the Tannery and the building of a marina which will already exacerbate the congestion issue. The lane was not built for heavy use.

I wish my objections to be fully taken into consideration and that the Local Plan is amended accordingly.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** PSLPP16/4015  **Respondent:** 8817537 / Kim Meredith  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I object to the proposed removal of the villages of Send, Ripley and Clandon from the Green Belt. There are no ‘exceptional circumstances’ for the boundaries of these villages to be altered in any way.

I object to the proposed removal of Garlick’s Arch (A43) and Wisley Airfield (A35) for the Green Belt as again there are no ‘exceptional circumstances’ to do so.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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I object that this statement has been totally ignored in the Local Plan - “The fundamental aim of the Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belt are their openness and their permanence.” GBC seem to want to destroy the Green Belt not keep it.

I object that the proposed Local Plan does not meet the needs and desires of local communities who enjoy access to the countryside, clean air and peace and quiet afforded by wide open spaces.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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</table>
I object to building on the Garlick Arch (A43) site as it is a known flood area.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4023  Respondent: 8817537 / Kim Meredith  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P4

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to development on the A44 Send Hill site as it is in the Green Belt and is beautiful countryside which should be left alone.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4014  Respondent: 8817537 / Kim Meredith  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to over 70% of new housing proposed to be built within the Guildford Borough. There are ample brownfield sites in the urban areas which could be used first before looking elsewhere.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/4026  Respondent: 8817537 / Kim Meredith  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I object that the National government guideline has not been conformed to as it states that development must be proportional to its locality – which is not the case here.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/744  Respondent: 8817537 / Kim Meredith  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )

I object to industrial development at Garlick’s Arch (A43) as it is not required. Latest ELNA shows a reduction of 80% required from the previous draft plan. Any industrial development may be built at Slyfield where there is room for it and it already has the infrastructure in place.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/745  Respondent: 8817537 / Kim Meredith  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ( )

I object to the SHMA proposed 693 houses per year built – this is more than double previous figures.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<th>Comment ID: SQLP16/742</th>
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**Re: Objections to Guildford Borough Council Proposed Submission Local Plan (June 2016)**

I object most vehemently to the Guildford Borough Proposed Submission Local Plan (June 2016).

I list below the reasons why.

I object to GBC not following the correct process when amending the Local Plan. I believe another full consultation under Regulation 18 is required as changes have been significant. Some sites have been added at the very last minute without proper consultation.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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<th>Comment ID: SQLP16/743</th>
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I object to the last minute inclusion of the Garlick’s Arch (A43) and it has not been consulted on previously.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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<th>Comment ID: pslp172/3903</th>
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Site A4 in Guildford has been removed. This is a perfectly good housing site, within the town centre and therefore with sustainable infrastructure, and would make use of a brownfield site that is in need of redevelopment. The Plan has removed housing from this site, in favour of commercial retail – thereby effectively substituting Green Belt land for retail development, which is totally unacceptable.

Site A44 in Broadford Business Park has also been removed. This is another brownfield site that has already been developed. The Council’s claims to “have adopted a ‘brownfield first’ approach” (page 5) but this is clearly not the case, and is contrary to national guidelines.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

| Comment ID: | pslp172/3901 | Respondent: | 8817537 / Kim Meredith | Agent: |
|-------------|-------------|-------------|-----------------------|
| Document:   | Proposed Submission Local Plan: strategy and sites 2017 / Policy A42 |

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the Policy A42 change at Clockbarn Nursery in Tannery Lane for the following reasons:

1. There has been an increase in proposed building of houses from 45 to 60 – this is ridiculously too many for our area.
2. This totally ignores hundreds of previous objections by local residents.
3. Access to Tannery Lane at the A247 junction is not viable for the amount of traffic that will be incurred.
4. Tannery Lane itself if not capable of being used by large or numerous vehicles – it is a Lane.
5. This will be eroding even more of the Green Belt.
6. There is already bad surface water flooding in this area. This can only increase the problem.
7. This has been increased by a third since the 2016 version of the Plan. This will have a significant impact on the already highly congested local rural road network around Send. This is in contradiction to section 2.14a of the Plan which states "Whilst most local roads are single carriageway, with a lane in each direction, it is at their junctions that the free flow of traffic is most often impeded during peak periods, in some cases resulting in significant delays." And yet there are no proposals to improve the local roads, only to add more junctions with the A3, thereby increasing congestion on the Trunk and Local road network.

I object to the lack of proper infrastructure planning for sites (A43 and A42)

The Foreword to the plan by Paul Spooner includes on page 5:

"We recognise that significant infrastructure upgrades are required to support existing communities and the planned growth of the borough. The delivery of sites allocated in this plan is contingent upon the provision of new infrastructure, which is a key theme of our Local Plan".
The lack of any plan for either physical or green infrastructure improvement clearly contradicts this in respect of both A43 Garlick’s Arch and A42 Clockbarn Nursery, Tannery Lane, Send. Development of these sites without the contingent infrastructure would therefore be contrary to the stated aims and themes of the Plan, and should not go ahead.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/3899   Respondent: 8817537 / Kim Meredith   Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A43

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I object to the Policy A43, land at Garlick’s Arch, Send Marsh for the following reasons:

1. This totally ignores hundreds of previous objections by local residents.
2. There are no ‘exceptional circumstances’ as required by the National Planning Policy to take this area out of the Green Belt.
3. This will remove ancient woodland which cannot ever by regained.
4. Ripley and Send villages will merge, therefore defeating the purpose of the Green Belt.
5. The number of homes proposed is excessive. Send is a village. This is over-development to the extreme.
6. The area is subject to frequent flooding and is currently a Flood Zone 2 allocation.
7. The excessive traffic that will be generated will totally cause mayhem on the Send and Ripley roads. Already whenever there is a road closure nearby or traffic accident (almost a daily occurrence on the A3/M25) in the vicinity – the main Ripley, Send Marsh and Send roads are ridiculously congested or at a total standstill.
8. There is no proven demand for Travelling Show people sites in this location. This development site is for 400 homes and so is not compliant with the minimum of 500 in as stated in section 4.2.24 of the Plan.
9. Guildford Borough is over 100 square miles. Of the 11350 homes proposed in the Plan, 40.6% (4613) are within 3 miles of Send Marsh, most of them on Green Belt. This is grossly unfair on an already overcrowded part of the borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp172/3900   Respondent: 8817537 / Kim Meredith   Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A58

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object to the Policy A58, land at Burnt Common, London Road for the following reasons:

1. This was deleted from the 2014 draft plan because of all the objections previously made – therefore why has it been included again?
2. There has been a decline in demand for industrial land since the previous draft plan but the 2016 version uses the word ‘maximum’ a change from ‘minimum’ within it – this does not make sense.
3. There are already empty sites and units at Slyfield and Guildford and therefore no need to build new industrial and warehouse developments in our area. I can only envisage these will end up being empty too.
4. The 2017 Employment Land Need Assessment shows a reduction in demand for industrial land for the whole borough to 3.9 hectares. This policy is a huge allocation of 10 hectares for Send alone. Totally unacceptable.
5. The small roads around this area are already often at gridlock. This can only make the problem worse.
6. The merging of existing villages (which will occur) defeats the purpose of the Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** pslp172/3904  **Respondent:** 8817537 / Kim Meredith  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2017 / Policy A58

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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The potential for a Waste Management Facility at site A58 Burnt Common is briefly mentioned in policy 4.423a and does not allow for full and proper consultation. These facilities are always highly contentious and the Council has a duty of transparency in this regard which it is, at best, neglecting.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPA16/1585  **Respondent:** 8817569 / Peter Davies  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
The increase in house prices is not solely due to increased population demand but a range of temporary one off factors that include historically very low interest rates and the increase in household income following the growth in double income families. Interest rates in the medium to long term will rise to normal levels and the number of two income families will stabilise. Both these changes will lead to UK house prices becoming lower relatively. House prices have also been recently increased temporarily by high levels of overseas investment in UK property. However, recent changes to housing taxation have already reduced this overseas investment.

Recent UK population growth should also not be assumed to continue; this growth has been driven largely by high levels of EU immigration in the last 10 to 15 years. Following the EU referendum, immigration from the EU is likely to fall rapidly and indeed given the fall in the £, many recent migrants may well return home. The assumptions behind the projections need to be brought up to date once the BREXIT terms become clearer and the projections recalculated before the Local Plan is finalised.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6535  Respondent: 8817569 / Peter Davies  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

the infrastructure is already on overload, evidence by traffic levels and train services already running at full capacity. In addition to the proposed Horsley developments, the proposed 2,000 houses at Ockham on Wisley Airfield will also put huge additional demand Horsley’s infrastructure.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6533  Respondent: 8817569 / Peter Davies  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
the removal of the Horsleys from the Green Belt requires “exceptional circumstances” and these have not been demonstrated.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6534  Respondent: 8817569 / Peter Davies  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

the proposed changes to the boundaries of the Settlement area of the Horsleys is not based on reason and seems to be solely to increase the land available for development in the future.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6532  Respondent: 8817569 / Peter Davies  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I am a resident of East Horsley and am writing to object to the Guildford Local Plan which proposes 593 new houses in the Horsleys within 5 years. This would be a huge increase of about a third on the existing number of households, imposing huge damage to the environment and the character of the villages in an unacceptably short timescale.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/1080  Respondent: 8817601 / A. L Thain  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

BUT IF a large number of houses are still to be built in the village then I believe your current proposed sites are clearly wrong. Three of the sites in West Horsley (A37, A38 and A40) should be removed and all proposed housing should be on one large site between sites A39 to the east, A41 and Lollesworth Lane to the west, East Lane to the north and the railway line to the south. The old wood on the site should largely be removed.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLP16/3814  Respondent: 8817601 / A. L Thain  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy D1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The entire character of the village will be changed forever due to the vast and rapid increase in housing and density which is against the wishes of most of the residences.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLP16/3813  Respondent: 8817601 / A. L Thain  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

With regards to the village of West Horsley, the proposal to increase the size of the village by 35% plus infilling (due to the proposed extension to the village boundaries) without any due regard or proposals for the replacement of the already full Raleigh school or how the doctors, car parks, railway station will cope is a complete dereliction of a Planning Officers duty. For instance you would not allow an individual house to be built without any proposals for parking so why are you floating your own rules and proposing to build 385 houses in one small village without any consideration or plans for how the infrastructure will cope?
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/723  Respondent: 8817601 / A. L Thain  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

RE: Objections to the Guildford Borough Council Local Plan Proposals for West Horsley

I strongly OBJECT to the current proposals on the following grounds:-

As the country has voted to leave the EU, the Guildford Borough Council's Local Plan proposals are now void as the large numbers of legal immigrants from within the EU will now be greatly reduced. Therefore the evidence base that has been used is now incorrect due to the decrease in the number of people that will settle in this country in the future.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/724  Respondent: 8817601 / A. L Thain  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 7: Any other comments?

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. A new larger replacement school for the Raleigh should be constructed on the site (built and paid for by the developers) and the old Raleigh school can then be demolished and replaced by new housing.
2. The site would have the main road entrance via a new roundabout constructed in East Lane.
3. To reduce traffic congestion a pedestrian tunnel should be built under the railway line embankment opposite the Horsley Surgery. This will enable safe, easy access to shops, railway station, doctors and East Horsley village hall. It will also allow residence of East Horsley a safe pedestrian route to the new school which would also reduce traffic.
4. By having just one large site this will also make the provision of utility services easier, which will reduce the number of surrounding roads that will have to be dug up to provide new sewers, ducts and cables to be laid as most of the existing infrastructure cannot cope with such a large increase in demand. It will also contain all construction traffic to one site accessed off the main village road thereby reducing disruption.
Limited development of a very small number of individual houses on sensible sites around the village can still be allowed to enable the village to evolve slowly over time.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/597  Respondent: 8817729 / Roger and Helen Mayes  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - Shalford (south)

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

We write to object to the proposed change to the settlement boundary to include fields behind Shalford Village Hall and Christmas Hill. The Green Belt and Settlement Boundaries have been in place for a long time and we see no good reason to change them. The only purpose for such a change would be to facilitate the development of the land involved and such development is highly likely to have a negative effect on the open character of this area of the village. As frequent visitors to the Village Halls, we are acutely aware of how much the land rises up and any development here would be likely to dominate these facilities. The green and rural nature of the land provides a very agreeable and visible backdrop to the village. In our view, the land should remain under the protection afforded by Green Belt and AGLV designation with other planned large scale local developments meeting the forecast future housing needs.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/1516  Respondent: 8817953 / Sheena Ewen  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the proposed Infrastructure Schedule (Appendix C)

The Infrastructure Schedule sets out the key infrastructure requirements on which the delivery of the plan depends. For each of the Key Allocated Sites in the borough it identifies infrastructure projects that are required, except for Garlick's Arch (A43) which is not mentioned.

It is clear that the Plan takes no account of the infrastructure required for this site and is therefore not fit for purpose.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
I OBJECT to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)

- The "objectively assessed need" figure of 693 homes a year is too high.

- A professional review by NMSS has concluded that, even basing the calculations on a period of stronger economic and student growth, the housing need figure should be revised down to 510 homes a year and the method changed to consider student housing need separately due to the distorting effects

- The current SHMA inflates the proposed housing figure due to
  - failure to correct for errors in the historical data for international migration flows,
  - issues with the way it considers students and affordability, and~
  - flaws in the method for estimating the number of homes needed to support job growth.

- It is unacceptable that demographic and economic model assumptions have been withheld from scrutiny and therefore cannot be checked making the process unaccountable.

The Plan's proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the borough, it is more than double the figure of 322 used in previous plans. The SHMA report methodology is I believe inaccurate; it inflates the needs of the borough by distorted student numbers. It is based on commercially confidential modelling assumptions that cannot be checked or reviewed. There is no transparency to this evidence base and it is therefore impossible to assess its accuracy. This is not democratic and is not appropriate for consultation of the Plan.

The National Planning Policy Framework allows the overall housing target to be reduced to take account of protected wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored these factors.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?
I OBJECT to Gosden Hill development being in the Local Plan. The land in Gosden Hill currently does exactly what the
Greenbelt was designed to. It provides a green buffer between the Guildford Urban Area and West Clandon and other
villages and gives Burpham a defined green boundary and breathing space.

No exceptional circumstances have been demonstrated for building on this site and therefore it does not comply with
paragraphs 87-89 of the NPPF. It stops the sprawl of Guildford town, assists in safeguarding the countryside from
encroachment and assists in urban regeneration by encouraging the recycling of derelict and other urban land. These are all
requirements of the NPPF.

The scale of the Gosden Hill development is out of proportion to West Clandon. It would have four times the amount of
housing plus shops, offices/factories, GP surgery, schools. Development on this scale would blight a historic village with a
history going back to the doomsday book and beyond.

While no connection is currently shown between Gosden Hill and A247 (save an already overloaded A3) the developer will
almost certainly seek to introduce such a connection and bring major new traffic into the village and the problematic A247.

Gosden Hill is the most obvious location for the north end of an aspirational A3 tunnel to bypass Guildford. It has rising
ground and is situated just before the urban area. If it is built on, it will be very difficult to construct a tunnel.

The development will generate in the region of 6,000 vehicles which will add to the burden on to the A3 which is already
stationary every day during rush hours. The linking of the A3106 through Burpham, B2215 through Ripley and A247
through West Clandon would channel thousands of cars, delivery vehicles and construction vehicles through the narrow,
winding (A247) road through West Clandon. This is already a road where large lorries mount the pavement virtually every
day.

The enhanced volume of traffic will greatly increase air pollution which is particularly critical given the proposal to build
two schools.

Without major as yet unplanned modifications, the existing two way north facing junction at the site would require vehicles
wanting to go north on the A3 to go through Burpham which is grid-locked every day. There is no south facing slip and
traffic would need pass through Merrow and Ladymead to access the A3 / A31 southbound. A new on-slip at Burpham
would only be 1.8km from the on-slip at Burnt Common which is against Highway England's requirement of 2km.

Burpham's sewers are at capacity. Sewage would have to be pumped to Slyfield for processing, a project of enormous cost.
There is inadequate fresh water in Guildford and current supplies could not meet the needs of a development of this size.
Electricity supply is also inadequate and would require a major infrastructure development.

A proposed railway station was previously rejected by Guildford Borough Council in 1984 because it feared Gosden Hill
would become a dormitory estate for London. This has not changed but we are more dependent than ever on motor cars to
access the station.

The wording of the Local Plan with regard to Gosden Hill is so loose that the developer could virtually do whatever it
wants.

The remaining agricultural land between Gosden Hill and West Clandon is so small that it is highly likely to be
uneconomic and therefore a prime candidate for further development which would roll the Guildford Urban Area over West
Clandon towards East Clandon and Wisley.
If the Strategic Sites are all developed, the north of Guildford will deliver 36% of demand, 5,036 houses towards the total of around 14,000. The infrastructures of the existing villages and the A3 will be overwhelmed by the scale of development.

Development and improvement of the A3 is not even slated to start until after 2020. The building of a tunnel, which is only an "aspiration" in the Local Plan is likely to be many years after. In the meantime given that developers build houses to provide cash-flow for infrastructure, Gosden Hill will have a crippling effect on villages like West Clandon and the A3.

Gosden Hill already has surface water problems. Merrow Stream crosses the site. No hydrological survey has been carried out to assess the implications. Electricity pylons run through the centre of Gosden Hill and may have health and safety issues.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/2803  Respondent: 8817953 / Sheena Ewen  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A43a

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the inclusion of the land for new on/off ramps at Burnt Common (A43a)

The proposed north facing ramps to the A3 at Burnt Common would be a disaster for local communities. There is minimal requirement for existing local traffic to access and egress the A3 to the north save to mitigate loads through Ripley, but the addition could draw in a huge amount of 'through' traffic. There has been no impact assessment for this last minute inclusion.

This Plan does not address the needs of local communities or the Borough in this regard. There has again been no Section 18 consultation on this.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6130  Respondent: 8817953 / Sheena Ewen  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I OBJECT to the damage to the historic environment as a result of the scale of the proposed development (Policy D3).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/6133   Respondent: 8817953 / Sheena Ewen   Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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I OBJECT to the local plan based on the impact it will have on the special countryside of the borough. The proposed development at Garlick's Arch (A43) will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/6129   Respondent: 8817953 / Sheena Ewen   Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E5

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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Policy E5 supports the retention and development of local services and community facilities in our inset and identified villages. Yet the development at Garlick's Arch (A43) would result in the loss of four existing successful rural businesses which have been in existence for over 30 years, and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises. The Plan does not promote rural employment; rather it will result in the loss of existing local rural businesses.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I OBJECT. Tourism and visitors do not depend on new visitor "attractions" and could actually be damaged by them, as compellingly argued in the current debate over Newlands Corner. In this policy, the presumption in favour of development runs the risk of becoming an excuse for overdevelopment / "Disneyfication". Heritage sites and the Green Belt are particularly vulnerable to harm.

Guildford has many "leisure and visitor attractions" already. The case for creating more is not made and no examples are given. Instead, the plan's explicit priorities should be:

1. To protect the borough's prime leisure and tourism asset, its countryside, from inappropriate development. This is all the more valuable because of its accessibility from London, the rest of Britain and from overseas.

2. The most valuable forms of tourism, such as walking and cycling, require no new investment. In the overcrowded South-East of England, lack of development is a leisure and tourism asset, not a liability.

3. To enhance and promote Guildford's river landscape and to seed-corn town-break packages for high-value tourists. To achieve this, the policy needs to define what leverage, if any, Council planners have to influence normal tourism market mechanisms.

4. To rule out the redevelopment of scarce rural hotel sites (e.g. Thatchers, East Horsley, earmarked for 40 new houses under Site A37 of the plan yet just a short walk from the new opera house).

I trust that the objections made above are fully taken into consideration and that the Plan is amended accordingly.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/6149  Respondent: 8817953 / Sheena Ewen  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT (POLICY H1- Homes for all) Numbers aside, all the policy in the blue box says is that the Council will encourage building over the plan period. It fails to set rules on important issues such as constraints and density, and is not specific enough to provide a practical framework for planning decisions.

The housing mix is based on out-of-date, pre-Brexit projections and on assumptions set out in a flawed SHMA that has not been scrutinised or evaluated.

I support higher density development in the urban area to suit the aspirations of town dwellers. Much of Guildford town could usefully be regenerated with 4-5 storey blocks with landscaping and underground parking, as often seen on the Continent and, recently, in London.
Student accommodation should be provided for 100% of new students and more than 60% of existing students. This would free up family accommodation in the urban area. Other university cities (e.g. Oxford) insist on higher percentages than those proposed in the plan. In my view, the Council's timidity is a case of "regulatory capture" by Surrey University, which has failed to use its existing planning permissions (dating from 2004) to accommodate 3,000 students or to improve the efficient development of its campus (e.g. by building on its extensive and under-used surface car parks). If all students were accommodated in this way, up to 2,000 homes would be freed up in town.

Guildford borough already has a higher proportion of traveller sites than most comparable boroughs. Over-provision is inappropriate given other constraints.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID:</th>
<th>PSLPP16/6187</th>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy H3. This is a Trojan horse policy. It says that homes can be built anywhere near a settlement of any form (including agricultural land and the AONB). These homes are meant for people with a village connection, but they could be for anyone on the Guildford borough housing list. To make the housing viable, or to improve the "mix" this can include "market" housing (i.e. normal commercial development which in Guildford usually means large executive homes). This policy means building anywhere, and ignoring all historic planning restrictions.

The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove "exceptional circumstances."

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I OBJECT, due to the congestion that development will cause to the local village roads and the lack of road infrastructure.

The proposed development under the plan will cause greater congestion in and around our villages. Our villages are already suffering from severe congestion for much of the day, for example the Newark Road & Rose Lane junction in the centre of Ripley. The A247 through West Clandon is a real issue of concern as an "A" road with inadequate width, inadequate lighting and inadequate speed control.

Cycling has become an ever popular past time, particularly at weekends hundreds of cyclists pass through the villages on the way to the Surrey Hills. There are no proper cycle lanes on the narrow local roads surrounding the villages and with greater vehicle traffic being generated from the proposed developments there is a real danger that there will be an increase in road accidents involving cyclists directly as a result of the development proposed under the local plan.

The Plan does not provide an achievable strategy for improving capacity on these local roads. To wilfully add traffic load would be quite irresponsible.

I OBJECT to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces.

With some 5,000 houses being proposed close to the village of Ripley, the roads serving the village will become even more congested.

The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the road becoming ever more dangerous for pedestrians.

The council has a statutory obligation to protect the public and the additional traffic flows will bring added pollution and risk to injury of the public. In the case of West Clandon, The Street (A247) generally only has a narrow footpath on one side of the road making it very dangerous, especially when vehicles mount the pavements as has happened most recently on 12th July 2016.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Respondent: 8817953 / Sheena Ewen</th>
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I OBJECT to the lack of proper infrastructure planning for sites.

Policy I1 requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.

Despite the Garlick’s Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents in the locality will see their quality of life significantly deteriorate in many ways. Without proper planning and funding for healthcare and other facilities, local services will be overwhelmed.
Police services are seeing funding reduced. The development of the proposed 13,860 homes during the plan period will stretch the police services further and is unsustainable.

There is no consideration of provision of the increased capacity of Guildford hospital.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** PSLPP16/6138  **Respondent:** 8817953 / Sheena Ewen  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy ID2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT due to the congestion that development will cause to the trunk roads, A3/M25 (Policy 12)

There is no certainty that either the A3 or M25 in the borough will be improved to increase capacity and reduce congestion during the Plan period. Highways England has no plans to even examine improving the A3 before 2020. I have considerable concerns that development of the large residential sites identified at Wisley Airfield (A35), Garlick's Arch (A43) and Gosden Hill (A25), will take place before any improvements are made to the trunk road network. The A3 & M25 are already at capacity and even standstill during peak hours and any development prior to improvement of these roads will exacerbate the situation further.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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**Comment ID:** PSLPP16/6148  **Respondent:** 8817953 / Sheena Ewen  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to poor air quality concerns (Policy 13)

Paragraph 4.6.27 of the Plan states: "Development must also mitigate its traffic impacts, including its environmental impacts and impacts on amenity and health." The significant level of development being proposed, particularly in the north east of the borough will lead to further highways congestion, despite any attempts to mitigate this through travel plans. This will be particularly acute as traffic spills onto roads in built up residential areas and will lead to greater levels of air pollution, which in turn will have a detrimental effect on local residents and their health and can result in early death.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/6192  Respondent: 8817953 / Sheena Ewen  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT in the strongest possible terms to the Guildford Borough Proposed Submission Local Plan (June 2016). This Plan is unsustainable, unworkable and, in many provisions, unnecessary. There is a lack of transparency in the underlying assessment of needs which is completely unacceptable. The effects on traffic would be woeful and a suitable solution is not apparent in the plan.

I set out below my objection to specific policies and matters within the Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/1167  Respondent: 8818017 / Anita Hose  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The infrastructure is not suitable for the proposed number of houses. The doctors surgery is already overstretched and the schools would not be able to cope. The roads are too narrow and not designed for all the additional housing and traffic.

I hope that you will heed our wishes and not be swayed by outside influences.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/1166  Respondent: 8818017 / Anita Hose  Agent:
Many of the areas proposed are subject to flooding.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLP16/1165  Respondent: 8818017 / Anita Hose  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I am at a loss to understand the need for all these houses in Horsley. Our local population has not gone up, birth rate is stable. Therefore, where are all these people coming from?

This is a Green Belt area also a SSI area, and must be preserved. We elected Guildford Council to consider and abide by the wishes of its residents.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/378  Respondent: 8818337 / Susan Stratford  Agent:

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
I object very strongly to the Guildford Plan, for these reasons:-

1. a) The removal of West Horsley from the Green Belt is unlawful, and morally indefensible.
2. b) The proposed new Settlement Area for the village would considerably widen the village boundaries. This would encourage even further development in the future.
3. c) The proposals are for 385 new homes in a village of 1,111 homes, an increase of 35%.
4. d) The infrastructure in the village is already under severe strain:-

the Raleigh primary School is already at more then full capacity and simply could not find space on its site for an additional entry form.

the Horsley station carpark is already full on weekdays, with commuters' cars,

the roads are choked at school times along Ockham Road North by Glenesk school,

and it is almost impossible to turn out of the Street at the Bell & Colvill roundabout near Cranmore School

after heavy rain the Street in West Horsley is impassable due to floodwater under the railway bridge, and Ripley Lane runs with water like a river

1. d) We are told that there is an urgent need for new homes for key workers, for young people who wish to stay in the village where they have grown up, and for opportunities for the elderly to downsize within their village.

BUT West Horsley house prices are much higher than the national average. How can the proposed new homes be made affordable? Is some shared ownership scheme proposed? Will there be a points system to determine who is eligible for these new homes? Will a certain percentage be reserved for key workers?

The Guildford Plan proposals for West Horsley cannot be supported by the existing infrastructure. There is absolutely no guarantee, in a free market, that the new housing would go to those for whom it is intended.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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A visit to the village would clearly demonstrate that our present roads are failing to meet current traffic requirements. In particular the A247 has pinch points in the centre of West Clandon village that requires lorries travelling in opposite direction to mount the pavement to pass. The present reply to a constructive local petition to address this problem effectively acknowledges the problem but says short of a "Black Water By Pass,, compulsory purchase order scheme nothing meaning full can be done! Many of us agree and it flies inthe face of all logical thought for the 2016 Plan to suggest further development in this area and in particular Burnt Common and West Clandon parish.
I strongly object to the 2016 Local Plan for the Guildford area as it is flawed at many levels and I demand that it be withdrawn and re-written to reflect the real requirements of both the local community and our national needs. The draft sets out a policy of green belt destruction to meet a set of questionable targets that bears no relationship to the requirements of the local community. Instead it attempts to impose on us the ambitious aspirations of a few local individuals and in some instances councillors who threaten us with even greater destruction of our communities and countryside if we do not adopt this plan.

Guilford is fortunate in having an area of outstanding natural beauty to the west and thankfully this is protected. The Green belt to the east is of equal importance and I strongly object to plans to destroy it through urban sprawl and industrial zoning. The planned growth figures were questionable before the EU referendum and are now a substantial over estimate given the national governments own forecast for the economy for the next decade. Consequently a significant reduction in the number of new homes should be adopted and conditioned by the opportunity to develop them on existing brown field sites in the Borough. Destruction of the green belt to the east of Guildford is indefensible not only because it would be an irretrievable loss to future generations but because its infrastructure which is already under extreme pressure could not cope with further development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
In summary the plan needs to be re-examined once again post Brexit and the growth plan focused on redevelopment of brown field sites in the Borough. We have no right to destroy the Green Belt, it's the property of future generations!

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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<th>pslp172/4714</th>
<th>Respondent:</th>
<th>8818433 / Julian Masters</th>
<th>Agent:</th>
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<tr>
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<td>Proposed Submission Local Plan: strategy and sites 2017 / Policy A25</td>
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**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ()**

1. I object to the changed policy A25 Gosden Hill for the development of 1700 homes which is still far too much.
2. There is no need for housing on this site because the local plan housing target is incorrect and inflated and ignores constraints.
3. Gosden Hill is located entirely within the Green Belt. No exceptional circumstances have been demonstrated for building on this site and therefore development here does not meet paragraphs 87-89 of the NPPF. Furthermore, Gosden Hill performs all five functions of green belt.
4. The site has no provision for foul or surface water sewerage and adjoining sewerage is at capacity.
5. The Green Belt at this point serves the important function of separating West Clandon from the edge of urban Guildford. Development here will cause the two to coalesce defeating one of the objectives of the Green Belt. If this development proceeds I believe the narrow strip of Green Belt remaining between Guildford and Clandon at this point will be too narrow and will come under further pressure. It will represent an undesirable ribbon development along the A3. It will be highly visible from the A3 when approaching Guildford and will, in conjunction with A43a at Garlick's Arch give the appearance of almost continuous development from Send through to Guildford.
6. The development of this site cannot be sustainable and will cause massive congestion onto surrounding roads. The development will generate in the region of 6,000 vehicles which will exit straight on to the A3 which is stationary every day during rush hours. The linking of the A3100, B2215 and A247 would channel thousands of cars through the narrow, winding road through West Clandon.
7. I object to the proposal for a link road to bring traffic from the Gosden Hill development to the proposed 4 way junction at Burnt Common. This has the potential to generate large volumes of traffic (including commercial vehicles) on the A247 through Send and West Clandon - a road which is already under traffic stress (see below).
8. The volume of traffic will greatly increase air pollution which is particularly critical given the proposal to build two schools.
9. A new on-slip at Burpham would only be 1.8km from the on-slip at Burnt Common which is against Highway England’s requirement of 2km.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2017 / Policy A43</td>
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</tbody>
</table>
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. I object to the changed policy A43 Garlick’s Arch for 400 homes and 6 travelling show people pitches
2. It ignores all the thousands of previous objections made by local people
3. There is no proven demand for travelling show people plots in this location
4. There is no need for putting houses on this site because the local plan housing target is incorrect and inflated and ignores constraints.
5. The allocation of 28.9 ha is an excessive land grab into the Green Belt. If we take a normal density of 30 homes per ha and it is at the end of the day proven that there is a need for 400 homes in this location the land requirement is 13 ha not 28.9 ha which is more than double. This replicates a similar over land grab at Burnt Common where the factor is 7 times the land required.
6. This confirms the worrying impression that GBC have a pre-determined policy of building on the Green Belt at every opportunity. The arithmetic does not stack up. One would have thought that they would as custodians of the green Belt be intent on conserving it rather than exploiting it.
7. The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.
8. Garlick’s Arch (A43) is in an unsustainable location. It does not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. The site is unsuitable due to lack of access to sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick’s Arch in the Infrastructure Plan. Residents will be dependent on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.
9. The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.
10. I object to the proposal to remove Garlick’s Arch from the Green Belt. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for this land to be taken from the Green Belt. Once taken the green belt is lost forever. There is a real danger that the loss of this Green Belt will result in urban sprawl and the neighbouring villages merging into one another. The significant development in West Clandon, Send and Ripley will result in the character of these villages being lost and the countryside encroached.
11. I object to the development at Garlick’s Arch because of flood risk. The site at Garlick’s Arch is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. Knowing the area well I am aware that this site often floods during the winter months and the flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.
12. I object to the loss of rural employment on the site. The development at Garlick’s Arch would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises.
13. I object to the potential loss of Ancient Woodland on the site. The proposed development at Garlick’s Arch will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees that existed in the year 1600.
14. I object due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1). Our villages are already suffering from severe congestion for much of the day, for example the Newark Road and Rose Lane junction in the centre of Ripley and the A247 through West Clandon. The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.
15. Furthermore, many of the country lanes around the villages of West Clandon, East Clandon, Ripley, and Send are narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition. I object to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces.

16. Many of the affected villages, such as West Clandon, East Clandon, Send and Ripley, already suffer from parking problems. Further development around these villages will only result in more traffic and more parking problems.

17. With some 5000 houses being proposed close to the villages of West Clandon, East Clandon, Send and Ripley, the roads serving the village will become even more congested. Cycling has become a popular past time, particularly at weekends hundreds of cyclists past through the village on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road accidents involving cyclists as a result of the development proposed under the local plan.

18. The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the roads becoming ever more dangerous for pedestrians.

19. I object to the lack of proper infrastructure planning for sites (Policy I1). Policy I1 requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.

20. Despite the Garlick’s Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents’ in the locality will see their quality of life significantly deteriorate in many ways.

21. Many of the utilities in the West Clandon, East Clandon, Burpham, Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers. No plans to improve these services should mean no development of the Garlick’s Arch site.

22. Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are already at capacity and suffering from funding cuts or freezes. Any further development without funding will place further stress upon existing health services.

23. I object due to the congestion that development will cause to the trunk roads, A3/M25 (Policy I2). There is no certainty that either the A3 or M25 in the borough will be improved to increase capacity and reduce congestion during the Plan period. Highways England has no plans to even examine improving the A3 before 2020. I have considerable concerns that development of the large residential sites identified at Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25), will take place before any improvements are made to the trunk road network. The A3 & M25 are already at capacity during peak hours and any development prior to improvement of these roads will only make the situations worse.

24. I object to poor air quality concerns (Policy I3). Paragraph 4.6.27 of the Plan states that “Development must also mitigate its traffic impacts, including its environmental impacts and impacts on amenity and health.” The significant level of development being proposed, particularly in the north east of the borough will lead to considerable further congestion, despite any attempts to mitigate this through travel plans. This will be particularly acute in built up residential areas and will only lead to greater levels of air pollution, which will have a detrimental effect on local residents and their health.

25. I object to the inclusion of the land at Garlick’s Arch, Send Marsh/Burnt Common and Ripley (A43). Garlick’s Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8). There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).

26. It is clear that with this site being added at the eleventh hour and no infrastructure planning has been undertaken. The Infrastructure Schedule makes no provision for any infrastructure improvements for this site. How will the local services such as schools and doctors cope, many of which are already at capacity? (Policy I1)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
1. I object to Policy A 58 at Burnt Common and to the proposed inclusion of Burnt Common as an Industrial Strategic Employment Site.

2. This previous allocation for B1c, B2 and B8 development was removed from the 2014 draft due to all the objections made previously.

3. The word “minimum” is a change from the previous “maximum” in the 2016 plan and since that time there has been a decline in demand for industrial land. This change alone is unacceptable since even if there was a need to build 7,000 sq m at Burnt Common this development would only require 1.4 ha at a standard plot ratio density of 50% not 9.26 ha. There is no justification for zoning an additional 7.86 ha in the Green Belt.

4. There is in fact no justification for building any more industrial development in the borough particularly at Burnt Common. The current industrial pipeline of granted consents of 38,357sqm in B1c, B2 or B8 use class space is double the 19,000 sq m said to be needed by Aecom who justify the need for new space on top of the existing pipeline by a completely unsubstantiated suggestion that “there is the possibility that some pipeline developments may not come forward at all, or be developed in different quantities by use class than has been consented.”

5. There is no need to build industrial or warehouse development in the middle of the Green Belt when Slyfield and Guildford still have empty sites and industrial units.

6. The 2017 Employment Land Need Assessment shows a reduction in demand to 3.9 hectares for industrial land for the whole borough not a huge over allocation of 9.26 hectares at Send in the Green Belt.

7. The Employment Land Needs Assessment update 2017 (ELNA) states “that the pipeline for employment floorspace defined by planning permissions yet to be implemented and prior approvals suggests the potential for an additional 33,607sqm of B use class floorspace to come forward. This figure comprises a net loss of 4,750sqm of B1a use class floorspace and a net gain of 38,357sqm in B1c, B2 or B8 use class space.”

8. 38,357 sq m of B1c, B2 or B8 use class is quite sufficient supply for the plan period and is in fact more space than the 3.9 ha of industrial land that is said to be needed for the plan period by Aecom. Since if you were to develop 3.9 ha at a plot ratio of 50% it would provide new industrial development of 19,000 sq m approximately half of current planning permissions granted. This does not justify the need for new development of industrial space on the Green Belt in such areas as Burnt Common.

9. The reality of demand for industrial space is that it is both nationally and locally in decline and this is evidenced by old existing permissions that have not been taken up and developed. The ELNA alludes incorrectly to the poor quality of existing space being a “constraint” on supply and fails to acknowledge that this assertion cannot apply to potential newly developed space e.g. the undeveloped pipeline of 38,357sqm.

10. The impact on small surrounding roads will create traffic gridlock.

11. It will join up existing villages and defeat the purpose of the Green Belt.

12. The ongoing poor quality of the updated research undertaken by Aecom in the Employment Land Needs Assessment 2017 does not support industrial development on land in the Green Belt at Burnt Common.

13. The Aecom research is generally superficial and lacks sufficient detail and analysis between B1c, B2 and B8 use classes and no reliable individual analysis has been undertaken of the widely different supply and demand dynamics of light industrial, general industrial and warehousing and distribution floor space.

14. The potential inclusion of a waste management facility mentioned at paragraph 4.4.23a lacks enough detail for proper consultation and is completely inappropriate.
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The Plan now states: “the presumption in favour of sustainable development will not automatically apply to policies relating to sites protected under the Birds and Habitats Directives and/or designated as Sites of Special Scientific Interest (SSSIs), land designated as Green Belt, Local Green Space, the Surrey Hills Area of Outstanding Natural Beauty, designated heritage assets and locations identified as at risk of flooding.”

Gosden Hill and Blackwell Farm (both currently in the green belt) are called “urban extensions” surely a euphemism for urban sprawl? Garlick’s Arch and Burnt Common developments take land from the green belt to extend Ripley/Send. One of the important specific purposes of the green belt is to prevent urban sprawl.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp17q/638  Respondent: 8818433 / Julian Masters  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2017 / Question 4: Duty to cooperate

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The NPPF states para 155: “Early and meaningful engagement and collaboration with neighbourhoods, local organisations and businesses is essential. A wide section of the community should be proactively engaged, so that Local Plans, as far as possible, reflect a collective vision and a set of agreed priorities for the sustainable development of the area, including those contained in any neighbourhood plans that have been made.”

The changes in this latest version of the Guildford Local Plan show little or no willingness of Guildford Borough Council to reflect a collective vision. Despite the many thousands of responses to previous versions of the Plan which overwhelmingly rejected building on Green Belt land this latest version has as much, if not more, building on the Green Belt and increased problems of infrastructure and traffic which will bring increased noise and air pollution and danger to residents.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/3958  Respondent: 8818625 / Beth and Frank Fuller  Agent:
Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix C: Infrastructure Schedule
I OBJECT to the proposed Infrastructure Schedule (Appendix C)

The Infrastructure Schedule sets out the key infrastructure requirements on which the delivery of the plan depends. For each of the Key Allocated Sites in the borough it identifies infrastructure projects that are required, except for Garlick’s Arch (A43) which is not mentioned. It is clear that the Plan takes no account of the infrastructure required for this site and is therefore not fit for purpose.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/3957  Respondent: 8818625 / Beth and Frank Fuller  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix D: Evidence base

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

1. The housing needs assessment is flawed in various respects and overstates housing need. In addition since it was produced, the referendum Brexit decision has almost certainly reduced future housing need and rendered the previous assessment seriously out of date. As a result any assessment of Green Belt sites which took place to consider whether “exceptional circumstances” existed to outweigh the harm to the Green Belt was based on false premises and should be reconsidered.

2. Having determined housing need the Council was entitled to consider constraints before determining the housing number. I believe that as Ill as being entitled to do this the Council was required to give proper consideration to constraints. The scarcity of sites outside the Green Belt as Ill as infrastructure (most notable roads) considerations all represented constraints which should have been taken into account in determining the final housing number. Accordingly in this regard our objection to the allocation of Green Belt sites is twofold. First I believe constraints should have been applied. Secondly I believe the Council did not properly consider constraints and that their decision making process was flawed and thus subject to being set aside by the Inspector.

3. Even if having properly applied constraints there is a need to develop in the Green Belt then specific Green Belt sites should not be included in the plan unless “exceptional circumstances” for development are proven in relation to that specific site, as stipulated repeatedly in the NPPF. The Green Belt should trump short-term considerations such as perceived housing need, as case law has established. There needs to be a specific balancing exercise conducted on each Green Belt site weighing the harm to the Green Belt against the very special circumstances which are argued in favour of development at that particular site. There is no evidence this has been done. Instead the council have appeared to say that having chosen a housing needs figure and decided it cannot be met without building on Green Belt then there is no need for any further consideration and any convenient Green Belt site can be allocated for building at will.

I OBJECT to the Strategic Housing Market Assessment SHMA figure of 693 houses per annum in the borough being too high (Appendix D)
• The “objectively assessed need” figure of 693 homes a year is too high.
• A professional review by NMSS has concluded that, even basing the calculations on a period of stronger
economic and student growth, the housing need figure should be revised down to 510 homes a year and the
method changed to consider student housing need separately due to the distorting effects.
• The current SHMA inflates the proposed housing figure due to
  ◦ failure to correct for errors in the historical data for international migration flows,
  ◦ issues with the way it considers students and affordability and
  ◦ flaws in the method for estimating the number of homes needed to support job growth.
• It is unacceptable that demographic and economic model assumptions have been withheld and cannot be checked
making the process unaccountable.

The Plan’s proposed growth is based on the SHMA report. This concludes that 693 homes a year are required by the
borough, it is over double the previous figure of 322 used in previous plans. The SHMA report methodology is I believe
inaccurate; it inflates the needs of the borough by distorted student numbers. However, it is based on commercially
confidential modelling assumptions that cannot be checked or reviewed. There is no transparency to this evidence base and
it is therefore impossible to assess its accuracy. This is not democratic and is not appropriate for consultation of the Plan.

The National Planning Policy Framework allows the overall housing target to be reduced to take account of protected
wildlife areas (e.g. Thames Basin Heath SPA), landscape areas (Surrey Hills AONB), Green Belt, flood risk and significant
infrastructure constraints, all of which apply to Guildford. This local plan and the SHMA number have completely ignored
these factors.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID:  PSLPS16/7385  Respondent:  8818625 / Beth and Frank Fuller  Agent:

Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy A25

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally
Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

POLICY A25 - Gosden Hill Farm

I OBJECT to Policy A25 with proposals for Gosden Hill Farm.

The Green Belt at this point serves the important function of separating West Clandon from the edge of urban Guildford.
Development here will cause the two to coalesce defeating one of the objectives of the Green Belt. If this development
proceeds I believe the narrow strip of Green Belt remaining between Guildford and Clandon at this point will be too
narrow and will come under further pressure.

It will represent an undesirable ribbon development along the A3. It will be highly visible from the A3 when approaching
Guildford and will, in conjunction with A43a at Garlick's Arch give the appearance of almost continuous development from
Send through to Guildford.

The Plan does not put forward any evidence that exceptional circumstances exist to justify removing this site from the
Green Belt.
The development will overburden the local road network and increase congestion on the A3 and A247 through the centre of West Clandon. This is already very heavily used whilst being unsuitable for designation as an A road. In places it is too narrow for two lorries to pass causing them to mount the pavement.

Note the following accident data:

2010 –2014 from Crashmap data

- Clandon Cross Roads Area to Bulls Head - 17 incidents
- Bulls Heads Head to Bennett Way - 8 incidents
- Bennett Way to Highcote Lane - 15 incidents
- Tithebarn Lane to Portsmouth Road Birch Close - 8 incidents

2015

- 21 Oct 2015 – A247 near shell garage - Three vehicles collided causing delays
  Surrey Fire and Rescue deployed.

2016

- 15 April 2016 12 year old boy injured in The Street – A247 closed in both directions
- 28 April 2016 A3 West Clandon London bound between A247 Tythebarns Lane (Burntcommon and M25J10 (Wisley Interchange) congestion on A3 to A3100 Clay Lane Burpham
- 30 6 2016 Motorcyclists with injuries airlifted to hospital  Send Marsh Road

Attempts have been made over many years to reduce traffic, traffic speeds and accident risks through West Clandon, however little has been achieved as the road cannot be widened and SCC is reluctant to impose further speed limits as congestion is already very high.

I object most strongly to the proposal for a link road to bring traffic from the Gosden Hill development to the proposed 4 way junction at Burnt Common. This has the potential to generate large volumes of traffic (including commercial vehicles) on the A247 through West Clandon - a road which is already under traffic stress (see below).

The land in Gosden Hill does exactly what the Greenbelt was designed to achieve. It provides a green buffer between the Guildford Urban Area and West Clandon, gives Burpham a defined green boundary and breathing space and it hides Guildford town from visitors until they pass the off-slip to Burpham.

No exceptional circumstances have been demonstrated for building on this site and therefore it does not comply with paragraphs 87-89 of the NPPF. It stops the sprawl of Guildford town, assists in safeguarding the countryside from encroachment and assists in urban regeneration by encouraging the recycling of derelict and other urban land. All of these are requirements of the NPPF.

The scale of Gosden Hill is out of proportion to West Clandon. It would have four times the amount of housing plus shops, offices/factories, GP surgery, schools. Development on this scale would blight a historic village with a history going back to the doomsday book and beyond.

Gosden Hill is the most obvious location for the north end of an A3 tunnel. It has rising ground and is situated just before the urban area. If it is built on, it will be very difficult to construct a tunnel.

The development will generate in the region of 6,000 vehicles which will pour on to the A3 which is stationary every day during rush hours. The linking of the A3100, B2215 and A247 would channel thousands of cars through the narrow, winding road through West Clandon, a road where large lorries mount the pavement virtually every day and through Send and Ripley which are also severely constrained.

The volume of traffic will greatly increase air pollution which is particularly critical given the proposal to build two schools.
Currently, a two way junction at the site would require vehicles wanting to go north on the A3 to go through Burpham which is grid-locked every day.

Burpham’s sewers are at capacity. Sewage would have to be pumped to Slyfield for processing, a project of enormous cost.

There is inadequate fresh water in Guildford and current supplies could not meet the needs of a development of this size.

Electricity supply is also inadequate and would require a big infrastructure development.

The railway station was rejected by Guildford Borough Council in 1984 because it feared Gosden Hill would become a dormitory estate for London.

The wording of the Local Plan with regard to Gosden Hill is so loose that the developer could virtually do whatever it wants.

The remaining agricultural land between Gosden Hill and West Clandon is so small that it is highly likely to be uneconomic and therefore a prime candidate for further development which would roll the Guildford Urban Area over West Clandon towards East Clandon and Wisley.

If the Strategic Sites are developed, the north of Guildford will deliver 36%, 5,036 houses towards the total of around 14,000. The infrastructures of the existing villages and the A3 will be overwhelmed by the scale of development.

A new on-slip at Burpham would only be 1.8km from the on-slip at Burnt Common which is against Highway England’s requirement of 2km.

Development of the A3 at best will not start until after 2020 and the building of a tunnel, which is only an “aspiration” in the Local Plan, is likely to be many years after. In the meantime given that developers build houses to provide cash-flow for infrastructure, Gosden Hill will have a crippling effect on villages like West Clandon and the A3.

Gosden Hill already has surface water problems. Merrow Stream crosses the site. No hydrological survey has been carried out to assess the implications. Electricity pylons run through the centre of Gosden Hill which have health and safety issues.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** PSLPS16/7386  **Respondent:** 8818625 / Beth and Frank Fuller  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A43

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ()**

I OBJECT to Policy A43 and A43a on Garlick’s Arch.

The site was only inserted in the draft plan at a late stage just before publication of the consultation draft which is a shabby way for the Council to proceed. The site is not a sustainable site being far from any infrastructure facilities and transport links. The bus service is infrequent and it is almost certain any future residents will rely almost entirely on cars for journeys. Similarly any employees at the employment areas will almost undoubtedly arrive and leave by car.

The site is susceptible to flooding and will not make a suitable site.
The Green Belt at this point serves the important function of separating West Clandon from Send. Building here will cause the two to coalesce defeating one of the objectives of the Green Belt.

I have seen no evidence that exceptional circumstances exist to justify removing this site from the Green Belt or that this important issue has been addressed. The Green Belt and Countryside study did not even consider this site.

It is understood the Council's eyes may have been turned by the possibility of receiving for free the land which might be used for new A3 slip roads in return for allowing this development, thus justifying it as some form of enabling development. However the slip road land if needed could be safeguarded in the plan and acquired by compulsory purchase when required. Lack of current funding for the slip road is not a justification for allowing the development of this site. If the slip road is genuinely needed then government funding will be available for it. (One of the reasons for turning down the so called enabling development proposal intended to fund the rebuilding of the Howard of Effingham School was that the redevelopment of the school was not essential. As and when it became essential Government funding would become available. Accordingly enabling development was not necessary. The same principle applies here.)

The A247 running south past this site through the centre of West Clandon is already very heavily used whilst being unsuitable for designation as an A road. In places it is too narrow for two lorries to pass causing them to mount the pavement often at speed. It has narrow bends with poor sight lines, an infants school and a hump-backed bridge concealing the entrance road to the station for southward traffic. In addition, there are no continuous footpaths which forces pedestrians to cross and re-cross the road. Development at Garlick’s Arch will only exacerbate the problem and make the road even more congested and unsafe for pedestrians.

The development will cause harm to the ancient woodland on and by the site.

Taken together with the Gosden Hill site, there will be a ribbon of development along the A3 in contrast to the current "soft" edge approach to Guildford.

Garlick’s Arch has previously been protected from development as Green Belt. Under the Plan it is proposed that the site will be developed for approximately 400 homes (C3) and up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8). There are no exceptional circumstances which allow for the removal of this land from the Green Belt (Policy P2).

The Plan states the preference is to making the best use of previously developed land. Yet at the 11th hour a perfectly acceptable brown field site at Burnt Common, capable of accommodating approximately 100 houses, was removed from the Plan and replaced with the Garlick’s Arch site. There was no proper consultation in relation to the inclusion of this site. Why was a brownfield site removed and replaced with a Greenfield site? There is no evidence that Section 18 of the Planning and Compulsory Purchase Act 2004, which requires local planning authorities to produce a Statement of Community Involvement, has been complied with for this site. This only came to light for local residents following a Council meeting on 11th May 2016.

Moreover, Guildford Borough Council’s own Green Belt & Countryside Report does not address Garlick’s Arch at all, so there is no evidence base to support the inclusion of this site.

National Planning Policy promotes sustainable developments, with sustainable transport. With ever reducing bus services in the area and no train station within reasonable walking distance it is impossible for any development on this site to offer a sustainable transport solution. Development on this site is wholly inappropriate (Policy I3).

The stream, which runs through the site, is identified as having a high risk of flooding by the Environment Agency. There are other sites that do not flood that can be developed and therefore this site should be removed from the Plan (Policy P4).

This site is bordered by Ancient Woodland and within it a number of trees are protected by Tree Preservation Orders (Policy D3).

The site has an abundance of wildlife, some of which are protected. It is home to many types of owls and bats, with the woods having cuckoos and woodpeckers. In addition there are regular sightings of badgers, deer and red kites. The development of the site will result in the loss of habitat. No wildlife report has been conducted on the site. (Policy I4)
It is clear that with this site being added at the 11th hours no infrastructure planning has been undertaken. The Infrastructure Schedule makes no provision for any infrastructure improvements for this site. How will the local services such as schools and doctors cope, many of which are already at capacity? (Policy I1)

Furthermore, several electricity pylon runs through the site, which will have the potential to be a health hazard for any residents.

I OBJECT to the inclusion of the land for new on/off ramps at Burnt Common (A43a)

The addition north facing ramps to the A3 at Burnt Common would be a disaster for local communities. There is no requirement for local traffic to access the A3 to the north, but the addition will draw in a huge amount of ‘through’ traffic.

The route from London/M25 to Woking or would now be through Burnt Common and Send. Equally traffic from the east of Guildford (Merrow etc) and the A25 will now go through West Clandon and Burnt Common. This will cause immense damage to those areas on small roads which cannot be improved.

This Plan does not address the needs of local communities or the Borough in this regard. There has again been no Section 18 consultation on this.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16442  Respondent: 8818625 / Beth and Frank Fuller  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the damage to the historic environment as a result of the scale of the proposed development (Policy D3)

I OBJECT to the local plan based on the impact it will have on the special countryside of the borough.

The proposed development at Garlick’s Arch (A43) will have a permanent impact on the character of the Ancient Woodland that surrounds the site on two sides and runs centrally through the site, which includes over 80 ancient oak trees.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16449  Respondent: 8818625 / Beth and Frank Fuller  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3

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<tbody>
<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D3</td>
<td>I OBJECT to Policy D3 - Historic environment</td>
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<tr>
<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td>I object to this policy as it is very weak and I do not think it is clear enough in its support for the conservation of the historic environment. It provides for development which will “enhance” heritage assets which I fear is a developer’s charter as it leaves plenty of room for abuse.</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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<tr>
<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy D4</td>
<td>I OBJECT to Policy D4 - Development in urban areas and inset villages</td>
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<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
<td>The policy should place much greater emphasis on residential development in the existing urban centres. In this way housing needs can be met without resorting to large developments in the Green Belt. There are urban areas in need of regeneration but these are ignored in favour of Green Belt development.</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
<td>The policy should not be applied to the villages which should remain in the Green Belt. Unrestricted application of this policy to the villages intended to be inset will change their characters radically and for the worse. The development it encourages will increase traffic and congestion disproportionately.</td>
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<td>What changes (2016)/further amendments (2017) do you suggest should be made to the document?</td>
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I OBJECT to the sustainable employment policy (Policy E1)

I object to the inclusion of a strategic employment site at Gosden Hill Farm. Employment sites should be concentrated on previously developed land in more sustainable locations with good transport links where the infrastructure can support development. Warehousing, distribution and industrial premises cause considerable commercial traffic, noise, pollution and general disruption. They are not good neighbours for schools and 2000 houses. Many of the jobs will be taken by people outside the area leading to additional congestion in Burpham and on the A3.

I object to the inclusion of a strategic employment site at Garlick’s Arch. It is in a non-sustainable location remote from any facilities of any kind and with poor public transport links. It is unlikely jobs there will be taken by local residents and it is likely all travel to and from work will be by car adding to local congestion. Employment sites should be concentrated on previously developed land in more sustainable location with good transport links where the infrastructure can support development.

The site is in any event subject to frequent flooding and unsuitable for development.

If developed, the new employment site at Garlick’s Arch, Send Marsh/Burnt Common (A43), would be treated as a Strategic Employment Site.

The proposed development of up to 7,000 sq m of either or a mix of light industrial (B1c), general industrial (B2) and storage and distribution (B8) at Garlick’s Arch (A43) is in the scheme of industrial development relatively small. Just to the south of the site at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m. The Garlick’s Arch site which is in the Green Belt should not be developed as a Strategic Employment Site when there is a suitable alternative brownfield site very close by, which is far more sustainable.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16440  Respondent: 8818625 / Beth and Frank Fuller  Agent:  
Document:  Proposed Submission Local Plan: strategy and sites 2016 / Policy E2  
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )  
Answer (if comment is on questions 1-7 of the questionnaire): ()  

I OBJECT to the location for new employment floorspace (Policy E2)

I object to this policy. It would be more sensible to confine new office and research and development floor space to the urban Guildford area. I also oppose the policy of expanding the Research Park onto Blackwell Farm. No exceptional circumstances, as defined under the NPPF, have been advanced to justify incursion into this permanent and high-quality area of Green Belt.

Proposals for new industrial, warehousing and storage (use Class B1c, B2 and B8) floorspace will be directed to the Industrial Strategic Employment Sites.

There is no need for the new employment floorspace to be located at Garlick’s Arch or Gosden Hill Farm, when near to these sites at Burnt Common there is an existing industrial development, with ample surplus land that could accommodate a further development of 7,000 sq m.
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: PSLPP16/16441</th>
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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E5</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to the loss of rural employment (Policy E5)

Policy E5 supports the retention and development of local services and community facilities in our inset and identified villages. Yet the development at Garlick’s Arch (A43) would result in the loss of four existing successful rural businesses, which have been in existence for over 30 years and another two businesses for over 9 years. These businesses employ dozens of people; none of them want to leave their premises. The Plan does not promote rural employment; rather it will result in the loss of existing local rural businesses.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E6</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy H3 – Rural Exception Homes as this Trojan horse policy. It says that homes can be built anywhere near a settlement of any form (including agricultural land and the AONB). These homes are meant for people with a village connection, but they could be for anyone on the Guildford borough housing list. To make the housing viable, or to improve the “mix” this can include “market” housing (i.e. normal commercial development which in Guildford usually means large executive homes). This policy means building anywhere, and ignoring all historic planning restrictions.

The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove “exceptional circumstances.”

The wording of the policy is far too wide and drives a coach and horses though all other aspects of planning policy. As drafted the planning authority could be obliged to grant permission for inappropriate and unsuitable developments.
The wording provides no ability to balance the desirability of the development against other considerations including harm to the Green Belt or the AONB. (If the housing would meet identified need and adjoins a settlement under this policy wording permission would have to be granted even in the most sensitive AONB location, even if more suitable locations were available.) The policy should include the need for a balancing exercise including consideration whether more suitable locations exist.

The policy wording should not allow market housing. The ability to include market housing is likely to inflate land values, leading to a self-perpetuating need to include market housing. It may lead to spurious developer led proposals which will be difficult to resist.

The policy wording should define small, either in land size or number of units. I am concerned that if small is left undefined the policy could be used to justify significant developments. In the context of the plan a development of 150 homes might be argued as small. (If Wisley at 2,500 homes is a big development then 500 homes might be a medium development and 150 could be small.)

The policy wording should be restricted to adjoining sites or define the concept of being "closely related". In particular I believe adding the concept of safe and easy walking distance extends the potential radius within which sites will be argued to be “closely related” Many people would regard a mile or so as an easy walking distance. (School children are expected to walk further than that before being eligible for free school travel.)

The wording of the policy itself does not require the local connection requirement for tenants to be secured in perpetuity - only the affordability must be secured in perpetuity. (For example housing could be built for retired Cabinet Ministers under this policy so long as the first tenant was required to have a local connection.) The introduction to the policy mentions this point, but it is not part of the policy itself and may carry little weight at appeal.

The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove “exceptional circumstances.” The size and location of sites should be better defined and it should be clear market housing cannot be included.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Comment ID: PSLPP16/16448  Respondent: 8818625 / Beth and Frank Fuller  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy E7

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy E7 Guildford Town Centre

The policy “vision” describes protecting the Guildford’s unique setting and historical character and sets out some of the ways this will be done. However none of this is included in the formal Policy wording in the blue box. I suspect the Vision wording is effectively of little or any force. These principles should be included in the formal policy.

There should be a much greater focus on residential use of the town centre where many people would like to live and where the necessary amenities and infrastructure exist. The policy misses the opportunity to propose forward looking sustainable residential development plans in, for example the Walnut Tree Close area, where very significant numbers of new homes
could be provided. Such town centre sites could meet much of the housing need over the plan period without harming the
countryside.

There is an urgent need for a strategy to focus on brownfield redevelopment before considering development outside the
existing urban area.

The policy does not address any of the major issues raised by the Council’s own Town Centre Master Plan, the Guildford
Vision Group’s proposal for new river and rail crossings or plans for the redevelopment of Guildford Station, all of which
are already the subject of public discussion.

The policy also fails to provide guidance on design requirements, as required by the NPPF.

The policy and surrounding text concentrates too much on shopping without regard to its nature which risks a proliferation
of dull high-street chain stores. The policy should seek to enhance Guildford’s character and encourage a wider variety of
small shops including locally owned businesses and shops of use to consumers. (For example there is no butcher in
Guildford.)

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16446  Respondent:  8818625 / Beth and Frank Fuller  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally
Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to Policy H1 – Homes for all. Numbers aside, all the policy in the blue box says is that the Council will
encourage building over the plan period. It fails to set rules on important issues such as constraints and density, and is not
specific enough to provide a practical framework for planning decisions.

The housing mix is based on out-of-date, pre-Brexit projections and on assumptions set out in a flawed SHMA that has not
been scrutinised or evaluated.

I support higher density development in the urban area, without resorting to dehumanising, high-rise buildings that
developers commonly claim are necessary for financial viability. Much of Guildford town could usefully be regenerated
with 4-5 storey blocks with landscaping and underground parking, as often seen on the Continent and, recently, in London.

Student accommodation should provided for 100% of new students and more than 60% of existing students, which would
free up ideal family accommodation in the urban area. Other university cities (e.g. Oxford) insist on higher percentages
than those proposed in the plan. In my view, the Council’s timidity is a case of “regulatory capture” by Surrey University,
which has failed to use its existing planning permissions (dating from 2004) to accommodate 3,000 students or to improve
the efficient development of its campus (e.g. by building on its extensive and under-used surface car parks). If all students
Ire accommodated in this way, 2,000 homes would be freed up in town and there would be no need to build on the Hog’s
Back.

It is not appropriate to release Green Belt land to house students who could be accommodated on the Surrey campus or
other university sites. The plan should take account of the university's ability to house its own students and reduce the
housing number accordingly.
Guildford borough has already a higher proportion of traveller sites than most comparable boroughs. Over-provision is inappropriate given other constraints.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to this policy on affordable homes (Policy H2) on the grounds of feasibility and that it should be more firm and explicit on unviability in paragraph 4.2.40.

In particular a scheme is only unviable if the value of developing the land (including some allowance for development risk and a normal level of profit) falls below the sale vale of the land for alternative non-premium uses such as agriculture. The price paid for the land is not relevant. The possibility of avoiding the affordable housing obligation through use of unviability arguments only serves to inflate land values. It will become clear that developments are unviable when developers start selling land for alternative non-development uses.

It should be noted in the plan that because of Guildford's relative popularity as a place to live combined with its location close to others towns and within the London Commuter belt no amount of building will meet demand. Similarly no amount of affordable housing will ever meet demand.

In addition the definition of an ‘affordable home’ is 80% of market value. With even a 2 bedroom flat in Guildford now having a market value of +£360,000 the discounted price is still not going to be affordable to anyone on a normal income.

And at what point will ‘affordable homes’ be able to go onto the market at full market price?

As we have seen with council houses it is not long before the discounted property is sold at full market value with the original owner simply pocketing the profit.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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The blue-box policy wording needs explicitly to limit rural exception to cases of demonstrable, unfilled, local need that cannot otherwise be met. It also needs to make it clear that the NPPF (especially paragraphs 87-89) fully applies, including the need to prove “exceptional circumstances.”

The wording of the policy is far too wide and drives a coach and horses though all other aspects of planning policy. As drafted the planning authority could be obliged to grant permission for inappropriate and unsuitable developments.

The wording provides no ability to balance the desirability of the development against other considerations including harm to the Green Belt or the AONB. (If the housing would meet identified need and adjoins a settlement under this policy wording permission would have to be granted even in the most sensitive AONB location, even if more suitable locations are available.) The policy should include the need for a balancing exercise including consideration whether more suitable locations exist.

The policy wording should not allow market housing. The ability to include market housing is likely to inflate land values, leading to a self-perpetuating need to include market housing. It may lead to spurious developer led proposals which will be difficult to resist.

The policy wording should define small, either in land size or number of units. I am concerned that if small is left undefined the policy could be used to justify significant developments. In the context of the plan a development of 150 homes might be argued as small. (If Wisley at 2,500 homes is a big development then 500 homes might be a medium development and 150 could be small.)

The policy wording should be restricted to adjoining sites or define the concept of being "closely related". In particular I believe adding the concept of safe and easy walking distance extends the potential radius within which sites will be argued to be “closely related” Many people would regard a mile or so as an easy walking distance. (School children are expected to walk further than that before being eligible for free school travel.)

The wording of the policy itself does not require the local connection requirement for tenants to be secured in perpetuity - only the affordability must be secured in perpetuity. (For example housing could be built for retired Cabinet Ministers under this policy so long as the first tenant was required to have a local connection.) The introduction to the policy mentions this point, but it is not part of the policy itself and may carry little weight at appeal.

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<td>Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )
I OBJECT, due to the congestion that development will cause to the local village roads and the lack of road infrastructure (Policy I1)

Our villages are already suffering from severe congestion for much of the day, for example the Newark Road & Rose Lane junction in the centre of Ripley and the A247 through West Clandon. The proposed development under the plan will cause greater congestion in and around our villages. The Plan does not provide an achievable strategy for improving capacity on these local roads.

Furthermore, many of the country lanes around the villages of Ripley, Send and Clandon are narrow and wide enough for only one vehicle at a time. In addition, the road surfaces are in a poor condition.

I OBJECT to the development proposed in the local plan, which will result in more traffic using these narrow roads and a further deterioration in the road surfaces.

Many of the affected villages, such as West Clandon, already suffer from traffic congestion. Further development around these villages will only result in more traffic and more parking problems.

With some 5,000 houses being proposed close to the village of Ripley, the roads serving the village will become even more congested. Cycling has become an ever popular past time, particularly at weekends hundreds of cyclists past through the villages on the way to the Surrey Hills. With no proper cycle lanes on the narrow local roads surrounding the village and with greater vehicle traffic being generated from these developments there is a real danger that there will be an increase in road accidents involving cyclists as a result of the development proposed under the local plan.

The narrow rural roads do not have proper pedestrian footpaths. The proposed significant levels of development will result in the road becoming ever more dangerous for pedestrians.

The council has a statutory obligation to protect the public and the additional traffic flows will bring added accidents, noise, pollution and injury of the public. In the case of West Clandon the Street often only has a narrow footpath on one side of the road making it very dangerous, especially when vehicles mount the pavements.

This policy as it is inappropriate and inadequate and fails to respond to the challenges raised by the proposed significant Green belt developments. The borough’s infrastructure is already heavily strained. However the plan’s determination to build large housing estates across the Guildford countryside significantly increases the need for infrastructure investment without securing the means for its provision. Placing housing in the established urban areas would reduce the need for enhanced infrastructure as would a more realistic housing number.

The policy wording says nothing about roads and traffic. The Council’s methodology for assessing traffic congestion - averaging it over periods of several hours and ignoring the effects of junctions - simply hides the problem, which will get worse as development proceeds. The schemes referred to in this policy will not solve existing congestion and the local road network has not been given sufficient consideration. Some proposed development locations would require highway schemes that are unlikely ever to happen.

Adequate infrastructure provision is a pre-condition of sustainable development. But in this plan it is an afterthought buried away in Policy I1. By prioritizing greenfield over urban, brownfield regeneration, the plan creates insurmountable (and unnecessary) obstacles for itself. Common sense suggests a local plan should first assess the borough’s infrastructure capacity for sustainable development, and then tailor development accordingly. This plan, however, assumes infrastructure will follow on the heels of housebuilding as if by magic. It makes implementation critically dependent on providers outside the Council’s control and on the vagaries of CIL income. Instead of recognizing this as a key constraint, the plan is based on hope. It is also highly likely that developers faced with the imposition of large infrastructure requirements will go to court to invoke the NPPF provision that prevents authorities from imposing conditions that make a development non-viable.
Policy I1 requires the delivery of improvements to infrastructure in conjunction with development. I have grave concerns over the planning of the infrastructure requirements and that the projects identified will be implemented when required, if at all.

Despite the Garlick’s Arch site (A43) being a significant site for development, no infrastructure projects have been identified in the Infrastructure Schedule. Without improvements to the infrastructure prior to development, the existing residents’ in the locality will see their quality of life significantly deteriorate in many ways.

Many of the utilities in the Ripley and Send area are at, or very close to capacity, such as the electrical network and sewers. No plans to improve these services should mean no development of the Garlick’s Arch site.

Without proper planning and a commitment to fund new healthcare facilities, existing services such as the Villages Medical Centre, Send will have their services stretched and overwhelmed. Many of these services are already at capacity and suffering from funding cuts or freezes. Any further development without funding will place further stress upon existing health services.

Police services are seeing funding reduced. The development of the proposed 13,860 homes during the plan period will stretch the police services further and is unsustainable.

There is no provision of the increased capacity of Guildford hospital, where is this assessed and remedied?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16445  Respondent: 8818625 / Beth and Frank Fuller  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to poor air quality concerns (Policy I3)

Paragraph 4.6.27 of the Plan states that “Development must also mitigate its traffic impacts, including its environmental impacts and impacts on amenity and health.” The significant level of development being proposed, particularly in the north east of the borough will lead to considerable further congestion, despite any attempts to mitigate this through travel plans. This will be particularly acute in built up residential areas and will only lead to greater levels of air pollution, which will have a detrimental effect on local residents and their health and can result in early death.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16434  Respondent: 8818625 / Beth and Frank Fuller  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT in the strongest possible terms to the Guildford Borough Proposed Submission Local Plan (June 2016). This Plan is unsustainable, unworkable and, in many provisions, unnecessary.

I set out below my objections to specific policies and matters within the Plan.

To summarise my personal key objection, firstly, the Green Belt. What is the point of a Green Belt if its status can be significantly changed by a local group? We, as a generation, (and I am in my sixties) are always being accused of ruining the future for the following generation. To remove Green Belt status and to build on it is a serious issue – let us not make a big mistake which can never be undone. I OBJECT to any significant alteration to the Green Belt.

I OBJECT to not protecting the Green Belt (Policy P2)
This policy does not sufficiently safeguard the Green Belt even though Green Belt constitutes 89% of the borough and should be the cornerstone of all local planning policy. The Green Belt is not the Council’s to give away and once it is gone it is gone forever. Sacrificing areas of the Green Belt to a developer influenced growth agenda is a betrayal of future generations and does not constitute sustainable development.

The Green Belt should be protected in perpetuity, but Policy P2 seeks to justify excessive development in supposedly protected areas. This is in breach of party manifesto commitments and contrary to previous responses to public consultation. It is disreputable to argue, as the Council does, that the Plan would involve the loss of “only” 1.6% of the borough’s Green Belt. Leaving aside the reliability of that statistic, the NPPF does not set an “acceptable” percentage. The fact remains that the plan proposes that 65% of the housing plus industrial development be built on land to be taken out of the Green Belt.

Paragraph 4.3.16 is seriously deficient in simply stating that the Council considers that exceptional circumstances exist to justify amendment of Green Belt boundaries. The exceptional circumstances are not identified. It is clear from national guidance that unmet housing need is not on its own an exceptional circumstance. Even to the extent that exceptional circumstances exist, these have to be balanced against the harm to the Green Belt in the specific sites proposed to be taken out of the Green Belt. This balancing exercise appears not to have been done.

The Countryside Study which the Council may argue fulfilled the need to demonstrate the exceptional circumstances required to justify removal of areas from the Green Belt was a simplistic tick box exercise. Within limits it may have answered certain questions about different attributes of different areas of Green Belt but it did not carry out the balancing exercise needed to determine whether specific exceptional circumstances justified removal of specific areas of land from the Green Belt. I believe that each of the identified Green Belt site proposed to be removed from the Green Belt should be carefully assessed against any exceptional circumstances in deciding whether it should be removed from the Green Belt in the final plan. This exercise should bear in mind that housing need in itself is not an exceptional circumstance and nor is the Council’s growth aspiration. An important consideration is that more housing need could be met on urban sites than is currently planned. The Plan has fallen into the developers’ hands and developers prefer building on undeveloped land rather than brown field sites.

I note that the Summer 2016 edition of "About Guildford" (published by the Council) on page 5 states that "... the Plan rejects any schemes that would have a detrimental impact on the Green Belt." This is demonstrably untrue and I consider this to be a deliberate untruth which compromises the consultation process. I would ask that this untruth be corrected and the consultation period restarted after the correction has been given the same distribution as the original statement. (I assume the document was delivered to most houses in the Borough.) I reserve the right to argue before the inspector that the consultation process was flawed and ineffective because of this.

I object to the “insetting” of 14 villages from the Green Belt. Contrary to assertions made in the Plan process many of these villages do contribute to the openness of the Green Belt and there is no need to inset them.

I also object to the wholesale extensions to the settlement boundaries in many villages to allow for infilling and that infilling is also proposed outside the settlement boundaries of 11 further villages. Many Guildford villages are linear. It is all too easy to square off boundaries by including countryside bounded on only one or two sides by existing development, claiming it contributes nothing to the “openness” of the Green Belt, a term which neither the plan nor the NPPF defines. The NPPF’s other 4 tests of Green Belt status, including the prevention of urban sprawl, are ignored. Effectively, this policy makes all villages within the Green Belt vulnerable to large blocks of new development and seems almost calculated to secure the rejection of the plan as a whole.

To “inset” two-thirds of the borough’s rural villages on the grounds that they no longer contribute to the purposes of the Green Belt is extreme and inherently implausible, given the borough’s location on the edge of Metropolitan London. I cannot see how such extensive areas fail to contribute to the purposes of the Green Belt under the NPPF, but this could quickly be the case if the proposed “insetting” and boundary extensions go ahead.

This policy is wildly disproportionate in terms of any foreseeable development need and has caused tidal waves of opposition from residents. It flies in the face of NPPF paragraph 17’s aim of “empowering local people to shape their surroundings” and other NPPF provisions.
Paragraph 4.3.17 states that “the general extent of the Green Belt has been retained.” I believe this should be deleted as an untruth.

In addition I OBJECT to the proposals to remove from the Green Belt the so called ‘strategic sites’ of Wisley Airfield (A35), Gosden Hill Farm (A25) and Garlick’s Arch (A43) and all other strategic sites. National Planning Policy requires there to be an exceptional circumstance for the Green Belt boundaries to be altered, or the development on Green Belt. There are no exceptional circumstances for these sites and villages (as mere housing need does not constitute a ‘special circumstance’) to be taken from the Green Belt. Once taken from the green belt they will be lost forever.

There is a real danger that the loss of this Green Belt will result in urban sprawl and these neighbouring villages merging into one another. The significant development in these villages will result in the character of these villages being lost and the countryside encroached.

GBC’s Green Belt & Countryside Report does not address Garlick’s Arch, so there is no evidence base to support including this site.

Rather than developing Garlick’s Arch, there is an existing brownfield site just to the south of the site at Burnt Common, with surplus land that could accommodate a further development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Respondent:</th>
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<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy P2</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to all strategic sites proposed in the draft Plan to be built in the Green Belt.

1. I object to the identification and allocation of sites in this plan without regard to Green Belt, infrastructure or other constraints. **The plan says that “allocating these sites does not grant planning permission for development.”** However, each of the sites will be removed from the Green Belt and will be available in principle for development and non-Green Belt uses. The inclusion of these sites without detailed site by site justification shows contempt for the thousands of detailed comments the Council have received about individual sites ever since the Issues and Options consultation in 2013. The plan has hardly changed since the Council received 20,000 objections to its first draft plan in 2014. The Inspector considering the plan may conclude that the consultation has not been properly conducted.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy P4</td>
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I OBJECT to development in areas which are at risk of flooding (Policy P4)

National Planning Policy states that Local Plans should take account of climate change over the longer term, including factors such as flood risk. It goes on to say that new development should be planned to avoid increased vulnerability to the range of impacts arising from climate change.

The Plan states that in accordance with national planning practice guidance, the Level 1 SFRA has been used to guide development towards areas at the lowest risk of flooding and identify areas unsuitable for development. However, the document concludes that land outside of the area of flood risk is not capable of accommodating all of the borough’s identified development needs. A Level 2 SFRA has therefore also been produced and will help the Council apply the exceptions test (as described in the NPPG) as necessary to development proposals in areas at risk of flooding.

The site at Garlick’s Arch (A43) is identified on the Environment Agency’s flood map as being in a flood Zone 3 from a river. This means that it has a 1 in 100 or greater chance of flooding each year, the highest risk category. Despite this flood risk, the site has been assessed as part of the Council’s SFRA as a Flood Zone 2 - having between a 1% and 0.1% annual probability of river flooding. Knowing the area well I am aware that this site often floods during the winter months and the flooding is made worse by the soil being heavy clay. Clearly the SFRA is not fit for purpose and it needs to be re-commissioned to accurately reflect the actual flooding risks of each site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/16436  Respondent: 8818625 / Beth and Frank Fuller  Agent:  
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I OBJECT to this Policy as the development proposed will not be sustainable (Policy S1)

The NPPF states that the presumption in favour of sustainable development “should be seen as a golden thread running through both plan-making and decision-taking.” As the first policy in the Plan, Policy S1 ought to set a clear framework. Instead, no definition of “sustainable development” is given. The policy also fails to set out any principles for applying sustainable development in practice to local planning decisions, which often have serious long-term impacts.

The policy states that it aims “to secure development that secures the economic, social and environmental conditions in the area”. This fails to recognize that economic growth, social justice and environmental protection often conflict. The policy does not say how each element is to be weighted or conflicts resolved. As a practical guide to the planning decision to be taken in the Plan period it is seriously deficient. The policy is likely to be used by developers to justify inappropriate developments on economic grounds. Under this policy, virtually any development will qualify as “sustainable”, in breach of the NPPF’s most important guideline.
Policy S1 is also seriously deficient in making no mention of the Green Belt. The Green Belt is a long term Government policy enshrined in primary legislation to protect green areas in perpetuity. The Green Belt is a living example of sustainable development in practice and is one of the most important factors affecting sustainable development in the area covered by the Plan and should be acknowledged in this policy. Policy S1 should include a commitment to protect the Green Belt from inappropriate development and to uphold Green Belt boundaries and protections. This would set at least one clear boundary to planning decisions. The Plan and the Council have treated the Green Belt as a developable land bank rather than as a constraint to development.

The commitment to approve planning applications “wherever possible” and “without delay” reveals the pro-development bias of the plan. Countervailing references to sustainability are so vague that the NPPF presumption in favour of sustainable development becomes a presumption in favour of any development at all.

This policy also ignores, as if they are inconvenient constraints, most of the 12 Core Planning Principles set out in NPPF paragraph 17.

The purpose of the planning system is to contribute to the achievement of sustainable development, as stated by National Planning Policy.

The development of 13,860 homes during the Plan period is not sustainable. It will have a permanently detrimental impact existing local communities by over-development, particularly for the villages between Guildford and the M25, including Ripley, Send and West Clandon. The services in these villages will be unable to cope with the level of development proposed. The proposed developments do not meet the needs of the local communities.

The strategic sites of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill Farm (A25) are in unsustainable locations. The former two sites do not benefit from railway stations within easy walking distance and bus services across rural villages are forever reducing. Residents will have few options, but to be reliant on motor vehicles. These sites are also unsuitable due to being unable to access sustainable transport. Furthermore, there are no plans to improve the infrastructure for Garlick's Arch in the Infrastructure Plan. Residents will be reliant on the car for transport. Greater consideration should be given to increasing the density of development in urban areas, such as Guildford, where more practical sustainable transport options can be provided.

The A3, M25 and the roads through the villages of Ripley, Send and Clandon already suffer from congestion. Further vehicle movements will result in even more acute congestion and greater pollution. Residents and the environment will suffer as a result.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I OBJECT to the Borough Wide Strategy (Policy S2)

The borough wide strategy is poorly considered. It proposes 13,860 housing being developed across the borough and does not apply any constraints to reduce the overall housing figure, which would be very reasonable and sensible. This approach differs from all the other Borough Councils in Surrey.

The housing number is based on pre-Brexit data for economic and population growth, including migration. These now need to be revised downwards, possibly quite seriously.

The housing number is based on an arbitrary Housing Market Area (HMA): the “West Surrey” tri-borough area of Guildford, Woking and Waverley. An HMA should be an area within which a majority of people live, work, shop or study. On any common sense view, “West Surrey” is much too small. Half of Guildford borough’s residents work elsewhere, and half who work here live outside the borough. A short, half-hour commute puts the borough within reach of Surbiton to the North, Haslemere to the South, Reigate to the East and Basingstoke to the West; but all lie well outside “West Surrey”. Puzzlingly, the adjacent district of Rushmoor, minutes from Guildford town centre, is outside the HMA. It is no justification to say that the tri-borough area has been used in the past, or that a similar approach is used elsewhere; unlike (say) Carlisle, Norwich or Shrewsbury, Guildford is in the London commuter belt and part of a far wider and more complex housing market.

These concerns have been raised since 2014 but the Council has failed to seek better market data. There was no public consultation on the SHMA and Councillors were not allowed to scrutinise it. The absence of a ready alternative, however, does not make “West Surrey” reliable. The area is artificial, and so therefore are the housing numbers derived from it. For instance, by juxtaposing Guildford with Woking it appears that Guildford residents are being asked to build homes on open countryside to meet its bigger, urban neighbour’s “need”. Guildford wants to build 7 sites of over 500 units, compared with only 4 across Surrey’s 10 other districts, and 26 sites over 100 units, compared with 53 across the rest of the county. This distribution is unbalanced.

The assumptions and calculations in the SHMA are widely regarded as flawed and even before Brexit, produced an inflated housing needs number. The figure of 13,860 new homes is completely unsubstantiated. It has not been scrutinized by Councillors despite repeated requests for debate. The assumptions and calculations underlying the model are hidden, protected by a claim to intellectual property by a commercial sub-contractor used in preparing the SHMA. I have serious doubts about the objectivity of the SHMA because it has been produced by consultants whose website openly proclaims their pro-development agenda leading to reasonable suspicion that the figures are inflated. Guildford’s OAN is not transparent but has been taken on trust by the authors of the plan. Given that almost every element of the plan is predicated on this OAN, the plan as a whole cannot be considered “sound”.

The status of the 13,860 figure is ambiguous. The Council has said that the housing number and the OAN are identical because the OAN is “deliverable” and is by definition objective and cannot be contradicted. The OAN is only deliverable because of the Council’s cavalier approach to the Green Belt in contravention of the NPPF, ministerial statements and local and national Conservative Party manifesto commitments. The plan also states that infrastructure or other constraints may in due course affect deliverability. It is also unlikely that the number of houses can be built at the rate proposed. In recent years, housing starts have on average been less than half the proposed rate. This is not because developers do not have the land or cannot get planning permission. Constraints in the supply chain and maintaining profit levels have been more important.

The plan cannot be considered “deliverable”. In addition, the number of homes proposed, plus existing planning permissions, plus expected “windfall” sites, exceeds the total of 13,860. So how many homes (taking account of these adjustments) do the Council want built? The plan does not say. Without this figure it is hard to see how anything else can be planned. This undermines the validity of the whole consultation. It is unreasonable to ask the public to approve a “plan” that fails to propose a target number that takes all the standard constraints and adjustments realistically into account, leaving the Council to set one without further consultation. Even if the OAN is not flawed, it is at best only a baseline figure and should not be passed off as a policy proposal.

It is unreasonable to embark on a radical transformation of the borough on the basis of an unclear housing target. Most of Guildford Borough is highly protected from development (89% Green Belt, 44% AONB and about 75% protected by SPA). Whether or not increasing the number of dwellings by up to a quarter is desirable, it would be a major and irreversible
change, arguably turning a largely rural borough into a mainly urban or suburban one like Woking. The scale of the housing number increases the onus for it to be seen to be sound. A substantially lower number, on the other hand, would remove the need to build on Green Belt or open countryside, and instantly meet the single biggest public objection to the plan as a whole.

The Plan in general and this policy in particular does not address the point that Guildford exists as part of London's commuter belt. Any increase in supply of housing in Guildford, particularly if the increase is proportionately greater than elsewhere in the commuter belt, will simply result in a shift of population into the area. It will not reduce prices or increase availability except imperceptibly. The Plan also ignores the point that many of those working in the area live elsewhere. Accordingly in considering the housing number the Plan should take into account that in this part of London’s commuter belt, demand for housing is, in practical terms, unlimited.

This policy does not take proper accounts of the constraints to development which exist, principally posed by the Green Belt and by infrastructure limitations. I believe the Council is under a duty to properly consider applying these constraints. It is clear the Council has failed to do this. This approach differs from all the other boroughs in Surrey. The Plan appears to have deliberately been manipulated towards a growth agenda without disclosing why this is being done. The housing that is needed should be concentrated on urban brown field sites and through increasing the housing density of existing built up urban areas.

The development of 13,860 homes in the Plan period with 65% in the Green Belt does not constitute sustainable development. It will have a permanently detrimental impact on the Borough in general and on West Clandon and surrounding area in particular. The developments at Garlick’s Arch and Gosden Hill Farm do not meet the needs of the local communities. The road infrastructure in and around West Clandon will be unable to cope with additional demand. The edge of urban Guildford will creep that much closer to West Clandon, thus negating the purposes of the Green Belt in the area which include safeguarding the countryside from encroachment, checking the unrestricted sprawl of large built up areas and preventing neighboring towns merging into one another.

It is clear that the strategy adopted in the Plan is out of balance, with disproportionate development in the north east of the borough resulting from the allocation Wisley Airfield (A35), Garlick’s Arch (Ripley/Send border) (A43) and Gosden Hill Farm (Clandon) (A25) as major residential sites. The allocation of sites in the Plan will result in 36% of all new housing being located in the three Wards of Lovelace, Send and Clandon & Horsley. Whilst at present these three Wards represent only about 11% of the existing housing in the borough, they are very much rural Wards. Some 5,036 houses are being allocated between the M25 and Burpham, a distance of only about 5 miles. It will result coalescence and a merging of identities of the surrounding villages. The Plan is completely unbalanced and does not reflect the current spread of housing across the borough.

The proposed development of Wisley Airfield (A35), Garlick’s Arch (A43) and Gosden Hill (A25) will have a disproportionate impact on the surrounding local villages. They will have a permanently detrimental impact on each of these communities.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

|Comment ID:  | SQLP16/1819 | Respondent: | 8818625 / Beth and Frank Fuller | Agent: |
|Document:   | Proposed Submission Local Plan: strategy and sites 2016 / Question 1: The evidence base and submission documents |
|            |            |            |                                | |
|Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( ) |
|Answer (if comment is on questions 1-7 of the questionnaire): () |
I do not agree that the evidence used for the Proposed Submission Local Plan Strategy and Sites is adequate, up-to-date and relevant.

The fundamental driving forces for much of the development proposed in the Plan (particularly that on Green Belt land) are based on:

1. An excessive ambition to expand the local economy which is neither warranted nor wanted by the local population. Guildford is already one of the highest ‘value creation’ areas in the country and has one of the lowest unemployment rates. There is no evidence that massive and accelerated expansion is required.

1. SHMA figures which are neither transparent nor justifiable, especially in view of previous figures set. Independent assessments of the SHMA (eg from Guildford Residents’ Association and David Reeve) show it is set far too high and so cannot be said to be adequate, up to date or relevant.

In addition the recent vote to leave the EU and the impact this will have on the economy and migration have not been taken into account.

The Plan should be re-assessed and the methodology for arriving at housing need figures should be fully transparent.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/1820  Respondent: 8818625 / Beth and Frank Fuller  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 2: Legal compliance

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I do not consider the Proposed Submission Local Plan: strategy and sites as a whole to be legally compliant because it mainly ignores the consultation process for the 2014 draft Plan it is claimed to be based on.

That consultation process was absolutely clear by some +20,000 responses that that Plan was flawed and no development should be carried out on Green Belt land.

Instead this 2016 draft Plan actually increases the number of dwellings being built on the Green Belt, in direct contradiction to the consultation process, yet is stated to be a Regulation 19 proposal.

As a result I do not see how the 2016 draft Plan can be Legally Compliant.

The 2016 draft Plan should be re-assessed and should take into account the views of the majority of responses from the consultation process for the 2014 draft Plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: SQLP16/1821  Respondent: 8818625 / Beth and Frank Fuller  Agent:
### Document: Proposed Submission Local Plan: strategy and sites 2016 / Question 3: Soundness

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

I do not consider the Proposed Submission Local Plan: strategy and sites as a whole to be sound, because, but not limited to, the following reasons:

1. "Only sites that propose sustainable solutions have been included in the Plan and the Plan rejects any schemes that would have a detrimental effect on the green belt." Summer 2016 edition of "About Guildford" (published by the Council) on page 5. This is demonstrably untrue and appears designed to bias the consultation process.

2. The housing OAN figure has been calculated by a process which is not transparent. It has not been properly examined by Councillors before being adopted.

3. The OAN has been adopted as the housing number without the application of any constraints to take account of Guildford's circumstances, including in particular the Green Belt, AONB and road infrastructure. National policy permits such constraints to be applied and it is inappropriate not to consider the need to do this.

4. The draft Plan does not accord with the NPPF policies on protecting the Green Belt. Exceptional circumstances need to be shown to justify removing areas from the Green Belt and this has not been done. The housing need number is not justification in itself according to published ministerial statements. Having properly calculated an OAN, constraints should be applied to it to reflect the Green Belt, AONB and infrastructure. Each proposed Green Belt site then needs to be justified on its own merits. The benefits of the proposed development need to be identified together with the harm to the Green Belt. Only if there are exceptional circumstances and following a proper balancing exercise demonstrating that these exceptional circumstances outweigh the harm to the Green Belt can the proposal proceed. The draft Plan does not demonstrate that this has been done. The housing number has been used as a blanket justification for all Green Belt sites—which amount to 65% of the proposed housing number.

5. Whatever the justification for the assumptions made in calculating the OAN, those assumptions are now almost certainly incorrect following the referendum.

6. The housing number is at least twice the achieved rate of building in the Borough over the last few years. There is no evidence in the Plan to show that this rate is achievable and sustainable.

7. Much of the infrastructure required to support the level of development proposed is outside the Council’s control. The Infrastructure Plan is long on possibilities and aspirations and very short on commitments. The infrastructure requirements placed on developers are supposed to be in place before development commences. This is utterly unrealistic and indicates a lack of knowledge of developer’s business models which depend on positive cash flow. It seems very clear that at best, infrastructure provision will seriously lag development and leave higher levels of congestion than now. This will reduce the quality of life for residents through congestion and disruption.

8. The 40-45% requirement for affordable homes together with infrastructure such as railway stations, park and ride facilities, schools and roads is highly likely to be challenged on a site by site basis by developers using the NPPF provision that Councils cannot impose conditions which make development non-viable.

9. GBC has not included details of its Town Centre Master Plan and urban development proposals in time for and as a part of the Guildford Local Plan consultation

10. GBC has failed to provide an Infrastructure Report in time for and as a part of the Guildford Local Plan consultation

11. GBC has proposed an OAN of 693 houses per annum in the GL Hearn West Surrey Strategic Housing Market Assessment (SHMA) which many, including independent assessors, consider unsound

12. Highways England will not start to consider what it intends to do as regards the A3 in the vicinity of Guildford until 2018

13. Network Rail have not made available for the public consultation any plans for a new railway station at Merrow with an adjacent Park & Ride for 1,000 cars
6. The GBC proposals for Gosden Hill Farm do not appear to be in coordination with the Neighbourhood Plan for Burpham.

7. The draft Local Plan will cause further linear development along the A3 between Burpham and West Clandon PC and encroachment onto open Green Belt countryside in clear conflict with the National Planning Policy Framework.

8. The proposal for Garlick’s Arch was added to the draft Local Plan without any prior consultation under Regulation 18.

9. The Land Availability Assessment (LAA) indicates a range of planning difficulties for Gosden Hill Farm and Burpham which have to be met by the developer involved. These include Electricity Grid supply problems and foul sewage and surface water issues that suggest the development proposed cannot easily be implemented both technically and financially.

10. No adequate explanation is given as to how the aspirational proposal for a tunnel will be used to overcome traffic issues relating to the quality of life and amenity of Burpham, West Clandon, Send and Ripley citizens.

11. In common with many others I do not believe the housing figure has been properly calculated and I believe it overstates housing need. The Council has prevented councillors or others from properly considering the SHMA by refusing to make public the basis on which it was drawn up.

12. The housing figure, when properly recalculated, should be subject to constraints to reflect Guildford’s circumstances, including in particular the Green Belt and road infrastructure. National policy permits such constraints to be applied and it is inappropriate not to consider the need to do this.

13. Even once a housing number has been calculated it cannot be used to justify taking land out of the Green Belt on a wholesale basis.

14. Cast iron commitment should be included in the plan that development can only commence when required infrastructure improvements have been secured.

15. The status of the text which accompanies each policy box is not clear. If the accompanying text does not have the force of policy a number of the policies (i.e. the text in blue) are so vague and general that they commit the Council to very little.

The draft Plan should be re-assessed with housing on brownfield sites made a priority over commercial development and Greenfield sites and each of the above points addressed.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** SQLP16/1822  **Respondent:** 8818625 / Beth and Frank Fuller  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Question 4: Duty to cooperate

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire):** ()

I do not consider the Proposed Submission Local Plan: strategy and sites as a whole has complied with the Duty to cooperate.

This 2016 draft of the Local Plan clearly demonstrates Guildford Borough Council’s refusal to co-operate with the wishes and requirements of the vast majority of the residents in its Borough.

The Council has failed to co-operate with the results of the consultation process for the 2014 draft Plan which was meant to inform and guide this 2016 draft Plan.
Despite campaigning on a clear statement ‘Conservatives Say Green Belt To Stay’, the ruling party on GBC is now intent on pushing through a Plan which will devastate Green Belt land and extend the Guildford Urban Area to further merge into surrounding rural villages.

This is not cooperation by any definition.

In addition the Council has failed to cooperate in providing any transparency to the housing need figures commissioned by the Council from GL Hearn.

The 2016 draft Local Plan should be reassessed with a reviewed and transparent SHMA and revised to reflect the views of the residents of the Borough, who pay for Guildford Borough Council to act in their interests, and not those of developers and central government.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPS16/1608  Respondent: 8818689 / Janet Tipper  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Secondly your intention to build over 2000 new houses on wisely aerodrom is unacceptable: the road infrastructure Surrounding this site isunsuitable, being narrow, winding roads, effingham and horsley stations have no spare capacity and parking or spare seating on their trains which are already full by 8am; and the land itself is a valuable green space and a haven for wildlife.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: PSLPP16/3556  Respondent: 8818689 / Janet Tipper  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Much of the proposed building is on the Green Belt. As you well know, this is illegal except in case of "exceptional circumstance" and we are not in this situation at present, nor will we be in the foreseeable future. The population growth forecast you are using is flawed.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

---

Comment ID: PSLPP16/3564  Respondent: 8818689 / Janet Tipper  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Thirdly I object to the complete disregard to locals feelings in producing such an intensive plan. We have a duty to our children to protect this beautiful part of the country for future generations, and not to destroy it simply for profit and gain. Please, please do not have this intended destruction on your consciences, and have the good sense to preserve the Green Belt as the lungs of London.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

Attached documents:

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Comment ID: PSLPA16/166  Respondent: 8818753 / Chris Bussicott  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I am writing to object in the strongest possible terms to the details contained in the latest draft local plan pertaining to the villages of East and West Horsley. I am deeply concerned that Guildford Borough Council Members and Officers seem to have more-or-less completely ignored the many well-argued objections raised to the last version of the plan for this area and created another proposal that seems hell-bent on destroying these beautiful villages. Of course I understand that the Horsleys are not part of the local ANOB, but they are directly adjacent to some of the finest landscape in the South East – rightly protected (I hope!) as ANOB – and the magnificent Lovelace architecture of East Horsley and the remarkable number of Tudor and other ancient houses in West Horsley are without doubt significant contributors to the amenity value of the entire area. The fact that the plan proposes more than 500 houses actually within the villages will significantly damage this.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**
And that brings me to the elephant in the room; the proposals for Wisley airfield. All of the objections raised above also apply there, but multiplied by four times as many proposed houses with a couple of miles of the Horsleys. Once again, no provision for schools, medical facilities, public transport, roads etc etc.

This is a disastrous proposal that risks irreversibly damaging a truly beautiful part of Guildford borough. There is no evidence that the real impact has been thought through adequately, and those elected members and officers involved need to take a long, hard look at themselves and their motivations for putting forward what is so obviously a badly flawed plan. Instead, I urge you to revisit the possibility of brown field development, finding locations in the borough that offer the opportunity for local jobs, education and medical capacity, and transport infrastructure. This is not nimby-ism, this is simply asking you to address the GBC local plan in such a way that provides sustainable development without throwing up houses on unsuitable pieces of land, simply because they appear to be 'underdeveloped'.

You will have seen my letter raises a number of direct questions. I look forward to a detailed response to these so that I can better understand why GBC are promoting what appears to me, as a local resident, to be a simply terrible plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID:</th>
<th>PSLPP16/493</th>
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<td>Respondent:</td>
<td>8818753 / Chris Bussicott</td>
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<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1</td>
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I can find no evidence in the plan that GBC have considered the infrastructure requirements necessary for such a dramatic increase in the local population. All local primary schools are fully subscribed, and I can see no proposals to create further capacity. I understand the current plans to redevelop the Howard of Effingham secondary school will only just provide sufficient additional capacity for the local children already making their way through the demographic profile towards secondary education. How many more children will 500+ new homes bring? 250? 500? 1000? Whatever the number, it is clearly going to be a large one and there is nowhere to educate them – and putting additional cars/coaches on the road to transport them elsewhere to school will probably gridlock our local roads. Why not build the houses where the capacity for education exists in the borough? The same applies to doctors and medical facilities. Where in the plan is there a proposal to enhance local services? How will people access these services if they are not local? In addition to children requiring education, the proposed new houses will contain adults requiring work. Where in the Horsley do the jobs for these people exist? Perhaps the planners think that they will be commuters. If so the planners haven’t attempted to travel from Horsley or Effingham Station in the rush hour. The station car parks are already full and the trains crowded even before they pull into our stations. There simply isn’t the room for hundreds more people. Perhaps the planners think that these new residents will drive to work and I understand that there is a proposal to build an additional A3 intersection in the area; perhaps the planners have included this in their proposals in an attempt to alleviate the local gridlock that the additional home owners will create trying to drive their children to non-existent local schools or themselves to work in jobs that aren’t in the area. If so, then these planners clearly haven’t travelled on the A3 northbound towards London or southbound towards Guildford recently, where the traffic is already at a crawl throughout the rush hour periods, even if it is on a rare day when the M25 is flowing adequately. And that brings me to the elephant in the room; the proposals for Wisley airfield. All of the objections raised above also apply there, but multiplied by four times as many proposed houses with a couple of miles of the Horsleys. Once again, no provision for schools, medical facilities, public transport, roads etc etc. This is a disastrous proposal that risks irreversibly damaging a truly beautiful part of Guildford borough. There is no evidence that the real impact has been thought through adequately, and those elected members and officers involved need to take a long, hard look at themselves and their motivations for putting forward what is so obviously a badly flawed plan. Instead, I urge you to revisit the possibility of brown field development, finding locations in the borough that offer the opportunity for local jobs, education and medical capacity, and transport infrastructure. This is not nimby-ism, this is simply asking you to address the GBC local plan in such a way that provides sustainable development without throwing up houses on unsuitable pieces of land, simply because they appear to be ‘underdeveloped’. You will have seen my letter raises a number of direct questions. I look
forward to a detailed response to these so that I can better understand why GBC are promoting what appears to me, as a local resident, to be a simply terrible plan.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/878  Respondent: 8818753 / Chris Bussicott  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID1

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

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The same applies to doctors and medical facilities. Where in the plan is there a proposal to enhance local services? How will people access these services if they are not local?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/879  Respondent: 8818753 / Chris Bussicott  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy ID3

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

In addition to children requiring education, the proposed new houses will contain adults requiring work. Where in the Horsley do the jobs for these people exist? Perhaps the planners think that they will be commuters. If so the planners haven't attempted to travel from Horsley or Effingham Station in the rush hour. The station car parks are already full and the trains crowded even before they pull into our stations. There simply isn't the room for hundreds more people.
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What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/877  Respondent: 8818753 / Chris Bussicott  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

The fact that the plan proposes to take the Horsleys out of the Green Belt makes my blood run cold. Almost one third of the houses proposed in the plan for Horsley are to be built on Green Belt land, which is simply disgraceful. And once these are completed how can GBC possibly justify the risk of opening the door to further unrestrained development.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPA16/750  Respondent: 8819137 / George Pincus  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I write with comments on the new plan.

Whilst i do appreciated the need for some new housing within the Horsleys i believe that the redefinition of the Green Belt does not recognise the limitations imposed by the access routes particularly via the already over used B2039 north/south. This is the only route to Horsley Station where new home owners are highly likely to use for employment .This area is already congested and often difficult to use .

At the recent planning application for Wisley Airfield it was clear that this and other nearby sites at Waterloo Farm, Manor Farm, East Lane and Ockham Road North are unsuited to any significant development that adds to the already limited access via the B2039.
For this reason I do not oppose the developments proposed at Bell Colville or Thatchers Hotel given their proximity to the A246.

Wisley Airfield site needs to be resolved first as a less concentrated development of say 200 homes could provide the key to the plan. Perhaps also a site for the expanded Howard of Effingham releasing their existing site adjacent to the A246 for housing?

Not a bad idea?

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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I do object to the removal of the extended village area from the Green Belt and the density of the Wisley Airfield proposal. They remain against all the evidence of the ability of the local area to sustain access, transport and employment.

Even with planned new facilities accompanying this proposal is clear that the neither the A3 or the B 2039 can accommodate any more traffic.

Imagine the vehicles needed by 2000 plus homes on the Wisley site seeking employment outside the immediate area and their impact on a road network already over crowded.

The proposed density of the Wisley plan is therefore grossly out of proportion to the character of the villages of Ockham and Horsleys.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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The proposed density of the Wisley plan is therefore grossly out of proportion to the character of the villages of Ockham and Horsleys.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
• I object to the housing number of 693 houses per year from the West Surrey Strategic Market Housing Assessment (SHMA) as far too high. This assessment and calculation process has been far from transparent and indeed is more than double the figure used in previous plans.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/6564  Respondent: 8819265 / Alan Robertson  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

• I strongly object to the removal of the Former Wisley Airfield (FWA/TFM) from the Green Belt. The site serves a vital role in protecting against urban sprawl from London. Development on the site will create an urban corridor stretching from London to Guildford. Under the NPPF, no exceptional circumstances have been established to warrant removing the land from the Metropolitan Green Belt.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPS16/6565  Respondent: 8819265 / Alan Robertson  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I trust that these objections will be fully considered and that the Former Wisley Airfield (Three Farms Meadows), Allocation A35, is removed from the Local Plan with immediate effect.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13769  Respondent: 8819265 / Alan Robertson  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy H1
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

- The Council has allowed many existing houses, which would be ideal for first time buyers and those with families, to be turned into houses of multiple occupation, in order to house students, who make no contribution to Council Tax, and who are a wholly transient population. The University should be made to house their students in Halls of Residence within the purlieu of its own considerable land holdings, thereby releasing much needed housing stock.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13764  Respondent: 8819265 / Alan Robertson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

- I object to a plan which proposes that over 70% of new housing be built within the Green Belt. There is ample brownfield land in the urban areas which needs to be regenerated, without the need to encroach on protected Green Belt land. Election manifesto promises to the electorate are being ignored.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/13767  Respondent: 8819265 / Alan Robertson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
• I object to the disproportionate allocation of housing in this particular part of the borough. Indeed, over 23% of the Plan’s new housing is proposed in the immediate localities of Ockham, Ripley, Send and the Horsleys (of which 65% is allocated to FWA/TFM, an area that at present has only 0.3% of the population of GBC).

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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Comment ID: pslp172/3960  Respondent: 8819265 / Alan Robertson  Agent:

Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy A35

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I am deeply concerned that the Council has produced such a poor quality document for discussion, submission plan is unsound due to the number of errors in the plan, try fails to address the concerns of resident, which have been clearly aired on numerous occasions, it lacks transparency in the evidence base, the accessibility of the evidence base, including the fact that huge files have again been used and these are not accessible to those with poor internet connections. There is also considerable lack of clarity and coherence. Whether this is just very poor work or deliberate obfuscation remains to be uncovered.

I am also seriously concerned about the Council’s past track record of making inappropriate decisions, its willingness to be manipulated by property developers and builders and the scope for corruption and considerable financial gain for unworthy individuals.

I require confirmation that all of these comments together with all my previous comments are passed to the Inspector. I reserve my right to appear at the inquiry and present my evidence.

I continue to object to the inclusion of policy A35, Three Farms Meadows in the draft Local Plan for many reasons including:

1. It is the least sustainable strategic site identified in both this version and in previous versions of the plan because of the constraints on the site and the physical location
2. It is further from railway stations than any other identified strategic site.
3. It is adjacent to the most congested stretch of strategic road network in the county and close to one the most congested junction in the country (J10)
4. Local roads are at capacity particularly when the SRN is not free-flowing (accidents, diversions, roadworks etc)
5. Any public transport provision such as bus services to/from Guildford will have to negotiate the over-crowded SRN and will therefore be unreliable and subject to frequent delays.
6. Any public transport (bus services) provision to Horsley will impact the safety of the local road network as the lanes are not wide enough to accommodate PSVs, particularly as sustainable methods of travel such as cycling and walking are being promoted at the same time. This is totally unrealistic and unsafe.
7. It is adjacent to the most popular visitor attraction in the south-east, the RHS at Wisley where visitor numbers will increase by 500,000/annum.
   - The associated traffic increase from the RHS has not been taken into account.
   - The regular events at the RHS which attract 1000’s more visitors several times a year and the resultant traffic has not been taken into account
8. There is insufficient employment available onsite so that almost all residents will have to travel to work. It is unrealistic and unsafe to assume people will walk/cycle on narrow unlit local roads on a regular basis.
9. The identified mitigation to address the impact of increased traffic will not address the commuters travelling to Woking rail station.
10. It remains unclear when/if the Ockham DVOR/DME will be decommissioned as the timetable has already slipped. This constrains the site significantly in terms of building heights etc.
11. The changed “Opportunities” listed in this policy reinforce why this site is totally inappropriate talking of “good urban design”.
12. Opportunity (3) should be common to all sites and is not unique to this site.
13. I object to the increased area of the site as this now abuts another heritage asset, Upton Farm negatively impacting the setting of this building.
14. I object to the fact that the increased area, being on the south of the site facing the Surrey Hills AONB will increase the negative impact of the views from the AONB.
15. I object to the change of site boundaries as these are not identified correctly on the plan (Appendix H p16).
16. I object to the removal of additional 3.1 ha from the green belt without any justification.
17. I object to the change in green belt boundary to the eastern end of the site as this now encloses an area of high archaeological impact.
18. I object to para 21 which “limits” development in flood zone 2 and 3. Development should be excluded in flood zone 2 and 3.
19. I object to para 22 as this does not reflect the impact of the buildings on the surrounding area.
20. I object to the fact that the council has failed to remove this site from the local plan despite receiving 1000’s of objection from local residents and statutory consultees.
21. I object to the proposed Submission Local Plan because the significant modifications made to the plan mean that this should not be a Regulation 19 consultation. A regulation 19 consultation needs to be on the totality of the plan rather than the proposed changes.
22. I object to the fact that there has been no clear explanation why the council think it is appropriate to have a regulation 19 consultation when the changes are major.
23. I object to the fact that there is no clear justification for the removal of one strategic site over site A35.
24. I object to the inclusion of A35 as it will not contribute to the 5-year housing projection due to constraints notably in the provision of sewerage capacity.
25. I object to the extension of the plan period by 1 year as it has not been identified as a major change.
26. I object to the fact that the Council have not explained why the Plan is unsound within the original time frame.
27. I object to the Council wasting tax payers and residents’ time and money not following due process and indeed ignoring previous representations.
28. I object to the inclusion of a 10% buffer in the housing number over the plan period. This is unnecessary.
29. I object to the evidence base especially the West Surrey SHMA and the Guildford addendum 2017 which is not transparent and has been challenged by other experts including NMSS.
30. I object to the transport evidence base including the SHAR 2016 Highways assessment report which has been criticised by Mouchel for using out of date modelling software and is therefore unreliable.
31. I object to the fact that the Council appear to have directed the transport assessment to use prescribed vehicle movements from this site with no justification.
32. I object to the housing number and particularly the fact that the Council have not, as required used any constraints such as green belt, infrastructure, air quality, AONB, TBHSPA etc. I believe that the housing number is unsound and open to legal challenge.
33. I object to the apparent disregard for the impact of in-combination development on the TBHSPA, particularly the damage caused by nitrogen deposition and high pollution levels.
34. I object to policy S2 where it states “the figures set out in the Annual Housing Target table sum to a total of 12,426” yet the figures in the table add up to 9,810 – what is the significance of the missing 2,616? This is one of a number of glaring examples of why the plan is not sound.
35. I object to the ratio of space allocated for retail in the town centre. This could be much better used for residential development. I particularly object to the reliance on the Carter Jonas study update 2017 which includes “demand” for retail space from companies already in administration.

Additionally, the Council has failed to ensure that Surrey University needs to provide student accommodation on its own land, rather than losing valuable, appropriately situated housing stock for Homes of Multiple Occupation, which are the temporary residences of a transient population of students who have no commitment to the communities in which they live, and who make demands on Council services whilst not paying any Council Tax.
I consider for the reasons listed above and numerous other reasons that this plan is unsound and thoroughly unfit for purpose.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPS16/2704  **Respondent:** 8819329 / Lindsey Haines  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy A36

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

I therefore object to the following policies:

**Policy A36 - Hotel, Guildford Road,** which is proposing a housing density of 37 dwellings per hectare. An added factor to object to is the loss of a local amenity.


This land is within the Green Belt and I object to this proposal

Policies A37, A38, A40 and A41-Land in West Horsley. All areas within the Green Belt and which would represent an increase in housing of 36%. This would lead to the destruction of the village character and have enormous impact on the infrastructure of both East and West Horsley. I therefore object to these policies.

Policy A35 - Land at former Wisley Airfield. This proposes a new town in the heart of the Surrey Green Belt. It would have a major impact on the local villages and roads and would contravene Metropolitan Green Belt policy. I therefore object to it.

I have only commented specifically on policies that affect East and West Horsley as these are the villages that I know. I am sure that people in other villages will be making their thoughts known about their particular areas. However, I reiterate that I object to the Proposed Submission Local Plan for the whole of the Guildford Borough because I consider the reasoning behind the need for 25% increase in housing to be flawed. I also consider that the Council has not taken the wishes of its electorate into consideration.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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**Comment ID:** PSLPP16/5990  **Respondent:** 8819329 / Lindsey Haines  **Agent:**

**Document:** Proposed Submission Local Plan: strategy and sites 2016 / Policy P2

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I object to Policy \textit{S2}. This allows for 25\% increase in housing stock in Guildford Borough Council whilst population increase is estimated by official statisticians' forecast to be 15\%. Is this because Guildford Borough Council has decided to pursue a policy of aggressive expansion? I am not aware that the local electorate has been asked if it wants this. I object to Guildford Borough Council’s policy of excessive growth.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
I object to the proposed development of the above site for the following reasons.

Normandy Parish Council are very much opposed to any such development, as are our County and Guildford Borough Councillors. In a recent joint communication, Keith Witham (SCC) and David Bilbe (our representative at GBC) said “We need to be clear that this is far from a done deal. The number proposed is simply too high and we need to challenge the empirical logic and evidence.”

In a letter to our constituency MP, Jonathan Lord, even the Leader of GBC Council has stated, “In all honesty if it was not for the education provision I would not have agreed to this site being included in the plan.” The need for a new school in this area is very dubious (see below.) In a personal letter to me Jonathan Lord, our MP, states, “I'm extremely sympathetic to your concerns and am myself appalled and aghast at the proposals.”

It appears that not only are the villagers of Normandy opposed to this proposal, we have the backing of all our democratically elected representatives and even doubts within the Council.

My own objections to this proposal, which I have already made known to the Executive, are as follows:

1.) This land is currently in the Green Belt and should be protected as such both now and in the future. Green Belt status has not been removed from this site. Prime Minister, David Cameron is on record as having declared that “there are no plans to relax the strong protections that prevent inappropriate development on the Green Belt.” And again, “We will always protect the green belt and make sure planning decisions are made by local people.” I take it that this means people who actually live in the vicinity of any proposed development.

I attended a meeting at Normandy Village Hall in February this year where villagers were assured by GBC Councillors that this particular piece of land was considered a sensitive site and, therefore, there were no plans to develop it.

We now know that a major construction company had already produced plans for a massive development of this site on a scale that would double the size of Normandy. GBC Planners were well aware of this proposal in advance of the February meeting.

I understand that there are exceptional circumstances in which certain areas of Green Belt land can lose their status in favour of important development. One of these exceptional circumstances might be the provision of a school although there seems to be no legal evidence that this is true. The inclusion of a new Secondary School on this site was obviously part of the original proposal and is included in order to justify the loss of Green Belt status.

However, the need for this school is extremely dubious given that two of the local secondary schools that serve Normandy, namely Ash Manor and King's College, are under-subscribed. Other secondary schools serving Normandy are being extended to cope with Guildford's ever increasing needs, although these needs themselves are dubious and are based on GBC's unsustainable housing quota.

The need for a new secondary school must be incontrovertibly demonstrated before any such loss of Green Belt land can considered.

2.) Before any Green Belt land is destroyed by development, full consideration should be given to the existence of Brown Field Sites, (that is previously developed land.) There are sites within the urban areas of Guildford, with its main line station and very good infrastructure, which are far better suited for development. Indeed, with far more on-line shopping now being carried out, buildings in the Town Centre itself will become vacant and ideally suited to change of use to dwellings.

3.) As a member of the Campaign for the Protection of Rural England, I would draw your attention to CPRE's recently expressed view that “developers already have planning permissions outstanding for 650,000 homes and there are brown
field sites available for another one million homes. We have to stop the over development now, before we wreck our green spaces for ever. Building on brown field sites can mean regeneration; building on open fields is destructive and environmentally disastrous.” I would urge Guildford Councillors to resist pressure from Central Government to ruin our beautiful British countryside. It should also be noted that this site is close both to Sites of Special Scientific Interest and an Area of Outstanding Natural Beauty. In the past planning inspectors have recognised that Normandy's green fields contribute to the openness of the green belt and the panoramic view of our green areas to the Surrey Hills AONB.

4.) A particular potential problem that concerns me personally is the matter of drainage. Surface water from the whole of Beech Lane and copses to the west of my property is discharged beneath the railway track, crosses Westwood Lane and is ditched across the land the subject of this proposal, towards Glazier's Lane and beyond. In the event of excessive rainfall, this discharge backs-up and causes extensive flooding in Beech Lane. This is evident not only in Beech Lane, but in flooding in Westwood Lane where the surface water is piped beneath the highway. My property has been flooded internally on two occasions due to this back-up and this has been exacerbated by the flooded sewer discharging contaminated water into my property. A personal and financial disaster!

The current system for the disposal of surface and foul water from Beech Lane is grossly inadequate and any interference to it would be wholly unacceptable.

5.) This development would result in the loss of sustainable Agricultural Land.

This is valuable Grade 3 arable pasture land and any destruction of it will have a devastating effect on wildlife and destroy our rural environment.

6.) This site is bounded on two sides by minor roads, both of which are currently congested during busy periods especially when there are traffic problems on the A31 Hog's Back and vehicles are redirected through our village.

The busy Aldershot/ Guildford road to the north of the site is currently even more congested. To add to this just one vehicle per proposed household (an unrealistic figure) together with cars dropping off and collecting numerous school children will cause unacceptable chaos and pollution in Normandy.

I shall be grateful if all members of the Council will take these points into consideration when discussing the GBC Local Plan and reject any proposal for the development of this site.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

<table>
<thead>
<tr>
<th>Comment ID:</th>
<th>pslp172/484</th>
<th>Respondent: 8819425 / Chris Kelland</th>
<th>Agent:</th>
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<tr>
<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2017 / Policy A26</td>
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<td>Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )</td>
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<td>Answer (if comment is on questions 1-7 of the questionnaire): ()</td>
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We object to Guildford Borough Council’s changes to the draft Local Plan and the inclusion of Blackwell Farm as a development site [Policy A26 & para. 4.1.9], which:

- disregards an independent expert landscape study, which demonstrates that part of the sites merits Area of Outstanding Natural Beauty status following Natural England’s forthcoming boundary review [para. 4.3.8]
• directs more office space to an extended business park [Policy E4], which will increase peak time congestion – particularly around the hospital and A&E – and will also encourage rat-running through residential areas
• ignores independent expert traffic studies, which show the impact of development at Blackwell Farm on the local network and question the viability of the development [2.14a]
• adds to air pollution in neighbouring areas, which already exceed safe EU limits for Nitrous Oxide.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: pslp171/458  Respondent: 8819425 / Chris Kelland  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2017 / Policy P2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy P2. Green Belt Land.

I welcome the removal of Sites A46 and A47 from the Local Plan, as this land is in the Green Belt and I fully support the intention to “check the unrestricted sprawl of large, built-up areas,” “prevent neighbouring towns from merging into each other” and “safeguarding the countryside from encroachment.” As most of Normandy and Flexford lie within the Green Belt, this also applies to other sites in the village. I am concerned that some areas have been removed from the Green Belt; these include Guildford Road at the northern end of Glazier’s Lane, Walden Cottages and Palm House Nurseries. Any development of these areas may well create a precedent for higher density housing, encouraging planning applications and the potential loss of even further valuable Green Belt land.

I would urge GBC to concentrate on approving plans to build on Brown Field Sites before any consideration is made to accommodate the loss of even more Green Belt Land.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Comment ID: PSLPP16/582  Respondent: 8819457 / Howard Turner  Agent: 
Document: Proposed Submission Local Plan: strategy and sites 2016 / Policy S2

Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()
Please note that I hereby formally object to:

[Response has been redacted due to statement containing personal data which cannot be disclosed due to the provisions of the Data Protection Act 1998]

- The number of homes that the Plan intends to deliver over the 20 year period 2013-2033 (policy S2). The annual target of 693 is significantly higher than the 652 that the Council proposed last year and disregards the constraints which should have been imposed by the high proportion of the borough's designated Green Belt land and the capacity of the roads, schools, doctors, hospitals and other infrastructure to support such an increase in the population.

- The new boundaries proposed for insetting the villages of Send and Send Marsh/Burnt Common from the Green Belt (policy P2). The boundaries drawn enclose huge areas of open spaces that should be retained as Green Belt land and not developed at any time in the future. The village boundaries should be much more closely circumscribed to prevent urban sprawl and retain their village identity. With a presumption for development within these 'inset' areas, the proposed enclosures would encourage over-development and expansion of the villages in the future and completely ruin their essentially rural nature.

- Garlick's Arch (policy A43)

  The proposal to build 400 houses and 7,000sq.m. employment space (light industrial/storage, warehousing) on virgin Green Belt land, lying outside the Send Marsh/Burnt Common village boundary, defies all logic. This area which includes ancient woodland is a refuge for deer and other wildlife. It was never considered as a Potential Development Area within the Council's 'Issues and Options report' or identified for development in the 2014 consultation. In 2014 the Council rejected a planning application from 'Oldlands' to build 25 houses in this location on sound planning grounds, so how is can now be considered apt to construct 400 houses and 7,000sq.metres of employment space there? Apart from the fact that this is all Green Belt land, the infrastructure just cannot support such a development. Send Marsh/Burnt Common has one just shop (Waitrose), no doctors' surgery, no schools and the local roads are already filled to capacity. Any development at all in this area world be totally inappropriate and would be to the very substantial detriment of Send Marsh/Burnt Common as a village. The housing proposal alone would add 960 to the existing population of 2,341, an increase of 41 %.

  The proposed light industrial/storage facility would significantly detract from the open countryside aspect and add dramatically to the existing road use. 11 is totally inappropriate and would destroy the village's demarcation from Ripley, creating urban sprawl. This very late and very major change to the Local Plan proposals does appear to have not followed the correct due process and therefore shall, if approved by your Council, be subject to immediate legal challenge.

- New north and southbound slip-roads to and from the A3 to the A 247 Clandon Road (policy A43a)

  This proposal would encourage additional traffic along the very narrow, winding A247 Clandon Road and the Send Barns Lane/Send Road leading to Woking, the traffic along both of which are already at capacity. Send village is a ribbon development of housing along both sides of Send Road, so there is no scope to widen it, and where it ends at the Old Woking roundabout none of the connecting roads can be widened to ease congestion because of the existing surrounding buildings.

**What changes (2016)/further amendments (2017) do you suggest should be made to the document?**

**Attached documents:**

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**Comment ID:** pslp172/2085  **Respondent:** 8819457 / Howard Turner  **Agent:**

**Document:**  Proposed Submission Local Plan: strategy and sites 2017 / Policy A25

**Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )**

**Answer (if comment is on questions 1-7 of the questionnaire): ()**
Policy A 25 - Gosden Hill Farm
I have previously objected to the previous intention to construct 2,000 homes on this site and consider that the new Plan's proposal to reduce the number of dwellings to 1,700 homes would not materially reduce the very detrimental impact that the scheme could have upon the A3 and other local roads. I object to this revised proposal on the grounds that the number of houses proposed or this area is still far too high and, unless the development is totally concealed from the A3, it would detrimentally affect the appearance of the borough as a predominantly rural area.

I am very disappointed to see that despite the massive number of valid objections raised by our villages' local residents within the 2016 consultation, the Borough Council has deemed it fitting to increase the housing, Travelling/showpeople pitches and industrial development allocations in the villages despite a reduction in the borough's overall target. With the proposed proposals for 3,700 homes at (Gosden Hill Farm and Wisley airfield (Policy A35) in the immediate vicinity and the specific proposals for the villages of Send and Send Marsh/Burnt Common to accommodate an extra 500 houses, 10 travellers pitches, 7,000+ sq.m of industrial development and slip roads to the A3. I hereby strongly object to every single one of these proposals on the grounds of their severe and adverse environmental (including atmospheric pollution from the increased traffic) impact and the unjustified sacrifice of prime agricultural Green Belt land and historic woodland.

Please ensure that this letter of objections is brought to the attention of the Government's planning inspectorate and, unlike the June 2016 process, make this consultation orth of its name.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

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<th>Comment ID: pslp172/2073</th>
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Policy A43 - Garlick's Arch
I have previously objected to the proposed development of 400 houses on this Green Belt and good agricultural land. The new policy A43 adds 8 travelling/showpeople pitches to this development rendering the policy even more inappropriate for the area. The Borough Council is reminded that less than 3 years ago it refused a planning application from 'Oldlands' to build just 25 houses in the same location. The Council cannot therefore incorporate this policy within the Plan and still maintain that it applies consistent and good practice.

This policy would increase the population of the Send Marsh/Burnt Common village by 49% and totally destroy its rural character.

I therefore strongly object to the revised proposal on the grounds that:

a) the village has no shops or other infrastructure to support the development;
b) the additional traffic generated would create major congestion on the already busy roads throughout the villages of Send, Send Marsh/Burnt Common and Ripley;
c) no exceptional circumstances exist to destroy this Green Belt land or the ancient woodland it contains;
d) there is no proven demand for travelling/showpeople pitches in this location, and
e) it would join up and destroy the distinct character of the villages of Send Marsh/Burnt Common and Ripley.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<td>Proposed Submission Local Plan: strategy and sites 2017 / Policy A58</td>
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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

New policy A58 - Land around Burnt Common warehouse, London Road, Send P2 and A58.
I have previously objected to the proposed enclosure of huge areas of Green Belt open space within 'inset boundaries' around the villages of Send and Send Marsh/Burnt Common where there will be a presumption in favour of development. The new policy A58 seeks to increase the area of land to be extracted from the Green Belt for a minimum of 7,000 sq.m of 'employment floorspace.
I therefore object to this proposal on the grounds that there is no proven need to allocate any Green Belt land within the Borough for industrial/warehouse development and the fact that, at this particular location, it would have a very severe and adverse environmental impact not only on the two villages, but throughout the whole surrounding area. overdeveloping the local rural communities and creating major traffic problems.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Policy'S2 - The 12,426 (654 per year) number of homes that the Plan intends to deliver over the 19 year period 2015-2034. Although the target for housing has now been reduced from 693 to 654 per year, it is still far too high and falls to take account of the constraints which should have been imposed by the high proportion of the boroughs designated Green Belt land and the capacity of the roads, schools, doctors, hospitals and other infrastructure to Support such an increase in the population.
I therefore object to the calculation of assessed need for housing and other development in the area and the grossly disproportionate impact oldie Local Plan's proposals on its more northerly communities of the borough.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

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<th>Respondent:</th>
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<td>Document:</td>
<td>Proposed Submission Local Plan: strategy and sites 2016 / Appendix H: Maps - West Horsley North</td>
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I am writing to you to express my views on the proposed local plan. I am horrified to read of the amount of housing that you are planning to build in the beautiful GREEN BELT area of East and West Horsley.

I have lived in this area for 50 years and have enjoyed the wonderful countryside and I am hoping that other generations would also be able to have the same experience.

TRAFFIC Since 1970 the traffic on the roads has increased so much that often I am not able to get out of my house for at least 10 minutes and with the building of so many houses, with perhaps 2 or 3 cars per household will make the roads even more congested. The roads were not built for large lorries and the state of the roads deteriorates each winter.

VILLAGES We are small villages that generations have and will appreciate, with friendly faces, small shops, good schools and where everyone can find help and advice. The Doctor’s surgery cannot take anymore patients, the schools are full and parking can be very difficult when shopping locally. The station car park can get full and people using the trains later in the day have nowhere to park. A few houses for downsizing and the young could be built in the character of the villages.

GREEN BELT How can it be beneficial to get rid of the green belt. We need the oxygen from these spaces, the wild life should be left to enjoy the peace and quiet and the local people can enjoy wonderful walks, views and get away from the noise and pollution in the towns.

Why cannot the new builds be made on brown fields.

If we build so many more houses in this area we will be losing part of England that will be beneficial to generations to come. We have many visitors from other parts of Britain and the world who come to this area and cannot believe that we will allow it to be changed forever.

Small villages must be allowed to stay in the Green Belt instead of becoming urban areas to the large towns.

I worry about the infrastructure; how will the villages cope with sewage and water, the disruption on our small roads with any building works will be dreadful for the community, forcing people to take longer routes to work and to their homes, foul noise and pollution.

I strenuously object to the Guildford Local Plan 2016 for both East and West Horsley.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
As a resident of West Horsley I believe that for the following reasons the Council need to rethink its proposals for the Horsleys

Once again those responsible for the development and approval of the Local Plan have failed to demonstrate that the very clear guideline that development of Green Belt land should be restricted to exceptional circumstances has been followed. This is particularly apparent in the case of West Horsley where the proposal to build 385 new homes on the Green Belt in a community of just over 1100 existing homes is clearly inappropriate and demonstrates a blatant disregard for the guidelines and the clearly expressed wishes of the inhabitants of the village. It represents an increase 35% which is the highest percentage increase of any community in the whole of the borough and is grossly unfair when (even if the need for the number of new homes in the borough was correct) these could be more evenly distributed throughout the borough. The timescale of just 5 years in which they should be built further demonstrates the total disregard for the feelings of the village and the disruption they would cause.

The proposal document fails to give a credible explanation of how the calculation of new homes required was made. To most outside of the Council it appears to be significantly overstated, one estimate being that the proposal represents a population increase 70% in excess of official national estimates. In the case of West Horsley the Parish Council survey identified the need for less than 30 homes to meet the requirements of local residents. Given the scale of objections made to the original proposals one would have expected a much better rationale for the need for so many new homes in this particular locality which is being so heavily targeted. None has been provided.

In addition the plan proposes an additional 148 homes in East Horsley, the adjoining village where most the local community amenities are situated. This together with the planned development of Wisley Airfield, and the developments at Ripley, Send and Burpham totals over 5,000 new homes in a relatively small wedge of land between the A3 and the A246 will destroy vast sections of Green Belt and Metropolitan Belt land to the North East of the borough. This imbalance is unacceptable and should be re-examined.

Unfortunately the problem is multiplied by the inadequate reasons as to why the Settlement areas for the villages of West and East Horsley should be changed. One can only conjecture that it is a device which will allow further land for future development as housing within the extended borders.

The proposals make little reference to how the local infrastructure is to be improved to cope with this enormous percentage increase in the population. The size of the individual sites means that there will be little or no assistance available from developers and even if budgets for drainage, schooling provision, parking facilities, road improvements, medical services, shops and community buildings etc were made available this would swallow up even more of the Green Belt which only compounds the problem. This scale of development is unsustainable particularly within the very short time frame proposed.

It would appear that the Borough Council is intent on destroying the character and beauty of this ancient village. The National Panning Policy Framework requires that new residential development MUST respect the character and density of housing in the area. Guildford Council seem determined to ignore this requirement and proceed with plans that are unsupportable by the infrastructure and facilities in the village.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:
Do you consider this section of the document; complies with the Duty to Cooperate? ( ), is Sound? ( ), is Legally Compliant? ( )

Answer (if comment is on questions 1-7 of the questionnaire): ()

Please take the following as my official response to the draft Guildford Plan 2016:

Disproportional Development of West Horsley

This plan calls for an increase of at least 35% in the number of houses in West Horsley, almost exclusively on Green Belt land. This is entirely out of proportion with all other areas and will result in West Horsley totally losing its rural character. A 35% increase will completely change the character of one of Surrey's rural villages with the few remaining ancient dwellings. It will simply become another built over area. It certainly does not have the infrastructure, road system, health or schooling to cater for such an increase.

Green Belt

The overwhelming majority of new housing is proposed on existing Green Belt land. Brownfield sites are being reserved for retail/commercial. This is exactly the opposite of national guidelines.

Previous plan

The revised plan seems to have completely ignored all previous comments. the number of houses in West Horsley has actually gone up.

What changes (2016)/further amendments (2017) do you suggest should be made to the document?

Attached documents:

Total records: 4447.